MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY

PALM & PEPPER COMMERCIAL DEVELOPMENT

TENTATIVE PARCEL MAP (TPM 84017),
CONDITIONAL USE PERMIT,
PLANNED DEVELOPMENT PERMIT,
DESIGN REVIEW BOARD (DRB) DESIGN REVIEW,
GENERAL PLAN MAP AMENDMENT, AND
ZONE CHANGE (ZC)

126, 132, & 146 S. PALM AVENUE
127 S. RAYMOND AVE.
1028 TEAGARDEN LANE
ALHAMBRA, CALIFORNIA 91803

LEAD AGENCY:
CITY OF ALHAMBRA
COMMUNITY DEVELOPMENT DEPARTMENT, PLANNING DIVISION
111 SOUTH FIRST STREET
ALHAMBRA, CALIFORNIA 91801

REPORT PREPARED BY:
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APRIL 26, 2024

ALHM 007

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: Palm and Pepper Commercial Development.

APPLICANT: The project Applicant is Hersel M. Zahab, P.E. Land Development Consultants, 1520 Brookhollow Drive, Suite 33. Santa Ana, California 92705

PROJECT ADDRESS: The proposed project site has multiple addresses that include 126, 132, and 146 Palm Avenue; 127 South Raymond Avenue, and 2018 Teagarden Lane. The corresponding Assessor Parcel Numbers (APNs) include 5342-022-033, 5342-022 -034, 5342-022-035, 5342-022-036, 5342-022-053, and 5342-022-054.

CITY AND COUNTY: City of Alhambra, Los Angeles County.

PROJECT: The City of Alhambra Community Development Department, in its capacity as the Lead Agency, is reviewing an application for the construction of a new commercial development within the 2.7-acre (117,996 square feet) site located in the north-central portion of the City. The project site is bounded on the north by two medical buildings (88 S. Palm Avenue and 55 Raymond Avenue), on the east by Raymond Avenue, on the south by Pepper Street, and on the west by Palm Avenue. The proposed project site consists of four parcels (referred to as Parcel 1 through 4). Parcels 1 through 3 would be occupied by the new restaurant buildings while Parcel 4 is a noncontiguous parcel located on the southeast corner of the now vacated Teagarden Lane and Palm Avenue that would be used for remote employee parking.

The proposed project would involve the construction of three new quick-serve food-related uses (a Starbucks®, a Raising Cane's®, and a Panda Express®) totaling 7,053 square feet of floor area. The project site is currently occupied by commercial and industrial uses, most of which are not presently active. Only a 10,000 square-foot warehouse located at 135 S. Raymond Avenue is currently in operation. All of the existing onsite buildings would be removed to accommodate the proposed project. The new uses that would occupy the project site would consist of the following:

- *Panda Express*. This proposed use would be located on Parcel 1. This quick service fast food restaurant would have a total floor area of 2,700 square feet and would be located in the northwest corner of the project site. The main public entrance to the restaurant would be located on the east-facing elevation. The drive-through lane and order window would be located along the building's north-facing elevation. The estimated indoor seating capacity for this restaurant is 66 seats.

- *Raising Cane's*. This proposed use would be located on Parcel 2. This restaurant would have a total floor area of 3,181 square feet and would be located in the southwest corner of the project site. The main public entrance to the restaurant would be located on the south-facing elevation. The drive-through lane and order window would be located along the building's north-facing elevation. The estimated indoor seating capacity for this restaurant is 75 seats.

- *Starbuck's*. This proposed use would be located on Parcel 3. This coffee shop would have a total floor area of 1,172 square feet and would be located in the northeast corner of the project site. No indoor seating would be provided. The drive-through lane and order window would be located along the building's west-facing elevation.

MITIGATED NEGATIVE DECLARATION (CONTINUED)

Landscaping would be provided around the site's perimeter, around the new buildings, and within the parking area. A total of 23,805 square feet or 20.17% of the total site area would be landscaped.

The proposed project would provide 121 parking spaces. Of this total, 44 spaces would be provided for the proposed Panda Express, 49 spaces would be provided for the Raising Cane's, 16 spaces would be provided for the Starbucks, and 12 spaces would be provided for employee parking within Parcel 4.

Vehicular access would be provided via three driveways intersecting the east side of Palm Avenue, one driveway intersecting the north side of Pepper Street, and two driveways intersecting the west side of Raymond Avenue. The North Driveway along Palm Avenue would replace the now vacated Teagarden Lane and would provide access to the 12 employee-only parking spaces. The Main Driveway along Palm Avenue is proposed for full access/egress, allowing for both inbound and outbound left- and right-turn movements, while the South Driveway would provide restricted right-turn only access/egress due to the presence of a raised median on Palm Avenue. The Pepper Street driveway would provide full access/egress, allowing inbound and outbound left- and right-turn movements. The Main Driveway along Raymond Avenue would allow for full access/egress in both directions, while the North Driveway would only serve trash trucks during off-peak periods.

FINDINGS:

The following findings may be made based on the analysis contained in the attached Initial Study:

- The construction and subsequent operation of the proposed project *would not* have the potential to degrade the quality of the environment.
- The construction and subsequent operation of the proposed project *would not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.
- The construction and subsequent operation of the proposed project *would not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development.
- The construction and subsequent operation of the proposed project *would not* have environmental effects that would adversely affect humans, either directly or indirectly.

The environmental analysis is provided in the attached Initial Study prepared for the proposed project.

Signature

Date

May 2, 2024

TABLE OF CONTENTS

SECTION 1 INTRODUCTION

1.1 PURPOSE OF INITIAL STUDY

The City of Alhambra Community Development Department, in its capacity as the Lead Agency, is reviewing an application for the construction of a new commercial development within a 2.7-acre (117,996 square feet) site located in the north-central portion of the City. The project site is bounded on the north by the now vacated Teagarden Lane, on the east by Raymond Avenue, on the south by Pepper Street, and on the west by Palm Avenue. The proposed project site consists of four parcels (referred to as Parcel 1 through 4). Parcels 1 through 3 would be occupied by the new restaurant buildings while Parcel 4 is a noncontiguous parcel located on the southeast corner of the now vacated Teagarden Lane and Palm Avenue that would be used for remote employee parking.[1] The proposed project would involve the construction of three new quick-serve food-related uses (a Starbucks®, a Raising Cane's®, and a Panda Express®) totaling 7,053 square feet of floor area. The project site is currently occupied by commercial and industrial uses, most of which are not presently active. Only a 10,000 square-foot warehouse, located at 135 S. Raymond Avenue, is currently in operation. All of the existing onsite buildings would be removed to accommodate the proposed development.[2] Vehicular access would be provided via three driveways intersecting the east side of Palm Avenue, one driveway intersecting the north side of Pepper Street, and two driveways intersecting the west side of Raymond Avenue.[3]

The proposed project would require the following approvals: a Tentative Parcel Map for the project site; a Conditional Use Permit (CUP) for outdoor dining; a Planned Development Permit for the new commercial buildings, a General Plan Amendment (GPA) for a land use designation change; a Zone Change (ZC) and Zoning Map change; a Design Review Board (DRB) approval for the new buildings, the adoption of the Mitigated Negative Declaration; and the adoption of the Mitigation Monitoring and Reporting Program (MMRP). The aforementioned discretionary actions, together with the proposed development, are considered to be a project pursuant to the California Environmental Quality Act (CEQA).[4] As part of the proposed project's environmental review, the City of Alhambra has authorized the preparation of this Initial Study. The primary purpose of the CEQA is to ensure that decision-makers and the public understand the environmental implications of an action or project and to ascertain whether the proposed project would have the potential for significant adverse impacts on the environment once it is occupied. Pursuant to the CEQA Guidelines, additional purposes of this Initial Study include the following:

- To provide the City of Alhambra with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR), a Mitigated Negative Declaration, or a Negative Declaration for the project;
- To facilitate the proposed project's environmental assessment early in the planning phases;
- To eliminate unnecessary EIRs; and,

[1] Land Development Consultants, Inc. *Site Plan, Tentative Parcel Map 84017, Sheet 1 of 1*. No Date.

[2] Ibid.

[3] Ibid.

[4] Ibid.

- To determine the nature and extent of any new impacts associated with the proposed project.[5]

Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and position of the City of Alhambra, in its capacity as the Lead Agency. The City determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the proposed project's CEQA review. Certain projects or actions may also require oversight approvals or permits from other public agencies. This Initial Study and the *Notice of Intent to Adopt a Mitigated Negative Declaration* would be forwarded to responsible agencies, trustee agencies, and the public for review and comment. A 30-day public review period would be provided to allow these entities and other interested parties to comment on the proposed project and the findings of this Initial Study.[6] Questions and/or comments should be submitted to the following contact person:

City of Alhambra, Community Development Department, Planning Division
Attn: Maia McCurley, Principal Planner
111 South First Street
Alhambra, California 91801
(626) 570-5042

1.2 INITIAL STUDY'S ORGANIZATION

The following annotated outline summarizes the format and content of this Initial Study:

- *Section 1 Introduction,* provides the procedural context surrounding this Initial Study's preparation and insight into its composition. The CEQA Checklist is also included in this section.
- *Section 2 Project Description,* provides an overview of the affected area along with a description of the proposed project's physical and operational characteristics. This section also identifies the related projects used in the analysis of cumulative impacts.
- *Section 3 Environmental Analysis,* includes an analysis of potential impacts associated with the implementation of the proposed project.
- *Section 4 Conclusions,* identifies the Mandatory Findings of Significance related to the proposed project's approval and subsequent implementation.
- *Section 5 References,* identifies the sources used in the preparation of this Initial Study.

The Appendices include the modeling results of the air quality analysis, traffic study, phase 1, noise measurements, and the utilities worksheets.

[5] California, State of, *Title 14. California Code of Regulations. Chapter 3. Guidelines for the Implementation of the California Environmental Quality Act* as Amended 2016. (CEQA Guidelines) § 15060.

[6] Ibid.

SECTION 2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The proposed project involves the construction of a new commercial development within a 2.7-acre (117,996 square feet) site located in the northwest portion of the City (refer to Exhibits 2-1 and 2-2). The project site is bounded on the north by the now vacated Teagarden Lane, on the east by Raymond Avenue, on the south by Pepper Street, and on the west by Palm Avenue (refer to Exhibit 2-3). The proposed project site consists of four parcels (referred to as Parcel 1 through 4). A conceptual site plan for the proposed project is provided in Exhibit 2-5.

2.2 PROJECT LOCATION

The project site is located within the northwest portion of the City of Alhambra. The City is situated in the westernmost portion of the San Gabriel Valley within Los Angeles County. Alhambra is located approximately 7.86 miles northeast of downtown Los Angeles. The City of Alhambra is bounded by the cities of South Pasadena, San Marino, and San Gabriel to the north; the City of San Gabriel to the east; the City of Monterey Park to the south; and the City of Los Angeles to the west.[7] Major physiographic features located in the vicinity of Alhambra includes the Repetto Hills, located approximately 2.49 miles to the northwest of the City; the San Rafael Hills, located approximately 4.89 miles to the northwest of the City; and the San Gabriel Mountains, located approximately 7.24 miles to the north[8] Regional access to the City of Alhambra is provided by two area freeways: the Long Beach Freeway (I-710), located 0.66 miles to the southwest, and the San Bernardino Freeway (I-10), located 0.90 miles to the south.

The project site is bounded on the north by Teagarden Lane (which has been vacated), on the east by Raymond Avenue, on the south by Pepper Street, and on the west by Palm Avenue. The proposed project site consists of four parcels (referred to as Parcel 1 through 4). Parcels 1 through 3 would be occupied by the new restaurant buildings while Parcel 4 is a noncontiguous parcel located on the southeast corner of the now vacated Teagarden Lane and Palm Avenue. Parcel 4 would be used for remote employee parking.[9] The proposed project site has multiple addresses that include 126, 132, and 146 Palm Avenue; 127 South Raymond Avenue, and 2018 Teagarden Lane. The corresponding Assessor Parcel Numbers (APNs) include 5342-022-033, 5342-022 -034, 5342-022-035, 5342-022-036, 5342-022-053, and 5342-022-054.[10] The site's latitude and longitude is 34°08896N -118°14573W. The City's location in a regional context is illustrated in Exhibit 2-1. In addition, a citywide map is illustrated in Exhibit 2-2 and a local map is provided in Exhibit 2-3.

2.3 ENVIRONMENTAL SETTING

The 2.7-acre (117,996 square feet) project site is located in an urban area and is surrounded by a mix of uses including retail, industrial, office, and multiple-family residential development. The project site is bounded on the north by the now vacated Teagarden Lane, on the east by Raymond Avenue, on the south by Pepper

[7] Quantum GIS and the Southern California Association of Governments.

[8] Google Earth. Website accessed April 5, 2016.

[9] Land Development Consultants, Inc. *Site Plan, Tentative Parcel Map 84017, Sheet 1 of 1.* No Date.

[10] Land Development Consultants, Inc. *Site Plan, Tentative Parcel Map 84017, Sheet 1 of 1.* No Date.

Street, and on the west by Palm Avenue. Exhibit 2-4 includes an aerial photograph of the project site and the adjacent development. Surrounding land uses in the vicinity of the project site are described below:

- *North of the project site*. Two medical buildings (88 S. Palm Avenue and 55 Raymond Avenue) are located on the north side of the site.[11]
- *South of the project site*. Pepper Street extends along the project site's south side. Warehousing and smaller distribution uses and office developments are located along the south side of Pepper Street (2048 Pepper Street).[12]
- *East of the project site*. Raymond Avenue extends along the project site's east side. The CosLo Pharmacy is located further east, on the east side of Raymond Avenue (150 S. Raymond Avenue).[13]
- *West of the project site*. Palm Avenue extends along the west side of the project site.[14] Various commercial uses including a Costco commercial center are located further west, along the west side of Palm Avenue.[15]

The project site is occupied by the following improvements:

- A 7,000 square foot building is located at 131 South Raymond Avenue (formerly occupied by Stefant Corporation, garment factory); A surface parking lot is located to the north of the existing building. This building was constructed in 1975.
- A 10,000 square foot building is located at 135 South Raymond Avenue (formerly occupied by House of Concepts / Lozano Marble & Granite). This building was constructed in 1975.
- A 10,000 square foot building is located at 137 South Raymond Avenue. This building was constructed in 1975.
- A 2,400 square foot building is located at 124 South Palm Avenue (formerly occupied by Sleep Shop Furniture, mattress sales); A surface parking lot is located to the west of this existing building. This building was constructed in 1965.
- A 7,000 square foot building is located at 132-136 South Palm Avenue (formerly occupied by Vehicle storage (VW); An outdoor storage and parking area is located to the east of this existing building. This building was constructed in 1973.

[11] Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on November 20, 2022.

[12] Ibid.

[13] Ibid.

[14] Ibid.

[15] Ibid.

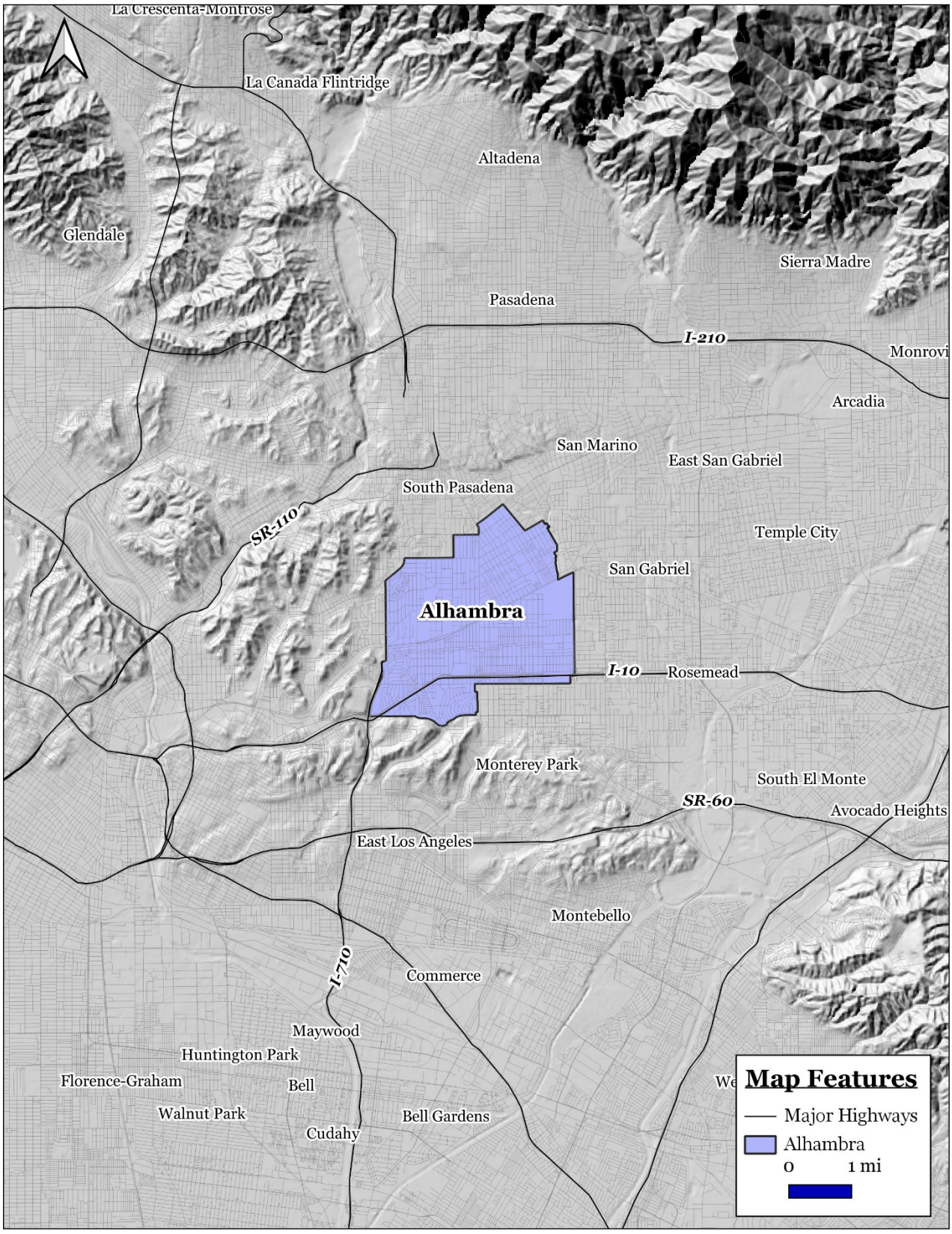

EXHIBIT 2-1 REGIONAL LOCATION MAP

Source: Quantum GIS

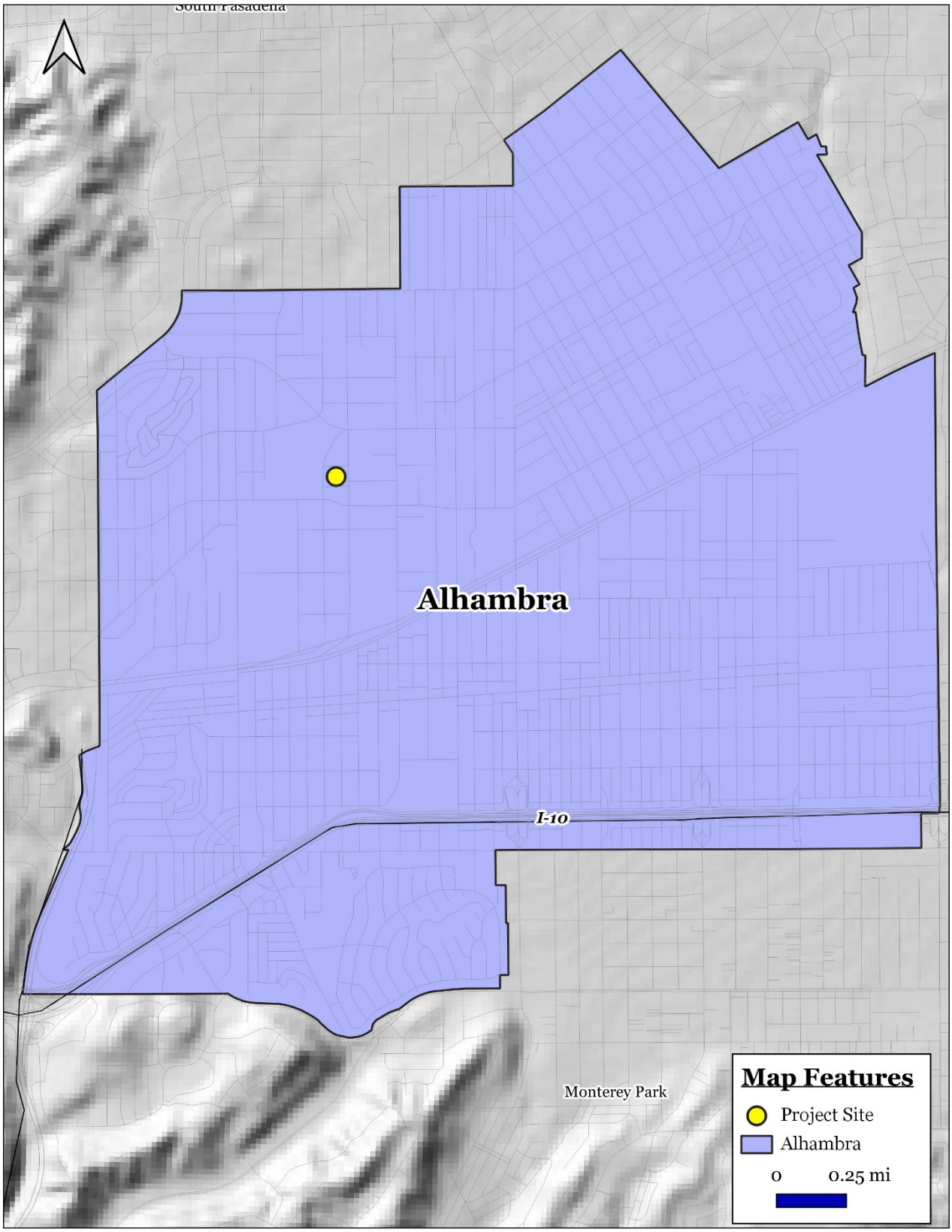

EXHIBIT 2-2 CITYWIDE MAP

Source: Quantum GIS

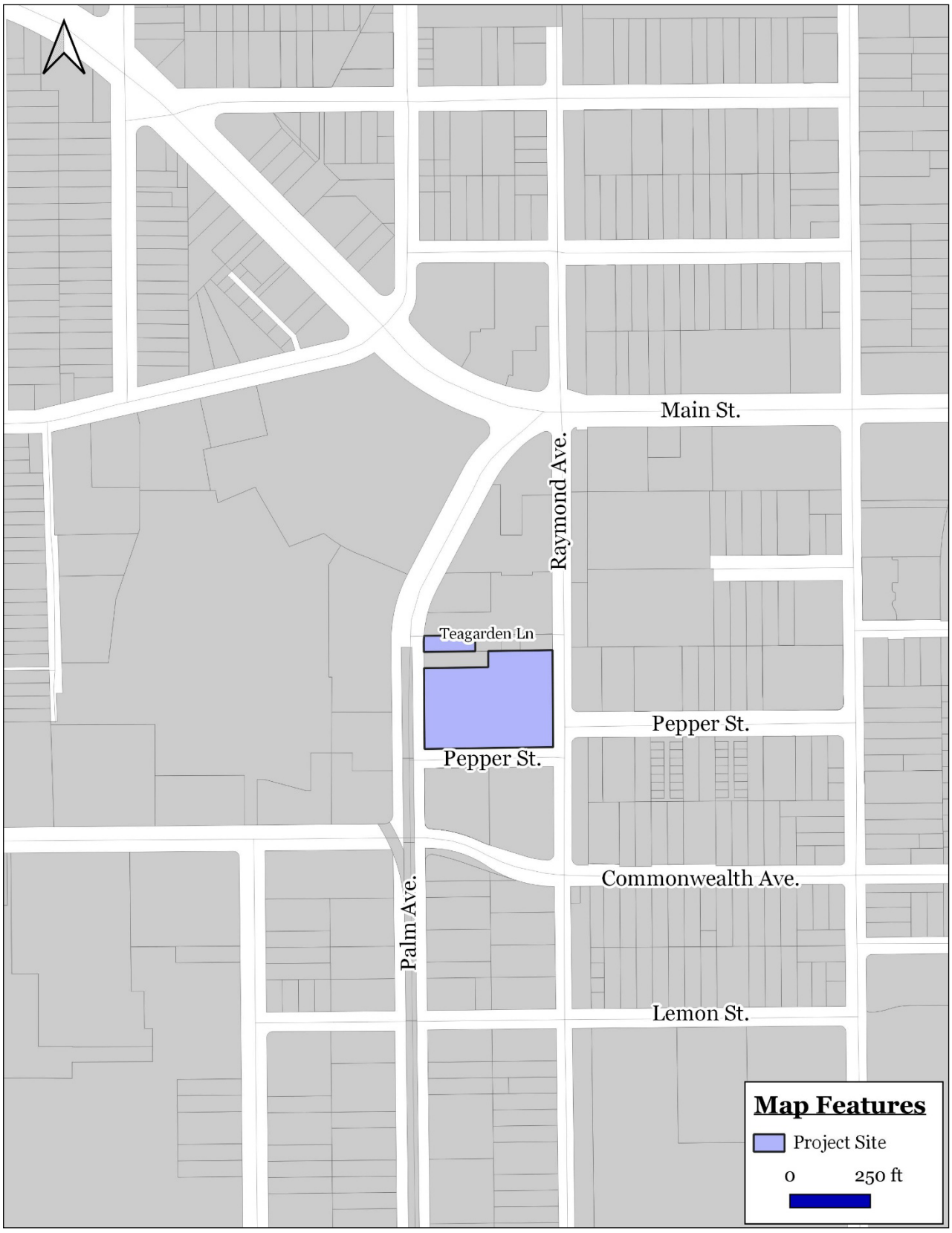

EXHIBIT 2-3 LOCAL AREA
Source: Quantum GIS

EXHIBIT 2-4 AERIAL PHOTOGRAPH

Source: Google Maps

- A 7,000 square foot office building is located at 146 South Palm Avenue. This building was constructed in 1926.
- A 10,000 square foot building is located at 2009-2055 Pepper Avenue. This building was constructed in 1975.[16] These existing buildings on site consist of steel frame structures. They have metal, concrete block and brick exterior walls with the interior walls consisting of sheetrock with associated drywall mud/joint compounds and wall surface texturing. The floors consist of concrete or a concrete base that is covered with floor tiles. The ceilings in the buildings are covered with fiberglass and cellulose ceiling tiles. All of the building have undergone extensive modifications since they were originally constructed. Some of the buildings exhibit significant signs of deterioration due to their vacant state. The existing lighting onsite consists of security lighting and streetlights located along the public roadways.

The project site is covered over in impervious surfaces (surface pavement and buildings). The Tree Preservation/Removal Plan (Sheet L0.4) identified three trees that would be removed from the site (two Chinese Flame and one Queen Palm). Two of the trees are being removed from the parkway along Palm Avenue and a single tree located on the property. According to the site plan, the proposed project would require the removal of a single tree located on the Palm Avenue frontage.

The project site is currently zoned as *Industrial (I)* and the project site's General Plan land use designation is *Industrial*. The project is being processed based upon the standards/regulations of the prior Zoning Code designation that was applicable to the project site. Under the prior Zoning Code, the project site was zoned IPD (Industrial Planned Development), but under the new Zoning Code currently in effect as of March 2, 2024, the project site is zoned I (Industrial). The project site is located in the midst of a commercial and industrial area. Residential uses are found to the east, east of Pepper Street. The nearest school is the Northrop Elementary School located approximately 2,600 feet to the southeast. The nearest public airport to the project site is the San Gabriel Valley Airport, located 6.70 miles to the east of the project site. Utilities are located in adjacent streets. Existing sewer lines include 8-inch lines in Palm Avenue, Pepper Street and Raymond Avenue. Existing water lines include a 12-inch line in Pepper Street, an 8-inch line in Palm Avenue, and a 6-inch line in Raymond Avenue. Electrical service to the site is provided by the Southern California Edison and natural gas service is provided by the Southern California Gas Company.

2.4 PROJECT DESCRIPTION

2.4.1 PHYSICAL CHARACTERISTICS OF PROPOSED PROJECT

The proposed project would involve the construction of three new quick-serve food-related uses (a Starbucks®, a Raising Cane's®, and a Panda Express®) totaling 7,053 square feet of floor area. The project site is currently occupied by commercial and industrial uses, most of which are not presently active. Only a 10,000 square-foot warehouse located at 135 S. Raymond Avenue is currently in operation.

- *Project Site*. The project would be a new commercial development within a 2.7-acre (117,996 square feet) site located in the north-central portion of the City. The proposed project site consists of four parcels (referred to as Parcel 1 through 4). Parcels 1 through 3 would be occupied by the new restaurant buildings while Parcel 4 is a noncontiguous parcel located on the southeast corner of the

[16] East West Bank. *Phase I Environmental Site Assessment Warehouse Properties @ 131-137 South Raymond Avenue, 124-126 and 132-146 South Palm Avenue and 2009 & 2055 Pepper Avenue, Alhambra, Los Angeles County, CA 91801* May 6, 2019

now vacated Teagarden Lane and Palm Avenue that would be used for remote employee parking.[17] Teagarden Lane would be abandoned and vacated.

- *Existing Uses*. All of the existing onsite buildings would be removed to accommodate the proposed new development. The project site is currently occupied by commercial and industrial uses, most of which are not presently active. Only a 10,000 square-foot warehouse located at 135 S. Raymond Avenue is currently in operation.[18]

- *Panda Express*. This proposed use would be located on Parcel 1. This quick service fast food restaurant would have a total floor area of 2,700 square feet and would be located in the northwest corner of the project site. The main public entrance to the restaurant would be located on the east-facing elevation. The drive-through lane and order window would be located along the building's north-facing elevation. The estimated indoor seating capacity for this restaurant is 66 seats. The maximum building height to the top of the parapet would be 23-feet, 3-inches.[19]

- *Raising Cane's*. This proposed use would be located on Parcel 2. This restaurant would have a total floor area of 3,181 square feet and would be located in the southwest corner of the project site. The main public entrance to the restaurant would be located on the south-facing elevation. The drive-through lane and order window would be located along the building's north-facing elevation. The estimated indoor seating capacity for this restaurant would be 75 seats. The maximum building height to the top of the parapet would be 21-feet, 4-inches.[20]

- *Starbuck's*. This proposed use would be located on Parcel 3. This coffee shop would have a total floor area of 1,172 square feet and would be located in the northeast corner of the project site. No indoor seating would be provided. The drive-through lane and order window would be located along the building's west-facing elevation. The maximum building height to the top of the parapet would be 20-feet. [21]

- *Landscaping, Signage, and Lighting*. Landscaping would be provided around the site's perimeter, around the new buildings, and within the parking area. A total of 23,805 square feet or 20.17% of the total site would be landscaped. All landscaping would comply with all pertinent requirements related to drought-tolerant landscaping. Four pylon signs would be constructed within the project site. The signs would be located on the corner of Raymond Avenue and Pepper Street, near the corner of S. Raymond and Pepper Street, near the site's northeast corner near the proposed Starbucks, and in the site's northwest corner south west of the proposed Panda Express. The dimensions of the proposed sign faces would be approximately 50 square feet on a 20-foot-high pylon. Signage would also be provided on side elevations of each of the new buildings. New lighting would be provided throughout the project site. A total of 17 new light poles would be installed in the parking area according to the photometric plan. The height of these light poles would be 25 feet. Other lighting would be provided on the buildings, pedestrian walkways, and for decorative lighting.

- *Parking*. The proposed project would provide 121 parking spaces. Of this total, 44 spaces would be provided for the proposed Panda Express, 49 spaces would be provided for the Raising Cane's, 16

[17] Land Development Consultants, Inc. *Site Plan, Tentative Parcel Map 84017, Sheet 1 of 1*. No Date.

[18] Ibid.

[19] Ibid.

[20] Land Development Consultants, Inc. *Site Plan, Tentative Parcel Map 84017, Sheet 1 of 1*. No Date.

[21] Ibid.

spaces would be provided for the Starbucks, and 12 spaces would be provided for employee parking within Parcel 4. [22]

- *Access*. Vehicular access would be provided via three driveways intersecting the east side of Palm Avenue, one driveway connecting with the north side of Pepper Street, and two driveways connecting with the west side of Raymond Avenue. The north driveway along Palm Avenue would replace the discontinuous and now vacated Teagarden Lane and provide access to the 12 employee-only parking spaces. The main driveway along Palm Avenue is proposed for full access/egress, allowing inbound and outbound left- and right-turn movements, while the south driveway would provide restricted right-turn only access/egress due to the presence of a raised median on Palm Avenue. The Pepper Street driveway would provide full access/egress, allowing inbound and outbound left- and right-turn movements. The main driveway along Raymond Avenue would allow for full access/egress in both directions, while the north driveway would only serve trash trucks during off-peak periods.[23]
- *Utilities*. The proposed project's utility connections would consist of the following:

  - *Raising Cane's*. The proposed project would connect to an existing 12-inch water line also located in Pepper Street and an existing 8-inch sewer main in Pepper Street.

  - *Panda Express*. The proposed project would connect to an existing 8-inch water line also located in Palm Avenue and an existing 8-inch sewer main in Palm Avenue.

  - *Starbucks*. The proposed project would connect to an existing 6-inch water line also located in Raymond Avenue and an existing 8-inch sewer main in Raymond Avenue.

- *Project Sustainability*. All of the proposed improvements would be required to implement all pertinent low impact development (LID) requirements. In addition, all landscaping would comply with all pertinent requirements related to drought-tolerant landscaping. Two EV charging stations would also be provided.

The existing curbs and gutters along all three street frontages (Palm Avenue, Pepper Street, and Raymond Avenue), would be reconstructed to accommodate the dedications. A conceptual site plan for the proposed project is provided in Exhibit 2-5. Conceptual elevations for the proposed new buildings are shown in Exhibits 2-6 through 2-8.

[22] Ibid.

[23] Ibid.

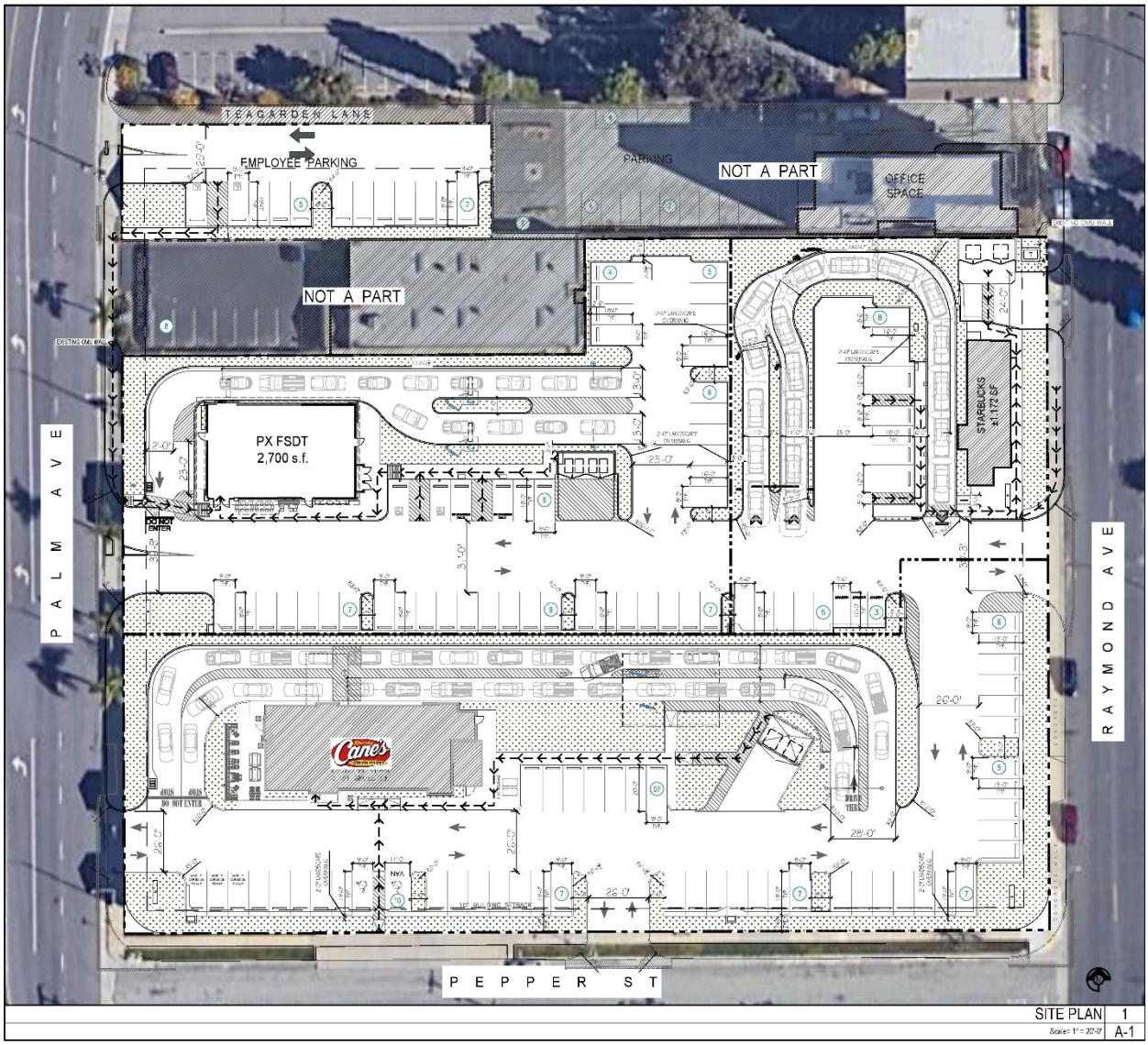

EXHIBIT 2-5 SITE PLAN

Source: Land Development Consultants

EXHIBIT 2-6 RAISING CANE'S BUILDING ELEVATION

Source: PM Design Architectural Solutions Group

EXHIBIT 2-7 PANDA EXPRESS BUILDING ELEVATION

Source: Gary Wang & Associates

EXHIBIT 2-8 STARBUCKS BUILDING ELEVATION

Source: Gary Wang & Associates Inc.

No off-site improvements other that the roadway dedications and the related curb and gutter improvements would be required. The proposed project is summarized in Table 2-1.

Table 2-1 Project Summary Table

Project Element	Description
Site Area	2.7-acres (117,996 sq. ft.)
Total Building Area (3 new buildings)	7,053 sq. ft.
Building Lot Coverage and FAR	29 percent and FAR 0.29
Panda Express (Parcel 1)	2,700 sq. ft.
Raising Cane's (Parcel 2)	3,181 sq. ft.
Starbucks (Parcel 3)	1,172 sq. ft.
Parking	121 Parking Spaces
Landscaping	23,805 sq. ft.

Source: Land Development Consultants, Inc. *Site Plan, Tentative Parcel Map 84017, Sheet 1 of 1*. No Date

2.4.2 OPERATIONAL CHARACTERISTICS

The hours of operation and projected employment for the three businesses that would be located within the proposed project site are summarized below:

- *Panda Express*. The hours of operation would be seven days a week, 12 hours a day 10:00 AM to 10:00PM. The projected employment would be an estimated 30 persons per day over two shifts.[24]

- *Raising Cane's*. The standard operating hours for both dine-in and drive-thru services would be seven days a week, from 9:00 AM to 3:30 AM. The restaurant anticipates employing 55 to 75 full- and part-time employees with an average of 12-15 crew members with 2 managers working per shift. There would be two shifts per workday, the first at 8:00 AM and the second shift beginning at 4:00 PM.

- *Starbucks*. The hours of operation would be seven days a week, 24-hours a day. The projected employment would be an estimated 20 persons per day over three shifts.

2.4.3 CONSTRUCTION CHARACTERISTICS

The proposed project's construction period would consist of the following phases:

- *Phase 1 - Demolition*. The existing onsite improvements would undergo demotion during this phase. This phase would take approximately one month to complete. In April 2021 Reds Environmental Inspections, LLC was retained to perform an asbestos and lead demolition survey for the project site. No asbestos was identified other than mastic on carport roofs. Sheet metal walls on Building 1

[24] The Natelson Company. *Employment Density Study, Summary Report*. October 31, 2001.

are coated with lead-based paint though the paint is in "fair" condition. Prior to the commencement of demolition, the contractors would remove both lead containing paint (LCP) materials and asbestos containing materials (ACMs). ACMs and LCP containing materials would be identified and removed by licensed personnel and disposed of pursuant to all requisite protocols. The type of demolition that would be used would be a "high reach arm" which employs a machine, such as an excavator, with an attached demolition arm or telescopic boom that is long enough to reach the top of tallest structures. Various attachments would then be used to break up the building. This equipment could be a hammer, shears, or a crusher. The buildings would then be broken up from the top of the building, downward. The machine(s) would then be used to remove the largest pieces of the structures. The demolition ground crews would then break the debris up further. Finally, the crew would then sort through the debris for disposal and/or recycling. The equipment that would be used during this phase would include backhoes, front-end loaders, bull dozers, graders, and trucks.

- *Phase 2 – Grading and Site Preparation.* During this phase, the project site would be graded and readied for construction. This phase would take approximately two weeks to complete. The new structural improvements would total 7,053 square feet of floor area. Hardscape surfaces (roadways, parking, etc.,) would total 95,916 square feet. The new buildings would be constructed on a shallow concrete foundation. The equipment that would be used during this phase would include backhoes, graders, and trucks.

- *Phase 3 – Building Erection*. The three new buildings would be constructed during this phase. The Phase 3 construction period would take approximately 10 months to complete. The equipment that would be used during this phase would include cranes, forklifts, mixers, and trucks.

- *Phase 4 - Paving, Landscaping, and Finishing*. This phase would involve paving, the installation of the landscaping, and the completion of the on-site improvements for the proposed project. This phase would last approximately one month. The equipment that would be used during this phase would include fork lifts, back hoes, pavers, rollers, and trucks.

The City requires that all construction activities be confined to the project site and that the site be secured during all phases of construction. The equipment and construction-related parking must be located onsite. No equipment staging or employee parking would be permitted on the local streets. The applicant must also adhere to all pertinent City requirements related to the preparation and implementation a Construction Traffic Management Plan, including the identification of designated haul routes. No adjacent roadways would be narrowed or closed to accommodate construction activities.

2.5 PROJECT OBJECTIVES

The City of Alhambra seeks to accomplish the following objectives with this review of the proposed project:

- To minimize the environmental impacts associated with the proposed project;
- To promote new infill development within underutilized properties;
- To promote increased property valuation as a means to finance public services and improvements in the City; and,

- To ensure that the development is in conformance with the policies of the City of Alhambra General Plan.

The project Applicant is seeking to accomplish the following objectives with the proposed project:

- To more efficiently utilize the site; and,
- To realize a fair return on their investment.

2.6 DISCRETIONARY ACTIONS

A *discretionary decision* is an action taken by a government agency (for this project, the government agency is the City of Alhambra) that calls for an exercise of judgment in deciding whether to approve a project. The proposed project would require the following approvals:

- The approval of a Tentative Parcel Map to subdivide the project site into four parcels;
- The approval of a Planned Development Permit for the new commercial buildings;
- The completion of a Design ReviewBoard (DRB) review for the new buildings, landscaping, and the Uniform Sign Program;
- The approval of Conditional Use Permits for the operation of outdoor dining for two of the proposed restaurants;
- A General Plan Map Amendment (GPA) for the land use designation change to General Commercial;
- A Zone Change (ZC) to Commercial Mixed Use (CMU);
- The adoption of the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program (MMRP).

SECTION 3 ENVIRONMENTAL ANALYSIS

This section of the Initial Study analyzes the potential environmental impacts that may result from the proposed project's implementation. The issue areas evaluated in this Initial Study include:

- Aesthetics (Section 3.1);
- Agricultural & Forestry Resources (Section 3.2);
- Air Quality (Section 3.3);
- Biological Resources (Section 3.4);
- Cultural Resources (Section 3.5);
- Energy (Section 3.6);
- Geology & Soils (Section 3.7);
- Greenhouse Gas Emissions; (Section 3.8);
- Hazards & Hazardous Materials (Section 3.9);
- Hydrology & Water Quality (Section 3.10);
- Land Use & Planning (Section 3.11);
- Mineral Resources (Section 3.12);
- Noise (Section 3.13);
- Population & Housing (Section 3.14);
- Public Services (Section 3.15);
- Recreation (Section 3.16);
- Transportation (Section 3.17);
- Tribal Resources (Section 3.18);
- Utilities (Section 3.19); and,
- Wildfire (Section 3.20).

The environmental analysis contained in this section reflects the Initial Study Checklist format used by the City of Alhambra Community Development Department in its environmental review process pursuant to the CEQA Guidelines. Under each issue area, an assessment of impacts is provided in the form of questions and answers. The analysis contained herein serves as a response to the individual questions. For the evaluation of potential impacts, questions are stated and an answer is provided according to the analysis undertaken as part of this Initial Study's preparation. To each question, there are four possible responses:

- *No Impact*. The approval and subsequent implementation of the proposed project would not have any measurable environmental impact on the environment.

- *Less Than Significant Impact*. The approval and subsequent implementation of the proposed project may have the potential for affecting the environment, although these impacts would be below levels or thresholds that the City of Alhambra or other responsible agencies consider to be significant.

- *Less Than Significant Impact with Mitigation*. The approval and subsequent implementation of the proposed project may have the potential to generate impacts that would have a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of mitigation measures.

- *Potentially Significant Impact*. The approval and subsequent implementation of the proposed project may result in environmental impacts that are significant.

3.1 AESTHETICS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project have a substantial adverse effect on a scenic vista?			✖	
B. Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				✖
C. Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				✖
D. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

The proposed project involves the construction of a new commercial development within a 2.7-acre (117,996 square feet) site located in the north-central portion of the City. The project site is bounded on the north by the now vacated Teagarden Lane, on the east by Raymond Avenue, on the south by Pepper Street, and on the west by Palm Avenue. The proposed project site consists of four parcels (referred to as Parcel 1 through 4). Parcels 1 through 3 would be occupied by the new restaurant buildings while Parcel 4 is a parcel located on the former Teagarden Lane that has been vacated and would be used for remote employee parking.[25] The proposed project would involve the construction of three new quick-serve food-related uses (a Starbucks®, a Raising Cane's®, and a Panda Express®) totaling 7,053 square feet of floor area. The project site is currently occupied by commercial and industrial uses, most of which are not presently active. Only a 10,000 square-foot warehouse located at 135 S. Raymond Avenue is currently in operation. All of the existing onsite buildings would be removed to accommodate the proposed project. Vehicular access would be provided via three driveways intersecting the east side of Palm Avenue, one driveway intersecting the north side of Pepper Street, and two driveways intersecting the west side of Raymond Avenue. The North Driveway along Palm Avenue would access 12 employee-only parking spaces.[26]

The 2.7-acre project site is located in an urban area and is surrounded by a mix of uses including retail, industrial, recreational, office, and residential development. The project site is bounded on the north by Teagarden Lane (which has been vacated and would be used for remote employee parking), on the east by Raymond Avenue, on the south by Pepper Street, and on the west by Palm Avenue. Exhibit 2-4 includes an

[25] Land Development Consultants, Inc. *Site Plan, Tentative Parcel Map 84017, Sheet 1 of 1*. No Date.

[26] Ibid.

aerial photograph of the project site and the adjacent development. Surrounding land uses in the vicinity of the project site are described below:

- *North of the project site*. Two medical buildings (88 S. Palm Avenue and 55 Raymond Avenue) are located further north, on the north side of Teagarden Lane (which has been vacated and would be used for remote employee parking).[27]

- *South of the project site*. Pepper Street extends along the project site's south side. Warehousing and smaller distribution uses and office developments are located along the south side of Pepper Street (2048 Pepper Street).[28]

- *East of the project site*. Raymond Avenue extends along the project site's east side. The CosLo Pharmacy is located further east, on the east side of Raymond Avenue (150 S. Raymond Avenue).[29]

- *West of the project site*. Palm Avenue extends along the west side of the project site.[30] Various commercial uses including a Costco commercial center are located further west, along the west side of Palm Avenue.[31]

The project site is occupied by the following land uses and development:

- A 7,000 square foot building is located at 131 South Raymond Avenue (formerly occupied by Stefant Corporation, garment factory);
- A 10,000 square foot building is located at 135 South Raymond Avenue (formerly occupied by House of Concepts / Lozano Marble & Granite);
- A 10,000 square foot building is located at 137 South Raymond Avenue;
- A 2,400 square foot building is located at 124 South Palm Avenue (formerly occupied by Sleep Shop Furniture, mattress sales);
- A 7,000 square foot building is located at 132-136 South Palm Avenue (formerly occupied by a vehicle storage use.
- A 7,000 square foot office building is located at 146 South Palm Avenue; and,
- A 10,000 square foot building is located at 2009-2055 Pepper Avenue.[32]

These existing buildings on site consist of steel frame structures. They have metal, concrete block and brick exterior walls with the interior walls consisting of sheetrock with associated drywall mud/joint compounds and wall surface texturing. The floors consist of concrete or a concrete base that is covered with floor tiles. These existing buildings are older and dilapidated.

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[27] Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on November 20, 2022.

[28] Ibid.

[29] Land Development Consultants, Inc. *Site Plan, Tentative Parcel Map 84017, Sheet 1 of 1*. No Date.

[30] Ibid.

[31] Ibid.

[32] East West Bank. *Phase I Environmental Site Assessment Warehouse Properties @ 131-137 South Raymond Avenue, 124-126 and 132-146 South Palm Avenue and 2009 & 2055 Pepper Avenue, Alhambra, Los Angeles County, CA 91801* May 6, 2019

A. *Would the project have a substantial adverse effect on a scenic vista? ● Less Than Significant Impact.*

The evaluation of aesthetics and aesthetic impacts is often subjective, and it typically requires the identification of key visual features in the area and their importance. The characterization of aesthetic impacts involves establishing the existing visual characteristics including visual resources and scenic vistas that are unique to the area. Visual resources are determined by identifying existing landforms (e.g., topography and grading), views (e.g., scenic resources such as natural features or urban characteristics), and existing light and glare characteristics (e.g., nighttime illumination). Changes to the existing aesthetic environment associated with the proposed project's implementation are identified and *qualitatively* evaluated based on the proposed modifications to the existing setting and the viewers' sensitivity.

According to the City's General Plan, the San Gabriel Mountains, the hills along the western and southern edges of the City, and slopes created by the San Pascual Wash and Alhambra Wash in the eastern part of the City are important viewsheds. However, these areas are not identified by the City as part of any protected scenic vista. Because views of the San Gabriel Mountains are prominent and the public can see the mountains from much of the City, views of the San Gabriel Mountains could be considered part of a scenic vista. Views of the San Gabriel Mountains are readily visible though the project's implementation would not lead to a loss in scenic views because of the proposed buildings' heights and scale. Lastly, the project would not obstruct views of the Repetto Hills and the Puente Hills.

The three new restaurant buildings would all be a single-level and would have a maximum building heights ranging between 18-feet and approximately 23 feet. The new development would have a lot coverage of 29% and a floor area ratio (FAR) of 0.29.[33] Landscaping would be provided around the site's perimeter, around the new buildings, and within the parking area. A total of 23,805 square feet or 20.17% of the total site would be landscaped.[34] Views of these vistas are restricted by the existing urban development that surrounds the project site. *As a result, the project's impacts on a scenic vista would be less than significant.*

B. *Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? ● No Impact.*

None of the surrounding roadways are locally designated scenic highways. Furthermore, there are no State or County designated scenic highways located in the area. While there are no officially designated scenic highways in Alhambra, the Foothill Freeway (Interstate 210 [I-210]), located approximately 2.5 miles north of the City, is identified as being eligible for a State scenic highway designation).[35] The proposed project would not impact natural rock-outcroppings or scenic vegetation along a designated scenic highway since there are no such features remaining within the project site. In addition, there are no historic buildings located in the project site (historic resources are discussed herein in Section 3.5). *As a result, no impacts on scenic resources would occur.*

[33] Land Development Consultants, Inc. *Site Plan, Tentative Parcel Map 84017, Sheet 1 of 1.* No Date.

[34] Ibid.

[35] California Department of Transportation. *Official Designated Scenic Highways.* www.dot.ca.gov

C. *Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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? ● No Impact*

The project site is located within the City of Alhambra that is fully developed and the City is surrounded by urban development. Pursuant to PRC Section 21071 (a), the area in which the project site is located is an urbanized area. Alhambra's population is 82,868. When considering the individual incorporated cities that surround Alhambra, the population would exceed 100,000 persons. The project site is occupied by older, dilapidated structures.[36] Once complete, the proposed project would improve the visual appearance of the site and the surrounding areas by introducing new development characterized by modern architecture and new landscaping. In addition, the new restaurant buildings, facades, and landscaping would represent a substantial improvement over the existing on-site conditions. The following design standards apply to all new commercial development within the City:

- The proposed development is of a quality and character which is compatible with the surrounding area and harmonizes with existing development. *The proposed project would adhere to this requirement.*

- The design improves community appearances by avoiding excessive variety and monotonous repetition. *The proposed project would adhere to this requirement.*

- Proposed signage is an integral architectural feature which does not overwhelm or dominate the structure or object to which it is attached. The proposed project would adhere to this requirement.

- Lighting is stationary and is deflected away from adjacent properties. *The proposed project would adhere to this requirement.*

- Mechanical equipment, storage and trash areas and utilities are architecturally screened from view. The proposed project would adhere to this requirement.

- The proposed plans indicate proper consideration for the relationship between the existing and finished grades of the site to be improved and adjacent properties. *The proposed project would adhere to this requirement.*

- The proposed development or modification is not, in its exterior design and appearance, so at variance with the appearance of existing buildings and development in the neighborhood as to cause the nature of the local environment to materially depreciate in appearance.

- The proposed design is compatible with existing development in the area in terms of scale, height, bulk, materials, cohesiveness, colors, roof pitch, roof eaves and the preservation of privacy. The use of T1-11 or similar plywood siding shall not be permitted. *The proposed project would adhere to this requirement.*

[36] Ibid.

- The proposed design promotes a harmonious transition in terms of scale and character between areas of different land use designations. *The proposed project would adhere to this requirement.*

- All building elevations have been architecturally treated in a uniform manner, including the incorporation within the side and rear building elevations of some or all of the design elements used for the primary facades. Parking structures shall also incorporate some or all of the design elements used for the primary facades. *The proposed project would adhere to this requirement.*

- The finished side of all perimeter fencing faces adjacent properties. *The proposed project would adhere to this requirement.*

- The project design shall provide for access and circulation of vehicular, pedestrian, bicycle and emergency vehicle traffic in a safe, logical and efficient manner, both to the site (off-site) and within the site (on-site). Developments located on Major Arterial streets shall be limited to one curb cut per 100 feet of street frontage. Such developments shall utilize rear or alley access whenever practical. *The proposed project would adhere to this requirement.*

- On-site lighting shall be installed along all vehicular access ways and major walkways. Such lighting shall be directed onto the driveways and walkways within the development and away from adjacent properties. Lighting shall also be installed within all covered and enclosed parking areas. *The proposed project would adhere to this requirement.*

- The main entrance to the dwelling unit(s) or commercial or industrial building(s) provides for independent access to the physically impaired. *The proposed project would adhere to this requirement.*

- All surface or ground mounted mechanical equipment, including transformers, terminal boxes, pull boxes, air conditioner condensers, gas meters and electric meter cabinets shall be screened from public view and/or treated to match the materials and colors of the adjacent building. The project design may not include the use of window or wall mounted air conditioning units. All roof-mounted mechanical equipment and duct systems shall comply with the screening standards in this section. *The proposed project would adhere to this requirement.*

- In any zone where zero lot line development is permitted, and where building walls are proposed to be constructed on an interior lot line, the materials of construction shall be of low maintenance decorative masonry, such as slump stone, split-face block, brick or other similar material, as approved by the Director. *The proposed project would adhere to this requirement.*

- All buildings shall display the street address number in a prominent location on the street side. In multi-unit developments, each unit shall prominently display the unit number or designation. All address numbers shall be easily visible to vehicular and/or pedestrian traffic. The street address and unit numbers shall be no less than four inches in height and shall be of a color contrasting to the background to which they are attached. *The proposed project would adhere to this requirement.*

- Balconies situated above the first floor shall be located at least 15 feet from any interior property line to minimize "overviewing" onto adjacent residential properties. *This policy does not apply to the proposed project.*

Finally, the entire project would be subject to the City's design review process to ensure that all of the City's design regulations are adhered to. *As a result, no impacts on the area's scenic character would occur.*

D. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ● Less than Significant Impact.*

The City of Alhambra is primarily built out and, as a result, a substantial amount of nighttime ambient light from urban uses already exists. Typical contributors to nighttime ambient light levels include both stationary and mobile sources. Stationary sources include exterior structure illumination, light spillover from interior lighting, lighting for outdoor uses such as sports fields and courts, parking lot lighting, streetlights, and illuminated signage such as neon signs. In an urban setting such as that which exists in Alhambra, the principal contributor to nighttime light is commercial signage, street lights, and vehicle headlights. While exterior lighting is important for safety and wayfinding in an urban setting, excessively high, ambient nighttime light levels can have various negative effects, including reduction of night sky visibility, and annoyance or interference with sleep when the light intrudes into interior spaces.

Glare is a separate but related phenomenon and may be defined as excessive and uncontrolled brightness from a particular source, with the viewer being exposed to a direct or reflected view of the light. During the day, the primary source of glare is sunlight reflected by highly reflective surfaces such as glass and metal on buildings and cars, while nighttime light and glare comes from the same sources of nighttime ambient light, discussed above.

Exterior lighting can be a nuisance to adjacent land uses that are sensitive to this lighting. This nuisance lighting is referred to as *light trespass,* which is typically defined as the presence of unwanted light on properties located adjacent to the source of lighting. Sources of lighting in the area include lighting from buildings, parking areas, commercial signage, and street lighting. The proposed project would include the installation of new lighting and signage.

Four pylon signs would be constructed within the project site. The signs would be located on the corner of Raymond Avenue and Pepper Street, near the corner of S. Raymond and Pepper Street, near the site's northeast corner near the proposed Starbucks, and in the site's northwest corner south west of the proposed Panda Express. The dimensions of the proposed sign faces would be approximately 50 square feet on a 20-foot-high pylon. Signage would also be provided on side elevations of each of the new buildings. New lighting would be provided throughout the project site. A total of 17 new light poles would be installed in the parking area. The height of these light poles would be 25 feet. Other lighting would be provided on the buildings, pedestrian walkways, and for decorative lighting. The nearest light sensitive receptors are the apartments that are located west of Raymond Avenue and to the north and south of Pepper Street. These apartments are located approximately 200 feet from the project site. The requirements of Section 23.44.030 of the City's Zoning Ordinance are reiterated in the following requirements:

- The Applicant shall ensure that all lighting meet the equipment and illumination standards of the City to the satisfaction of the Community Development Department. Such lighting shall be directed onto the project site, driveways, and parking areas within the project and shielded away from the adjacent properties.

- All signage must not display flashing lights. The lighting system shall be automated using electronic

timers and cut offs and the lighting devices shall be equipped with vandal resistant covers.

- A photometric study must be submitted to the Community Development Department during the Plan Check process. The photometric study shall be reviewed and approved by the Community Development Department. The Applicant must also submit an exterior lighting plan for review and approval by the Community Development Department prior to the issuance of building permits.

The requirements of Section 23.52.070(H) of the City's Zoning Ordinance are reiterated in the following requirements:

- *Lighting*. Parking areas and vehicle sales area designed to accommodate three or more vehicles shall have lighting facilities capable of providing a minimum of one footcandle illumination at every point of the parking lot. Any illumination, including security lighting, shall be so arranged as to reflect away from adjoining properties and rights-of-way.

Glare is related to light trespass and is defined as visual discomfort resulting from high contrast in brightness levels. Glare-related impacts can adversely affect day or nighttime views. As with lighting trespass, glare is of most concern if it would adversely affect sensitive land use or driver's vision. The architectural plans call for inset and shaded window treatments and the use of non-reflective glass. *The proposed project's light and glare impacts would be less than significant*.

MITIGATION MEASURES

The requirements of Section 23.44.030 of the City's Zoning Ordinance would effectively reduce potential light trespass. As a result, no mitigation would be required.

3.2 AGRICULTURE & FORESTRY RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses?				✖
B. Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract?				✖
C. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				✖
D. Would the project result in the loss of forest land or conversion of forest land to a non-forest use?				✖
E. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on agriculture and forestry resources if it results in any of the following:

- The proposed project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- The proposed project would conflict with existing zoning for agricultural use, or a Williamson Act contract.
- The proposed project would conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).
- The proposed project would result in the loss of forest land or conversion of forest land to non-forest use.
- The proposed project would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of Important Farmland. It divides the state's land into eight categories of land use designation based on soil quality and

existing agriculture uses to produce maps and statistical data. These maps and data are used to help preserve productive farmland and to analyze impacts on farmland. Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance are all Important Farmland and are collectively referred to as Important Farmland in this analysis. The highest rated Important Farmland is Prime Farmland. The California Land Conservation Act of 1965, or the Williamson Act, allows city or county governments to preserve agricultural land or open space through contracts with landowners. The County has areas that are currently agriculture preserves under contract with San Bernardino County through the Williamson Act of 1965. Contracts last 10 years and are automatically renewed unless a notice of nonrenewal is issued.

A. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses? ● No Impact.*

According to the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP), the City of Alhambra does not contain any areas of *Prime Farmland*, *Unique Farmland*, or *Farmland of Statewide Importance.*[37] The project site and the adjacent properties are entirely developed and these properties are not zoned for agriculture or timberland uses. The project site is developed in various smaller manufacturing and office uses. Since the implementation of the proposed project would not involve the conversion of prime farmland, unique farmland, or farmland of statewide importance to urban uses. *As a result, no farmland conversion impacts would occur.*

B. *Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract? ● No Impact.*

The project site is currently zoned as Industrial (I). There are no agricultural uses located within the site that would be affected by the project's implementation. According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.[38] *As a result, no impacts on Williamson Act contracts would occur.*

C. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? ● No Impact.*

There are no forest lands or timber lands located within or adjacent to the site. Furthermore, the site's existing zoning designation Industrial (I) does not contemplate forest land or timber land uses. *As a result, no impacts related to the zoning for forest lands would occur.*

[37] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. *Important Farmland in California 2010*. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2010/fmmp2010_08_11.pdf.

[38] California Department of Conservation. *State of California Williamson Act Contract Land.* https://www.conservation.ca.gov/dlrp/wa.

D. *Would the project result in the loss of forest land or conversion of forest land to a non-forest use? ● No Impact.*

No forest lands are located within or adjacent to the project site. The proposed use would be restricted to the site and would not affect any forest land or farmland. As a result, no loss or conversion of forest lands to urban uses would result from the proposed project's implementation. *As a result, no impacts related to the conversion of forest lands to other uses would occur.*

E. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use? ● No Impact.*

The project would not involve the disruption or damage of the existing environment that would result in a loss of farmland to nonagricultural use or conversion of forest land to non-forest use. The site does not contain any agricultural or forestry vegetation. As a result, no farmland conversion impacts would occur with the implementation of the proposed project. *As a result, no impacts related to the conversion of agricultural lands would occur.*

MITIGATION MEASURES

The analysis of agriculture and forestry resources indicated that no significant adverse impacts would result from the proposed project's implementation. *As a result, no mitigation measures are required.*

3.3 AIR QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with or obstruct implementation of the applicable air quality plan?				✖
B. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			✖	
C. Would the project expose sensitive receptors to substantial pollutant concentrations?		✖		
D. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

The South Coast Air Quality Management District (SCAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for criteria pollutants. These criteria pollutants include the following:

- *Ozone (O_3)* is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. O_3 is formed by a photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon monoxide (CO),* a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain, is produced by the incomplete combustion of carbon-containing fuels.
- *Nitrogen oxide (NOx)* is a yellowish-brown gas, which at high levels can cause breathing difficulties. Nitrogen oxides are formed when nitric oxide (a pollutant from burning processes) combines with oxygen.
- *Volatile Organic Chemicals. (VOCs)* are gases that are emitted into the air from products or processes. Some VOCs are harmful by themselves, including some that cause cancer. In addition, some can react with other gases and form other air pollutants after they are in the air.
- *Sulfur dioxide (SO_2)* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels.
- *PM_{10} and $PM_{2.5}$* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk when inhaled.
- *Lead* (Pb) refers to a naturally occurring element found in small amounts in the earth's crust. Lead is a soft, malleable, and corrosion resistant material. Since 1980, Federal and State regulatory standards have helped to minimize or eliminate the amount of lead in consumer products and occupational settings. There are no safe thresholds for lead exposure.

A project would be considered to have a significant effect on air quality if it violated any ambient air quality standard (AAQS), contributed substantially to an existing air quality violation, or exposed sensitive receptors to substantial pollutant concentrations. In addition to the Federal and State AAQS, there are daily emissions thresholds for construction and operational activities. Projects in the South Coast Air Basin (SCAB) generating *construction-related* emissions that exceed any of the following daily emissions thresholds are considered to be significant under CEQA:

- 75 pounds per day of VOC's;
- 100 pounds per day of nitrogen oxides (NOx);
- 550 pounds per day of carbon monoxide (CO);
- 150 pounds per day of sulfur oxides (SOx);
- 150 pounds per day of PM_{10}; or,
- 55 pounds per day of $PM_{2.5}$.

A project would have a significant effect on air quality if any of the following *operational* daily emissions thresholds for criteria pollutants are exceeded:

- 55 pounds of VOCs;
- 55 pounds of nitrogen oxides (NOx);
- 550 pounds of carbon monoxide (CO);
- 150 pounds per day of sulfur oxides (SOx);
- 150 pounds of PM_{10};
- 55 pounds per day of $PM_{2.5}$; or,
- 3 pounds per day of lead.

A. *Would the project conflict with or obstruct implementation of the applicable air quality plan? ● No Impact.*

The City of Alhambra is located within the South Coast Air Basin (SCAB), which includes a 6,600 square-mile area within Orange County and the non-desert portions of Los Angeles County, Riverside County, and San Bernardino County. Air quality in the SCAB is monitored by the South Coast Air Quality Management District (SCAQMD) at various monitoring stations located throughout the area.[39] Measures to improve regional air quality are outlined in the SCAQMD's Air Quality Management Plan (AQMP). The AQMP would help the SCAQMD maintain focus on the air quality impacts of major projects associated with goods movement, land use, energy efficiency, and other key areas of growth.

Key elements of the 2022 AQMP include enhancements to existing programs to meet the 24-hour $PM_{2.5}$ Federal health standard and a proposed plan of action to reduce ground-level ozone. The primary criteria pollutants that remain non-attainment in the local area include $PM_{2.5}$ and Ozone. Specific criteria for determining a project's conformity with the AQMP is defined in Section 12.3 of the SCAQMD's CEQA Air

[39] South Coast Air Quality Management District, *Final 2022 Air Quality Plan*, 2022.

Quality Handbook. The Air Quality Handbook refers to the following criteria as a means to determine a project's conformity with the AQMP:[40]

- *Consistency Criteria 1* refers to a proposed project's potential for resulting in an increase in the frequency or severity of an existing air quality violation or its potential for contributing to the continuation of an existing air quality violation.

- *Consistency Criteria 2* refers to a proposed project's potential for exceeding the assumptions included in the AQMP or other regional growth projections relevant to the AQMP's implementation.[41]

In terms of Criteria 1, the proposed project's long-term (operational) airborne emissions would be below levels that the SCAQMD considers to be a significant adverse impact (refer to the analysis included in the next section where the long-term stationary and mobile emissions for the proposed project are summarized in Table 3-2). The proposed project would also conform to Consistency Criteria 2 since it would not significantly affect any regional population, housing, and employment projections prepared for the City of Alhambra. The project would involve a General Plan Amendment from *Industrial* to *Commercial* to ensure conformity between the proposed project and the General Plan. The GPA would ensure conformity with the project and the City of Alhambra General Plan. As a result, there would be conformity with the General Plan's build-out projections.

According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 Regional Transportation Plan (RTP), the City of Alhambra is projected to add a total of 3,000 jobs (30,500 jobs in 2020 and 33,500 jobs in 2040).[42] Approximately 42 new jobs would be created by the three new restaurants.[43] The City's current unemployment rate is 3.8% as of October, 2022. The implementation of the proposed project would aid the City and the surrounding region in further reducing its unemployment rate. Furthermore, the number of new jobs that would be created are well within SCAG's employment projections for the City of Alhambra and the proposed project would not violate Consistency Criteria 2. *As a result, no impacts related to the obstruction of the AQMP's implementation would result.*

B. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? ● Less than Significant Impact.*

The entire project construction period is expected to last for approximately 12 months to complete (refer to Section 2.4.3) and would include grading, site preparation, construction of the new buildings, and the finishing of the project (pavement areas, painting, and installation of landscaping). The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod V.2022.1.1.21). The assumptions regarding the construction phases and the length of construction followed those identified herein in Section 2.4.3. As shown in Table 3-1, daily construction

[40] South Coast Air Quality Management District. *CEQA Air Quality Handbook*. April 1993.

[41] Ibid.

[42] Southern California Association of Governments. *Growth Forecast. Regional Transportation Plan 2016-2040.* Adopted on April 7, 2016.

[43] City of Aspen. *Employment Generation Rate Updates*. Study dated February 13, 2013.

emissions are not anticipated to exceed the SCAQMD's significance thresholds. The CalEEMod report is shown in Appendix A – Air Quality Report.

Table 3-1 Estimated Daily Construction Emissions in lbs./day

Construction Phase	VOCs	NO_2	CO	SO_2	PM_{10}	$PM_{2.5}$
Total Demolition	1.47	13.9	15.1	0.02	0.57	0.52
Total Site Preparation	1.19	10.9	11.0	0.03	1.09	0.50
Total Grading	1.51	14.1	14.5	0.02	3.40	1.93
Total Building Construction	1.24	10.6	11.9	0.02	0.40	0.37
Total Paving	1.37	6.13	8.21	0.01	0.27	0.25
Total Architectural Coatings	9.74	0.86	1.13	--	0.02	0.02
Maximum Daily Emissions	**9.74**	**14.1**	**15.8**	**0.03**	**3.54**	**1.96**
Daily Thresholds	**75**	**100**	**550**	**150**	**150**	**55**

Source: CalEEMod V.2022.1.1.21 (the worksheet are included herein in Appendix A)

As indicated previously, the project area is located in a non-attainment area for ozone and particulates, the project would be required to adhere to all SCAQMD regulations related to fugitive dust generation and other construction-related emissions. According to SCAQMD Regulation 403, all unpaved demolition and construction areas shall be regularly watered up to three times per day during excavation, grading and construction as required (depending on temperature, soil moisture, wind, etc.). Rule 403 also requires that temporary dust covers be used on any piles of excavated or imported earth to reduce wind-blown dust. Watering could reduce fugitive dust by as much as 55%. In addition, all clearing, earthmoving, or excavation activities must be discontinued during periods of high winds (i.e. greater than 15 mph), so as to prevent excessive amounts of fugitive dust. Finally, the contractors must comply with other SCAQMD regulations governing equipment idling and emissions controls. The aforementioned SCAQMD regulations are standard conditions required for every construction project undertaken in the City. The long-term air quality impacts associated with the proposed project include mobile emissions from vehicular traffic; on-site stationary emissions related to the operation of machinery; and off-site stationary emissions associated with the off-site generation of electricity (electrical power). The analysis of long-term operational impacts summarized in Table 3-2, also used the CalEEMod computer model developed for the SCAQMD. The analysis summarized in Table 3-2 indicates that the operational (long-term) emissions would be below the SCAQMD's daily emissions thresholds for the criteria pollutants.

Table 3-2 Estimated Operational Emissions in lbs./day

	Emission Source	VOCs	NO_2	CO	SO_2	PM_{10}	$PM_{2.5}$
Existing Use - Warehouse	Area-wide (lbs./day)	0.31	--	0.43	--	--	--
	Energy (lbs./day)	--	0.05	0.04	--	--	--
	Mobile (lbs./day)	0.06	0.05	0.55	--	0.11	0.03
	Total (lbs./day)	**0.38**	**0.11**	**1.03**	**--**	**0.11**	**0.03**
Future Use – Fast Food	Area-wide (lbs./day)	0.24	--	0.31	--	--	--
	Energy (lbs./day)	0.01	0.22	0.18	--	0.02	0.02
	Mobile (lbs./day)	5.81	4.40	50.9	0.12	11.2	2.9
	Total (lbs./day)	**6.06**	**5.04**	**51.4**	**0.12**	**11.2**	**2.92**
Net Increase	**Total (lbs./day)**	**5.68**	**4.93**	**50.37**	**.12**	**11.09**	**2.89**
Daily Thresholds		**55**	**55**	**550**	**150**	**150**	**55**

Source: CalEEMod V.2022.1.1.21. (the worksheet are included herein in Appendix A)

As indicated in Table 3-2, the projected long-term emissions are below thresholds considered to be a significant impact. *As a result, the impacts would be less than significant.*

C. *Would the project expose sensitive receptors to substantial pollutant concentrations? ● Less than Significant Impact with Mitigation.*

Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality and typically include homes, schools, playgrounds, hospitals, convalescent homes, and other facilities where children or the elderly may congregate (refer to Exhibit 3-1).[44] These population groups are generally more sensitive to poor air quality. The nearest sensitive receptors are located to the east of Raymond Avenue approximately 200 feet from the project site's eastern side. The location and extent of the aforementioned sensitive receptors is shown in Exhibit 3-1.

The SCAQMD requires that CEQA air quality analyses indicate whether a proposed project would result in an exceedance of *localized emissions thresholds* or LSTs. LSTs only apply to short-term (construction) and long-term (operational) emissions at a fixed location and do not include off-site or area-wide emissions. The approach used in the analysis of the proposed project utilized a number of screening tables that identified maximum allowable emissions (in pounds per day) at a specified distance to a receptor. The pollutants that are the focus of the LST analysis include the conversion of NO_x to NO_2; carbon monoxide (CO) emissions from construction and operations; PM_{10} emissions from construction and operations; and $PM_{2.5}$ emissions from construction and operations. As indicated in Table 3-2, the proposed project's operational emissions are not anticipated to exceed thresholds of significance outlined by the SCAQMD.

The allowable emissions threshold shown in Table 3-3 is from the Mass Rate LST Look-up Tables provided by the SCAQMD. For purposes of the LST analysis, the receptor distance used was 50 meters. A separate operational CalEEMod was run for the LSA analysis that reduces the operational trip distances to 1,000 feet or 0.19 miles. This was done to capture the local emissions. As indicated in the table, the proposed project would not exceed any LSTs based on the information included in the Mass Rate LST Look-up Tables. The CalEEMod report for the reduced trip distance is also shown in Appendix A – Air Quality Report.

[44] South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix 9*. 2004 (as amended).

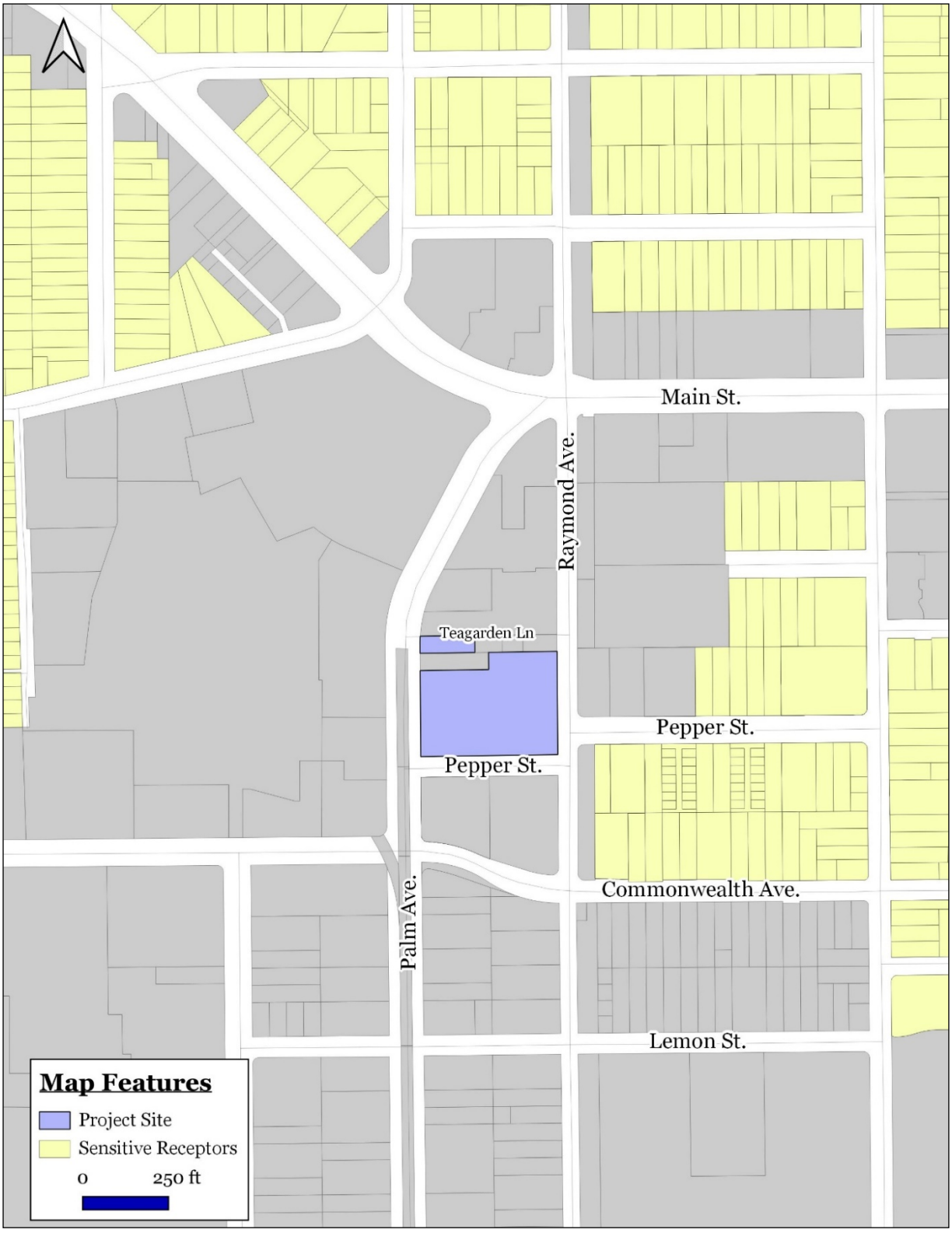

EXHIBIT 3-1 NEAREST SENSITIVE RECEPTORS MAP

Source: Quantum GIS

Table 3-3 Local Significance Thresholds Exceedance SRA 8 (for 2-acre sites)

Emissions	Project Emissions (lbs./day)	Type	Allowable Emissions Threshold (lbs./day) and a Specified Distance from Receptor (in meters)				
			25	50	100	200	500
NO_2	1.72	Operational	98	**95**	104	124	175
NO_2	14.1	Construction	98	**95**	104	124	175
CO	13.7	Operational	812	**1,125**	1,594	2,785	7,957
CO	15.8	Construction	812	**1,125**	1,594	2,785	7,957
PM_{10}	0.61	Operational	2	**5**	9	16	39
PM_{10}	7.86	Construction	6	**9**	34	66	160
PM2.5	0.17	Operational	1	**2**	3	5	20
PM2.5	4.05	Construction	4	**5**	9	21	82

Source: CalEEMod V. 2022.1.1.21

To further reduce construction PM_{10} and $PM_{2.5}$ emissions, the following mitigation is required:

- The surrounding streets (Palm Avenue, Raymond Avenue, Pepper Street, and Palm Avenue) shall be swept throughout the day during the construction period to ensure that all dust is removed from the street.

- All unpaved demolition and construction areas shall be watered up to three times per day (or as deemed necessary by the City) during excavation, grading and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD Rule 403. Watering could reduce fugitive dust by as much as 55%.

- The project contractors must install a green screen around the project site.

- The Applicant must place signs with the local project manager's contact information for the neighborhood to contact regarding concerns.

In conclusion, the proposed project is not anticipated to impact sensitive receptors and *as a result, the impacts would be less than significant with mitigation.*

D. *Would the project create objectionable odors affecting a substantial number of people? ● Less than Significant Impact.*

The SCAQMD has identified land uses that are typically associated with odor complaints. These uses include activities involving livestock, rendering facilities, food processing plants, chemical plants, composting activities, refineries, landfills, and businesses involved in fiberglass molding.[45] The proposed project would involve the construction and operation of three fast food restaurants. The project would be subject to the following regulations that would be related to restaurant operations, including odors:

- *Rule 401 (Visible Emissions).* prohibits discharge into the atmosphere from any single source of emission for any contaminant for a period or periods aggregating more than three minutes in any

[45] South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix 9*. 2004 (as amended).

one hour that is as dark or darker in shade than that designated as No. 1 on the Ringelmann Chart, as published by the U.S. Bureau of Mines.

- *Rule 402 (Nuisance)* prohibits discharges of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. Rule 402 includes regulation of odors that may become a public nuisance.

- *Rule 1113 (Control of Emissions from Restaurant Operations)* sets the requirements to equip and operate catalytic oxidizer control devices on chain-driven charbroilers. If chain-driven charbroilers are installed and operated by any of the future restaurants, this rule would apply.

In addition, construction truck drivers must adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel-powered vehicles to less than five minutes, which helps minimize exhaust-related odors. Furthermore, the project's contractors must adhere to SCAQMD rules and regulations that govern fugitive dust during site preparation which would further reduce the generation of any nuisance-related odors. *As a result, the impacts of the project related to the generation of odors. The impacts would be less than significant.*

MITIGATION MEASURES

To further reduce construction PM_{10} and $PM_{2.5}$ emissions, the following mitigation is required:

Air Quality Mitigation Measure No. 1. The surrounding streets (Palm Avenue, Raymond Avenue, Pepper Street, and Palm Avenue) shall be swept throughout the day during the construction period to ensure that all dust is removed from the street.

Air Quality Mitigation Measure No. 2. All unpaved demolition and construction areas shall be watered up to three times per day (or as deemed necessary by the City) during excavation, grading and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD Rule 403. Watering could reduce fugitive dust by as much as 55%.

Air Quality Mitigation Measure No. 3. The project contractors must install a green screen around the project site.

Air Quality Mitigation Measure No. 4. The Applicant must place signs with the local project manager's contact information for the neighborhood to contact regarding concerns.

3.4 BIOLOGICAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✖
B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✖
C. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✖
D. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?				✖
E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			✖	
F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on biological resources if it results in any of the following:

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

- The proposed project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.

- The proposed project would have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

- The proposed project would 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.

- The proposed project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

- The proposed project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Sensitive biological resources include a variety of plant and animal species that are specialized and endemic to a particular habitat type. Due to loss of habitat, some of these species have been designated by either, or both, the federal and state government resource agencies as threatened or endangered. Species listed as threatened include those whose numbers have dropped to such low levels and/or whose populations are so isolated that the continuation of the species could be jeopardized. Endangered species are those with such limited numbers or subject to such extreme circumstances that they are considered in imminent danger of extinction. Other government agencies and resource organizations also identify sensitive species, those that are naturally rare and that have been locally depleted and put at risk by human activities. While not in imminent danger of jeopardy or extinction, sensitive species are considered vulnerable and can become candidates for future listing as threatened or endangered.

A. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ● No Impact.*

A review of the California Department of Fish and Wildlife California Natural Biodiversity Database (CNDDB) Bios Viewer for the Los Angeles Quadrangle (the City of Alhambra is located within the aforementioned quadrangle) indicated that out of a total of 33 native plant and animal species, five are either threatened or endangered.[46] These species are described in detail below and on the following page and include:

- The *Coastal California Gnatcatcher* is not likely to be found on-site due to the lack of habitat suitable for the California gnatcatcher. The absence of coastal sage scrub, the California gnatcatcher's primary habitat, further diminishes the likelihood of encountering such birds.

- The *least Bell's vireo* lives in a riparian habitat, with a majority of the species living in San Diego County.[47] As a result, it is not likely that any least Bell's vireos would be encountered during on-site construction activities.

[46] California Department of Fish and Wildlife. Bios Viewer. https://map.dfg.ca.gov/bios/?tool=cnddbQuick

[47] California Partners in Flight Riparian Bird Conservation Plan. *Least Bell's Vireo*. *http://www.prbo.org/calpif/htmldocs/species/riparian/least_bell_vireo.htm*

- The *willow flycatcher's* habitat consists of marsh, brushy fields, and willow thickets. These birds are often found near streams and rivers and are not likely to be found on-site due to the lack of marsh and natural hydrologic features.

- The *California red-legged frog* would not be found on or near the project site due to its specific habit requirements. According to the National Wildlife Federation, California red-legged frogs can be found near still or slow-moving ponds, pools, or streams (wetland areas). The chances of encountering this species within the project site are limited since there are no natural wetlands or habitats present in the area.

- The *bank swallow* populations located in Southern California are extinct.

The proposed project would not have an impact on the aforementioned species because there is no suitable riparian or native habitat located within, or in the vicinity of, the project site. In addition, according to the California Department of Fish and Wildlife, the site falls under the category of "urban development."[48] *As a result, no impacts on any candidate, sensitive, or special status species would result.*

B. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ● No Impact.*

Site visits and surveys did not identify any streams or wetlands on the property. A review of the U.S. Fish and Wildlife Service National Wetlands Inventory, Wetlands Mapper indicated that there are no wetlands or riparian habitat present on-site or in the adjacent properties. As indicated previously, the project site is developed. In addition, there are no designated "blue-line streams" located within the project site. *As a result, no impacts on riparian areas would occur.*

C. *Would the project have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? ● No Impact.*

As indicated in the previous subsection, the project area and adjacent developed properties do not contain any natural wetland and/or riparian habitat.[49] The project area is located in the midst of an urban setting. As a result, the proposed project would not impact any protected wetland area or designated blue-line stream and no impacts would occur. *As a result, no impacts on Federally protected wetlands would occur.*

D. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites? ● No Impact.*

The project site was previously disturbed to accommodate the development that would be demolished to accommodate the proposed project. Because of this existing development, no native vegetation or natural

[48] California Department of Fish and Wildlife. *California Vegetation Mapping Projects.* file:///C:/Documents%20and%20Settings/William%20Blodgett/My%20Documents/Downloads/NVCSCurrentAndInProcessandInitialSurveyAug_2014_CAStandardCompliant.pdf

[49] U.S. Fish and Wildlife Service. *Wetlands Mapper*. http://www.fws.gov/Wetlands/data/Mapper.html

open space areas remain. Furthermore, the site and the adjacent properties do not contain any natural habitat or hydrological features. Constant disturbance (noise and vibration) from vehicular traffic travelling along the adjacent roadways also limit the site's utility as a migration corridor. Since the site is located along highly travelled roadways and lacks suitable habitat, the site's utility as a migration corridor is restricted. *As a result, no impacts on native resident or migratory fish or wildlife species would occur.*

E. *Would the project conflict with any local policies or ordinances, protecting biological resources, such as a tree preservation policy or ordinance? ●Less than Significant Impact.*

Two street trees are located in the public right-of-way and proposed for removal along the Palm Avenue right-of-way. These street trees are required to be replaced. In addition, there are two trees located within the project site (which is private property) that do qualify as protected trees under the tree preservation ordinance and require replacement in accordance with the Tree Preservation Ordinance standards. Tree permits processed with other entitlements are approved by Planning Commission (not by the Director of Public Works). The removal of the aforementioned trees are permitted under the City's tree ordinance subject to the approval and adherence of the standard conditions described in a permit. In addition, the project would include the installation of 23,805 square feet of landscaping. Adherence to the permit conditions described in the permit would reduce impacts to levels that are less than significant.

F. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan? ● No Impact.*

The proposed project would not impact an adopted or approved local, regional, or State habitat conservation plan because the proposed project is located in the midst of an urban area. The closest Significant Ecological Area (SEA) to the project site is the Whittier Narrows Dam County Recreation Area Significant Ecological Area (SEA #42), located approximately 5 miles southeast from the project site.[50] The construction and operation of the proposed project would not affect the Whittier Narrows Dam County Recreation Area SEA. *As a result, no impacts on an adopted conservation plan or similar plan would occur.*

MITIGATION MEASURES

The analysis indicated that the implementation of the proposed project would not result in any significant adverse impacts on biological resources. As a result, no mitigation measures are required.

[50] Google Earth. Website accessed April 22, 2016.

3.5 CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 ?				✖
B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			✖	
C. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on cultural resources if it results in any of the following:

- The proposed project would cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.
- The proposed project would cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
- The proposed project would disturb any human remains, including those interred outside of formal cemeteries.

JM Research & Consulting (JMRC) completed a focused Cultural Resources Study (CR) for the proposed Palm and Pepper Project (UPA-2022-00149) located in the City of Alhambra, Los Angeles County, California. The project proposes to demolish existing site improvements and redevelop the approximately 2.7-acre property for multi-tenant commercial use with the construction of three drive-thru restaurant buildings and related site improvements.

This CR Study is required by the City of Alhambra as part of the environmental review process in compliance with CEQA (PRC §21000, et seq.) to identify potential historical resources and analyze potential impacts of the proposed project. This memorandum report, included as Appendix F – Cultural Resources to this Draft IS/MND, was used to complete the environmental review process with regard to Cultural Resources.

The City of Alhambra is currently in the process of creating a Historic Preservation Program. Two phases of the three-phase approach have been completed. A Historic Context Statement was developed by Historic Resources Group (HRG) and adopted in April 2022. Headed by HRG, a Citywide Historic Resources Survey was then conducted in 2022-2023 by a joint survey team comprised of HRG and Architectural Resources Group (ARG) and completed in September 2023. All personnel on the survey team meet the Secretary of the Interior's (SOI) Professional Qualifications Standards in Architectural History. The development of a historic preservation ordinance is planned as the last and final phase in the development of the local program.

As the citywide survey included the Project Area, a modified level of effort to appropriately investigate Cultural Resources was developed with City of Alhambra planning staff, and the CR study was completed in January 2024. See Appendix F – Cultural Resources. The scope of work included a peer review of HRG 2023 Historic Context Statement, and a California Historical Resources Information System (CHRIS) records search.

A. *Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 of the State CEQA Guidelines? ● No Impact.*

Historical resources are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a General Plan or historic preservation ordinance. In addition, a site or structure may be historically significant according to State or Federal criteria even if the locality does not recognize such significance. To be considered eligible for the National Register, a property's significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements. Specific criteria outlined in CEQA Section 15064.5 used to evaluate the significance of a historical or cultural resource includes the following:

- A resource(s) listed or determined eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources (CRHR; 14 CCR Section 15064.5[a][1]);
- A resource(s) either listed in the National Register of Historic Places (NRHP) or in a "local register of historical resources" or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, unless "the preponderance of evidence demonstrates that it is not historically or culturally significant" (14 CCR Section 15064.5[a][2]);
- A resource determined by the Lead Agency to meet the criteria for listing on the CRHR (14 CCR Section 15064.5[a][3]); and,
- A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4850 et seq.).

The following requirement is mandated by the California Code of Regulations (CCR) Section 15064.5(b)(4):

> "A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures."

A historical aerial photograph search was conducted on the subject property. The aerial photographs obtained are from 1923, 1928, 1938, 1948, 1952, 1964, 1970, 1977, 1981, 1989, 1994, 2005, 2009, 2012 and 2016. The aerial photographs were reviewed to ascertain historic land uses of the project site. In the photos from 1928 to 1960s, the subject site consisted of a mix of commercial uses and residential dwellings. By the 1970s, all the residential dwellings had been razed and had been replaced with warehouse/ industrial park facilities. In the photos from 1989 to 2016, no significant changes are noted at the subject site. A historical

topographic map search was also conducted of the project site and the surrounding area from 1894, 1896, 1900, 1924, 1926, 1953, 1966, 1972, 1981, 1994 and 2012.[51]

A number of previous cultural resources investigations have been completed in Alhambra, including a historic resources survey of two neighborhoods conducted in the 1980s. The City and various individuals have also identified properties and neighborhoods as potentially having individual and/or collective historical significance. In 2005, the City installed signs throughout Alhambra identifying historic residential tracts, including the Alhambra, Ramona Park, Midwick, Emery Park, Mayfair, Story, Marguerita–Souders, and Bean tracts. A local non-profit, Alhambra Preservation Group, established in 2003 to raise awareness about the value of historic preservation in Alhambra, has also compiled a list of architecturally significant properties, which lists nearly 600 homes, businesses, schools, churches, and other landmarks. Also, Robert Winter and David Gebhard identified other individual properties with potential cultural and/or architectural significance in An Architectural Guidebook to Los Angeles.[52] These include:

- 1000 South 2nd Street/1001 South 1st Street;
- The Hat, 1 West Valley Boulevard;
- Mark Keppel High School, 501 East Hellman Avenue;
- Church of St. Simon and Jude, 1428 Marengo Avenue;
- Los Angeles County Public Works, 900 South Fremont Avenue; and,
- St. Steven's Serbian Orthodox Cathedral, 1621 West Garvey Avenue.

The California OHP Historic Property Data File identified three potential historic districts in Alhambra:

- A group of five residences on Champion Place, between West Las Tunas Drive and Orienta Drive;
- The 200 block of East Beacon Avenue; and,
- A group of approximately 225 residences generally bound by South 2nd Street to the east, West Norwood Place to the north, South 9th Street to the west, and I-10 to the south.

Although no properties in Alhambra are currently listed in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR), a number of properties in the City were found to potentially meet applicable eligibility criteria for one or both designations. As identified in the OHP's Historic Property Data File (California OHP 2012), these include the following:

- Reid House, 816 East Alhambra Road (at the Granada Southwest corner);
- Convent of Carmel of St Therese, 215 East Alhambra Road;
- Southern California Edison Granada Substation, 904 East Alhambra Road;
- First United Methodist Church, 9 Almansor Street;
- Holy Trinity Church Guild Hall, 9 East Grand Avenue;

[51] East West Bank. *Phase I Environmental Site Assessment Warehouse Properties @ 131-137 South Raymond Avenue, 124-126 and 132-146 South Palm Avenue and 2009 & 2055 Pepper Avenue, Alhambra, Los Angeles County, CA 91801* May 6, 2019 (The study was referred to so as to document the site's history.)

[52] Alhambra, City of. *General Plan Environmental Impact Report. SCH 2017051085.* January 2019.

- Pyrenees Castle, 1700 Grandview Drive;
- Garfield Inn, 341 North Garfield Avenue, 300 North Granada Avenue;
- 111 North Stoneman Avenue
- Alhambra Benevolent and Protective Order of Elks Lodge/Masonic Temple, 601 East Main Street;
- F.Q. Story Residence, 502 North Story Place;
- Los Angeles Gas & Electric Company, 17 South 1st Street;
- Marshall Residence, 1601 South 4th Street;
- Fire Station, 1215 South 6th Street;
- C.F. Braun Company, 1000 South Fremont Avenue;
- Ramona Convent, 1700 South Marengo Avenue;
- Boy Scout Hut, 1919 South Palm Avenue;
- Fire Station #74, 2505 West Norwood Street;
- Graffen Residence, 1306 West Pine Street; and,
- Alhambra Health Center, 612 West Shorb Street.

A Cultural Resources Record Search was conducted by a qualified archaeologist with Duke CRM (Appendix F – Cultural Resources, Attachment B of the aforementioned cultural resources study). The record search was conducted at the South-Central Coastal Information Center (SCCIC), which is located at the California State University, Fullerton and is part of the California Historical Resources Information System. The records search included a review of all recorded cultural resources within a ½-mile radius of the Project, as well as a review of known cultural resource survey and excavation reports. In addition, a review of online historical aerial photographs and historical USGS quad maps was completed.

The records search did not identify any cultural resources or cultural resource reports within or adjacent to the Project boundaries. Five (5) reports and six (6) historic buildings ineligible for listing in the National Register of Historic Places were identified within ½-mile of the Project, the closest of which is a commercial building (1967) located approximately 1,240 feet northeast of the Project Area. Aerial photography and quad maps confirmed that the Project Area was largely developed with residential and commercial uses by 1948 and improved to its current state by 1988.[53] The project site is occupied by the following improvements:

- A 7,000 square foot building is located at 131 South Raymond Avenue (formerly occupied by Stefant Corporation, garment factory); A surface parking lot is located to the north of the existing building. This building was constructed in 1975.
- A 10,000 square foot building is located at 135 South Raymond Avenue (formerly occupied by House of Concepts / Lozano Marble & Granite). This building was constructed in 1975.
- A 10,000 square foot building is located at 137 South Raymond Avenue. This building was constructed in 1975.

[53] JM Research and Consulting. *Cultural Resources Study for the Proposed Palm and Pepper Project (UPA-2022-00149)*. January 30, 2024.

- A 2,400 square foot building is located at 124 South Palm Avenue (formerly occupied by Sleep Shop Furniture, mattress sales); A surface parking lot is located to the west of this existing building. This building was constructed in 1965.
- A 7,000 square foot building is located at 132-136 South Palm Avenue (formerly occupied by Vehicle storage (VW); An outdoor storage and parking area is located to the east of this existing building. This building was constructed in 1973.
- A 7,000 square foot office building is located at 146 South Palm Avenue. This building was constructed in 1926.
- A 10,000 square foot building is located at 2009-2055 Pepper Avenue. This building was constructed in 1975.[54] These existing buildings on site consist of steel frame structures. They have metal, concrete block and brick exterior walls with the interior walls consisting of sheetrock with associated drywall mud/joint compounds and wall surface texturing. The floors consist of concrete or a concrete base that is covered with floor tiles. The ceilings in the buildings are covered with fiberglass and cellulose ceiling tiles. All of the building have undergone extensive modifications since they were originally constructed. Some of the buildings exhibit significant signs of deterioration due to their vacant state. The existing lighting onsite consists of security lighting and street lights located along the public roadways.

JMRC concurs with the findings of ineligibility for the properties within the Project Area and the appropriately assigned CHR Status Code of *6Z – Found ineligible for NR, CR, or Local designation through survey evaluation*. As the properties were not identified as potentially eligible resources, no DPR forms were prepared by the survey team and are not required. Due to the lack of significant historical resources in the Project Area and in the surrounding area, and the prior ground disturbance from the construction of the existing buildings on-site, the Project has a low sensitivity for intact archaeological resources.

The proposed Palm and Pepper Project (UPA-2022-00149) includes the demolition of all existing site improvements and redevelopment of the site for commercial use. As the historic-age properties within the Project Area have been found ineligible for designation, they are not considered historical resources under CEQA. The low sensitivity for subsurface cultural material indicates a limited potential for impacts to archaeological resources. The results of this focused study indicate that no further historic investigation is required, and no mitigation measures are recommended.

The site does not contain any historic resources. *As a result, no impacts on a historical resource would result.*

B. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines? ● Less than Significant Impact.*

A Cultural Resources Record Search was conducted by a qualified archaeologist with Duke CRM (Appendix F – Cultural Resources, Attachment B). The record search was conducted at the South-Central Coastal Information Center (SCCIC), which is located at the California State University, Fullerton and is part of the California Historical Resources Information System. The records search included a review of all recorded cultural resources within a ½-mile radius of the Project, as well as a review of known cultural resource survey

[54] East West Bank. *Phase I Environmental Site Assessment Warehouse Properties @ 131-137 South Raymond Avenue, 124-126 and 132-146 South Palm Avenue and 2009 & 2055 Pepper Avenue, Alhambra, Los Angeles County, CA 91801* May 6, 2019

and excavation reports. In addition, a review of online historical aerial photographs and historical USGS quad maps was completed.

The records search did not identify any cultural resources or cultural resource reports within or adjacent to the Project boundaries. Five (5) reports and six (6) historic buildings ineligible for listing in the National Register of Historic Places were identified within ½-mile of the Project, the closest of which is a commercial building (1967) located approximately 1,240 feet northeast of the Project Area. Aerial photography and quad maps confirmed that the Project Area was largely developed with residential and commercial uses by 1948 and improved to its current state by 1988.[55]

JMRC concurs with the findings of ineligibility for the properties within the Project Area and the appropriately assigned CHR Status Code of *6Z – Found ineligible for NR, CR, or Local designation through survey evaluation*. As the properties were not identified as potentially eligible resources, no DPR forms were prepared by the survey team and are not required.

Due to the lack of significant historical resources in the Project Area and in the surrounding area, and the prior ground disturbance from the construction of the existing buildings on-site, the Project has a low sensitivity for intact archaeological resources.

In the unlikely event that human remains are uncovered by construction crews and/or the Native American Monitors, all excavation/grading activities shall be halted and the Alhambra Police Department would be contacted (the Department would then contact the County Coroner). Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA would apply in terms of the identification of significant archaeological resources and their salvage. *Since the project has a low sensitivity for intact archaeological resources, there would be less than significant impact.*

C. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*
● *Less than Significant Impact.*

Section 5097.98 of the Public Resources Code states:

> "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with (b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American

[55] JM Research and Consulting. *Cultural Resources Study for the Proposed Palm and Pepper Project (UPA-2022-00149)*. January 30, 2024.

> or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission."

There are no cemeteries located in the immediate area of the project site. The nearest cemetery to the project site is the San Gabriel Cemetery, located 2.5 miles northeast of the project site at 601 West Roses Road in the City of San Gabriel.[56] The proposed project is not likely to disturb any on-site burials due to the level of disturbance that has occurred in order to accommodate the former development. In addition, compliance with the existing state requirement (Section 5097.98 of the PRC plus include section 7050.5 of the California Health and Safety Code), the impact would be less than significant in the event human remains were discovered during excavation and grading. Notwithstanding, in the event of an accidental discovery, Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA would apply in terms of the identification of significant archaeological resources and their salvage. *As a result, the impacts would be less than significant.*

MITIGATION MEASURES

The analysis indicated that the implementation of the proposed project would not result in any significant adverse impacts on cultural resources. As a result, no mitigation measures are required.

[56] Google Earth. Website accessed May 6, 2015.

3.6 ENERGY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?			✖	
B. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on energy resources if it results in any of the following:

- The proposed project would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during the proposed project's construction or operation.

- The proposed project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Energy and natural gas consumption were estimated using default energy intensities by building type in CalEEMod. In addition, it was assumed the new buildings would be constructed pursuant to the 2022 CALGreen standards, which was considered in the CalEEMod inputs.

A. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? ● Less than Significant Impact.*

The anticipated construction schedule assumes that the proposed project would be constructed over a 12-month period. Construction activities would require energy for the manufacture and transportation of building materials, the demolition and grading activities, and the construction activities. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. Fuel use associated with construction vehicle trips generated by the proposed project was also estimated; trips include construction worker trips, haul truck trips for material transport, and vendor trips for construction material deliveries. Fuel use from these vehicles traveling to the project site was based on the projected number of trips the proposed project would generate during construction, the average trip distances by trip type, and fuel efficiencies estimated in the CalEEMod analysis emission model. The CalEEMod 2022's energy demand data is roughly estimated to be consistent with Title 24 2019 standards. Energy consumed during construction would be temporary in nature and would not present a significant demand on energy resources.

Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 3 emissions standards and shall ensure that all construction equipment is tuned and maintained in accordance with the

manufacturer's specifications. California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Additionally, construction building materials could include recycled materials and products originating from nearby sources in order to reduce costs of transportation.

Energy consumed by the proposed project once it is operational would be associated with natural gas use, electricity consumption, and fuel used for vehicle trips associated with the project. Energy and natural gas consumption was estimated using default energy intensities by building type in CalEEMod. In addition, the proposed buildings would be constructed pursuant to 2022 CALGreen standards, which was considered in the CalEEMod inputs. In addition, the Proposed Project would result in energy usage associated with gasoline to fuel project-related trips. Based on the CalEEMod analysis, the annual estimated existing use for the electrical consumption and natural gas consumption is 46,804 KWh per year and 192,761 kBTU per year, respectively. The annual potential electricity demand associated with the proposed project is 341,171 kWh per year. The estimated potential natural gas demand associated with the proposed project is 812,023 kBTU per year. The net increase in electrical consumption is approximately 294,367 kWh annually. The net change in natural gas consumption is 101,606 kBTU per year. These are shown below in Table 3-4.

Table 3-4 Proposed Project's Energy Consumption

	Energy Type	Annual Energy Consumption
Existing Use – Warehouse	Electrical Consumption	46,804 kWh
	Natural Gas Consumption	192,761 kBTU
Future Use – Fast Food	Electrical Consumption	341,171 kWh
	Natural Gas Consumption	812,023 kBTU
Net Increase	Electrical Consumption	294,367 kWh
	Natural Gas Consumption	101,606 kBTU

Source: California Emissions Estimator Model (CalEEMod v. 2022.1.1.21)

It should be noted that the project would comply with all applicable Federal and State fuel efficiency standards. Furthermore, per the 2019 Title 24 Building Energy Efficiency Standards and the 2022 California Green Buildings Standards Code (CalGreen). The design of the three new buildings would maximize sustainable approaches, such as the implementation of Zero Net Carbon (ZNC), the potential future use of solar energy and/or the use of battery storage to meet peak demands.[57] All project elements would be designed to meet City of Alhambra program requirements. Interior lighting would be LED and would be compatible with ceiling types and room function. In addition, a complete lighting control system would be provided to meet Title 24 requirements, including automatic cut-off, dimming, occupancy sensing, daylighting, time clock, and demand response controls. Given the above, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. *As a result, the impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources, would be less than significant.*

[57] A ZNC building is defined as a highly energy efficient building that produces on-site, or procures, enough carbon-free renewable energy to meet building operations energy consumption annually.

B. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ● Less Than Significant Impact.*

The proposed project would comply with the California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new buildings reduce water consumption, employ building commissioning (verifying and documenting design and engineering practices to ensure that critical building components are operating efficiently) so as to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The proposed project would conform to all pertinent energy conservation requirements. As indicated above, energy usage on the project site during construction would be temporary in nature. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the State's available energy sources and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the project's total impact to regional energy supplies would be minor, the proposed project would not conflict with California's energy conservation plans as described in the California Energy Commission 2019 Integrated Energy Policy Report. In addition, as discussed above, the proposed project would be constructed to CALGreen standards, which would help to reduce energy and natural gas consumption.

Interior lighting would be LED and would illuminate the interior building space at a brightness consistent with recommendations from the Illuminating Engineering Society (IES). Fixtures would be selected to be compatible with ceiling types and room function. In addition, a complete lighting control system would be provided to meet Title 24 requirements, including on/off, dimming, occupancy sensing, daylighting, time clock, and demand response controls. The proposed project would implement the energy efficiency measures described above and comply with Title 24 energy standards as applicable. *As a result, the impacts related to the obstruction of an energy conservation plan, would be less than significant.*

MITIGATION MEASURES

The proposed project would conform to all pertinent energy conservation requirements. The analysis determined that no additional mitigation was required.

3.7 GEOLOGY & SOILS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving.			✖	
i). Would the project, directly or indirectly, cause rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; Refer to Division of Mines and Geology Special Publication 42.			✖	
ii). Would the project, directly or indirectly, cause Strong seismic ground shaking?			✖	
iii). Would the project, directly or indirectly, cause seismic-related ground failure, including liquefaction;			✖	
iv). Would the project, directly or indirectly, cause landslides?			✖	
B. Would the project result in substantial soil erosion or the loss of topsoil?			✖	
C. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✖	
D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			✖	
E. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?				✖
F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✖		

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on geology and soils if it results in any of the following:

- The proposed project would, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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); strong seismic ground shaking; seismic-related ground failure, including liquefaction; and, landslides?

- The proposed project would result in substantial soil erosion or the loss of topsoil.

- The proposed project would 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.

- The proposed project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

- The proposed project would 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.

- The proposed project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

A. *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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), ground–shaking, liquefaction, or landslides? ● Less than Significant Impact.*

The City of Alhambra is located in a seismically active region (refer to Exhibit 3-2). Many major and minor local faults traverse the entire Southern California region, posing a threat to millions of residents including those who reside in the City. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake.[58] There are no known or active faults that traverse the project site (refer to Exhibit 3-2). *As a result, the impacts from fault rupture would be less than significant.*

i). *Would the project, directly or indirectly, cause rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; Refer to Division of Mines and Geology Special Publication 42? ● Less than Significant Impact.*

The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults.[59] A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. The City of Alhambra is not on the list.[60] Even though the City is not on the list, there are a number of known faults in proximity to the City. The nearest known fault is the Raymond Fault located approximately two miles north of the project site. The potential impacts in regard to ground shaking and fault rupture are less than significant since the risk is no greater in and around the project site than for the rest of the area. In

[58] California Department of Conservation. *What is the Alquist-Priolo Act* http://www.conservation.ca.gov /cgs/rghm/ap/ Pages/main.aspx

[59] California Department of Conservation. *What is the Alquist-Priolo Act* http://www.conservation.ca.gov /cgs/rghm/ap/ Pages/main.aspx.

[60] California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010.* http://www.conservation.ca.gov/cgs/rghm/ap/Pages/affected.aspx

addition, the project must be in compliance with Title 24 of the California Code of Regulations, which identifies building standards for seismic-related construction requirements that have been promulgated by the State of California. *As a result, the fault rupture impacts would be less than significant.*

ii). *Would the project, directly or indirectly, cause strong seismic ground shaking? ● Less than Significant Impact.*

The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults.[61] A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. The City of Alhambra is not on the list.[62] Even though the City is not on the list, there are a number of known faults in proximity to the City. The nearest known fault is the Raymond Fault located approximately two miles north of the project site. The potential impacts in regard to ground shaking and fault rupture are less than significant since the risk is no greater in and around the project site than for the rest of the area. *As a result, the impacts related to seismic ground shaking would be less than significant.*

iii). *Would the project, directly or indirectly, cause seismic-related ground failure, including liquefaction? ● Less than Significant Impact.*

In addition, the project site is not located in an area that is subject to liquefaction (refer to Exhibit 3-2). According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. Essentially, liquefaction is the process by which the ground soil loses strength due to an increase in water pressure following seismic activity. *As a result, the potential impacts associated with seismic-related ground failure would be less than significant.*

iv). *Would the project, directly or indirectly, cause landslides? ● Less than Significant Impact.*

The project site and the surrounding area is relatively level and is at no risk for landslides. The project site is not subject to the risk of landslides (refer to Exhibit 3-2) because there are no hills or mountains located in the vicinity of the project site. Lateral spreading is not anticipated to occur because previous construction activities have compressed the native soils that underlie the project site, thus altering their original characteristics. *As a result, the impacts related to potential landslides would be less than significant.*

[61] California Department of Conservation. *What is the Alquist-Priolo Act* http://www.conservation.ca.gov /cgs/rghm/ap/ Pages/main.aspx.

[62] California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010.* http://www.conservation.ca.gov/cgs/rghm/ap/Pages/affected.aspx

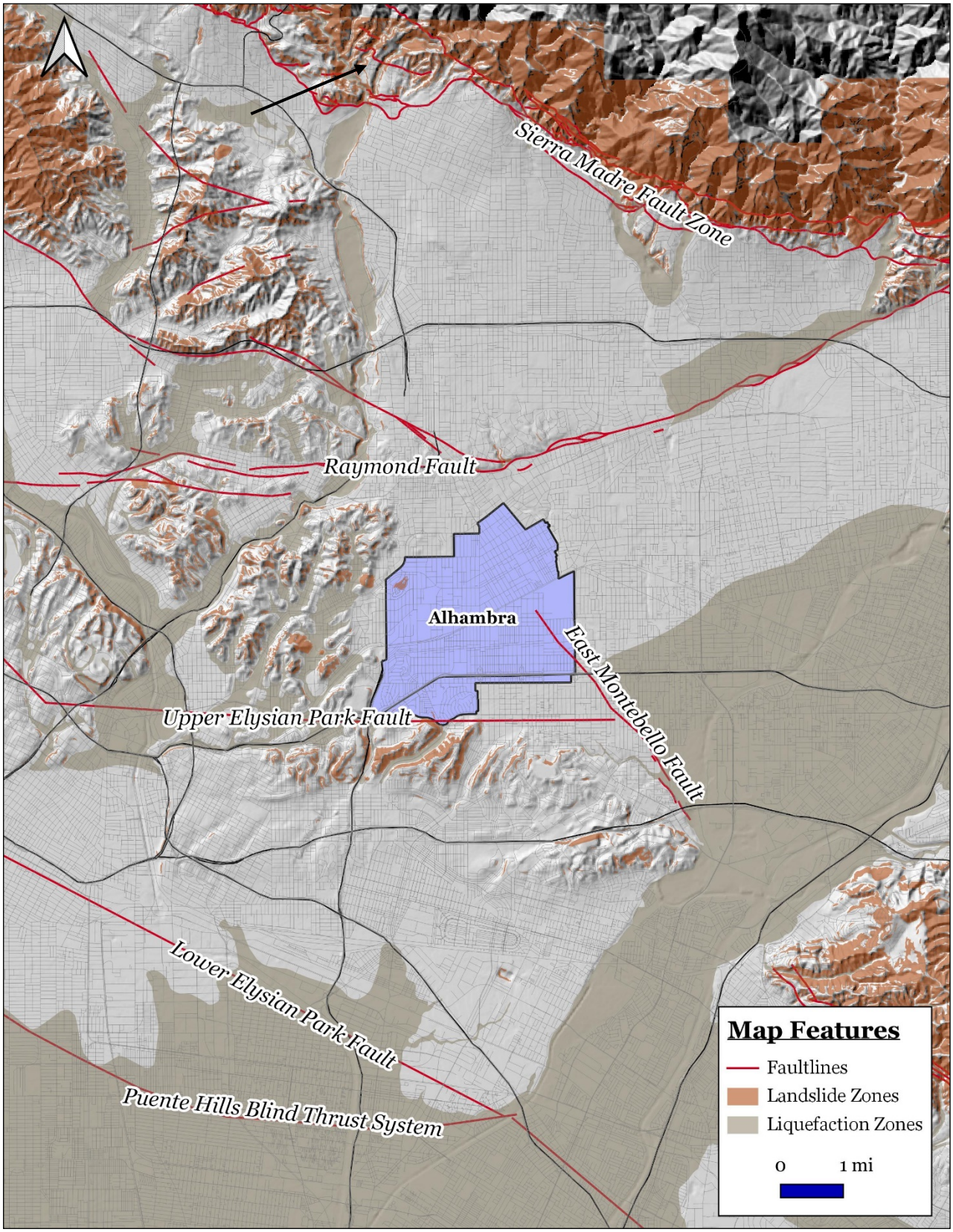

EXHIBIT 3-2 REGIONAL FAULT MAP
Source: United States Geological Survey

B. *Would the project expose people or structures to potential substantial adverse effects, including substantial soil erosion or the loss of topsoil? ● Less than Significant Impact.*

The project site is underlain with soils of the Altamont-Diablo association.[63] These soils are well-drained, though they consist of clay subsoil. These soils also have slow subsoil permeability. The United States Department of Agriculture classifies soils based on their limitations or hazard risk. The Altamont-Diablo soils association was placed into Class IV, which are soils described as having very severe limitations.[64] The major limitations exhibited from these soils are their fine textures, as well as their slope and erosion hazard. The site does not contain any slopes and the placement of permanent vegetative cover and proper drainage equipment would reduce erosion. The proposed project would not result in erosion or loss of erosion with compliance with state and local requirements. These requirements include provisions included in the City's Municipal Code to control erosion and storm water runoff. Construction erosion control is generally addressed in Stormwater Pollution Prevention Plans (SWPPPs), which are required by the state for construction sites larger than one acre in size. In the absence of these storm water runoff requirements, rainwater sheet flow could carry mud and debris onto neighboring properties during the construction phases. Any construction activity that results in the exposure of barren earth is at risk from erosion. The City and the County has identified sample construction Best Management Practices (BMPs) that may be included in the mandatory SWPPP. These construction BMPs are as follows: [65]

- Stockpiling of Soil. County Ordinance requires operators to preserve native topsoil on-site unless infeasible and protect all soil storage piles from run-on and runoff. For smaller stockpiles, covering the entire pile with a tarp may be required.

- Protecting Construction Materials from Run-On and Runoff. At the end of every workday and during precipitation events**,** contractors must provide cover for materials that could leach pollutants.

- Designating Waste Disposal Areas. Waste disposal areas must be clearly on-site for hazardous waste, construction waste, and domestic waste by designating with signage, and protect from run-on and runoff.

- Installing Perimeter Controls on Downhill Lot Line. Perimeter controls must be installed such as sediment filter logs or silt fences around the downhill boundaries of the site.

- Maintaining a Stabilized Exit Pad. Sediment track-out fixtures should be provided for vehicles exiting the site by maintaining an exit pad made of crushed rock spread over geotextile fabric. If sediment track-out occurs, deposited sediment must be removed by the end of the same work day.

The use of construction Best Management Practices (BMPs) identified in the mandatory SWPPP would prevent soil erosion and the discharge of sediment into the local storm drains during the project's construction phase. Finally, the site would be fully paved and/or landscaped during operation, which *would*

[63] United States Department of Agriculture, Soil Conservation Service. *Report and General Soil Map, Los Angeles County, California.* Revised 1969.

[64] United States Department of Agriculture, Soil Conservation Service. *Report and General Soil Map, Los Angeles County, California.* Revised 1969.

[65] San Bernardino County. *Erosion Control and Pollution Prevention for General Construction Sites.* http://www.sbcounty.gov/Uploads/lus/BandS/PreConstErosionControl/Erosion_Control_Flyer.pdf

preclude substantial erosion from occurring once construction is completed. *As a result, the potential impacts related to the loss of top-soil or erosion would be less than significant.*

C. *Would the project expose people or structures to potential substantial adverse effects, including location on a geologic unit or a 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.*

Soils of the Altamont-Diablo association might be prone to subsidence due to the shrink swell characteristics exhibited by the underlying soils (refer to section 3.6.D).[66] The shrinking and swelling of soils is influenced by the amount of clay present in the underlying soils. Altamont-diablo soils have clay surface and subsoil layers. The soils onsite have been compacted and disturbed by previous development and disturbances. Once redeveloped, the project site would be paved over and landscaped, which would minimize soil erosion. The project's construction would not result in soil erosion since the project's contractors must implement the construction BMPs identified in the mandatory SWPPP. The BMPs would minimize soil erosion and the discharge of sediment off-site. Additionally, the project site is not located within an area that could be subject to landslides or slope failure.

Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils. Liquefaction induced lateral spreading would not affect the proposed project because the site is not located in an area that is subject to liquefaction (refer to Exhibit 3-2). Therefore, lateral spreading caused by liquefaction would not affect the project. The soils that underlie the project site possess a low potential for shrinking and swelling. Soils that exhibit certain shrink swell characteristics become sticky when wet and expand according to the moisture content present at the time. Since the soils have a low shrink-swell potential, lateral spreading resulting from an influx of groundwater is slim. The likelihood of lateral spreading would be further reduced since the project's implementation would not require grading of hillside areas and excavation that would extend to depths required to encounter groundwater. In addition, the project would not result in the direct extraction of groundwater located below ground surface (BGS) since the project would be connected to the City's water system. The soils that underlie the project site are not prone to subsidence. Subsidence occurs via soil shrinkage and is triggered by a significant reduction in an underlying groundwater table, thus causing the earth on top to sink. No groundwater would be drained to accommodate the construction of the proposed project. Moreover, the project would not result in the direct extraction of groundwater located below ground surface (BGS). *As a result, the impacts related to lateral spreading, subsidence, liquefaction, or collapse would be less than significant.*

D. *Would the project result in or expose people to potential impacts, including location on an expansive soil, as defined in Uniform Building Code (2010) creating substantial risks to life or property? ● Less than Significant Impact.*

As indicated previously, the soils that underlie the project site belong to the Altamont-Diablo association, which exhibit certain shrink swell characteristics.[67] The shrinking and swelling of soils is influenced by the amount of clay present in the underlying soils. Altamont-Diablo soils have clay surface and subsoil layers.

[66] Subsidence Support. *What Causes House Subsidence?* http://www.subsidencesupport.co.uk/what-causes-subsidence.html

[67] United States Department of Agriculture, Soil Conservation Service. *Report and General Soil Map, Los Angeles County, California.* Revised 1969.

In addition, these soils become sticky when wet and expand according to the moisture content present at the time. If soils consist of expansive clay, damage to foundations and structures may occur. In order to prevent foundation damage, the project structural engineer must determine the nature and extent of foundation and construction elements that would be required to address potential expansive soil impacts. The project contractors would be required to comply with the structural engineer's recommendations in the subsequent phases of the proposed project's design. *As a result, the potential impacts related to expansive soils are considered to be less than significant.*

E. *Would the project result in or expose people to potential impacts, including 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*

No septic tanks would be used as part of the proposed development. The new buildings would be connected to the sanitary sewer system. *As a result, no impacts related to the use of septic systems would occur.*

F. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ● Less than Significant Impact with Mitigation.*

SB-18 and AB-52 consultation letters were mailed to a total of eight tribes, including the different Gabrieleño subsets and the Soboba tribe. The specific tribal contacts included the following:

- Rudy Ortega, Tribal President, Fernandeno Tataviam Band of Mission Indians;
- Sandonne Goad, Chairperson, Gabrielino/Tongva Tribe;
- Anthony Morales, Chairperson, Gabrieleno/Tongva – San Gabriel Band of Mission Indians;
- Robert F. Dorame, Tribal Chair/Cultural Resources, Gabrielino Tongva Indians of California Tribal Council;
- Charles Alvarez, Gabrielino Tongva Indians of California Tribal Council;
- Lovina Redner, Tribal Chair, Santa Rosa Band of Cahuilla Indians;
- Isaiah Vivanco, Chairperson, Soboba Band of Luiseno Indians;
- Joseph Ontiveros, Cultural Resource Director, Soboba Band of Luiseno Indians;
- Andrew Salas, Chairman, Gabrieleno Band of Mission Indians – Kizh Nation; and,
- Christina Conley, Tribal Consultant and Administrator, Gabrielino Tongva Indians of California Tribal Council.

Only one of the aforementioned tribes responded. The tribal representative of the Gabrielino-Kizh indicated that the project site is situated in an area of high archaeological significance. As a result, the mitigation under Section 3.18 Tribal Cultural Resources would reduce the impact to less than significant.

The project site is underlain by the Altamont-Diablo association.[68] These Late Holocene sediments consist of unconsolidated sand, gravel, and boulders deposited in active washes or channels. Alluvium soil deposits

[68] United States Department of Agriculture, Soil Conservation Service. *Report and General Soil Map, Los Angeles County, California.* Revised 1969.

that are present in a natural and undisturbed condition may contain paleontological resources, though these resources are more typically found in marine terraces and shales. According to the City of Alhambra General Plan EIR, there are no unique paleontological resources are known to be present in Alhambra. However, previously undiscovered paleontological resources may be present in fossil-bearing soils and rock formations below the ground surface. Ground-disturbing activities in fossil-bearing soils and rock formations have the potential to damage or destroy paleontological resources that may be present below the ground surface. The on-site soils have undergone disturbance due to the previous development. The entire site has been previously disturbed and graded. The proposed project site's disturbed character would limit the likelihood of the discovery of paleontological resources during grading and excavation. However, the following mitigation discussed in Mitigation Measures would be required to address potential paleontological resources.

The impacts of the proposed project on unique geologic features would be less than significant with mitigation.

MITIGATION MEASURES

The following mitigation is required to address the mitigation requested by the Gabrieleno Band of Mission Indians - Kizh Nation as part of the SB-18 and AB-52 consultation:

> *Paleontological Mitigation Measure No. 1.* Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities
>
> The tribe has requested that all information be kept in a confidential appendix to be mentioned in the public document but not included. The full mitigation measure is included in the confidential appendix. Additional mitigation measures are provided under Section 3.18 Tribal Cultural Resources.

3.8 GREENHOUSE GAS EMISSIONS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✖	
B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✖	

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on greenhouse gas emissions if it results in any of the following:

- The proposed project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

- The proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

For the proposed project, the threshold that will be used is 10,000 MTCO2e per year. The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler. However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above natural levels. These man-made GHG will have the effect of warming atmospheric temperatures with the attendant impacts of changes in the global climate, increased sea levels, and changes to the worldwide biome. They major GHGs that influence global warming are described below.

- *Water Vapor*. Water vapor is the most abundant GHG present in the atmosphere. Changes in the atmospheric concentration of water vapor is directly related to the warming of the atmosphere rather than a direct result of industrialization. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to "hold" more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. When water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation. This will allow less energy to reach the Earth's surface thereby affecting surface temperatures.

- *Carbon Dioxide (CO_2)*. The natural production and absorption of CO_2 is achieved through the terrestrial biosphere and the ocean. Manmade sources of CO_2 include the burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700's, these activities have

increased the atmospheric concentrations of CO_2. Prior to the industrial revolution, concentrations were fairly stable at 280 parts per million (ppm). The International Panel on Climate Change (IPCC Fifth Assessment Report, 2014) determined that emissions of CO_2 from fossil fuel combustion and industrial processes contributed about 78% of the total GHG emissions increase from 1970 to 2010, with a similar percentage contribution for the increase during the period 2000 to 2010.

- *Methane (CH_4).* CH_4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO_2. Methane's lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO_2, N_2O, and Chlorofluorocarbons (CFCs). CH_4 has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other human-related sources of methane production include fossil-fuel combustion and biomass burning.

- *Nitrous Oxide (N_2O).* Concentrations of N_2O also began to increase at the beginning of the industrial revolution. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is also commonly used as an aerosol spray propellant.

- *Chlorofluorocarbons (CFC).* CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source but were first synthesized in 1928. It was used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and in 1989 the European Community agreed to ban CFCs by 2000 and subsequent treaties banned CFCs worldwide by 2010. This effort was extremely successful, and the levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.

- *Hydrofluorocarbons (HFC).* HFCs are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF_3), HFC-134a (CF_3CH_2F), and HFC-152a (CH_3CHF_2). Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant. HFCs are manmade and used for applications such as automobile air conditioners and refrigerants.

- *Perfluorocarbons (PFC).* PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.

- *Sulfur Hexafluoride (SF_6).* SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF_6 has the highest global warming potential of any gas evaluated; 23,900 times that of CO_2. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O).

A. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ● Less than Significant Impact.*

The SCAQMD has adopted Interim GHG thresholds for development projects within the South Coast Air Basin. The project would be less than significant if project emissions are below one of the following screening thresholds:

- *Residential and Commercial land uses:* 3,000 MTCO2e per year; or,
- *Industrial land uses:* 10,000 MTCO2e per year; or,
- Based on land use type: residential: 3,500 MTCO2e per year; commercial: 1,400 MTCO2e per year; or
- Mixed use: 3,000 MTCO2e per year.

For the proposed project, the threshold that would be used is 3,000 MTCO2e per year. The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler. However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above natural levels. These man-made GHG would have the effect of warming atmospheric temperatures with the attendant impacts of changes in the global climate, increased sea levels, and changes to the worldwide biome.

The SCAQMD has established a number of CEQA thresholds for significant GHG thresholds though only one for commercial development is a quantified threshold. This single quantified threshold is 3,000 metric tons of CO_2E ($MTCO_2E$) per year for commercial projects. Table 3-5 summarizes annual greenhouse gas (CO_2E) emissions from build-out of the proposed project. Carbon dioxide equivalent, or CO_2E, is a term that is used for describing different greenhouses gases in a common and collective unit. The greenhouse gas emissions are shown in Appendix A – Air Quality Report.

As indicated in Table 3-5, the CO_2E total operational emissions for the project is 1,104 $MTCO_2E$ per year. The total construction emissions for the project is 269 MTCO2E per year. Taking the construction emission and amortizing it over 30 years (divide by 30 years), this translates into 8.97 MTCO2E of construction amortized over 30 years in emissions. The total annual combined construction and operational emission is 1,113 $MTCO_2E$, which is below the aforementioned threshold of 3,000 MTCO2E per year. The existing warehouse emission is 46.2 MTCO2E per year. The net change in MTCO2E emissions from existing to future project use is 1,067 MTCO2E per year.

Table 3-5 Greenhouse Gas Emissions Inventory

Source	GHG Emissions (Metric Tons/year)			
	CO_2	CH_4	N_2O	CO_2E
Total Project Construction Emissions	268	0.01	--	269
Total Annual Construction Amortized Over 30-Years in $MTCO_2E$				**8.97**
Long-Term – Area Emissions	0.14	--	--	0.14
Long-Term - Energy Emissions	125	0.01	--	126
Long-Term - Mobile Emissions	927	0.06	0.05	944
Total Annual Long Term Emissions in $MTCO_2E$	**1,065**	**0.87**	**0.05**	**1,104**
Total GHG Emissions (Construction and Long-term) in $MTCO_2E$				**1,113**
Total Existing Warehouse Emissions in MTCO2E				**46.2**
Net Increase in Emissions				**1,067**
Significance Threshold Emissions in MTCO2E				**3,000**

Source: CalEEMod. 2022.1.1.21

This figure does not take into account the implementation of LID requirements (drought tolerant landscaping, water efficient appliances, and energy efficient appliances) that are applicable to the project. As indicated in the table, the great majority of the GHG emissions (944 MTCO2E/year) would be generated from mobile sources. The project is also an infill development that would serve the local market. *As a result, the project's GHG impacts would be less than significant.*

B. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? ● Less than Significant Impact.*

AB 32 requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28% reduction in "business as usual" GHG emissions for the entire State. Additionally, Governor Edmund G. Brown signed into law Executive Order (E.O.) B-30-15 on April 29, 2015, the Country's most ambitious policy for reducing Greenhouse Gas Emissions. Executive Order B-30-15 calls for a 40% reduction in greenhouse gas emissions below 1990 levels by 2030.[69] The proposed project would not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. As a result, no impacts related to a potential conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases are anticipated.

The State of California Office of Planning Research (OPR) identified a number of measures and programs that would be effective in reducing GHG emissions. These programs and measures are identified below in Table 3-6. The proposed project's conformity with these measures is summarized in the Table. The great majority of the measures identified would be effective in reducing the overall GHG below the quantities identified previously in Table 3-5.

[69] Office of Governor Edmund G. Brown Jr. *New California Goal Aims to Reduce Emissions 40 Percent Below 1990 Levels by 2030.* http://gov.ca.gov/news.php?id=18938

Table 3-6 Project Conformity with GHG Mitigation Identified by the State Office of Planning Research

Attorney General's Recommended Measures	Project Applicability/Compliance
Land Use & Transportation: Implement land use strategies to encourage jobs/housing proximity, promote transit-oriented development, and encourage high density development along transit corridors. Encourage compact, mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling and the use of public transit systems.	**Compliant.** The proposed project conforms to this policy/program.
Land Use & Transportation: Encourage infill, redevelopment, and higher density development, whether in incorporated or unincorporated settings	**Compliant.** The proposed project conforms to this policy/program.
Land Use & Transportation: Encourage new developments to integrate housing, civic and retail amenities (jobs, schools, parks, shopping opportunities) to help reduce VMT resulting from discretionary automobile trips.	**Compliant.** The proposed project conforms to this policy/program.
Land Use & Transportation: Apply advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Land Use & Transportation: Incorporate features into project design that would accommodate the supply of frequent, reliable and convenient public transit.	**Compliant.** The proposed project conforms to this policy/program.
Land Use & Transportation: Implement street improvements that are designed to relieve pressure on a region's most congested roadways and intersections.	**Compliant.** The proposed project conforms to this policy/program.
Land Use & Transportation: Limit idling time for commercial vehicles, including delivery and construction vehicles.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Urban Forestry: Plant trees and vegetation near structures to shade buildings and reduce energy requirements for heating/cooling.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Urban Forestry: Preserve or replace onsite trees (that are removed due to development) as a means of providing carbon storage.	**Compliant.** The proposed project conforms to this policy/program.
Urban Forestry: Encourage public and private construction of LEED (Leadership in Energy and Environmental Design) certified (or equivalent) buildings.	**Compliant.** The proposed project conforms to this policy/program.
Energy Conservation Policies & Actions: Execute an Energy Savings Performance Contract with a private entity to retrofit public buildings. This type of contract allows the private entity to fund all energy improvements in exchange for a share of the energy savings over a period of time.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Energy Conservation Policies & Actions: Design, build, and operate schools that meet the Collaborative for High Performance Schools (CHPS) best practices.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Energy Conservation Policies & Actions: Retrofit municipal water and wastewater systems with energy efficient motors, pumps and other equipment, and recover wastewater treatment methane for energy production.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Energy Conservation Policies & Actions: Educate the public, schools, other jurisdictions, professional associations, business and industry about reducing GHG emissions.	**Not Applicable.** The program/policy is not applicable to the proposed project.

Table 3-6 (continued)
Project Conformity with GHG Mitigation Identified by the State Office of Planning Research

Recommended Measures	Project Applicability/Compliance
Energy Conservation Policies & Actions: Convert landfill gas into energy sources for use in fueling vehicles, operating equipment, and heating buildings.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Energy Conservation Policies & Actions: Purchase government vehicles and buses that use alternatives fuels or technology, such as electric hybrids, biodiesel, and ethanol. Where feasible, require fleet vehicles to be low emission vehicles. Promote the use of these vehicles in the general community.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Energy Conservation Policies & Actions: Recognize and promote energy saving measures beyond Title 24 requirements for residential and commercial projects.	**Compliant.** The proposed project conforms to this policy/program.
Energy Conservation Policies & Actions: Where feasible, include in new buildings facilities to support the use of low/zero carbon fueled vehicles, such as the charging of electric vehicles from green electricity sources.	**Compliant.** The proposed project conforms to this policy/program.
Energy Conservation Policies & Actions: Offer rebates and low-interest loans to residents that make energy-saving improvements on their homes.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Energy Conservation Policies & Actions: Purchase Energy Star equipment and appliances for public agency use.	**Compliant.** The proposed project conforms to this policy/program.
Energy Conservation Policies & Actions: Incorporate on-site renewable energy production, including installation of photovoltaic cells or other solar options.	**Compliant.** The proposed project conforms to this policy/program.
Energy Conservation Policies & Actions: Offer government incentives to private businesses for developing buildings with energy and water efficient features and recycled materials. The incentives can include expedited plan checks and reduced permit fees.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Energy Conservation Policies & Actions: Create bicycle lanes and walking paths directed to the location of schools, parks and other destination points.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Programs to Reduce VMTs: Offer government employees financial incentives to carpool, use public transportation, or use other modes of travel for daily commutes.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Programs to Reduce VMTs: Encourage large businesses to develop commute trip reduction plans that encourage employees who commute alone to consider alternative transportation modes.	**Compliant.** The proposed project conforms to this policy/program.
Programs to Reduce VMTs: Develop shuttle systems around business district parking garages to reduce congestion and create shorter commutes.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Programs to Reduce VMTs: Create an online ridesharing program that matches potential carpoolers immediately through email.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Programs to Reduce VMTs: Develop a Safe Routes to School program that allows and promotes bicycling and walking to school.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Programs to Reduce Solid Waste: Create incentives to increase recycling and reduce generation of solid waste by residential users.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Programs to Reduce Solid Waste: Implement a Construction and Demolition Waste Recycling Ordinance to reduce the solid waste created by new development.	**Not Applicable.** The program/policy is not applicable to the proposed project.
Programs to Reduce Solid Waste: Add residential/commercial food waste collection to existing green waste collection programs.	**Not Applicable.** The program/policy is not applicable to the proposed project.

Source: Adapted after the California Office of Planning and Research, Technical Advisory. June 19, 2008.

CARB's 2022 Scoping Plan, once final, would outline how California would realize carbon neutrality by 2045 or earlier. This is the first Scoping Plan that adds carbon neutrality as a science-based guide and touchstone beyond statutorily established emission reduction targets. The Plan identifies a technologically feasible, cost-effective and equity-focused path to achieve carbon neutrality by 2045, or earlier. The major elements of the Plan's approach include the following:

- The aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place here for a decade and a half;
- Aggressively moving to zero-emission transportation, electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution;
- Phasing out the use of fossil gas used for the heating of homes and other buildings;
- Restricting the use of chemicals and refrigerants that are thousands of times more powerful at trapping heat than carbon dioxide (CO2);
- Providing communities with sustainable options for walking, biking, and public transit so that people do not have to rely on a car;
- Continuing to build the solar arrays, wind turbine capacity, and other resources that provide clean, renewable energy;
- Scaling up new options such as green hydrogen for hard to electrify end uses and renewable gas where needed; and,
- Expanding the implementation of new options such as green hydrogen and renewable gas where needed.

The proposed project would not be inconsistent or otherwise adversely impact, the implementation of the above Plan objectives. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 Regional Transportation Plan (RTP), the City of Alhambra is projected to add a total of 3,000 jobs (30,500 jobs in 2020 and 33,500 jobs in 2040).[70] Approximately 42 new jobs would be created by the three new restaurants.[71] The City's unemployment rate is 3.8% as of October, 2022. The implementation of the proposed project would aid the City and the surrounding region in further reducing its unemployment rate. Furthermore, the number of new jobs that would be created are well within SCAG's employment projections for the City of Alhambra.

The City, in partnership with the San Gabriel Valley Council of Government (SGVCOG), has developed and adopted an Energy Efficient Climate Action Plan (EECAP) that addresses the City's goals to reduce GHGs. The EECAP identifies seven goals and underlying policies that, if implemented, would assist the City in reducing its energy consumption and greenhouse gas emission in order to meet the projected 2020 targets.[72]

[70] Southern California Association of Governments. *Growth Forecast. Regional Transportation Plan 2016-2040.* Adopted on April 7, 2016.

[71] City of Aspen. *Employment Generation Rate Updates.* Study dated February 13, 2013.

[72] City of Alhambra. N.d. *City of Alhambra Energy Efficiency Chapter of a Climate Action Plan*. Prepared by PMC. Prepared for City of Alhambra and San Gabriel Valley Council of Governments.

The aforementioned energy conservation policies and the project's conformity are outlined on the following page.

- *Policy 1.1. Promote electricity conservation in existing residential structures through education and outreach.* This policy is not applicable to the proposed project since its focus is on residential uses and development.

- *Policy 1.2. Support owner-occupied whole house renovations that reduce energy use and improve thermal comfort of existing residential buildings.* This policy is not applicable to the proposed project since its focus is on residential uses and development.

- *Policy 1.3. Encourage energy-efficient improvements in the City's older housing stock.* This policy is not applicable to the proposed project since its focus is on residential uses and development.

- *Policy 1.4. Support renovations that reduce energy use and improve thermal comfort in existing multi-family units and buildings.* This policy is not applicable to the proposed project since its focus is on residential uses and development.

- *Policy 1.5. Promote reduction in energy use and plug-load demand through upgrades to household appliances and equipment.* This policy is not applicable to the proposed project since its focus is on residential uses and development.

- *Policy 2.1. Educate Alhambra's businesses about opportunities to conserve energy use and reduce costs through behavioral changes in daily operations.* The proposed project would be required to comply with all pertinent energy efficiency standards and low impact development requirements.

- *Policy 2.2. Support the use of energy-efficient appliances and equipment in leased and owner-occupied businesses.* The proposed project would be required to comply with all pertinent energy efficiency standards and low impact development requirements.

- *Policy 2.3. Facilitate retrofits and energy efficiency improvements within the nonresidential building stock.* The proposed project would be required to comply with all pertinent energy efficiency standards and low impact development requirements.

- *Policy 3.1. Support the integration of energy efficiency upgrades as part of new building construction, remodels, or other tenant improvements.* The proposed project would be required to comply with all pertinent energy efficiency standards and low impact development requirements.

- *Policy 3.2. Encourage the use of energy-efficient appliances and equipment in new buildings.* The proposed project would be required to comply with all pertinent energy efficiency standards and low impact development requirements.

- *Policy 3.3. Participate in a regional effort to implement energy efficiency standards for new development.* The proposed project would be required to comply with all pertinent energy efficiency standards and low impact development requirements.

- *Policy 4.1. As part of the City's economic development strategy, provide resources to local businesses for revenue enhancing energy efficiency improvements.* The proposed project would not inhibit the implementation of this policy.

- *Policy 4.2. Streamline and encourage energy efficiency through the development standards and the permit and plan review process.* The proposed project would be required to comply with all pertinent energy efficiency standards and low impact development requirements.

- *Policy 4.3. Identify funding opportunities and financing programs to support community energy efficiency and retrofits.* The proposed project would be required to comply with all pertinent energy efficiency standards and low impact development requirements.

- *Policy 4.4. Align planning efforts with energy efficiency and conservation.* The proposed project would be required to comply with all pertinent energy efficiency standards and low impact development requirements.

- *Policy 5.1. Expand the City's urban tree forest.* The proposed project would involve the installation of landscaping, including trees.

- *Policy 5.2. Maximize the use of cool roofs and surfaces to reduce electricity use.* The proposed project would be required to comply with all pertinent energy efficiency standards and low impact development requirements.

- *Policy 6.1. Implement the water demand measures as identified in the 2010 Urban Water Management Plan.* The proposed project would not inhibit the implementation of this policy.

- *Policy 7.1. Lead the community by example through the implementation of cost-saving energy management practices.* The proposed project would not inhibit the implementation of this policy.

- *Policy 7.2. Continue to identify opportunities to reduce water infrastructure and electric utility costs through pump upgrades, leak detection services, reservoir renovations, and water conservation at City facilities.* The policy is not applicable to the proposed project.

- *Policy 7.3. Implement an energy-efficient procurement policy to ensure the purchase of efficient equipment that would result in energy costs savings that outweigh additional upfront costs.* The proposed project would be required to comply with all pertinent energy efficiency standards and low impact development requirements.

- *Policy 7.4. Improve the thermal comfort of City facilities and reduce the number of personal heating and cooling devices in work spaces.* The policy is not applicable to the proposed project.

- *Policy 7.5. Work with the San Gabriel Valley Council of Governments to use regional partners for creation of an energy management position to track energy use at City facilities, identify opportunities for efficiencies and cost savings, and implement energy efficiency projects.* The policy is not applicable to the proposed project.

The proposed project would not introduce any conflicts with adopted initiatives that are designed to control future GHG emissions. The project is an "infill development" and is seen as an important strategy in reducing regional GHG emissions. *As a result, the impacts related to the implementation of a GHG control plan would be less than significant.*

MITIGATION MEASURES

The analysis of potential impacts related to greenhouse gas emissions indicated that no significant adverse impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

3.9 HAZARDS & HAZARDOUS MATERIALS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✖	
B. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		✖		
C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			✖	
D. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			✖	
E. Would the project for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				✖
F. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✖
G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on hazards and hazardous materials if it results in any of the following:

- The proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- The proposed project would 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.
- The proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- The proposed project would 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.

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

- The proposed project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

- The proposed project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Hazardous materials refer generally to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in a wide variety of products (household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials can occur from a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

A. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ● Less than Significant Impact.*

Hazardous materials refer generally to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in a wide variety of products (household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials can occur from a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

National Environmental Services (NES) conducted a Phase I ESA for the proposed project site. The scope of work included: an inspection of the site for environmental concerns, a review of environmental databases and other governmental records, a review of available historical documents (including aerial photographs, fire insurance maps, and topographic maps), interviews with the owner, and the preparation of this report. Site Description: National Environmental Services, LLC (NES) was retained to perform the Phase I Environmental Site Assessment (ESA. No recognized environmental conditions were discovered. No evidence of acutely hazardous chemical storage problems, waste disposal concerns, leaking transformers, deteriorating lead based paint, sumps, pits, catch basins, surface impoundments, landfill activities, bodies of water, unusual odors, oil or gas wells, or other environmental conditions was observed on the property in review. There was no physical or visual evidence of stressed vegetation, soil discoloration, odors, or other indicators of environmental exposure to the surface areas or soils on the subject property.[73] The Phase I consisted of the following findings:

[73] East West Bank. *Phase I Environmental Site Assessment Warehouse Properties @ 131-137 South Raymond Avenue, 124-126 and 132-146 South Palm Avenue and 2009 & 2055 Pepper Avenue, Alhambra, Los Angeles County, CA 91801* May 6, 2019

- According to the database review, one NPL site was found located within a mile radius from the subject site. It is listed as San Gabriel Valley (Area 1). This site is actually a contaminated groundwater basin that is undergoing remediation. Based on this designation's reported status and/or its distance from the site, it was not deemed likely to constitute an environmental risk to the project site.[74]

- SEMS (Superfund Enterprise Management System) tracks hazardous waste sites, potentially hazardous waste sites, and remedial activities performed in support of EPA's Superfund Program across the United States. The list was formerly known as Compensation and Liability Act (CERCLIS), renamed to SEMS by the EPA in 2015. The list contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). This dataset also contains sites which are either proposed to or on the National Priorities List (NPL) and the sites which are in the screening and assessment phase for possible inclusion on the NPL. Based on the environmental database review, one SEMS registered facility was found located within a half of a mile radius from the subject site. Based on its status and its distance from the subject site, it was not deemed likely to constitute an environmental concern to the subject site. Based on the environmental database review, four Resource Conservation and Recovery Act (RCRA) A-LQG, 14 RCRA-SQG, one RCRA-SQG and five RCRANLR registered facilities were found located within a quarter of a mile radius from the subject site. Based on their topographical elevation, reported status and/or their distances from the site, these facilities found were not deemed likely to constitute a significant environmental risk to the project site.[75]

- CORRACTS is a list of handlers with RCRA Corrective Action Activity. This report shows which nationally-defined corrective action core events have occurred for every handler that has had corrective action activity. Based on the environmental database review, one CORRACTS registered facility was found located within a mile radius from the subject site. Based on its status and its distance from the subject site, it was not deemed likely to constitute an environmental concern to the project site.[76]

- The RESPONSE database Identifies the confirmed release sites where the DTSC is involved in remediation, either in a lead or oversight capacity. These confirmed release sites are generally high-priority and high potential risk. A review of RESPONSE list revealed the presence of two sites within a mile radius from the subject site. Based on these facilities' reported status and/or their distances away, they were not deemed likely to constitute an environmental risk to the project site. [77]

- The Department of Toxic Substances Control's (DTSC's) Site Mitigation and Brownfields Reuse Program's (SMBRP's) EnviroStor database identifies sites that have known contamination or sites for which there may be reasons to investigate further. The database includes the following site types: Federal Superfund sites (National Priorities List (NPL), State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. EnviroStor provides similar

[74] Ibid.
[75] East West Bank. *Phase I Environmental Site Assessment Warehouse Properties @ 131-137 South Raymond Avenue, 124-126 and 132-146 South Palm Avenue and 2009 & 2055 Pepper Avenue, Alhambra, Los Angeles County, CA 91801* May 6, 2019

[76] Ibid.

[77] Ibid.

information to the information that was available in CalSites, and provides additional site information, including, but not limited to, identification of formerly-contaminated properties that have been released for reuse, properties where environmental deed restrictions have been recorded to prevent inappropriate land uses, and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites. A review of the ENVIROSTOR list, as provided by EDR, has revealed that there are 12 ENVIROSTOR sites within approximately a mile of the target property. Based on these facilities' reported status and/or their distances away, they were not deemed likely to constitute an environmental risk to the project site.[78]

- The California Integrated Waste Management Board maintains a database on solid waste facilities, operations, and disposal sites throughout the state of California. The types of facilities found in this database include landfills, transfer stations, material recovery facilities, composting sites, transformation facilities, waste tire sites, and closed disposal sites. A review of the SWF/LF list, as provided by EDR has revealed that there is one SWF/LF site within approximately half of a mile from the target property. Based on its status and its distance from the subject site, it was not deemed likely to constitute an environmental concern to the subject site. According to the database review, four registered underground storage tank (UST) sites were found located within a quarter of a mile radius from the subject property. Based on these facilities' topographical elevation, reported status and/or their distances from the site, they were not deemed likely to constitute a significant environmental risk to the project site.[79]

- SWEEPS (Statewide Environmental Evaluation and Planning System) is the underground storage tank listing, updated and maintained by a company contacted by the SWRCB in the early 1980s. The listing is no longer updated or maintained. According to the database review, 12 SWEEPS UST sites were found within a quarter of a mile radius from the subject site. Based on these facilities' topographical elevation, reported status and/or their distances from the site, they were not deemed likely to constitute a significant environmental risk to the subject site. HIST UST is a Historical UST Registered Database. A review of the HIST UST list, as provided by EDR, has revealed that there are nine HIST UST sites within approximately a quarter of a mile from the target property. Based on these facilities' topographical elevation, reported status and/or their distances from the site, they were not deemed likely to constitute a significant environmental risk to the project site.[80]

The aforementioned Phase I study concluded that the project site's environmental conditions are consistent with good commercial and customary practice in an effort to minimize liability, and there is no evidence or indication of recognized environmental conditions, historical recognized environmental conditions or controlled recognized environmental conditions has been revealed. No further assessment or investigation is deemed necessary at this time.

The proposed project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings (paint), fertilizers, and equipment lubricants.

[78] East West Bank. *Phase I Environmental Site Assessment Warehouse Properties @ 131-137 South Raymond Avenue, 124-126 and 132-146 South Palm Avenue and 2009 & 2055 Pepper Avenue, Alhambra, Los Angeles County, CA 91801* May 6, 2019

[79] Ibid.

[80] Ibid.

In the event of an accidental spill, construction workers are trained in the requisite protocols to contain and clean up any potential spills. *As a result, the impacts related to the routine transport and disposal of hazardous materials would be less than significant.*

B. *Would the project create a significant hazard to the public or the environment, or result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ● Less than Significant Impact with Mitigation.*

In April 2021, Reds Environmental Inspections, LLC was retained to perform an asbestos and lead demolition survey for a property at the project site. The property comprises nine separate mailing addresses and twelve (12) structures. The intention of this survey is to identify all regulated asbestos containing materials, their friability, location, approximate quantity and condition. It was also the intention of this report to identify surfaces that are coated with lead-based paint or lead-containing paint and to determine their condition. The results of the survey for the buildings are identified below:

- *124 S. Palm Avenue* Asbestos: No asbestos identified. *Lead:* (1) Sheet metal walls on Building 1 are coated with lead-based paint. Paint is in "fair" condition. *Recommendations:* Retain a licensed abatement contractor to (a) stabilize and encapsulate loose and flaking lead-based paint on Building 1 and (b) conduct an exposure assessment for tasks required for demolition of lead-coated surfaces to ensure worker exposure does not exceed the permissible exposure limit for lead as defined in 1532.1 Lead in Construction Standards.

- *132 S. Palm Avenue Asbestos:* (1) None identified. Palm Ave. and Pepper St. *Asbestos & Lead. Recommendations:* Retain a licensed abatement contractor to conduct an exposure assessment for tasks required to demolish lead-containing surfaces to ensure worker exposure does not exceed the permissible exposure limit for lead as defined in CCR Title 8 Section 1532.1 Lead in Construction Standards.

- *136 S. Palm Avenue Asbestos:* (1) Penetration mastic on carports roofs (2). Lead: (1) Office paint in the south carport is lead-based paint. (2) exterior stucco paint is not lead-based but is lead-containing. *Recommendations:* Retain a licensed abatement contractor to (a) remove and dispose of ACM penetration mastic from both carport roofs, (b) stabilize and encapsulate loose and flaking lead-based paint in the south carport interior and (c) conduct an exposure assessment for the tasks required to demolish lead based and lead-containing surfaces to ensure worker exposure to lead does not exceed the permissible exposure limit as defined in 1532.1 Lead in Construction Standards.

- *146 S. Palm Avenue Asbestos:* (1) Roof parapets. (2) roof penetration and HVAC patch mastic. (3) interior nine-inch tile and associated mastic. Lead: (1) Second floor restroom wall tile is lead based. (2) Exterior orange paint and interior white office paint is not lead-based but is lead containing. Recommendations: Retain a licensed abatement contractor to (a) abate asbestos-containing flooring (carpet on nine inch tile) and mastic on the first and second floors under an approved SCAQMD 14-day notification, (b) abate asbestos containing penetration and patch mastics, (c) remove and dispose of lead-based second floor restroom wall tile and (d) perform an exposure assessment for tasks required to demolish surfaces coated with lead-containing paint.

- *2009 Pepper Street Asbestos:* (1) Transite wall panels. Lead: (1) The steel frame is coated with damaged lead-based paint. *Recommendations:* Retain an abatement contractor to (a) remove and dispose of transite wall panels under an approved SCAQMD 14-day notification and (b) demolish

and dispose of the damaged lead-coated steel frame.

- *131 S. Raymond Avenue Asbestos:* (1) Roofing penetration mastic and patch mastic is assumed to be ACM. Lead: (1) White paint on exterior CMU walls is not lead-based but is lead-containing. *Recommendations:* Retain a licensed abatement contractor to (a) remove and dispose of penetration and patch mastic and (b) conduct an exposure assessment for tasks that would be required to demolish lead-containing CMU walls.

- *135 S. Raymond Avenue. Asbestos:* (1) None identified. Lead: (1) The steel frame is coated with intact lead-based paint. *Recommendations:* Retain an abatement contractor to conduct an exposure assessment for tasks required for demolition of the steel frame to ensure worker exposure does not exceed the permissible exposure limit for lead.

- *137 S. Raymond Avenue. Asbestos:* (1) None identified. *Lead:* (1) If steel frame is present it is assumed to be coated with lead-based paint. Recommendations: Retain an abatement contractor to conduct an exposure assessment for tasks required to demolish the steel frame to ensure worker exposure does not exceed the permissible exposure limit for lead.

- *147 S. Raymond Avenue. Asbestos:* (1) Roof patch mastic and penetration mastic. (2) interior nine-inch floor tiles. (3) interior stucco (trace (1) Roof patch mastic and penetration mastic. (2) interior nine-inch floor tiles. (3) interior stucco (trace

The project's implementation would require the removal and proper disposal of the ACMs and LBP materials outlined in the report prepared by Reds Environmental Inspections, LLC. *Adherence to the mitigation would reduce the impacts to levels that would be less than significant.*

C. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? ● Less than Significant Impact.*

There are no schools located within ¼ mile of the project site. Emery Park Elementary School is located 2,500 feet to the west.[81] The proposed project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings (paint), fertilizers, and equipment lubricants. In the event of an accidental spill, construction workers are trained in the requisite protocols to contain and clean up any potential spills. The project would not involve the transportation, use, storage, or disposal of hazardous materials since the project would be involved in commercial food service. Any hazardous materials used on-site will be chemicals most commonly used for routine cleaning and maintenance. *As a result, the impacts related to hazardous materials emissions would be less than significant.*

[81] Google Earth. Website accessed November 20, 2022.

D. *Would the project be located on a site, which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, and, as a result, would it create a significant hazard to the public or the environment? ● Less than Significant Impact*

The U.S. EPA's National Priorities List (NPL) was reviewed to identify any NPL sites within one mile of the project site.[82] The project site is not listed as an NPL site. The Department of Toxic Substances Control's (DTSC's) Site Mitigation and Brownfields Reuse Program's (SMBRP's) EnviroStor database identifies sites that have known contamination or sites for which there may be reasons to investigate further. The database includes the following site types: Federal Superfund sites (National Priorities List (NPL), State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. EnviroStor provides similar information to the information that was available in CalSites, and provides additional site information, including, but not limited to, identification of formerly-contaminated properties that have been released for reuse, properties where environmental deed restrictions have been recorded to prevent inappropriate land uses, and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites. A review of the ENVIROSTOR list, as provided by EDR, has revealed that there are 12 ENVIROSTOR sites within approximately a mile of the target property. Based on these facilities' reported status and/or their distances away, they were not deemed likely to constitute an environmental risk to the project site.[83] *As a result, the impacts related to the site being located on a site containing hazardous materials would be less than significant.*

E. *Would the project be located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area? ● No Impact.*

The project site is not located within two miles of a public use airport. The nearest public airport to the project site is the San Gabriel Valley Airport, located 6.70 miles to the east of the project site.[84] As a result, the proposed project's implementation would not present a safety hazard to aircraft and/or airport operations at a public use airport. *As a result, no impacts related to the site being subject to an airport land use plan requirements, would occur.*

F. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ● No Impact.*

At no time would any of the adjacent arterial roadways be completely closed to traffic. The construction plan must identify specific provisions for the regulation of construction vehicle ingress and egress to the site during construction as a means to provide continued through-access. All construction staging must occur

[82] To appear on the NPL, sites must have met or surpassed a predetermined hazard ranking system score, been chosen as a top priority site, pose a significant health or environmental threat, or be a site where the U.S. EPA has determined that remedial action is more cost-effective than removal action.

[83] East West Bank. *Phase I Environmental Site Assessment Warehouse Properties @ 131-137 South Raymond Avenue, 124-126 and 132-146 South Palm Avenue and 2009 & 2055 Pepper Avenue, Alhambra, Los Angeles County, CA 91801* May 6, 2019

[84] Google Earth. Website accessed November 22, 2022.

on-site in accordance with City requirements. *As a result, no impacts on an emergency evacuation plan would occur.*

G. *Would the project expose people or structures to a significant risk of loss, injury, or death involving wild lands fire, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands? ● No Impact.*

As indicated previously, the adjacent properties are urbanized and there are no areas of native or natural vegetation found within the vicinity of the project site. The project site is located outside of any wildfire risk designation or any areas where there is natural vegetation that may represent a significant wildfire risk. *As a result, no wildland fire impacts would occur.*

MITIGATION MEASURES

The analysis of potential impacts related to hazardous materials determined that the following mitigation is required:

Hazards & Hazardous Materials Mitigation Measure No. 1. The project's implementation would require the removal and proper disposal of the ACMs and LBP materials outlined in the report prepared by Reds Environmental Inspections, LLC. The removal must be undertaken by licensed contractors that are trained and experienced in the safe handling, removal, and disposal of such materials.

3.10 HYDROLOGY & WATER QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			✖	
B. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✖	
C. Would the project 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). Would the project result in substantial erosion or siltation on- or off-site;			✖	
ii). Would the project result substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site.			✖	
iii). Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			✖	
iv). Would the project impede or redirect flood flows?			✖	
D. In Flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✖
E. Has a sustainable groundwater plan been adopted that includes the project site?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on hydrology and water quality if it results in any of the following:

- The proposed project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

- The proposed project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

- The proposed project would 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 result in substantial erosion or siltation on- or off-

site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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, impede or redirect flood flows.

- The proposed project would risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.

- The proposed project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

A. *Would the project violate any water quality standards or waste discharge requirements? ● Less than Significant Impact.*

The proposed project would involve the construction of three new quick-serve food-related uses (a Starbucks®, a Raising Cane's®, and a Panda Express®) totaling 7,053 square feet of floor area. The project site is currently occupied by commercial and industrial uses, most of which are not presently active. The project would be a new commercial development within a 2.7-acre. All of the existing onsite buildings would be removed to accommodate the proposed new development. Landscaping would be provided around the site's perimeter, around the new buildings, and within the parking area. A total of 23,805 square feet or 20.17% of the total site would be landscaped. Once redeveloped, the amount of pervious area would essentially remain unobstructed.

As a permittee subject to the MS4 permit, the City is responsible for ensuring that all new development complies with the performance criteria contained in the permit. The City adopted Stormwater Low Impact Development (LID) Standards, as codified in Chapter 16.36 of the City Code. These standards were adopted to ensure compliance with the MS4 permit, to lessen the water quality impacts from new development. Pursuant to Section 16.36.050(c) of the City Code, the project applicant would be required to prepare a LID Plan to comply with a number of performance criterion, as set forth in Section 16.36.050(c). The overarching performance criterion relevant to the proposed project is that the project would be required to retain 100/filter percent of the Stormwater Quality Design Volume on-site.

The City of Alhambra Municipal Code includes standards and measures that are designed to reduce storm water runoff during construction activities in Chapter 16.34 of the Municipal Code, Section 16.34.070 (Construction Activity Storm Water Measures).[85] These measures include the following:

(1) Retain on-site the sediments generated on or brought to the project site, using treatment control or structural BMPs;

(2) Retain construction-related materials and wastes, spills and residues at the project site and prevent discharges to streets, drainage facilities, the MS4, receiving waters or adjacent properties;

(3) Contain non-storm water runoff from equipment and vehicle washing at the project site; and,

[85] Alhambra, City of. Code of Ordinances §16.34.070 Construction Activity Storm Water Measures. https://codelibrary.amlegal.com/codes/alhambra/latest/alhambra_ca/0-0-0-103363.

(4) Control erosion from slopes and channels through use of effective BMPs, such as limitation of grading during the wet season, inspection of graded areas during rain events; planting and maintenance of vegetation on slopes, if any, and covering any slopes susceptible to erosion.

Compliance with the terms and conditions of the Construction General Permit and the MS4 permit is required by state law, and the Applicant and/or its contractor would also be required to further address water quality impacts in compliance with the City regulations. Additionally, the project would be subject to a number of conditions of approval from the Public Works Department, Utilities Division. These include a requirement to implement structural and source BMPs to minimize pollutant discharges to the storm drain system during construction and operation.

The project would include various design measures implemented to control and prevent the pollution of storm water runoff. These design features include the use of high-density polyethylene (HDPE) storm drain pipes, trench drains, three and a half-foot wide catch basis, and PVC storm drain pipes. Any excess water would either be diverted into the existing storm drain through a system of newly proposed storm drains or would filter and percolate into the ground. During periods of heavy rain, storm water would be captured from the catch basins located in the landscaped areas. The water would then be conveyed to the storm water chambers through a system of new high-density polyethylene (HPDE) storm drain pipes. *Required compliance with State and City regulations, as well as project-specific conditions of approval, would reduce the impacts to levels that are less than significant.*

B. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? ● Less than Significant Impact.*

Grading related activities are not anticipated to encounter and deplete groundwater supplies. The project is not anticipated to deplete groundwater supplies through the consumption of the water (water consumption impacts are analyzed in Section 3.17.2.D). A search was conducted through the Regional Water Quality Control Board's on-line database Geotracker to identify the presence of any natural underground water wells. The search yielded no results.[86] Finally, the site is completely covered over in impervious surfaces and is not presently used for any groundwater recharge. While no significant adverse impacts on water quality are anticipated as part of the proposed project's construction and subsequent operation, the following standard conditions would be required:

- During construction, disposal of refuse and other materials should occur in a specified and controlled temporary area on-site physically separated from potential storm water runoff, with ultimate disposal in accordance with local, State, and Federal requirements.

- Sediment from areas disturbed by construction shall be retained on-site using structural controls to the maximum extent practicable.

- Stockpiles of soil shall be properly contained to eliminate or reduce sediment transport from the site to the streets, drainage of facilities, or adjacent properties via runoff, vehicle tracking, or wind.

[86] Geotracker GAMA. *Search for wells*. http://geotracker.waterboards.ca.gov/gama/gamamap/public/default.asp?CMD=runreport&myaddress=4143+rowland+avenue

The implementation of the aforementioned standard conditions would ensure that the potential water quality impacts are addressed. *As a result, the project's groundwater impacts would be less than significant.*

C. *Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site? ● Less than Significant Impact.*

The project proposes the redevelopment of 2.7-acres of land consisting of several commercial buildings and warehouses located northeast of Pepper Street and South Palm Avenue, into three fast-food restaurants with drive-thru lanes and parking with landscaped medians. Currently the property consists of various impervious surfaces, existing commercial buildings and parking lots with sparce landscaped areas. At present, runoff generally sheet flows to the surrounding streets or discharges via curb face outlets from the roofs, into several existing catch basins located near the northeast corner of Pepper Street and South Palms Avenue. From here the runoff converges within the existing stormwater conveyance systems south of the project and ultimately flows to the ocean via the Los Angeles River The project proposes onsite drainage improvements by way of landscaped areas to received runoff from adjacent impervious areas (roofs and hardscapes), catch basins, onsite conveyance system, a drywell and infiltration chambers. Runoff originating within the project boundary would be collected by the proposed onsite drainage inlets and routed to the drywell chamber where the required LID retention volume would be diverted to the infiltration chamber via a flow-flow pipe. The infiltration chamber is sized to provide the required volume capacity for both the LID BMP Design Capture Volume (DCV) and the difference between 80% of the predeveloped peak flow and the developed peak runoff for the 100-year, 24-hour storm event. The infiltration chambers are sized designed to dewater within 48 hours as required by the Los Angeles County Department of Public Works Hydrology Manual, dated January 2006. Since the project is proposing to retain and infiltration all of the increased runoff onsite, the only runoff that leave the site is 80% of the predeveloped runoff peak of which would continue to the current discharge location. The proposed project would be restricted to the designated site and would not alter the course of any offsite stream or water channel. No streams or rivers are located on or around the project site. No other bodies of water are located in and around the project site. *As a result, the impacts related to the alteration of the site's existing drainage pattern would be less than significant.*

i) *Would the project result in a substantial erosion or siltation on- or off-site? ● Less than Significant Impact.*

The proposed project would involve the construction of three new quick-serve food-related uses (a Starbucks®, a Raising Cane's®, and a Panda Express®) totaling 7,053 square feet of floor area. The project site is currently occupied by commercial and industrial uses, most of which are not presently active. The project would be a new commercial development within a 2.7-acre. All of the existing onsite buildings would be removed to accommodate the proposed new development. Landscaping would be provided around the site's perimeter, around the new buildings, and within the parking area. A total of 23,805 square feet or 20.17% of the total site would be landscaped. As a permittee subject to the MS4 permit, the City is responsible for ensuring that all new development complies with the performance criteria contained in the permit. The City adopted Stormwater Low Impact Development (LID) Standards, as codified in Chapter 16.36 of the City Code. These standards were adopted to ensure compliance with the MS4 permit, to lessen the water quality impacts from new development. Pursuant to Section 16.36.050(c) of the City Code, the project applicant would be required to prepare a LID Plan to comply with a number of performance criterion, as set forth in Section 16.36.050(c). The overarching performance criterion relevant to the proposed project is that the project would be required to retain /filter 100 percent of the Stormwater Quality Design Volume on-site. The

LID would help the project reduce stormwater runoff from the project site, thereby reducing the potential for erosion and siltation. The City of Alhambra Municipal Code includes standards and measures that are designed to reduce storm water runoff during construction activities in Chapter 16.34 of the Municipal Code, Section 16.34.070, Construction Activity Storm Water Measures). Once redeveloped, the amount of pervious area would essentially remain unchanged because of the additional landscaping. The project site is surrounded by existing streets and no off-site erosion would be permitted. *As a result, the impacts related to erosion would be less than significant.*

ii) *Would the project result substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite? ● Less than Significant Impact.*

The project site is not located within a designated flood zone. The site is located within Zone X (Refer to Exhibit 3-3). As previously mentioned, the project would include various design measures implemented to control and prevent the pollution of storm water runoff. These design features include the use of high-density polyethylene (HDPE) storm drain pipes, trench drains, three and a half-foot wide catch basis, and PVC storm drain pipes. Any excess water would either be diverted into the existing storm drain through a system of newly proposed storm drains or would filter and percolate into the ground. Once redeveloped, the amount of pervious area would essentially remain unchanged because of the additional landscaping. Stormwater runoff would be conveyed to existing curbs and gutters and storm drains. The project site is surrounded by existing streets and no off-site erosion would be permitted. *The impacts would be less than significant.*

iii) *Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? ● Less than Significant Impact.*

The City adopted Stormwater Low Impact Development (LID) Standards, as codified in Chapter 16.36 of the City Code. These standards were adopted to ensure compliance with the MS4 permit, to lessen the water quality impacts from new development. Pursuant to Section 16.36.050(c) of the City Code, the project applicant would be required to prepare a LID Plan to comply with a number of performance criterion, as set forth in Section 16.36.050(c). The overarching performance criterion relevant to the proposed project is that the project would be required to retain 100/filter percent of the Stormwater Quality Design Volume on-site. Once redeveloped, the amount of pervious area would essentially remain unchanged because of the additional landscaping. Stormwater runoff would be conveyed to existing curbs and gutters and storm drains. The project site is surrounded by existing streets and no off-site erosion would be permitted. The City of Alhambra Municipal Code includes standards and measures that are designed to reduce storm water runoff during construction activities in Chapter 16.34 of the Municipal Code, Section 16.34.070, Construction Activity Storm Water Measures). *As a result, the impacts related to the site' would be less than significant.*

iv) *Would the project impede or redirect flood flows? ● Less than Significant Impact.*

The project site is not located within a designated flood zone. The site is located within Zone X (Refer to Exhibit 3-3). In addition, the City would not be directly affected by dam failure from any of the dams located in the area (Devil's Gate Reservoir on the Arroyo Seco six miles north of Alhambra, or the Eaton Wash Reservoir on Eaton Wash four miles north of Alhambra). Tsunamis and seiches are not a threat because

Alhambra is not near the ocean or any other large body of water. *As a result, the impacts related to placing the project within a designated flood zone would be less than significant.*

D. *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? ● No Impact.*

The project site is not located within a designated flood zone. The site is located within Zone X (Refer to Exhibit 3-3). In addition, the City would not be directly affected by dam failure from any of the dams located in the area (Devil's Gate Reservoir on the Arroyo Seco six miles north of Alhambra, or the Eaton Wash Reservoir on Eaton Wash four miles north of Alhambra). Tsunamis and seiches are not a threat because Alhambra is not near the ocean or any other large body of water. As indicated previously, the implementation of the proposed project would essentially remain the same amount of pervious area due to additional landscaping. The impervious surfaces (asphalt, building slabs, etc.) that would be constructed may result in the generation of additional storm water runoff. In addition, the proposed project would be properly drained and is not expected to result in on-or off-site flooding. Stormwater runoff would be conveyed to existing curbs and gutters and storm drains. *As a result, no tsunami or seiche impacts would occur.*

E. *Has a sustainable groundwater plan been adopted that includes the project site? ● No Impact.*

The City of Alhambra 2020 Urban Water Management Plan (adopted in June 2021) shows the project site is included within the water service area.[87] A search was conducted through the Regional Water Quality Control Board's on-line database Geotracker to identify the presence of any natural underground water wells. The search yielded no results.[88] The development site is currently covered over in impervious surfaces and, as a result, the site is not being used for groundwater recharge. The project would include various design measures implemented to control and prevent storm water runoff. These design features include the use of HDPE storm drain pipes, trench drains, three and a half-foot wide catch basis, and PVC storm drain pipes. Any excess water would either be diverted into the existing storm drain through a system of newly proposed storm drains or would filter and percolate into the ground. During periods of heavy rain, storm water would be captured from the catch basins located in the landscaped areas. The water would then be conveyed to the storm water chambers through a system of new high-density polyethylene (HPDE) storm drain pipes. All of the improvements would be constructed pursuant to City requirements and their installation must be approved by the City. The project would not affect underground water wells. *As a result, no impacts on a groundwater plan would occur.*

MITIGATION MEASURES

The analysis of hydrology and water quality impacts indicated that no significant adverse impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

[87] City of Alhambra. *2020 Urban Water Management Plan*. June 2021. https://www.cityofalhambra.org/DocumentCenter/View/2672/City-of-Alhambra-2020-UWMP-FINAL-?bidId=
[88] Geotracker GAMA. *Search for wells*. http://geotracker.waterboards.ca.gov/gama/gamamap/public/default.asp?CMD=runreport&myaddress=4143+rowland+avenue

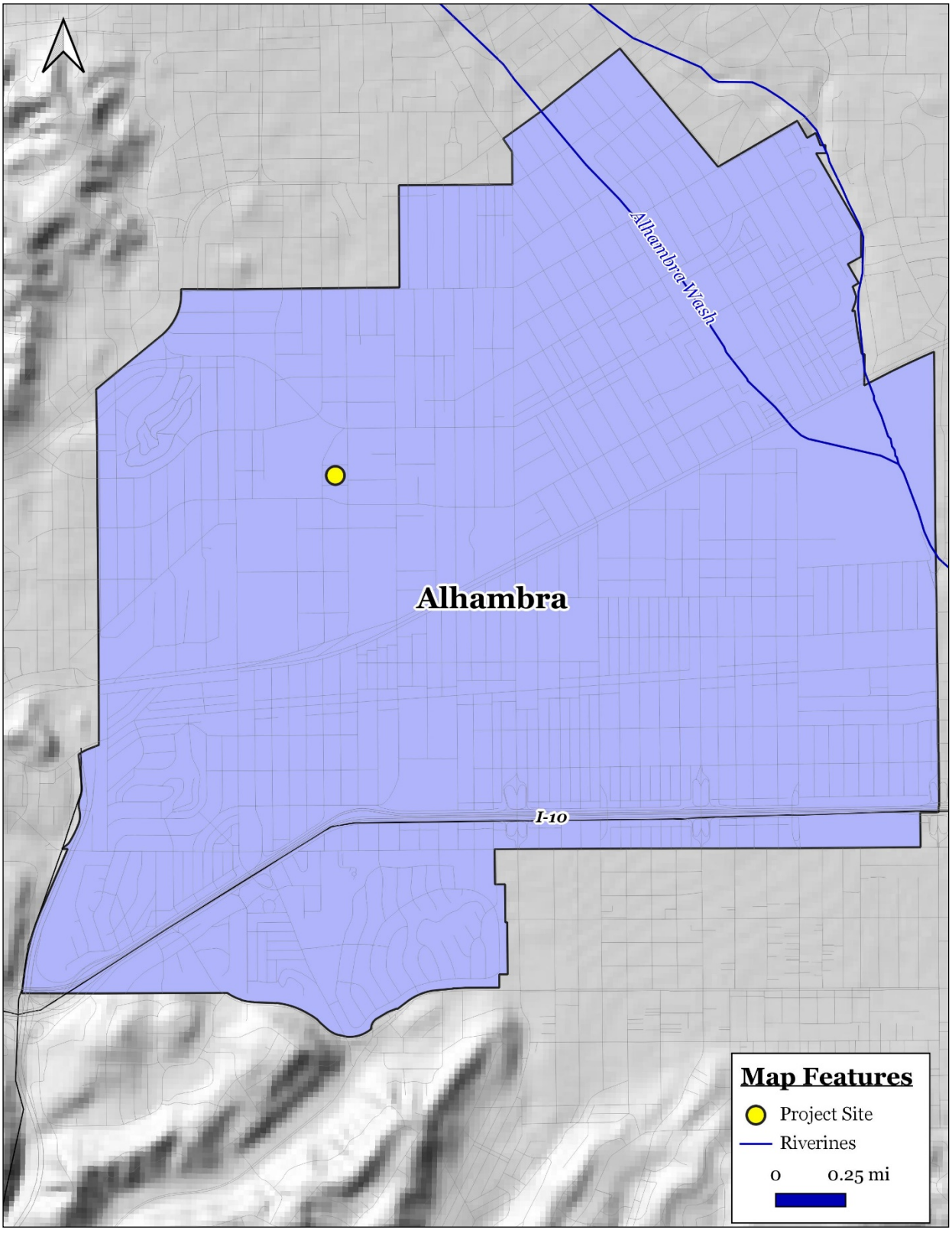

EXHIBIT 3-3 FEMA FLOOD MAP

Source: Los Angeles County Department of Public Works

3.11 LAND USE & PLANNING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project physically divide an established community?				✖
B. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, acting as Lead Agency, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The proposed project would physically divide an established community.
- The proposed project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

A. *Would the project physically divide an established community?* ● *No Impact.*

The 2.7-acre (117,996 square feet) project site is located in an urban area and is surrounded by a mix of uses including retail, industrial, office, and multiple-family residential development. The project site is bounded on the north by Teagarden Lane (which has been vacated and would be used for remote employee parking), on the east by Raymond Avenue, on the south by Pepper Street, and on the west by Palm Avenue. Exhibit 2-4 includes an aerial photograph of the project site and the adjacent development. Surrounding land uses in the vicinity of the project site are described below:

- *North of the project site*. Teagarden Lane extends along the project site's north side (which has been vacated and would be used for remote employee parking). Two medical buildings (88 S. Palm Avenue and 55 Raymond Avenue) are located further north, on the north side of the now vacated Teagarden Lane.[89]
- *South of the project site*. Pepper Street extends along the project site's south side. Warehousing and smaller distribution uses and office developments are located along the south side of Pepper Street (2048 Pepper Street).[90]
- *East of the project site*. Raymond Avenue extends along the project site's east side. The CosLo Pharmacy is located further east, on the east side of Raymond Avenue (150 S. Raymond Avenue).[91]

[89] Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on November 20, 2022.

[90] Ibid.

[91] Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on November 20, 2022.

- *West of the project site*. Palm Avenue extends along the west side of the project site.[92] Various commercial uses including a Costco commercial center are located further west, along the west side of Palm Avenue.[93]

The proposed project would be restricted to the project site and would not divide or disrupt any residential neighborhood. The proposed project would be consistent and compatible with the adjacent land uses with the processing of the General Plan Map Amendment (GPA) and the Zone Change. In addition, the proposed project would not result in incompatible land uses since the project would consist of fast-food restaurant uses that are consistent with surrounding development. Furthermore, the project site is located along a two City arterials, thus providing the proposed project with maximum exposure to persons traveling along both Palm Avenue and Raymond Avenue. *As a result, the potential impacts related to the division of an established community would be less than significant.*

B. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? ● No Impact.*

The project site is currently zoned as *Industrial* (I) (refer to Exhibit 3-4 for the zoning map). The project site's General Plan land use designation is *Industrial* (also refer to Exhibit 3-4). The project is being processed based upon the standards/regulations of the prior Zoning Code designation that was applicable to the project site. Under the prior Zoning Code, the project site was zoned IPD (Industrial Planned Development), but under the new Zoning Code currently in effect as of March 2, 2024, the project site is zoned I (Industrial). The proposed project would require a General Plan Map Amendment for the proposed land use designation change and Zoning Map Amendment for the zone change. The proposed uses are not permitted within the IPD zone, and thus, the project would require a zone change to Commercial Mixed-Use (CMU) and a General Plan Map Amendment to General Commercial. CMU is the updated zoning designation that replaced the CPD (Commercial Planned Development) zoning designation that was utilized in the previous Zoning Code. A conditional use permit (CUP) is also required for outdoor dining.[94] The project would also require the approval of a Tentative Parcel Map to subdivide the parcel; a Design Review Board Approval for the new buildings, landscaping, and Uniform Sign Program. Table 3-7 depicts the project's conformity with the City's zoning standards.

[92] Ibid.

[93] Ibid.

[94] City of Alhambra Municipal Code. *Title 23 (Zoning) Chapter 23.32 – IPD (Industrial Planned Development) Zone.* Date accessed April 27, 2016.

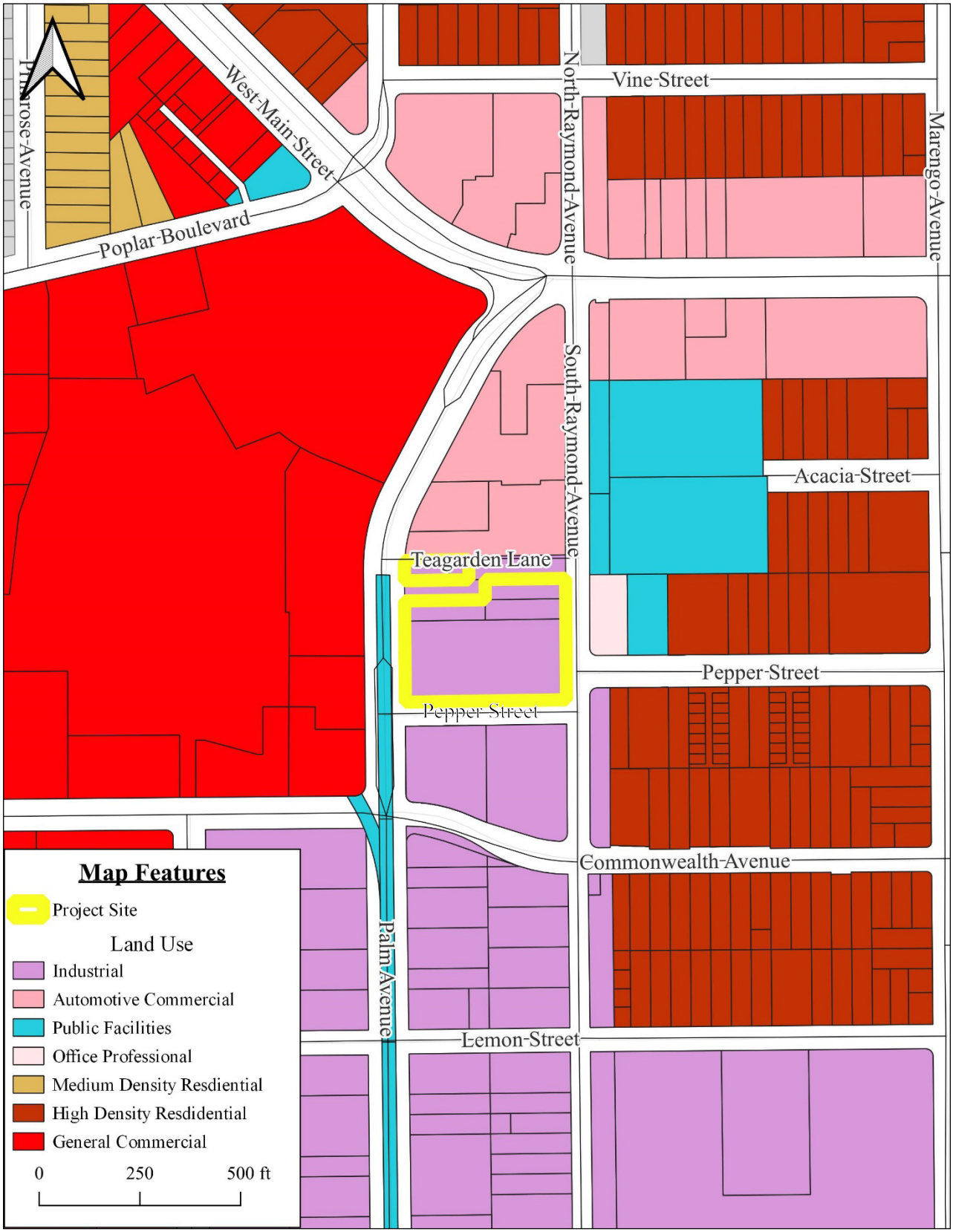

EXHIBIT 3-4 GENERAL PLAN MAP

Source: Quantum GIS

Table 3-7 Project's Conformity with the City's Zoning Standards

Description	City Requirements	Project Element
Maximum building height	CMU 40 within 50 feet of a Residential Zoning District, otherwise 75	23-feet, 3 inches
Maximum number of stories	CMU 3 within 50 feet of a Residential Zoning District, otherwise 5	1 story
Maximum FAR for lots over an acre in size	2.0 FAR	0.29 FAR (restaurant)
Minimum setback from butting public right-of-way	Not applicable to CMU zone	Not applicable to CMU zone

Source: City of Alhambra Municipal Code. Property Development Standards for CMU Zone. Section 23.05.030 Development Standards

According to Table 3-7, the project conforms to all of the development standards identified for the CMU zone. As indicated previously, the project would require the approval of a CUP for outdoor seating. The project must meet the following findings:

- The project is permitted under the City's zoning code.
- The project would comply with the City's General Plan land use designations and polices with the appropriate conditioning. The project complies with the site's development standards refer to Table 3-7).
- The project is physically suitable for the proposed site. The project complies with the City's zoning and building standards (refer to Table 3-7).
- The project is compatible with the surrounding uses. The site is abutted by medical, retail, and office uses.
- The project would have adequate fire flows and the local utility lines would have sufficient capacity to serve the project. In addition, the local utility providers would have adequate supplies to accommodate the increase in demand following the occupation of the project.
- The project would be provided with adequate public access.

The project is eligible for a Commercial Mixed Use (CMU) permit given its conformance with the above-mentioned findings. The following findings are applicable as part of the Planned Development Permit:

(1) The proposed use is permitted;

(2) With appropriate conditioning, the proposed use complies with the purpose and intent of the zoning ordinance and the city's General Plan;

(3) With appropriate conditioning, the proposed development would be physically suitable for the lot or lots on which it is proposed:

(4) With appropriate conditioning, the proposed use would be compatible with existing and future land uses within the general area in which the proposed use is located;

(5) With appropriate conditioning, there would be adequate provisions for water, sanitation and public utilities and services to ensure that the proposed use would not be detrimental to public health and safety;

(6) With appropriate conditioning, there would be adequate provisions for public access to serve the subject proposal.

All of the following findings must be consider in the review of the CUP:

(A) With appropriate conditioning, the proposed use is one conditionally permitted within the subject zone and complies with all of the applicable pro-visions of this title;

(B) With appropriate conditioning, the proposed use would not impair the integrity and character of the zone in which it is to be located;

(C) With appropriate conditioning, the subject site is physically suitable for the type of land use being proposed;

(D) With appropriate conditioning, the proposed use is compatible with the land uses presently on the subject property;

(E) With appropriate conditioning, the proposed use would be compatible with existing and future land uses within the zone and the general area in which the proposed use is to be located;

(F) With appropriate conditioning, there would be adequate provisions for water, sanitation, and public utilities and services to ensure that the proposed use would not be detrimental to public health and safety;

(G) With appropriate conditioning, there would be adequate provisions for public access to serve the subject proposal;

(H) With appropriate conditioning, the proposed use is consistent with the objectives, policies, general land uses and programs of the Alhambra General Plan;

(I) With appropriate conditioning, the proposed use would not be detrimental to the public interest, health, safety, convenience, or welfare.

As demonstrated above, the proposed project would not be in conflict with the City's land use policy governing commercial development. *As a result, the potential impacts related to the project's conformity with an adopted land use plan are considered to have no impact.*

MITIGATION MEASURES

The analysis of land use and development impacts indicated that no significant adverse impacts on land use and development would result from the implementation of the proposed project. As a result, no mitigation measures are required.

3.12 MINERAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✖
B. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The proposed project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- The proposed project would result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

A. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? • No Impact.*

The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. According to the SMARA, the following four mineral land use classifications are identified:

- *Mineral Resource Zone 1 (MRZ-1):* This land use classification refers to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- *Mineral Resource Zone 2 (MRZ-2):* This land use classification refers to areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.
- *Mineral Resource Zone 3 (MRZ-3):* This land use classification refers to areas where the significance of mineral deposits cannot be evaluated from the available data. Hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan material are often included in this category. Additional information about the quality of material in these areas could either upgrade the classification to MRZ-2 or downgraded it to MRZ-1.
- *Mineral Resource Zone 4 (MRZ-4):* This land use classification refers to areas where available information is inadequate for assignment to any other mineral resource zone.

According to the California Department of Conservation Division of Oil, Gas, and Geothermal Resources Well Finder, there are no existing or former oil wells and/or oil extraction activities located within the project site.[95] In addition, according to the Significant Mineral Aggregate Resource Area (SMARA) study area maps prepared by the California Geological Survey, the City of Alhambra is located within the larger San Gabriel Valley SMARA (identified as the Portland cement concrete-grade aggregate).[96] However, as indicated in the San Gabriel Valley P-C region MRZ-2 map, the project site is not located in an area where there are significant aggregate resources present.[97] In addition, the project site is not located in an area with active mineral extraction activities. *As a result, no impacts related to the availability of a mineral resource would occur.*

B. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? ● No Impact.*

A review of the San Gabriel Valley P-C region MRZ-2 map indicated that the project site is not located in an area that contains aggregate resources.[98] Therefore, the project's implementation would not contribute to a loss of availability to locally important mineral resources. Furthermore, the resources and materials that would be utilized for the construction of the proposed project would not include any materials that are considered rare or unique. *As a result, no impacts related to the availability of a mineral resource would occur.*

MITIGATION MEASURES

The analysis of potential impacts related to mineral resources indicated that no significant adverse impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

[95] California Department of Conservation. http://maps.conservation.ca.gov/doggr/index.html#close. Site accessed November 22, 2022.

[96] California Department of Conservation. *San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations.* ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/Plate%201.pdf

[97] Ibid.

[98] Ibid.

3.13 NOISE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		✖		
B. Would the project result in generation of excessive ground borne vibration or ground borne noise levels?			✖	
C. For a project located within the vicinity of a private airstrip or an airport land use plan, or where such 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?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on noise if it results in any of the following:

- The proposed project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- The proposed project would result in the generation of excessive ground borne vibration or ground borne noise levels.
- For a proposed 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.

A. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? • Less than Significant Impact with Mitigation.*

Noise levels may be described using a number of methods designed to evaluate the "loudness" of a particular noise. The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 db. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. Noise level increases of 3.0 dB or less are not generally perceptible to persons with average hearing abilities. Typical noise levels related to common activities are illustrated in Exhibit 3-5.

The ambient noise levels in the project area are dominated by traffic noise emanating from vehicles travelling on the local streets. A Westward Digital Sound Level Meter Model: 5URG5 was used to conduct the noise measurements. A series of 100 discrete noise measurements were recorded along the west side of Raymond Avenue and along the east side of Palm Avenue. The meter's height above the ground surface was approximately 4 feet. The meter was calibrated using an Extech Sound Meter Calibrator (with an estimated 2% accuracy following the calibration. The results of the survey are summarized in Table 3-8. The measurements were taken on a Friday afternoon at 2:00 PM. Table 3-8 indicates the variation in noise levels over time during the measurement period.[99] As indicated previously, the L_{50} noise level represents the noise level that is exceeded 50% of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. The average noise level along Raymond Avenue and Palm Avenue during the measurement period was 71.1 dBA and 70.7 dBA, respectively. The noise measurement is shown in Appendix D – Noise Worksheet.

Table 3-8 Noise Measurement Results

Noise Metric	Noise Level (dBA) along Raymond Avenue	Noise Level (dBA) along Palm Avenue
L^{50} (Noise levels <50% of time)	71.6	69.9
L^{75} (Noise levels <75% of time)	74.7	71.6
L^{90} (Noise levels <90% of time)	76.4	73.5
L^{99} (Noise levels <99% of time)	78.4	76.6
L_{min} (Minimum Noise Level)	61.5	68.3
L_{max} (Maximum Noise Level)	80.1	83.2
Average Noise Level	71.1	70.7

Source: Blodgett Baylosis Environmental Planning. November 2022

As indicated in Table 3-8, the average noise levels along Raymond Avenue and Palm Avenue, respectively during the measurement period were 71.1 dBA and 70.7 dBA. Noise contours are lines of equal noise level, shown on a map, extending out from a noise source (typically a roadway. Figure 25 of the City of Alhambra Health and Safety Element shows the existing traffic noise contours for the City. According to the City's General Plan EIR, the portions of the project site located adjacent to Raymond Avenue are located within the 65-CNEL contour.

The nearest land uses that may potentially be impacted from ground borne vibration and noise (primarily from the use of heavy construction equipment) are the residential units located along the east side of Raymond Avenue. The noisiest phases of construction are anticipated to be 77 dBA as measured at a distance of 200 feet from the construction activity. The construction noise levels would decline as one moves away from the noise source. This effect is known as *spreading loss*. In general, the noise level adjustment that takes the spreading loss into account calls for a 6.0 dBA reduction for every doubling of the distance

[99] Bugliarello, et. al., *The Impact of Noise Pollution,* Chapter 127, 1975.

beginning with the initial 50-foot distance. As a result, noise generated during the construction phase is estimated to be 77 dBA. Mitigation has been provided below to alleviate potential noise impacts generated during the project's construction phase.

The applicant would follow the City of Alhambra Code of Ordinances §18.02.060 (C) Exemptions, which states, "The following activities shall be exempted from the provisions of this chapter:

> (C) Noise sources associated with or vibration created by construction, repair, remodeling or grading of any real property or during authorized seismic surveys, provided the activities do not take place between the hours of 7 p.m. and 7 a.m. on weekdays including Saturday, or at any time on Sunday or a federal holiday, and provided any vibration created does not endanger the public health, welfare and safety."

According to the City of Alhambra Code of Ordinances §18.02.050(A) Noise Standards, allowable noise level for a commercial zone is 70 dBA. Section §18.02.050(B) of the Code of Ordinances states "In the event the ambient noise level exceeds the allowable noise level limits in the table above, the maximum allowable "noise level under the category shall be increased to reflect the maximum ambient noise level." [100]

The implementation of the proposed project would not expose future employees to excessive noise because the use that is contemplated for development is not a noise sensitive receptor. In addition, the future tenants would be required to adhere to all pertinent noise control regulations outlined by the City of Alhambra. Although the project would not expose future patrons or employees to excessive noise, noise emanating from the site may affect the adjacent sensitive receptors. As indicated in Section 2.4, the restaurants would be open seven days a week. However, mitigation has been provided to ensure that the nearby residents are fully protected from excess noise. This mitigation is described below:

- Security and door alarms that are audible in the exterior areas would not be permitted. The Applicant would be required to install "silent alarms."

- All lot sweeping and maintenance activities would be prohibited from taking place after hours.

- The Applicant shall ensure that the contractors conduct demolition and construction activities between the hours of 7:00 AM and 6:00 PM on weekdays and 9:00 AM to 12:00 PM on Saturdays, with no construction permitted on Sundays or Federal holidays.

[100] City of Alhambra. Code of Ordinances Section §18.02.050 Noise Standards. https://codelibrary.amlegal.com/codes/alhambra/latest/alhambra_ca/0-0-0-104573#JD_18.02.040

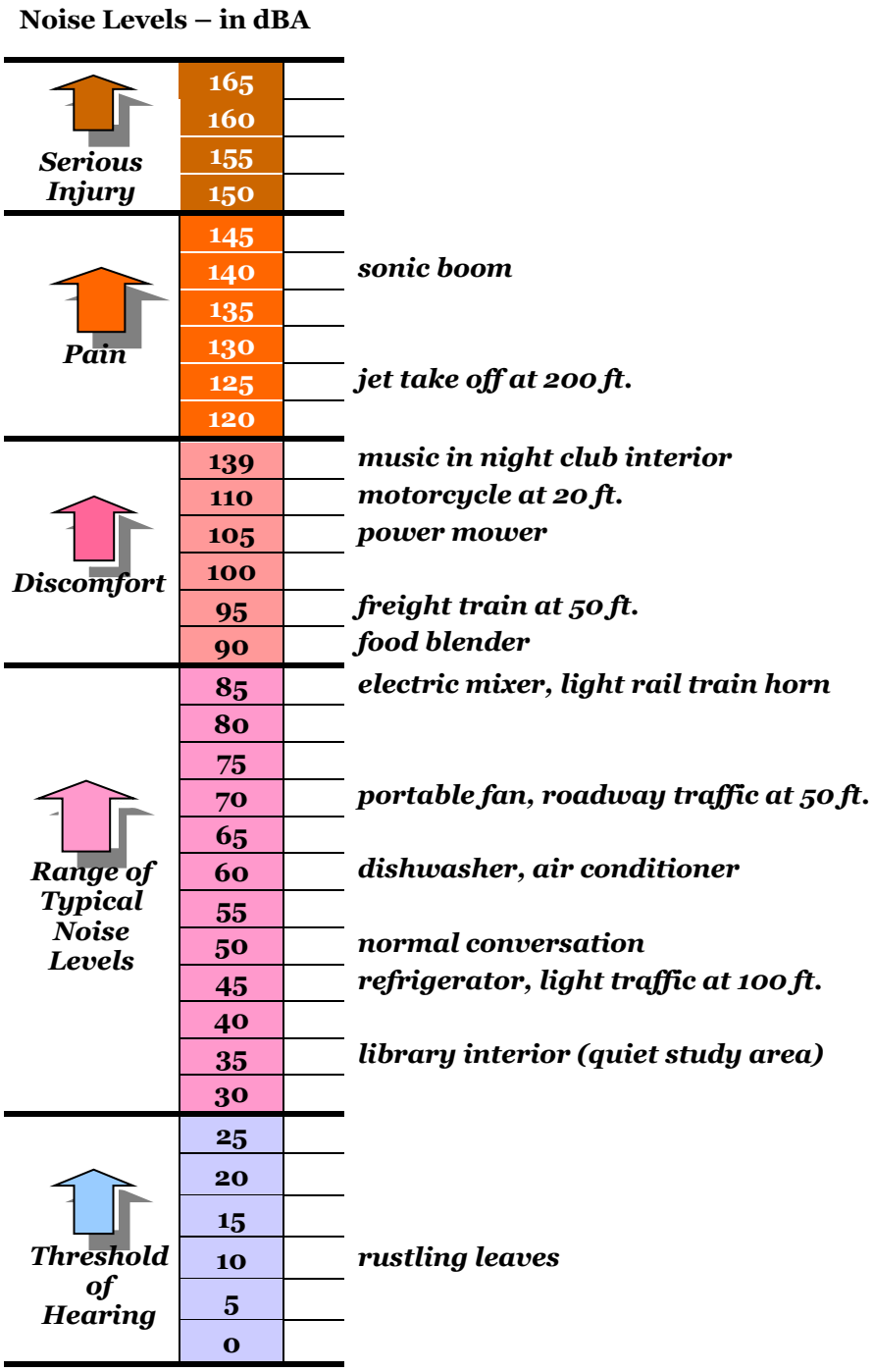

EXHIBIT 3-5 TYPICAL NOISE SOURCES AND LOUDNESS SCALE
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

- The Applicant shall ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment as a means to reduce machinery noise.

- The construction staging areas must be located in the western portion of the project site, away from the nearby residential uses.

The proposed project's traffic would not be great enough to result in a measurable or perceptible increase in traffic noise (it typically requires a doubling of traffic volumes to increase the ambient noise levels to 3.0 dBA or greater).[101] According to the City of Alhambra Public Works Department, the existing average daily traffic on Palm Avenue and Raymond Avenue is approximately 10,000 trips and 3,600 per day, respectively. The proposed project would generate a net 1,394 trips per day, which is well under the doubling required to result in a perceptible increase in traffic noise. Furthermore, the project site is not located within the line of sight for the single-family residential located along the east side of Raymond Avenue and is not expected to impact the aforementioned receptors.

Adherence to above-mentioned mitigation would reduce potential impacts to levels that are less than significant.

B. *Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels? ● Less than Significant Impact.*

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High frequency vibrations reduce much more rapidly than low frequencies, so that low frequencies tend to dominate the spectrum at large distances from the source. While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Construction activities may result in varying degrees of ground vibration, depending on the types of equipment, the characteristics of the soil, and the age and construction of nearby buildings. Ground vibrations associated with construction activities using modern construction methods and equipment rarely reach the levels that result in damage to nearby buildings though vibration related to construction activities may be discernable in areas located near the construction site.[102]

The background vibration velocity level in residential neighborhoods is usually around 50 vibration velocity level (VdB). The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximately dividing line between barely perceptible and distinctly perceptible levels for many people. Vibration sources found within a building such as operation of mechanical equipment, movement of people, or the slamming of doors are typical sources of indoor vibration. Typical outdoor sources of ground borne vibration include construction equipment, steel-wheeled trains, and traffic on rough roads. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, and 100 VdB, which the general threshold where minor damage can occur in fragile buildings.[103]

[101] Bugliarello, et. al., *The Impact of Noise Pollution,* Chapter 127, 1975.

[102] Federal Transit Administration Noise and Vibration Impact Assessment, May 2006.

[103] Ibid.

Table 3-9 summarizes the levels of vibration and the usual effect on people and buildings. The U.S. Department of Transportation (U.S. DOT) has guidelines for vibration levels from construction related to their activities, and recommends that the maximum peak-particle-velocity levels remain below 0.05 inches per second at the nearest structures.

Table 3-9 Common Effects of Construction Vibration

Peak Particle Velocity (in/sec)	Effects on Humans	Effects on Buildings
<0.005	Imperceptible	No effect on buildings
0.005 to 0.015	Barely perceptible	No effect on buildings
0.02 to 0.05	Level at which continuous vibrations begin to annoy occupants of nearby buildings	No effect on buildings
0.1 to 0.5	Vibrations considered unacceptable for person exposed to continuous or long-term vibration	Minimal potential for damage to weak or sensitive structures
0.5 to 1.0	Vibrations considered bothersome by most people, however tolerable if short-term in length	Threshold at which there is a risk of architectural damage to buildings with plastered ceilings and walls. Some risk to ancient monuments and ruins.
>3.0	Vibration is unpleasant	Potential for architectural damage and possible minor structural damage

Source: U.S. Department of Transportation

Typical levels from vibration generally do not have the potential for any structural damage. Some construction activities, such as pile driving and blasting, can produce vibration levels that may have the potential to damage some vibration sensitive structures if performed within 50 to 100 feet of the structure. The reason that normal construction vibration does not result in structural damage has to do with several issues, including the frequency vibration and magnitude of construction related vibration. Unlike earthquakes, which produce vibration at very low frequencies and have a high potential for structural damage, most construction vibration is in the mid- to upper- frequency range, and therefore has a lower potential for structural damage.

Various types of construction equipment have been measured under a wide variety of construction activities with an average of source levels reported in terms of velocity levels as shown in Table 3-10. Although the table gives one level for each piece of equipment, it should be noted that there is a considerable variation in reported ground vibration levels from construction activities. The data in Table 3-10 does provide a reasonable estimate for a wide range of soil conditions. Based on federal Transportation Administration's Transit Noise and Vibration Impact Assessment, a vibration level of 102 VdB (velocity in decibels or 0.5 inches per second [iii/sec]) or higher is considered safe and would not result in any construction vibration damage. It is important to note that no "impact" pile driving equipment would be used.[104]

[104] Google Earth. Site accessed May 19, 2023.

Table 3-10 Vibration Source Levels for Construction Equipment

Construction Equipment		PPV @25 ft. (inches/sec.)	Noise Levels (VdB) @ 25 ft.
Pile Driver (impact)	Upper range	1.58	112
	Typical	0.644	104
Pile Drive (Sonic)	Upper range	0.734	105
	Typical	0.170	93
Clam Shovel Drop		0.202	94
Large Bulldozer		0.089	87
Caisson Drilling		0.089	87
Loaded Trucks		0.076	86
Small Bulldozer		0.035	79

Source: Noise and Vibration During Construction

The nearest land uses that may potentially be impacted from ground borne vibration and noise (primarily from the use of heavy construction equipment) are the residential units located along the east side of Raymond Avenue. These residences are located approximately 100 feet at the closest point to the project site. When considering a spreading loss of 3.0 dB for every doubling of distance, the noise source, the estimated noise level at the nearest sensitive receptor would be 81 dBA assuming a baseline noise level of 87 dBA at the proposed project's property line.

Due to work times, restrictions, and other requirements varying on a case-by-case basis (depending on the type of permit or construction), rules for construction are dictated by Chapter 18 of the City's Municipal Code. The maximum permitted noise levels for the commercial zone is 70 dBA. Noise sources associated with or vibration created by construction, repair, remodeling or grading of any real property are permitted provided the activities do not take place between the hours of 7:00 PM and 7:00 AM on weekdays including Saturday, or at any time on Sunday or a federal holiday, and provided any vibration created does not endanger the public health, welfare and safety. Any complaints of noise or times can either be directed to the Code Enforcement Division or the Public Works Inspector. Typical noise levels from construction equipment is illustrated in Exhibit 3-6.

As noted in the previous subsection, the project is not considered to be a sensitive receptor; therefore, employees would not be affected by noise generated through daily activities occurring on-site. Furthermore, adherence to the operational mitigation provided in the previous subsection would ensure that nearby residents are not exposed to excessive noise levels.

The project would be required to adhere to all pertinent City noise control regulations. In addition, the cumulative traffic associated with the proposed project would not be great enough to result in a measurable or perceptible increase in traffic noise (it typically requires a doubling of traffic volumes to increase the ambient noise levels to 3.0 dBA or greater). *As a result, the impacts related to excessive ground borne noise and vibration would be less than significant.*

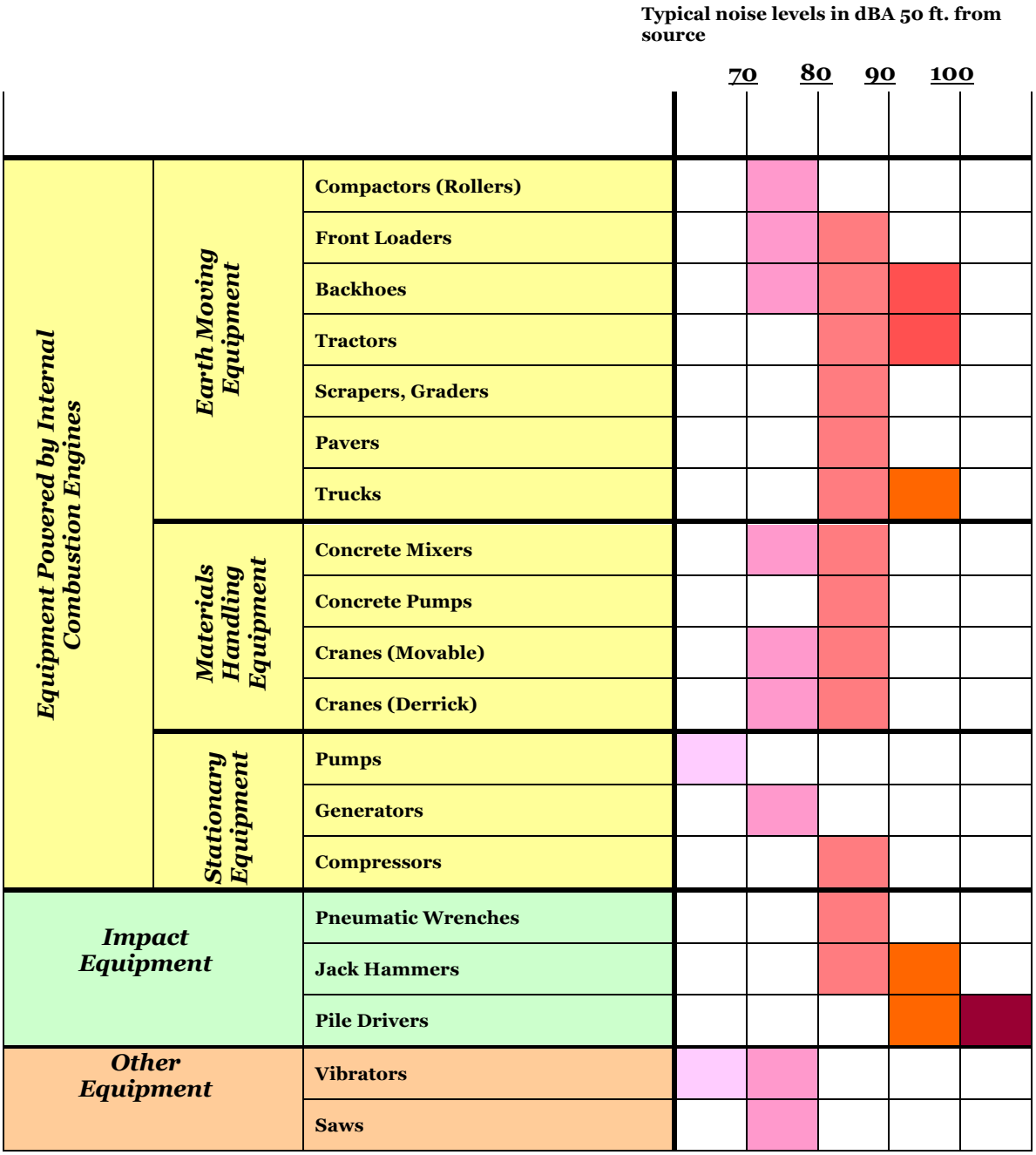

EXHIBIT 3-6 TYPICAL CONSTRUCTION NOISE LEVELS

Source: Blodgett Baylosis Environmental Planning

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 use airport. The nearest public airport to the project site is the San Gabriel Valley Airport, located 6.70 miles to the east of the project site.[105] The nearest private airstrip is the Whittier Air Strip located approximately 5.29 miles southeast of the project site.[106] As a result, the proposed project's implementation would not result in any excessive noise levels that would impact the project site. *As a result, no airport noise exposure impacts would occur.*

MITIGATION MEASURES

The following measures would further ensure that on-site construction and operational activities do not adversely impact noise sensitive land uses located nearby:

Noise Mitigation Measure No. 1. Security and door alarms that are audible in the exterior areas would not be permitted. The Applicant would be required to install "silent alarms" for the proposed restaurants.

Noise Mitigation Measure No. 2. All lot sweeping and maintenance activities would be prohibited from taking place after hours.

Noise Mitigation Measure No. 3. The Applicant shall ensure that the contractors conduct demolition and construction activities between the hours of 7:00 AM and 6:00 PM on weekdays and 9:00 AM to 12:00 PM on Saturdays, with no construction permitted on Sundays or Federal holidays.

Noise Mitigation Measure No. 4. The Applicant shall ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment as a means to reduce machinery noise.

Noise Mitigation Measure No. 5. The construction staging areas must be located in the western portion of the project site, away from the nearby residential uses.

[105] Google Earth. Website accessed November 22, 2022.

[106] Google Earth. Website accessed January 4, 2024.

3.14 POPULATION & HOUSING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✖
B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on population and housing if it results in any of the following:

- The proposed project would induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- The proposed project would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

A. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? ● No Impact.*

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. The variables that typically contribute to growth-inducing impacts, and the project's potential growth-inducing impacts, are identified in Table 3-11 provided below and on the following page. As indicated in Table 3-11, the proposed project would not result in any growth inducing impacts.

Table 3-11 Potential Growth-Inducing Impacts

Factor Contributing to Growth Inducement	Project's Potential Contribution	Basis for Determination
New development in an area presently undeveloped and economic factors which may influence development.	The proposed project would promote development of an underutilized parcel.	The new development would promote development consistent with the General Plan Policies for infill development.
Extension of roadways and other transportation facilities.	The proposed project would not involve the extension or modification of any off-site existing roadways.	The project would include new sidewalks, curbs, and gutters.
Extension of infrastructure and other improvements.	No other off-site water, sewer, and other critical infrastructure improvements are anticipated.	The only infrastructure improvements would be designed to serve the proposed project site only.

Factor Contributing to Growth Inducement	Project's Potential Contribution	Basis for Determination
Major off-site public projects (treatment plants, etc.).	No major facilities are proposed at this time.	No off-site facilities would be required to accommodate the projected demand for wastewater treatment or water.
The housing requiring replacement housing elsewhere.	The project does not involve the removal or the replacement of existing affordable or subsidized housing units.	No subsidized affordable housing would be affected by the proposed project.
Additional population growth leading to increased demand for goods and services.	The proposed project would result in long-term growth in employment.	The proposed project would result in long term employment generation.
Short-term growth inducing impacts related to the project's construction.	The proposed project may result in the creation of new construction employment.	Short-term increases in construction employment are considered a beneficial impact.

Source: Blodgett Baylosis Environmental Planning. 2016.

According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 Regional Transportation Plan (RTP), the City of Alhambra is projected to add a total of 5,500 jobs and 4,800 new residents through the year 2040.[107] According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 Regional Transportation Plan (RTP), the City of Alhambra is projected to add a total of 3,000 jobs (30,500 jobs in 2020 and 33,500 jobs in 2040).[108] Approximately 42 new jobs would be created by the three new restaurants.[109] The City's current unemployment rate is 3.8% as of October, 2022. The implementation of the proposed project would aid the City and the surrounding region in further reducing its unemployment rate. *As a result, no impacts would occur.*

B. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? ● No Impact.*

No housing units are located on the project site. No housing displacement impacts would occur. *As a result, no housing displacement impacts would occur.*

MITIGATION MEASURES

The analysis of potential population and housing impacts indicated that no significant adverse impacts would result from the proposed project's implementation.

[107] Southern California Association of Governments. *Growth Forecast. Regional Transportation Plan 2016-2040.* Adopted on April 7, 2016.

[108] Southern California Association of Governments. *Growth Forecast. Regional Transportation Plan 2016-2040.* Adopted on April 7, 2016.

[109] City of Aspen. *Employment Generation Rate Updates*. Study dated February 13, 2013.

3.15 PUBLIC SERVICES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i). Would the project result in substantial adverse physical impacts associated with Fire protection?			✖	
ii). Would the project result in substantial adverse physical impacts associated with Police protection?			✖	
iii). Would the project result in substantial adverse physical impacts associated with Schools?				✖
iv). Would the project result in substantial adverse physical impacts associated with Parks?				✖
v). Would the project result in substantial adverse physical impacts associated with Other public facilities?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on public services if it results in any of the following:

- The proposed project would 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: fire protection, police protection, schools, parks or other public facilities.

A. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public service:*

The analysis for the various public services are outlined in Subsections I through V.

i). *Would the project result in substantial adverse physical impacts associated with fire protection? ● Less than Significant Impact*

The City of Alhambra Fire Department provides fire prevention and emergency medical services within the City. The Alhambra Fire Department can respond to an emergency within four to six minutes from initial dispatch time. The Department maintains four engine companies, one truck, one urban search and rescue vehicle, and two paramedic ambulances on a 24-hour basis out of four stations. The first response station that would serve the proposed project is Station No. 74, located 0.38 miles to the southeast along Norwood Place. The proposed project would only place an incremental demand on fire services since the project would be constructed with strict adherence to all pertinent building and fire codes. In addition, the proposed project would be required to implement all pertinent Fire Code Standards. Furthermore, the project would be reviewed by City and County building and fire officials to ensure adequate fire service and safety. *As a result, the potential impacts to fire protection services would be less than significant.*

ii). *Would the project result in substantial adverse physical impacts associated with police protection? ● Less than Significant Impact.*

The Alhambra Police Department provides law enforcement services throughout the City. Currently, the Police Department is comprised of over 200 staff including sworn police officers, full-time and part-time civilians, reserve police officers, volunteer police chaplains, community volunteers, and is organized in two divisions, Field Services and Support services, each overseen by a police captain and reporting directly to the Chief of Police. The Alhambra Police Department is located at 211 South First Street.[110] Surveillance cameras would be provided for the three restaurants. The City of Alhambra Police Department shall review the site plan for the proposed project to ensure that the development adheres to the Department requirements. *Adherence to the above mitigation would reduce potential law enforcement impacts to levels that are less than significant.*

iii). *Would the project result in substantial adverse physical impacts associated with schools? ● No Impact.*

The proposed project would not involve any development and/or uses that could potentially affect school enrollments. However, the project may indirectly lead to an increase in student enrollment if future employees relocate to the City. The Alhambra Unified School District (AUSD) operates 19 schools in the City. The project Applicant would be required to pay mandatory development fees to the local school district as is required under State law under SB-50. The AUSD developer fees for commercial and industrial development is $3.79 per square foot of new development. The payment of these fees is considered to be full mitigation for any school impacts. *As a result, no impacts on schools would occur.*

iv). *Would the project result in substantial adverse physical impacts associated with parks? ● No Impact.*

The City of Alhambra Parks and Recreation Department operates six parks and recreation facilities throughout the City.[111] The proposed project would not result in any direct population increase that would affect park use. *As a result, no impacts on parks would occur.*

[110] Google Earth. *Site accessed November 22, 2022.*
[111] City of Alhambra. *Parks.* http://www.cityofalhambra.org/page/112/park_facilities/

v). *Would the project result in substantial adverse physical impacts associated with other public facilities?*
● *No Impact.*

The proposed project would not create direct local population growth which could potentially create demand for other governmental service. *As a result, no impacts on other public facilities would occur.*

MITIGATION MEASURES

The analysis determined that no mitigation measures were required.

3.16 RECREATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with 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?				✖
B. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on recreation if it results in any of the following:

- The proposed project would 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.

- The proposed project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

A. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? ● No Impact.*

The City of Alhambra Parks and Recreation Department operates six parks and recreation facilities throughout the City.[112] The City has a total of 442 acres of open space (including parks, trails, public school sites, landscaped street medians, and a golf course). The proposed project would not result in any direct population increase that would affect park use. In addition, the proposed project would not result in any residential development that would potentially physically alter any public park facilities and services. The project would not increase the demand for recreational facilities necessitating a new park or recreational facility since there is no direct population increase to the residential areas. *As a result, no impacts on parks would occur.*

B. *Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? ● No Impact.*

[112] City of Alhambra. *Parks*. http://www.cityofalhambra.org/page/112/park_facilities/

The proposed commercial development would not result in any development that would potentially increase the demand for recreational facilities and services. *As a result, no impacts related to the demand for parks would occur.*

MITIGATION MEASURES

The analysis of potential impacts related to parks and recreation indicated that no significant adverse impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

3.17 TRANSPORTATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			✖	
B. Conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)?			✖	
C. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✖	
D. Would the project result in inadequate emergency access?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on transportation and circulation if it results in any of the following:

- The proposed project would conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- The proposed project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
- The proposed project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- The proposed project would result in inadequate emergency access.

A. *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ● Less than Significant Impact.*

The proposed project would be located on four parcels totaling approximately 2.68 acres between Palm Avenue and Raymond Avenue, immediately north of Pepper Street, in the City. The site is bounded by Palm Avenue to the west, Pepper Street to the south, Raymond Avenue to the east, and Teagarden Lane (which has been vacated and would be used for remote employee parking) and commercial uses to the north. In the project vicinity, commercial land uses are located along Palm Avenue and Commonwealth Avenue north and west of the site, residential uses are located east of the site, and industrial uses are located south of Commonwealth Avenue along Palm Avenue and Raymond Avenue.

The site is currently occupied by industrial and commercial uses, of which only a 10,000 square-foot warehouse at 135 S. Raymond Avenue is currently active. A single driveway intersecting the north side of

Pepper Street provides primary access to the existing warehouse. The project's proposed land uses are two fast-food restaurants with drive-through windows and one coffee shop with a drive-through window and no indoor seating, which have a combined gross floor area off approximately 7,053 square feet. The fast-food restaurants proposed include a Panda Express (2,700 square feet) and Raising Cane's (3,181 square feet), while the 1,172 square-foot coffee shop is proposed to be a Starbucks. As shown in the site plan, parking would be provided on-site within the main surface parking lot surrounding the three restaurants, and an employee lot taking access from the now vacated Teagarden Lane. Teagarden Lane, already fully vacated and no longer providing a connection between Palm Avenue and Raymond Avenue and would serve as an employee parking area south of the former alley alignment. As proposed, approximately 121 parking spaces would be provided for the Project within the main parking lot, which is consistent with the Alhambra Municipal Code (AMC) off-street vehicle parking requirements. Project vehicular access/egress would be provided via three driveways intersecting the east side of Palm Avenue, one driveway intersecting the north side of Pepper Street, and two driveways intersecting the west side of Raymond Avenue. The North Driveway along Palm Avenue would replace the discontinuous and vacated Teagarden Lane and access 12 employee-only parking spaces. The Main Driveway along Palm Avenue is proposed for full access/egress, allowing inbound and outbound left- and right-turn movements, while the South Driveway would provide restricted right-turn only access/egress due to the presence of a raised median on Palm Avenue. The Pepper Street driveway would provide full access/egress, allowing inbound and outbound left- and right-turn movements. The Main Driveway along Raymond Avenue would allow for full access/egress in both directions, while the North Driveway would only serve trash trucks during off-peak periods.[113]

The Traffic Analysis was conducted in accordance with the methodology outlined in the City's Traffic Scoping memorandum dated April 6, 2022 (refer to Appendix A of Appendix B - Traffic Study). The Focused Traffic Analysis report is shown in Appendix B – Traffic Study.

Regional roadway access for the project site and the surrounding area is provided via an extensive network that includes freeways, arterials, collectors, and local streets. The San Bernardino (Interstate 10 [I-10]) Freeway is located to the south of the project site. This freeway provides convenient access to the larger, regional roadway network. Surface streets within the project study area include Palm Avenue, Commonwealth Avenue, Raymond Avenue, and Pepper Street.

- *Palm Avenue* is short roadway that provides access to commercial and industrial uses in the City, and it bounds the project site to the west. The segment of Palm Avenue adjacent to the project site is designated Raymond Avenue south to its terminus at Mission Road. In the project vicinity, Palm Avenue is primarily a north-south commercial and industrial corridor, with two through travel lanes in each direction. Side-by side northbound and southbound left-turn lanes run along Palm Avenue immediately west of the project site, for a length of approximately 610 feet stretching from the proposed location of the Main Driveway to the north. These side-by-side left-turn lanes allow for left-turn access to a series of commercial properties on both sides of the roadways. Parking is generally permitted on both sides of the roadway.

- *Commonwealth Avenue* is designated as a Secondary Arterial in the vicinity of the project, per the City's General Plan. Commonwealth Avenue run discontinuously through the City, traversing in an east-west direction between Granada Avenue to the east and Winchester Avenue to the west, where it continues westerly as Templeton Street. This roadway generally provides two travel lanes in each

[113] KOA. Revised Focused Traffic Analysis | Palm & Pepper Commercial Project. December 12, 2023.

direction between Fremont Avenue and Raymond Avenue, and one travel lane in each direction outside of this corridor. Left-turn pockets provide access to adjoining roadways and properties in the project vicinity. Parking is prohibited along Commonwealth Avenue, west of Raymond Avenue, but it is permitted on both sides of the roadway east of Raymond Avenue.

- *Raymond Avenue* is a Collector north of Main Street, per the City's General Plan, and a Collector along the segment that runs east of the project site. The roadway runs north-south, between Alhambra Road and Mission Road, where it continues on the other side of the railroad tracks until Hellman Avenue. This roadway generally provides one travel lane in each direction with left-turn channelization provided at select major intersections. Parking is generally permitted on both sides of Raymond Avenue.

- *Pepper Street* is a Local Street that runs adjacent to the project site to the south. The roadway runs discontinuously along an east-west alignment, providing access to local commercial and residential uses between Palm Avenue and Marengo Avenue. Pepper Street provides one travel lane in each direction, and parking is generally permitted on both sides of the roadway.

To determine the effects of the project on the operation of vehicular travel within the immediate Project vicinity, an evaluation was conducted of the Project's contribution to delay at key adjacent intersections under existing and future conditions. For purposes of a conservative traffic analysis, a Project completion year of 2024 has been assumed. In consultation with the City, the following nearby study intersections were selected for the analysis of potentially negative Project traffic effects: 1. Palm Avenue & Commonwealth Avenue 2. Raymond Avenue & Commonwealth Avenue;

For this analysis, the ITE Trip Generation Manual trip generation rates were used to determine the weekday daily, AM peak-hour, and PM peak-hour vehicle trips anticipated for the Project. As these rates do not account for such trip-reducing factors as internally captured trips, significant transit usage and/or walk-trip potential, or pass-by trips, the baseline vehicle trip estimates reflect a conservative condition. These trip-reducing factors are important considerations in determining the actual traffic generating characteristics of a development project and, therefore, adjustments were made to the baseline trip generation estimates to develop the project's vehicle trips. Although there are a few bus lines with stops within a comfortable walking distance of the Project site, transit/walk-in adjustments were conservatively excluded from the Project's trip adjustments. In addition, a low level of internal trip interaction is anticipated between the proposed fast-food restaurant and coffee shop uses, so the project trip generation estimates conservatively do not include internal capture adjustments. However, project trip adjustment factors were applied that account for the presence of "pass-by" trips. As motorists pass by the project, the specific convenient facilities provided by the Project (or other factors) may produce a stop at the site. Such activity is considered an interim stop along a trip that existed irrespective of the development of the Project, and therefore vehicles making these stops are not considered newly generated Project-related traffic. The ITE Trip Generation Manual provides a series of recommended pass-by trip reduction percentages for various commercial land use types and sizes. In line with these guidelines, pass-by trip reductions were applied to the project's proposed restaurant (Fast Food Restaurant with Drive-Through Window and Coffee/Donut Shop with Drive-Through Window and No Indoor Seating) components.[114]

[114] KOA. Revised Focused Traffic Analysis | Palm & Pepper Commercial Project. December 12, 2023.

The trip generation rates and aforementioned adjustment factors were employed to derive project vehicle trip projections. The proposed project's trip generation is shown below in Table 3-12. The project is anticipated to generate a total of 1,394 net daily vehicle trips, including 24 vehicle trips during the AM peak hour (11 inbound, 13 outbound) and 86 trips during the PM peak hour (45 inbound, 41 outbound). These peak-hour trips were distributed to the two study intersections for the Project impact analysis. Applying these inbound and outbound percentages to the (non-pass-by) project trip generation estimates previously calculated net project traffic volumes at the two study intersections were determined for the weekday AM and PM peak hours.

Table 3-12 Trip Generation Summary

Land Use	ITE Code	Intensity	Ave. Weekday	AM Pk. Hr.	PM Peak Hr.
Trip Generation Rates					
Warehouse	150	1,000 sq. ft.	1.71	0.17	0.18
Restaurant	931	1,000 sq. ft	83.84	0.73	7.80
Fast Food Restaurant w/ Drive Through	934	1,000 sq. ft	467.48	44.61	33.03
Coffee Shop w/Drive Through Window	938	Drive thru lane	179.00	39.81	15.08
Trip Generation Summary – Proposed Uses					
Fast-food w/drive through window		2,700 sq. ft.	1,262	8	89
Pass-by adjustment			-631	0	-49
Fast-food w/ drive through window (w/pass-by) Total			631	8	40
Fast-food w/drive through window		3,181 sq. ft.	1,487	10	105
Pass-by adjustment			-743	0	-58
Fast-food w/drive through (w/pass by) Total			744	10	47
Coffee Shop w/drive through, no seating (w/pass by)		2 drive thru lanes	358	80	30
Proposed Project Trips (Including pass-by trips)			-322	-72	-29
Coffee Shop w/drive through, no seating (w/pass by) Total			36	8	1
Project Traffic (including Pass-by Trips)			**3,107**	**98**	**224**
Total Trips (Excluding Pass-by Trips)			**1,411**	**26**	**88**
Trip Generation Summary – Existing Uses					
Warehouse		10,000 sq. ft.	17	2	2
Net Traffic Generation					
			1,394	**24**	**86**

Source: KOA. *Revised Focused Traffic Analysis | Palm & Pepper Commercial Project*. December 12 2023.

There are three existing transit lines located approximately 500 feet from the project site. These three lines are the Transit Line ACT Green Line, Transit Line ACT Blue Line, and Metro Line 258 Purple Line.[115] The project would not change or be in conflict with the existing transit lines. The City of Alhambra General Plan's Mobility Element includes the following policies:

[115] City of Alhambra. *Alhambra General Plan Vision 2040*. Approved August 12, 2019. https://www.cityofalhambra.org/DocumentCenter/View/473/Final-General-Plan-Approved-August-12-2019-PDF

- Policy M-1A Maintain peak hour LOS D for intersections on secondary arterial and collector roadways and, as feasible, on major arterials. *The project would not impact this policy*.

- Policy M-1B At major intersections where two major arterials intersect (such as along Fremont, Valley, Mission, and Garfield), peak hour LOS E or F may be acceptable. In these locations, balance the efficiency and convenience of vehicular operations with other General Plan goals and policies. *The project would not impact this policy*.

- Policy M-1C Plan and maintain the City's transportation facilities in a way that provides adequate and safe access for all users, including pedestrians, bicyclists, and motorists of all ages and abilities. *The project would be required to implement this policy as it applied to the proposed project*.

- Policy M-1D Develop and implement new mobility metrics that address alternative transportation modes and vehicle miles traveled, as required by Senate Bill 743. *The project would not impact this policy*.

- Policy M-1E To minimize the negative effects of cut-through traffic in residential neighborhoods, route truck traffic onto arterial streets, and consider measures to calm traffic in and/or divert cut through traffic from residential neighborhoods. *The project would not impact this policy*.

- Policy M-2B Improve transportation infrastructure and services in a way that will increase the utility and attractiveness of alternative modes of transportation. *The project would not impact this policy*.

- Policy M-2C Improve connectivity for alternative transportation modes throughout and beyond the City. *The project would not impact this policy*.

- Policy M-2D Create transit stop amenity and access improvements at key intersections on Atlantic Boulevard and Valley Boulevard. The intersections of Atlantic/Huntington Garfield, Atlantic/Main, and Atlantic/ Valley would be the first priority, and the intersections of Fremont/Valley and Garfield/Valley would be the second priority. *The project would not impact this policy*.

- Policy M-2E Investigate and where feasible implement first-mile/last-mile supportive measures to encourage and facilitate the use of transit. *The project would not impact this policy*.

- Policy M-2F As feasible, implement improvements to the City's bike network, as illustrated conceptually in Figure 12. The bikeway system should connect to the regional system and may need to be adjusted over time as conditions change. *The project would not impact this policy*.

- Policy M-3A Maintain parking standards that meet demand but do not unnecessarily encourage use of the drive-alone automobile. *The project would be required to adhere to this policy*.

- Policy M-3B Continue to re-evaluate parking standards periodically in light of travel mode shifts, changing land use patterns, and evolving vehicle technology. *The project would be required to adhere to this policy*.

- Policy M-4A As feasible in appropriate locations, retrofit streets to better accommodate all users. Possible redesigns of key nodes/corridors are shown in Figure 14. *The project would not impact this policy*.

The project would not change or be in conflict with the existing roadway, bicycle, and pedestrian facilities adopted by the City of Alhambra per the General Plan. *As a result, the impacts related to a circulation plan would be less than significant*.

B. *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)? ● Less than Significant Impact.*

Pursuant to the updated California Environmental Quality Act (CEQA) Guidelines, transportation impacts must now be determined based on an analysis of a development project's VMT impact. As of July 1, 2020, all land use projects within the State of California are required to prepare a VMT analysis. Per the City's TS Guidelines, and consistent with the State of California Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA, screening criteria were first applied to determine if a VMT analysis would be required for the Project. The project-type screening criteria outlined in the TS Guidelines are listed below:

- Projects located in a Transit Priority Area (TPA);
- Projects located in a low-VMT generating area;
- Local-serving K-12 schools, local parks, and day care centers;
- Local-serving retail centers, gas stations, banks, and restaurants (under 50,000 square feet);
- Local-serving hotels (e.g., non-destination hotels);
- Local-serving assembly uses, places of worship, and community organizations;
- Community institutions such as libraries and fire stations;
- Affordable, assisted-living, and senior housing projects;
- Local-serving community colleges and student housing projects near campus;
- Public parking; and,
- Projects generating fewer than 110 daily vehicle trips.[116]

The project, which consists of fast-food restaurant with drive-through window uses and a coffee/donut shop with drive-through window and no indoor seating use, would be comprised of only local-serving restaurant uses, with both the individual restaurant and total project floor areas measuring well below 50,000 square feet. The fast food restaurants are to serve the local community. The employees and the vast majority of the customers would be from the Alhambra and neighboring communities. This project would not create new vehicle trips. Therefore, project development would reduce the distance that trips associated with these land uses would have to travel. These land use types are explicitly defined in the City's TS Guidelines as being screened from further VMT analysis. Therefore, the project is presumed to have a less-than-significant VMT

[116] KOA. Revised Focused Traffic Analysis | Palm & Pepper Commercial Project. December 12, 2023.

impact.[117] *As a result, the impacts related to a VMT impact would be less than significant.*

C. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ● Less than Significant Impact.*

Vehicular access would be provided via three driveways intersecting the east side of Palm Avenue, one driveway intersecting the north side of Pepper Street, and two driveways intersecting the west side of Raymond Avenue. The North Driveway along Palm Avenue would replace the discontinuous and vacated Teagarden Lane and access 12 employee-only parking spaces. The Main Driveway along Palm Avenue is proposed for full access/egress, allowing inbound and outbound left- and right-turn movements, while the South Driveway would provide restricted right-turn only access/egress due to the presence of a raised median on Palm Avenue. The Pepper Street driveway would provide full access/egress, allowing inbound and outbound left- and right-turn movements. The Main Driveway along Raymond Avenue would allow for full access/egress in both directions, while the North Driveway would only serve trash trucks during off-peak periods.[118]

A sight distance analysis was prepared for the proposed project driveways along Palm Avenue, Raymond Avenue, and Pepper Street. The results of the sight distance analysis are presented in Appendix E of the Traffic Study. All calculations were performed in general accordance with the requirements of the current version of the Caltrans Highway Design Manual (HDM). The Caltrans HDM was last updated on July 1, 2020. Both stopping sight distance (SSD) and corner sight distance (CSD) measurements were performed at the proposed Project driveway locations and compared with minimum line-of-sight requirements. In brief, SSD is the distance required by a vehicle traveling along an uncontrolled roadway at the roadway's design speed to stop, on wet pavement, prior to striking an object in its travel path. CSD is the sight distance required by a driver entering or crossing an uncontrolled roadway from an intersecting roadway/driveway to perceive an oncoming vehicle and complete a turning or crossing maneuver without oncoming traffic substantially slowing or stopping. In accordance with Caltrans HDM standards, minimum SSD and CSD are to be provided on State facilities for all roadway intersections. This analysis accounts for the practice of minor-street motorists stopping at a limit line and then "creeping" forward to a point of visibility, which has long been recognized as "practical" under California law.

In order to complete the sight distance analysis, it was necessary to determine first the design speeds of Palm Avenue, Raymond Avenue, and Pepper Street. Where possible, the posted speed limit was assumed to be the roadway design speed. The segment of Palm Avenue adjacent to the project site is designated as a Collector per the City's General Plan, with two travel lanes in each direction. While no posted speed limit is provided along this segment, a speed limit of 30 miles per hour (MPH) was assumed, in line with the speed limit along Main Street north of the Project site. Raymond Avenue has a posted speed limit of 25 MPH. While no speed limit is posted along Pepper Street adjacent to the site, this roadway is designated as a Local Street per the General Plan, thus a prima facie design speed of 25 MPH was assumed for this roadway. Stopping Sight Distance – The minimum SSD standards are outlined in Index 201.3 of the Caltrans HDM. The required SSD for Palm Avenue is 200 feet based on the 30 MPH approach speed. Based on a 25 MPH design speed for Raymond Avenue and Pepper Street, the required SSD approaching their Project driveways is 150 feet. The

[117] Ibid.

[118] Land Development Consultants, Inc. *Site Plan, Tentative Parcel Map 84017, Sheet 1 of 1*. No Date.

minimum required SSD at the five Project driveway locations is summarized in Table 10. Corner Sight Distance – As shown in Appendix E of the Traffic Study, the CSD was also measured for motorists making turning movements from the project driveways onto adjacent roadways. The CSD standards for public and private roadway intersections are outlined in Index 405.1(2) and Table 405.1B of the Caltrans HDM. For private roadway intersections such as the project driveways, the minimum CSD shall be equal to the SSD, as determined above. However, to be conservative, the minimum CSD based on the roadway design speed (for both left- and right-turns from the Project driveways) was also compared with the available line of sight.[119]

A comparison of the available sight distance at the five project driveways with the required SSD and CSD is shown graphically in Appendix E of the Traffic Study. The required SSD and CSD are compared with the available sight distance. For the purposes of this analysis, it has been assumed that red curb markings would be installed on the (sides of the) roadways adjacent to the project site, on both sides of proposed driveway locations. As shown, along Palm Avenue, the curvature of the roadway north of the project site limits the available sight distance for exiting vehicles making left-turns onto southbound Palm Avenue. The project would set back landscaping along the east side of Palm Avenue in order to maintain clear sight lines to the north. The wide roadway and setback of buildings and landscaping aid in extending the sight distance for the Palm Avenue driveways. Looking to the north, both the required SSD and the CSD are met by the available sight distance at the project's Main Driveway and South Driveway. [120]

At the project North Driveway (vacated Teagarden Lane), the required SSD is met, but on-street parking north of the site restricts the sight lines to less than the required CSD. However, per the HCM, driveway intersections are only required to provide the minimum SSD. Thus, as the required SSD is met at this location and this driveway would only serve a limited number of employee parking spaces, left-turn egress from the project's North Driveway would be maintained. Looking to the south along Palm Avenue, the roadway provides a straight alignment and building and landscaping setbacks provide extended lines for exiting Project motorists to identify oncoming northbound traffic. The required SSD and CSD are met by the available sight distance for all three project driveways along Palm Avenue. The Project landscaping along the east side of Palm Avenue would maintain clear sight lines for exiting vehicles. Raymond Avenue, along the east side of the project site, provides a straight alignment both north and south of the project Main Driveway, which allows for clear lines of sight in both directions. For this driveway, the SSD and the CSD requirements are met by the available sight distance in both directions. In addition, most driveways to other properties along Raymond Avenue are located along the east side of the street. This would allow Project motorists exiting the Main Driveway to identify potential conflicting traffic as vehicles turn onto Raymond Avenue from across the street.

The segment of Pepper Street along the south side of the project site provides a straight alignment for an approximately 450-foot stretch between Palm Avenue and Raymond Avenue. While the required SSD can be provided at the project driveway location, the required CSD cannot be provided due to the short nature of the segment. However, as approaching vehicles would have to turn onto Pepper Street before they approach the project driveway, these vehicles would be traveling at a lower speed than the assumed 25 MPH design speed (typically in the 10-15 MPH range) and thus the required CSD does not need to be met.[121]

Based on the findings of the sight distance analysis at all five project driveway locations, no turning

[119] KOA. Revised Focused Traffic Analysis | Palm & Pepper Commercial Project. December 12, 2023.

[120] Ibid.

[121] KOA. Revised Focused Traffic Analysis | Palm & Pepper Commercial Project. December 12, 2023.

movement restrictions are required in order to maintain safe lines of sight. Thus, no restrictions to turning movements at the project driveway locations have been proposed, aside from the South Driveway on Palm Avenue operating as a right-turn-in/out only facility due to the presence of the raised median. In order to maintain the lines of sight demonstrated in the preceding analysis, red curb markings must be installed on roadways adjacent to the project site and affected landscaping must be trimmed to below the standard driver's eye height of 3.5 feet.

Operations of the proposed driveways along Palm Avenue, Raymond Avenue, and Pepper Street were evaluated to determine potential turning movement restrictions to/from the Project site that may be required in order to maintain safe and efficient operation of the adjacent roadways. The Project is proposing three driveway locations along the east side of Palm Avenue. In addition to these driveways, the segment of Palm Avenue adjacent to the Project site currently features two driveways along the west side of the roadway that provide access to the neighboring Costco site. Due to the complexity of the driveway configurations along Palm Avenue, a microsimulation analysis was prepared using the SimTraffic software to simulate queuing and turning movements from these commercial driveways. The results of this analysis, as well as an evaluation of potential turning movement restrictions for each Project driveway, are presented in the following sections.[122]

Palm Avenue Driveway Evaluation:

> In addition to the delay and LOS analysis that was conducted for the two study intersections, a queuing analysis was conducted to determine the turning movements that can be allowed in and out of Project driveways along Palm Avenue. Queuing conditions at the following Project driveways were evaluated: 1. Palm Avenue Main Driveway (central) 2. Palm Avenue North Driveway (vacated Teagarden Lane) 3. Palm Avenue South Driveway
>
> As discussed previously, existing turning movement volumes were collected at the study intersections in May 2022 at the three proposed driveway intersections. As the two fast-food restaurant uses proposed as part of the Project are not open during the weekday AM peak hour, only weekday PM peak-hour conditions were evaluated as part of the microsimulation analysis. The data collection at the driveway intersections included the collection of turning movement volumes into and out of the Costco driveway locations opposite the Project's proposed driveways. At the time of the counts, only outbound trips were allowed from the Costco driveway serving as the north leg of the intersection of Date Avenue & Commonwealth Avenue, causing vehicles to divert to other Costco driveways for entrance (primarily those along Palm Avenue). Thus, as discussed with City staff, inbound vehicular trips to the Costco site were redistributed through the study area to the closed driveway to approximate traffic volumes at the Costco driveway intersections under typical conditions.
>
> Following a methodology similar to that described in Section 5.4 of this report, future traffic volumes at the Project driveway intersections were developed accounting for ambient traffic growth and cumulative project traffic volumes. Once the future intersection traffic volumes were developed, the Project volumes at the Project driveway locations [determined using the Project trip generation, trip distributions presented in Table 5 and Figures 5(a) and 5(b), and Project pass-by trip volumes in

[122] KOA. Revised Focused Traffic Analysis | Palm & Pepper Commercial Project. December 12, 2023.

Figure 6(b)] were added to develop the Future Opening Year (2024) With Project traffic volumes at the Project driveway locations. These volumes are shown in Figure 12 for the weekday PM peak hour. The Project microsimulation study assesses vehicle queuing on the Palm Avenue corridor as well as within the Project site, during the same weekday PM peak hour evaluated under the intersection LOS analysis. These volumes were then used to establish a Synchro and SimTraffic model for the Future Opening Year (2024) With Project condition at the Palm Avenue driveway locations during the PM peak hour. Due to limitations in the SimTraffic software arising from the presence of closely spaced intersection, modifications to roadway configuration were made within the model.

Using the outputs from a SimTraffic microsimulation, the 95th percentile vehicle queue results for each Project-related lane group at the Palm Avenue driveway locations are detailed in Table 9 of the Traffic Study. The SimTraffic queue calculation worksheets are included in Appendix D of the Traffic Study. Queuing results are presented for only those queues that are associated with or may restrict access to or from the Project driveways. In the queuing analysis, the Project Main Driveway and North Driveway were evaluated as having full access, allowing left- and right-turns in and out. The Project South Driveway was modeled with right-turn only access and egress due to the raised center median preventing left-turn movements.

Table 3-13 Future Opening Year (2024) with Project Traffic Conditions
Palm Avenue Driveway Microsimulation Queuing Summary

Intersection	Peak Hour	Approach & Turning Movement[1]	Queue Length[2]
Palm Avenue & Commonwealth Avenue	PM	SBL	112
		SBT	115
		SBR	82
Palm Avenue & Project North Driveway	PM	SBL	14
		WB	34
Palm Avenue & Project Main Driveway	PM	SBL	41
		WB	63
Palm Avenue & Project South Driveway	PM	WBR	41

Notes: [1]SB – Southbound; WB – Westbound; L – Left Turn; T – Through; R – Right Turn
[2]95th percentile queue length in feet

Source: KOA. Revised Focused Traffic Analysis | Palm & Pepper Commercial Project. December 12, 2023.

The Project Main Driveway is planned to be located approximately 180 feet south of the now vacated Teagarden Lane. The driveway is located across from an existing Costco driveway on Palm Avenue. However, as discussed, the center of the Project Main Driveway is offset approximately 50 feet north of the Costco driveway, making the queuing analysis an important step in determining if the driveway can operate with full access. As shown in Table 9, during Future Opening Year (2024) With Project PM peak-hour conditions, the 95th percentile vehicle queue length for the southbound left-turn movement into this driveway is expected to extend approximately 41 feet. The presence of the striped southbound left-turn lane at this driveway location provides a refuge for southbound vehicles accessing the Project site to queue without impeding the flow of southbound traffic along Palm Avenue. Thus, it is recommended that left-turn movements into the Project Main Driveway be permitted.

Additionally, the 95th percentile queue for westbound traffic exiting the Project Main Driveway is expected to be 63 feet, or approximately 2.5 vehicle lengths. While this queuing may occasionally block the Panda Express drive-through exit (as discussed in Section 9), this queuing is not expected to interfere substantially with circulation conditions within the Project site. Further, to ensure that extended queuing along Palm Avenue from the intersection with Commonwealth Avenue does not restrict left-turn movements from the Project Main Driveway, southbound queues at the intersection of Palm Avenue & Commonwealth Avenue were reviewed. Under Future Opening Year (2024) With Project conditions, the southbound queues from Commonwealth Avenue are expected to extend to 115 feet north of the intersection. As the Project Main Driveway is proposed to be located approximately 320 feet north of this Commonwealth Avenue, these queues are not expected to restrict left-turn movements from the Project Main Driveway. Therefore, it is recommended that left-turn movements be permitted exiting the Project Main Driveway.

In order to improve the safety of left-turn movements from both the Project Main Driveway and the opposing Costco driveway, the Project is proposing to install striping improvements at this intersection. The improvements will include cat tracks formalizing the lane divisions through the intersection, as depicted conceptually in Figure 13 of Appendix B – Traffic Study. These markings will provide flexible turning movements from the Project Main Driveway and the Costco driveway, while also guiding vehicles into the proper travel lanes. The striping changes will also push the terminus of the solid (side-by-side) left-turn lane striping to the north along Palm Avenue, formalizing an increased size for this intersection. The larger intersection will allow more perpendicular left-turn movements across the Palm Avenue left-turn pockets, enabling the vehicles exiting the commercial driveways to cross the opposing driveways as through movements along Palm Avenue. Thus, these striping improvements will serve as a safety improvement over the existing striping configuration along Palm Avenue.

The Project North Driveway is located at the two-way stop-controlled intersection of Palm Avenue & the now vacated Teagarden Lane/Costco Driveway. As shown in Table 9, during the PM peak hour of Future Opening Year (2024) With Project conditions, the 95th percentile vehicle queue length for the southbound left-turn is expected to extend approximately 14 feet. Given the presence of side-by-side left-turn lanes on Palm Avenue at this intersection, this level of queuing does not pose an issue and left-turn movements into the Project North Driveway should be permitted. Further, the westbound 95th percentile queue for the Project North Driveway exiting traffic is expected to be approximately 34 feet. This level of queuing would result in minimal blockage of the parking spaces along the now vacated Teagarden Lane. It should be noted that Teagarden Lane, which already dead-ends between Palm Avenue and Raymond Avenue, will be fully vacated as part of Project development. As such, the east leg of the intersection will function as a driveway for Project employee parking and not as a public-serving alley. Therefore, allowing left-turn movements from the Project North Driveway is recommended.

The Project South Driveway is proposed to be located approximately 30 feet north of Pepper Street and 260 feet north of Commonwealth Avenue. With the raised center median on Palm Avenue stretching across the South Driveway location, left-turn movements will not be allowed into or out of this driveway. In the Future Opening Year (2024) With Project PM peak hour scenario, 95th percentile vehicle queue lengths for westbound exiting traffic will extend approximately 41 feet. These expected vehicle queue lengths can comfortably be contained on the Project site.

Raymond Avenue Driveway Evaluation:

> The Main Driveway along Raymond Avenue is proposed to be located approximately 100 feet north of Pepper Street. Raymond Avenue operates as a low-speed, low-volume Local Street with parking permitted on both sides of the roadway. Several driveways are provided along both sides of Raymond Avenue, north and south of the Project site, for access to adjacent land uses. As discussed in the following section, sufficient sight distance is provided along this roadway in order for Project motorists entering and exiting the site to identify and avoid potential conflicting traffic. For these reasons, no turning movement restrictions are suggested for the Raymond Avenue Main Driveway.

Pepper Street Driveway Evaluation:

> The driveway along Pepper Street is proposed to be located approximately 220 feet east of Palm Avenue. Adjacent to the site, Pepper Street is a 450-foot long Local Street segment with parking permitted on both sides of the roadway. All other driveways along this segment of Pepper Street are located on the opposite side of the roadway, which provides clear lines of sight for motorists exiting the Project site to identify conflicting traffic. As discussed in the following section, sufficient sight distance is provided along this roadway in order for Project motorists entering and exiting the site to identify and avoid potential conflicting traffic. For these reasons, no turning movement restrictions are recommended for the Pepper Street driveway.[123]

The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Implementing the striping improvements over the existing striping configuration along Palm Avenue would allow improvement of the safety of left turn movements from both the Project Main Driveway and the opposing Costco Driveway. *As a result, the traffic and access impacts would be less than significant.*

D. *Would the project result in inadequate emergency access? ● No Impact.*

In order to ensure that the Project's parking and drive-through facilities have been designed to accommodate the standard passenger vehicles expected to utilize the site, a review of on-site circulation conditions has been conducted. Turning movement template simulations for large passenger vehicles have been conducted for vehicles accessing and egressing the drive-through lane facilities and Project site driveways. In addition, a turning movement template simulation for the Raising Cane's delivery truck (the largest heavy vehicle anticipated to access the site) has been run to show that the delivery truck can safely access/egress the southern portion of the site via the driveways along Raymond Avenue and Palm Avenue. The large passenger vehicle and heavy vehicle swept path analyses are presented in Appendix H of the Traffic Study. Based on the results of this review, the Project parking and landscaping areas have been modified and adjusted to ensure that sufficient clearance is provided throughout the site to provide safe circulation for both large passenger vehicles and heavy trucks.

As discussed previously, queuing of exiting vehicles at the Project Main and South Driveways along Palm Avenue are expected to have 95th percentile vehicle queues of approximately 63 feet and 41 feet, respectively, during the PM peak hour under Future Opening Year (2024) traffic conditions. Based on these queue

[123] KOA. Revised Focused Traffic Analysis | Palm & Pepper Commercial Project. December 12, 2023.

lengths, the drive-through lane exits of both the Panda Express and Raising Cane's restaurants may experience some blockages during peak periods. However, additional vehicle storage space within the drive-through lanes is provided between the drive-through pick-up window and drive-through exit. This will allow three to four vehicles to queue without impeding the drive-through operations at the Panda Express, and six to seven vehicles per lane to queue at the Raising Cane's. Thus, during periods when the queues of vehicles exiting the Project driveways may block the drive-through lane exits, the design of the drive-through facilities provides space in which vehicles can queue as they merge with Project driveway exiting traffic, ensuring that these blockages will not result in spillover queuing effects within the drive through facilities.

The revised conceptual emergency pumper fire truck maneuvers plan is provided as Attachment C in Appendix B of the Traffic Study. The revised plan incorporates the latest site plan as a base and contains the relevant overlays representing the appropriate 28-foot turning radius template on both sides of the center driveway on Palm Avenue, as well as in the drive aisle at the southeast corner of the site (adjacent to the Raising Cane's drive-through lane entrance).

During construction and operation phases of the project, none of the adjacent roadways would be closed to traffic. Additionally, none of the proposed driveways would be blocked. *As a result, no adverse impacts would occur.*

MITIGATION MEASURES

The analysis of potential transportation impacts indicated that the impacts would be less than significant impacts. As a result, no mitigation measures are required.

3.18 TRIBAL CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:		✖		
i) Would the project have 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		✖		
ii). Would the project have 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American.		✖		

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on tribal cultural resources if it results in any of the following:

- The proposed project would 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 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).

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

A. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: ● Less than Significant Impact with Mitigation*

A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

- 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a).

B. i). *Would the listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? ● Less than Significant Impact with Mitigation*

SB-18 and AB-52 consultation letters were mailed to a total of eight tribes, including the different Gabrieleño subsets and the Soboba tribe. Appendix G – Tribal Consultation Responses shows the consultation letters from the tribes. The specific tribal contacts included the following:

- Rudy Ortega, Tribal President, Fernandeno Tataviam Band of Mission Indians;
- Sandonne Goad, Chairperson, Gabrielino /Tongva Tribe;
- Anthony Morales, Chairperson, Gabrieleno/Tongva – San Gabriel Band of Mission Indians;
- Robert F. Dorame, Tribal Chair/Cultural Resources, Gabrielino Tongva Indians of California Tribal Council;
- Charles Alvarez, Gabrielino- Tongva Indians of California Tribal Council;
- Lovina Redner, Tribal Chair, Santa Rosa Band of Cahuilla Indians;
- Isaiah Vivanco, Chairperson, Soboba Band of Luiseno Indians;
- Joseph Ontiveros, Cultural Resource Director, Soboba Band of Luiseno Indians;
- Andrew Salas, Chairman, Gabrieleno Band of Mission Indians – Kizh Nation; and,
- Christina Conley, Tribal Consultant and Administrator, Gabrielino Tongva Indians of California Tribal Council.

Only one of the aforementioned tribes responded. The tribal representative of the Gabrielino-Kizh indicated that the project site is situated in an area of high archaeological significance. As a result, the following mitigation is required:

- The project Applicant would be required to obtain the services of a qualified Native American Monitor during construction-related ground disturbance activities. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the monitor has indicated that the site has a low potential for archeological resources.

Adherence to the abovementioned mitigation would reduce potential impacts to levels that are less than significant. In the unlikely event that remains are uncovered by construction crews and/or the Native American Monitors, all excavation/grading activities shall be halted and the Alhambra Police Department would be contacted (the Department would then contact the County Coroner). Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA would apply in terms of the identification of significant archaeological resources and their salvage. *As a result, the impacts would be less than significant with mitigation*.

C. ii). *Would the project have 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe? ● Less than Significant Impact with Mitigation*

The San Gabriel Valley (and the greater Los Angeles Basin) was previously inhabited by the Gabrieleño-Kizh people, named after the San Gabriel Mission.[124] The Gabrieleño-Kizh tribe has lived in this region for around 7,000 years.[125] Before European contact, approximately 5,000 Gabrieleño-Kizh people lived in villages throughout the Los Angeles Basin.[126] Archaeological sites are often located along creek areas, ridgelines, and vistas.[127] Villages were typically located near major rivers such as the San Gabriel, Rio Hondo, or Los Angeles Rivers. While no major coastal rivers traverse the City, Alhambra's proximity to other known village sites throughout the San Gabriel Valley make it likely that Native Americans either lived or traveled through the City.[128] Formal Native American consultation was provided in accordance with SB-18 and AB-52. SB-18 and AB-52 consultation letters were mailed to a total of eight tribes, including the different Gabrieleño subsets and the Soboba tribe. Appendix G – Tribal Consultation Responses shows the consultation letters from the tribes. The specific tribal contacts included the following:

- Rudy Ortega, Tribal President, Fernandeno Tataviam Band of Mission Indians;
- Sandonne Goad, Chairperson, Gabrielino /Tongva Tribe;
- Anthony Morales, Chairperson, Gabrieleno/Tongva – San Gabriel Band of Mission Indians;

[124] Tongva People of Sunland-Tujunga. *Introduction*. http://www.lausd.k12.ca.us/Verdugo_HS/classes/multimedia/intro.html. Website accessed in December 2014.

[125] Ibid.

[126] Rancho Santa Ana Botanical Garden. *Tongva Village Site*. http://www.rsabg.org/tongva-village-site-1. Website accessed in March 2016.

[127] McCawley. The First Angelinos, The Gabrieleño Indians of Los Angeles County. 1996.

[128] Tongva People. *Villages*. http://www.tongvapeople.org/?page_id=696. Website accessed in March, 2016.

- Robert F. Dorame, Tribal Chair/Cultural Resources, Gabrielino Tongva Indians of California Tribal Council;
- Charles Alvarez, Gabrielino- Tongva Indians of California Tribal Council;
- Lovina Redner, Tribal Chair, Santa Rosa Band of Cahuilla Indians;
- Isaiah Vivanco, Chairperson, Soboba Band of Luiseno Indians;
- Joseph Ontiveros, Cultural Resource Director, Soboba Band of Luiseno Indians;
- Andrew Salas, Chairman, Gabrieleno Band of Mission Indians – Kizh Nation; and,
- Christina Conley, Tribal Consultant and Administrator, Gabrielino Tongva Indians of California Tribal Council.

Only one of the aforementioned tribes responded. The tribal representative of the Gabrielino-Kizh indicated that the project site is situated in an area of high archaeological significance. As a result, the mitigation measure is shown below. *As a result, the cultural resources impacts would be less than significant with mitigation.*

MITIGATION MEASURES

The following mitigation is required to address the mitigation requested by the Gabrieleno Band of Mission Indians - Kizh Nation as part of the SB-18 and AB-52 consultation:

Tribal Cultural Resources Mitigation Measure No. 1. Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.

Tribal Cultural Resources Mitigation Measure No. 2. Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial).

Tribal Cultural Resources Mitigation Measure No. 3. Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.

The tribe has requested that all information be kept in a confidential appendix to be mentioned in the public document but not included. The full mitigation measure is included in the confidential appendix.

3.19 UTILITIES AND SERVICE SYSTEMS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✖	
B. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			✖	
C. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✖	
D. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✖	
E. Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on utilities if it results in any of the following:

- The proposed project would 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.

- The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

- The proposed project would result in a determination by the wastewater treatment provider which serves or may serve the proposed project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

- The proposed project would 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.

- The proposed project would negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals.

- The proposed project would comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.

The Alhambra Municipal Code Section 20.25.030 Required Diversion Rates includes:

> The applicant for a covered project shall divert the minimum percentage of the construction and demolition waste resulting from the project pursuant to Construction Waste Reduction, Disposal and Recycling requirements of the California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations.

A. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? ● Less than Significant Impact.*

The proposed project would involve the construction of three new quick-serve food-related uses (a Starbucks®, a Raising Cane's®, and a Panda Express®) totaling 7,053 square feet of floor area. The project site is currently occupied by commercial and industrial uses, most of which are not presently active. Only a 10,000 square-foot warehouse located at 135 S. Raymond Avenue is currently in operation. All of the existing onsite buildings would be removed to accommodate the proposed project.

According to the City's Sewer System Management Plan, the City's existing sewer collection system is made up of a network of gravity sewers, pump stations, and force mains. The gravity system consists of approximately 128.51 miles (678,510 feet.) of pipe and 2,800 manholes and cleanouts. The system also includes seven pump stations and 7,800 feet of associated force mains. The general direction of flow is from north to south and west to east. The majority of the local sewers tie directly into one of the Sanitation Districts of Los Angeles County (LACSD) trunk sewers crossing through the City. The sewage is then transported out of the City at the southeast corner. The sewers are primarily constructed of vitrified clay pipe with sizes ranging from six-inches to 24-inches in diameter. Approximately 87% of the pipes are eight-inch in diameter.

A majority of the City (the project site included) is located within Los Angeles County Sanitation District Area 16. LA County Sanitation District Area 16 is served by the Joint Outfall System. Sewage generated within the City is conveyed to the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson. The JWPCP has a design capacity of 385 mgd and currently processes an average flow of 326.1 mgd. The proposed project's utility connections would consist of the following:

- *Raising Cane's*. The proposed project would connect to an existing 8-inch sewer main in Pepper Street.
- *Panda Express*. The proposed project would connect to an existing 8-inch sewer main in Palm Avenue. The maximum building height to the top of the parapet is 18-feet.

- *Starbucks*. The proposed project would connect to an existing 8-inch sewer main in Raymond Avenue.[129]

As indicated in Table 3-14, the future development is projected to generate 564 gallons of effluent on a daily basis. When discounting the existing effluent generation (450 gallons per day), the net increase would be 396.4 gallons per day as indicated in Table 3-14. The wastewater generation is shown in Appendix E – Utilities Worksheets.

Table 3-14 Wastewater (Effluent) Generation (gals/day)

Use	Unit	Factor	Generation
Existing Use -warehouse	10,000 sq. ft.	0.025 gals/day/sq. ft.	250 gals/day
Future Use – Fast food	7,053 sq. ft.	0.08 gals/day/sq. ft.	564 gals/day
Net Change			314 gals/day

Source: Blodgett Baylosis Environmental Planning (Appendix E – Utilities Worksheets)

The existing sewer lines have sufficient capacity to accommodate the projected flows. Adequate sewage collection and treatment are currently available. In addition, the new plumbing fixtures that would be installed would consist of water conserving fixtures as is required by the current City Code requirements, no new or expanded sewage and/or water treatment facilities would be required to accommodate the proposed project. *As a result, the proposed project's wastewater impacts would be less than significant.*

B. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? ● Less than Significant Impact.*

The Water Division of the City's Utilities Department is responsible for the production, treatment, disinfection, storage, and distribution of domestic water. According to the City's 2015 Urban Water Management Plan, the City has the legal right to pump groundwater from both the Main San Gabriel Basin and the Raymond Basin. The City also has the legal right to purchase imported water from the Metropolitan Water District. The demand for water peaked at 9,972 acre-feet during 2015. The total amount supplied equaled the demand for 2015 (9,972 acre-feet). The supplies would continue to match demand through the year 2030.[130] The proposed project's utility connections would consist of the following:

- *Raising Cane's*. The proposed project would connect to an existing 12-inch water line also located in Pepper Street.
- *Panda Express*. The proposed project would connect to an existing 8-inch water line also located in Palm Avenue.
- *Starbucks*. The proposed project would connect to an existing 6-inch water line also located in Raymond Avenue.

As indicated in Table 3-15, the future development is projected to consume 836 gallons of water on a daily basis. When discounting the existing water consumption (450 gallons per day), the net increase would be

[129] Los Angeles County Sanitation Districts. *Joint Water Pollution Control Plant*. http://www.lacsd.org/wastewater/wwfacilities/jwpcp/default.asp

[130] SA Associates. *2015 Urban Water Management Plan for the City of Alhambra*. June 2016.

396 gallons per day as indicated in Table 3-16. The water consumption is shown in Appendix E – Utilities Worksheets.

Table 3-15 Water Consumption (gals/day)

Use	Unit	Factor	Generation
Existing Use -warehouse	10,000 sq. ft.	0.045 gals/day/sq. ft.	450 gals./day
Future Use – Fast food	7,053 sq. ft.	0.12 gals/day/sq. ft.	846 gals/day
Net Change			396 gals/day

Source: Blodgett Baylosis Environmental Planning (Appendix E – Utilities Worksheets)

California prior to 2023 experienced a prolonged drought over the previous five years. In response to this drought, Governor Brown announced emergency legislation aimed at reducing water consumption. Governor Brown signed an Executive Order in April of 2015 in which cities, including Alhambra, are required to reduce their citywide water consumption by 24%. Because of the recent rainfall, the majority of the State is no longer under a drought condition. However, water conservation protocols remain in place as part of the LID requirements. The project would be required to comply with CalGreen which also includes water conservation features. In addition, the project would be required to comply with section 23.48.050, which requires drought tolerant landscaping. Even though the demand for water generated by the proposed project would not exceed City water supplies, the proposed project should incorporate features that aim to reduce water consumption on a larger scale.

The project Applicant would be required to install Xeriscape, or landscaping with plants that require less water, as an alternative to traditional landscaping and turf, subject to review and approval by the Community Development Department and the City's Design Review Board. According to the City of Alhambra Department of Public Works, the addition of Xeriscape can reduce outdoor water consumption by as much as 50%. The Applicant would also be required to install high-efficiency, WaterSense labeled toilets in order to reduce water consumption. Installing high efficiency toilets would reduce long term operating costs by consuming less water. *As a result, the project's water utility impacts would be less than significant.*

C. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ● Less than Significant Impact.*

The Sewer and Storm Drain Division of the Utilities Department maintains and operates the sewer collection system including storm drains, catch basins, and sewer lines. The Sewer Division maintains and operates the sanitary sewer collection system that consists of 2,800 manholes and seven lift stations with main sewer lines ranging in size from 4 to 36 inches. Approximately 99% of the system is composed of vitrified clay pipe, with less than 1% being cast iron or reinforced concrete pipe. The City does not operate its own wastewater treatment plant.

The City's 2020 Urban Water Management Plan includes the following: [131]

[131] City of Alhambra. 2020 Urban Water Management Plan. June 2021. https://www.cityofalhambra.org/DocumentCenter/View/2672/City-of-Alhambra-2020-UWMP-FINAL-?bidId=

Wastewater generated by the City is treated by the Sanitation Districts of Los Angeles County (LACSD). Wastewater is collected within the City's local sewer collection system. All wastewater is treated off-site at two regional treatment plants and no wastewater is treated or disposed of within the City's service area. The Whittier Narrows Water Reclamation Plant (WNWRP) treats a majority of the City's wastewater, with the balance treated at the Joint Water Pollution Control Plant (JWPCP); however, the percentage breakdown between these two plants in treating the City's wastewater in unknown. LACSD estimates approximately 69 gallons per person per day of wastewater is generated within LACSD's service area. Based on a 2020 population of 83,921 within the City, the estimated amount of wastewater collected by the City is approximately 5.5 million gallons per day (about 6,500 AFY), as shown in Table 6-2 of the 2020 Urban Management Plan. As indicated previously, and in Table 6-3 2020 of the Urban Management Plan, wastewater is not treated or disposed within the City's service area.

The WNWRP began operations in 1962 and has a treatment capacity of about 15 million gallons per day (MGD). During FY 2018-19, about 7.1 MGD of recycled water produced at the WNWRP is used at 29 different reuse sites. The WNWRP provides coagulated, filtered and disinfected tertiary effluent. All wastewater treated at the WNWRP meets recycled water standards. Approximately 99 percent of treated water at the WNWRP is reused in a recycled water project. The method of disposal when treated recycled water is not used (non-recycled) is discharge to the San Gabriel River/Rio Hondo and eventually flows to the ocean.

LACSD's JWPCP, which began operation in 1928, currently has a treatment capacity of about 300 MGD. The treatment level is primary and secondary treatment with disinfection. The JWPCP plant serves a population of approximately 3.5 million people. Solids collected in primary and secondary treatment are processed in anaerobic digestion tanks where bacteria break down organic material and produce methane gas. Treated wastewater is ultimately disinfected prior to being discharged to the Pacific Ocean. All water discharged to the ocean is monitored to ensure compliance with applicable local, state, and federal standards for discharge water.

As indicated in Table 3-14, the future development is projected to generate 564 gallons of effluent on a daily basis. This translates to approximately 0.0005 million gallons per day (MGD). Since the WNWRP has a capacity of 15 MGD and the JWPCP has a capacity of about 300 MGD, the wastewater treatment has adequate capacity for the wastewater produced by the project operations.

As indicated above, the Sewer and Storm Drain Division of the Utilities Department maintains and operates the sewer collection system including storm drains, catch basins, and sewer lines. The City's stormwater system includes about 1,000 storm drains/catch basins. As indicated in Section 3.9, the project would include various design measures implemented to control and prevent the pollution of storm water runoff. These design features include the use of storm drain pipes, trench drains, new catch basis, and PVC storm drain pipes. Local storm drains are under the jurisdiction of the Los Angeles County Department of Public Works. Once operational, the proposed project would be required to comply with all pertinent Federal Clean Water Act requirements. The project proposes new impervious surfaces that would be subject to the National Pollutant Discharge Elimination System (NPDES) permit from the Regional Water Quality Control Board. The project would also be required to comply with the City's storm water management guidelines. The addition of the aforementioned runoff controls would ease the potential strain placed on the existing system by excess runoff because the above-mentioned runoff controls would limit the amount the water that would be discharged. *As a result, the project's wastewater treatment impacts would be less than significant.*

D. *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? ● Less than Significant Impact.*

Trash collection is provided by Republic Services for disposal into the nearby landfills, primarily the Olinda Alpha landfill (the Puente Landfill is now closed). The Olinda Alpha landfill accepts up to 8,000 tons of solid waste on a daily basis and processes an average of 5,322 tons of waste per day.[132] In addition, the Los Angeles County Sanitation District selected the Mesquite Regional Landfill in Imperial County as the new target destination for the County's waste (as an alternative to the closed Puente Hills landfill). The Mesquite Regional Landfill in Imperial County has a 100-year capacity at 8,000 tons per day. The existing and future solid waste generation is summarized below in Table 3-16. The solid waste generation is shown in Appendix E – Utilities Worksheets.

Table 3-16 Solid Waste Generation (lbs./day)

Use	Unit	Factor	Generation
Existing Use -warehouse	10,000 sq. ft.	8.93 lbs./1,000/sq. ft./day	89 lbs./day
Future Use – Fast food	7,053 sq. ft.	42.0 lbs./1,000 sq. ft./day	296 lbs./day
Net Change			207 lbs./day

Source: Blodgett Baylosis Environmental Planning (Appendix E – Utilities Worksheets)

As indicated in Table 3-16, the future development is projected to generate 296 pounds of solid waste on a daily basis. When discounting the existing waste generation (89 pounds per day), the net increase would be 207 pounds per day as indicated in Table 3-16. Then anticipated solid waste generation would be minimal and would be readily accommodated by the existing waste facilities. *As a result, the proposed project's solid waste impacts would be less than significant.*

E. *Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste? ● No Impact.*

Alhambra complies with all state recycling requirements, including legislation that imposes mandatory commercial recycling requirements. Effective July 1, 2012, California Assembly Bill 341 (AB 341) states that required commercial businesses and multi-family properties of five units or more must arrange for recycling services. The purpose of the law is to reduce greenhouse gas emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. Section 20.25.030 of the Alhambra Municipal Code indicates that an Applicant for a "covered project" must divert the minimum percentage of the construction and demolition waste resulting from the project pursuant to Construction Waste Reduction, Disposal and Recycling requirements of the California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations. The recycling requirements apply to all businesses that generate at least 4 cubic yards of trash per week, and on all multi-family dwelling with five or more units. The City's waste haulers send both commercial and multi-family dwelling solid waste to a materials recovery facility where recyclable items are pulled out of the waste stream and recycled. Located in Anaheim, Republic's CVT Regional Material

[132] Solid Waste Association of North America (SWANA). *SWANA 2014 Landfill Management Excellence Award for Olinda Alpha Landfill.* Site access on October 11, 2016.

Recovery Facility processes an average of 5,500 tons of materials daily using automated and manual sorting systems.

The proposed use, like all other development in the City, would be required to adhere to all pertinent ordinances related to waste reduction and recycling. As a result, no impacts on the existing regulations pertaining to solid waste generation would result from the proposed project's implementation. *As a result, no impacts would occur*.

MITIGATION MEASURES

The analysis determined that no impacts would be required.

3.20 WILDFIRE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?				✖
B. Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✖
C. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✖
D. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✖

ANALYSIS OF ENVIRONMENTAL IMPACTS

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on wildfire risk and hazards if it results in any of the following:

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, substantially impair an adopted emergency response plan or emergency evacuation plan.

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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.

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

- The proposed project would, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

A. *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan? ● No Impact.*

The proposed project would not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. At no time during construction would adjacent streets be completely closed to traffic. All construction staging must occur on-site. *As a result, no impacts on emergency evacuation plans would occur.*

B. *Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? ● No Impact.*

The project site is located in the midst of an urbanized area. The proposed project may be exposed to particulate emissions generated by wildland fires in the mountains (the site is located approximately 16 miles south of the San Gabriel Mountains). However, the potential impacts would not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire City as well as the surrounding cities and unincorporated county areas. *As a result, no wildfire impacts would occur.*

C. *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? ● No Impact.*

The project site, along with the entire city, is not located in an area that is classified as being located a within a Local Responsibility Area (LRA), and therefore would not require the installation of specialized infrastructure such as fire roads, fuel breaks, or emergency water sources. *As a result, no wildfire mitigation impacts would occur.*

D. *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? ● No Impact.*

While the site is not located within a wildfire risk and local responsibility area and the proposed project site is located within an area classified as urban. Therefore, the project would not expose future employees to flooding or landslides facilitated by runoff flowing down barren and charred slopes. *As a result, no wildfire impacts would occur.*

MITIGATION MEASURES

The analysis of wildfires impacts indicated that less than significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

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SECTION 4 CONCLUSIONS

4.1 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✖		
B. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			✖	
C. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		✖		

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

A. *The proposed project will not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. •Less than Significant Impact with Mitigation.*

As indicated in Section 3.1 through 3.20, the proposed project would not result in any significant unmitigable environmental impacts. Mitigation has be included under Section 3.18 to address potential Tribal/Cultural Resources.

B. *The proposed project will not have impacts that are individually limited, but cumulatively considerable. •Less than Significant Impact.*

A comprehensive listing of potential development projects located in the surrounding area ("cumulative projects") that might be developed or that would be under construction within the study time frame of the proposed project were obtained from the City's Planning Department. The cumulative project list provided by the City's Community Development Department was reviewed and refined for potential cumulative projects to be included in environmental analysis. Pursuant to the City's guidance, the cumulative projects were located within a 1.5-mile radius around the project site. The cumulative project locations and descriptions are summarized in Table 4-1.

The 14 related projects include two automated carwashes, one new school development, seven residential developments totaling 191 units, a self-storage business (69,402 square feet), two warehouse developments totaling 59,567 square feet, and a meditation center (5,000 square feet). The nearest related project is #13 (refer to Table 4-1) located at 321 Raymond Avenue, approximately 550 feet south of the project site. The next nearest related project is #5, located at 29 S. Electric Avenue approximately 1,200 feet to the northeast of the project site. Finally, the next nearest related project is #7, located at 501 Marengo Avenue, approximately 1,900 feet south east of the project site.

Table 4-1 Cumulative Projects

Project #	Location	Size	Description
1	1301 W. Valley Blvd.	1 tunnel	automatic carwash
2	1318 & 1322 W. Alhambra Rd.	5,000 sf	meditation center
3	749-753 S. Sierra Vista Ave.	18 DU	residential
4	38 S. Second St.	50 DU	residential & commercial
5	29 S. Electric Ave.	10 employees	new school building
6	2000 W. Mission Rd.	69,402 sf	self-storage
7	501 Marengo Ave.	53,700 sf	warehouse
8	110 S. Chapel Ave.	24 du	residential
9	101-107 S Chapel Ave.	28 du & 1,000 sf	residential & office
10	103 N. Chapel Ave.	24 du & 1,025 sf	residential & office
11	15 S Chapel Ave.	10 du & 1,500 sf	residential & retail
12	123 S. Chapel Ave.	37 du & 3,412 sf	residential & office
13	321 Raymond Ave.	5,867 sf	warehouse
14	2424 W. Main St.	1 tunnel	Automatic carwash

Source: City of Alhambra

The 14 related projects included two automated carwashes, one new school development, seven residential developments totaling 191 units, a self-storage business (69,402 square feet), two warehouse developments totaling 59,567 square feet, and a meditation center (5,000 square feet). The nearest related project is #13 (refer to Table 2-2) located at 321 Raymond Avenue, approximately 550 feet south of the project site. The next nearest related project is #5, located at 29 S. Electric Avenue approximately 1,200 feet to the northeast of the project site. Finally, the next nearest related project is #7, located at 501 Marengo Avenue, approximately 1,900 feet south of the project site.

- *Cumulative Aesthetic Impacts.* None of the related projects are visible from the proposed project site. The potential aesthetic impacts related to views, aesthetics, and light and glare is site specific. No cumulative projects are located within close proximity to the project site that would lead to potential light and glare impacts. For this reason, no cumulative aesthetic impacts are anticipated.
- *Cumulative Agricultural and Forestry Impacts.* None of the related projects are visible from the proposed project site. These related projects are not located in the immediate vicinity of the proposed project. None of these related projects are an agricultural or forestry use. As a result, no cumulative impacts on agricultural or farmland resources would occur.
- *Cumulative Air Quality Impacts.* None of the related projects are visible from the proposed project site. The emissions for the individual cumulative projects were found to be under the SCAQMD's thresholds of significance. All three developments, the proposed project and the two related

projects, are infill projects that would further the sustainable development objectives related to air quality and global warming. All three projects would be required to adhere to all pertinent SCAQMD regulations governing emissions control. Finally, all three projects are separated from one another, which would eliminate the creation of any concentration of pollutants. The air quality analysis determined that the implementation of the proposed project would not result in any significant adverse air quality impacts. As a result, no significant adverse cumulative impacts would occur.

- *Cumulative Biological Resources Impacts*. All of the potential development sites are currently developed. As a result, no cumulative impacts on biological resources would be associated with the proposed project's implementation.
- *Cumulative Cultural Resources Impacts*. None of these related or cumulative projects are located in the vicinity of the proposed project. The potential environmental impacts related to cultural resources are site specific. Furthermore, the analysis herein also determined that the implementation of the proposed project would not result in any impacts on cultural resources. As a result, no cumulative impacts would occur as part of the implementation of the proposed project.
- *Cumulative Energy Resources Impacts*. The analysis herein also determined that the implementation of the proposed project would not result in any impacts on energy resources. As a result, no cumulative impacts would occur as part of the implementation of the proposed project.
- *Cumulative Geological Resources Impacts*. The analysis herein determined that the implementation of the proposed project would not result in significant adverse impacts related to landform modification, grading, or the destruction of a geologically significant landform or feature. As a result, no cumulative earth and geology impacts would occur as part of the proposed project's implementation.
- *Cumulative Greenhouse Impacts*. All of the cumulative projects would be infill projects and would further the sustainable development objectives related to air quality and global warming. In addition, these newer projects would replace existing development. The commercial developments, including the proposed project, would be required to adhere to all pertinent regulations governing GHG emissions. The analysis herein determined that the implementation of the proposed project would not result in any significant adverse impacts related to the emissions of GHG. As a result, no significant adverse cumulative impacts would result from the proposed project's implementation.
- *Cumulative Hazardous Materials Impacts*. The potential impacts related to hazardous materials are site specific. Furthermore, the analysis herein also determined that the implementation of the proposed project would not result in any significant immitigable impacts related to hazards and/or hazardous materials. As a result, no significant adverse cumulative impacts would result from the proposed project's implementation.
- *Cumulative Hydrology and Water Quality Impacts*. The 14 related projects included two automated carwashes, one new school development, seven residential developments totaling 191 units, a self-storage business (69,402 square feet), two warehouse developments totaling 59,567 square feet, and a meditation center (5,000 square feet). The nearest related project is #13 located at 321 Raymond Avenue, approximately 550 feet south of the project site. The next nearest related project is #5, located at 29 S. Electric Avenue approximately 1,200 feet to the northeast of the project site. Finally, the next nearest related project is #7, located at 501 Marengo Avenue, approximately 1,900 feet south of the project site. None of the related projects are visible from the proposed project site. The potential impacts related to hydrology and storm water runoff are typically site specific. The implementation of the proposed project would not result in any significant adverse impacts related to hydrology. As a result, no cumulative impacts are anticipated.

- *Cumulative Land Use Impacts*. The 14 related projects included two automated carwashes, one new school development, seven residential developments totaling 191 units, a self-storage business (69,402 square feet), two warehouse developments totaling 59,567 square feet, and a meditation center (5,000 square feet). The nearest related project is #13 (refer to Table 2-2) located at 321 Raymond Avenue, approximately 550 feet south of the project site. The next nearest related project is #5, located at 29 S. Electric Avenue approximately 1,200 feet to the northeast of the project site. Finally, the next nearest related project is #7, located at 501 Marengo Avenue approximately 1,900 feet south of the project site. The analysis determined that the proposed project would not result in any significant adverse land use impacts. As a result, no significant adverse cumulative land use impacts would occur.

- *Cumulative Mineral Resources Impacts*. The analysis determined that the implementation of the proposed project would not result in any impacts on mineral resources and no cumulative impacts would occur.

- *Cumulative Noise Impacts*. The nearest related project is #13 (refer to Table 2-2) located at 321 Raymond Avenue, approximately 550 feet south of the project site. The next nearest related project is #5, located at 29 S. Electric Avenue approximately 1,200 feet to the northeast of the project site. Finally, the next nearest related project is #7, located at 501 Marengo Avenue, approximately 1,900 feet south of the project site. The related projects are not located in the immediate vicinity of the proposed project. The three projects are separated from one another, which would eliminate the creation of any concentration of activities that would result in an increase in cumulative noise levels. As a result, no cumulative noise impacts are anticipated.

- *Cumulative Population and Housing Impacts*. The 14 related projects included two automated carwashes, one new school development, seven residential developments totaling 191 units, a self-storage business (69,402 square feet), two warehouse developments totaling 59,567 square feet. The analysis of potential population and housing impacts indicated that no significant adverse housing or population impacts would result from the proposed project's implementation. As a result, no significant adverse cumulative housing and population impacts would occur.

- *Cumulative Recreation Impacts*. The analysis determined the proposed project would not result in any potential impact on recreational facilities and services. As a result, no cumulative impacts on recreational facilities would result from the proposed project's implementation.

- *Cumulative Traffic Impacts*. The 14 related projects included two automated carwashes, one new school development, seven residential developments totaling 191 units, a self-storage business (69,402 square feet), two warehouse developments totaling 59,567 square feet, and a meditation center (5,000 square feet). The nearest related project is #13 (refer to Table 2-2) located at 321 Raymond Avenue, approximately 550 feet south of the project site. The next nearest related project is #5, located at 29 S. Electric Avenue approximately 1,200 feet to the northeast of the project site. Finally, the next nearest related project is #7, located at 501 Marengo Avenue, approximately 1,900 feet south of the project site. Under Future Opening Year (2024) Without Project conditions, traffic operations are expected to degrade when compared with existing conditions, due to ambient and cumulative project traffic volume growth. Palm Avenue & Commonwealth Avenue is expected to continue to operate at LOS B during the AM and PM peak hours. Raymond Avenue & Commonwealth Avenue would deteriorate from LOS B to LOS C in the AM peak hour and continue to operate at LOS F in the PM peak hour.

- *Cumulative Tribal Resources Impacts*. None of these related or cumulative projects are located in the vicinity of the proposed project. The potential environmental impacts related to cultural

resources are site specific. Furthermore, the analysis herein also determined that the implementation of the proposed project would not result in any impacts on cultural resources. As a result, no cumulative impacts would occur as part of the implementation of the proposed project.

- *Cumulative Utilities Impacts*. The 14 related projects include two automated carwashes, one new school development, seven residential developments totaling 191 units, a self-storage business (69,402 square feet), two warehouse developments totaling 59,567 square feet, and a meditation center (5,000 square feet). The nearest related project is #13 (refer to Table 2-2) located at 321 Raymond Avenue, approximately 550 feet south of the project site. The next nearest related project is #5, located at 29 S. Electric Avenue approximately 1,200 feet to the northeast of the project site. Finally, the next nearest related project is #7, located at 501 Marengo Avenue, approximately 1,900 feet south of the project site. The potential impacts related to water line and sewer line capacities are site specific. Furthermore, the analysis herein also determined that the proposed project would not result in any significant adverse impacts on utility infrastructure and/or services. As a result, no cumulative impacts on utilities would occur.
- *Cumulative Wildfire Impacts*. The potential impacts related to wildfire risk are site specific. Furthermore, the analysis herein also determined that the proposed project would not result in any significant adverse impacts with respect to wildfire. As a result, no cumulative impacts on utilities would occur.

C. The proposed project would not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. ●*Less than Significant Impact with Mitigation.*

As indicated in Section 3.1 through 3.20, the proposed project would not result in any significant unmitigable environmental impacts. Mitigation has been included to address potential impacts with respect to paleontological resources, hazardous materials, noise, and tribal/cultural resources.

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SECTION 5 REFERENCES

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