

February 2025 | Draft Supplemental Environmental Impact Report  
State Clearinghouse No. 2017101010

# WALNUT BUSINESS PARK PROJECT

for City of Walnut

*Prepared for:*

**City of Walnut**

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# Table of Contents

Contents	Page
<b>1. EXECUTIVE SUMMARY .....</b>	<b>1-1</b>
1.1 INTRODUCTION .....	1-1
1.2 ENVIRONMENTAL PROCEDURES .....	1-1
1.2.1 Type and Purpose of This Draft SEIR .....	1-2
1.2.2 SEIR Format .....	1-5
1.3 PROJECT LOCATION .....	1-7
1.4 PROJECT SUMMARY .....	1-7
1.5 SUMMARY OF PROJECT ALTERNATIVES .....	1-8
1.5.1 No Project/Existing General Plan Alternative .....	1-8
1.5.2 Mixed-Use Alternative .....	1-11
1.6 ISSUES TO BE RESOLVED .....	1-11
1.7 AREAS OF CONTROVERSY .....	1-12
1.8 SUMMARY OF ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, AND LEVELS OF SIGNIFICANCE AFTER MITIGATION .....	1-12
1.9 REFERENCES .....	1-29
<b>2. INTRODUCTION .....</b>	<b>2-1</b>
2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT .....	2-1
2.2 NOTICE OF PREPARATION .....	2-2
2.3 SCOPE OF THIS DEIR .....	2-9
2.3.1 Impacts Considered Less than Significant .....	2-9
2.3.2 Potentially Significant Adverse Impacts .....	2-10
2.3.3 Unavoidable Significant Adverse Impacts .....	2-10
2.4 INCORPORATION BY REFERENCE .....	2-10
2.5 FINAL EIR CERTIFICATION .....	2-11
2.6 MITIGATION MONITORING .....	2-11
<b>3. PROJECT DESCRIPTION .....</b>	<b>3-1</b>
3.1 PROJECT LOCATION .....	3-1
3.2 STATEMENT OF OBJECTIVES .....	3-1
3.3 PROJECT CHARACTERISTICS .....	3-2
3.3.1 Land Use .....	3-2
3.3.2 Baseline Conditions (Approved Project) .....	3-11
3.3.3 Site Plan and Character .....	3-11
3.3.4 Architectural Design and Character .....	3-12
3.3.5 Landscaping and Lighting .....	3-12
3.3.1 Access, Circulation, and Parking .....	3-31
3.3.2 Operational Characteristics .....	3-31
3.3.3 Infrastructure Improvements and Utility and Service Systems .....	3-32
3.3.4 Green Building Standards .....	3-38
3.3.5 Project Phasing and Construction .....	3-47
3.4 INTENDED USES OF THE DRAFT SEIR .....	3-48
3.5 REFERENCES .....	3-49
<b>4. ENVIRONMENTAL SETTING .....</b>	<b>4-1</b>
4.1 INTRODUCTION .....	4-1
4.2 REGIONAL ENVIRONMENTAL SETTING .....	4-1
4.2.1 Regional Location .....	4-1
4.2.2 Regional Planning Considerations .....	4-1
4.3 LOCAL ENVIRONMENTAL SETTING .....	4-3
4.3.1 Location .....	4-3
4.3.2 Surrounding Land Uses .....	4-3

## Table of Contents

Contents	Page
4.3.3 Physical Site Conditions .....	4-3
4.3.4 General Plan and Zoning.....	4-3
4.3.5 Aesthetic Resources .....	4-4
4.3.6 Air Quality and Climate.....	4-13
4.3.7 Geology and Landform.....	4-13
4.3.8 Hazards and Hazardous Materials.....	4-14
4.3.9 Hydrology .....	4-14
4.3.10 Noise.....	4-17
4.3.11 Public Services .....	4-17
4.3.12 Transportation .....	4-18
4.3.13 Utilities and Service Systems.....	4-19
4.4 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS .....	4-19
4.5 REFERENCES.....	4-20
<b>5. ENVIRONMENTAL ANALYSIS .....</b>	<b>5-1</b>
5.1 AESTHETICS .....	5.1-1
5.1.1 Environmental Setting.....	5.1-1
5.1.2 Thresholds of Significance.....	5.1-5
5.1.3 Environmental Impacts.....	5.1-5
5.1.4 Cumulative Impacts .....	5.1-10
5.1.5 Level of Significance Before Mitigation .....	5.1-10
5.1.6 Mitigation Measures.....	5.1-10
5.1.7 Level of Significance After Mitigation .....	5.1-11
5.1.8 References.....	5.1-11
5.2 AIR QUALITY .....	5.2-1
5.2.1 Environmental Setting.....	5.2-2
5.2.2 Thresholds of Significance.....	5.2-15
5.2.3 Environmental Impacts.....	5.2-21
5.2.4 Cumulative Impacts .....	5.2-38
5.2.5 Level of Significance Before Mitigation .....	5.2-39
5.2.6 Mitigation Measures.....	5.2-39
5.2.7 Level of Significance After Mitigation .....	5.2-40
5.2.8 References.....	5.2-42
5.3 BIOLOGICAL RESOURCES .....	5.3-1
5.3.1 Environmental Setting.....	5.3-1
5.3.2 Thresholds of Significance.....	5.3-7
5.3.3 Environmental Impacts.....	5.3-8
5.3.4 Level of Significance Before Mitigation .....	5.3-15
5.3.5 Mitigation Measures.....	5.3-15
5.3.6 Level of Significance After Mitigation .....	5.3-17
5.3.7 References.....	5.3-17
5.4 CULTURAL RESOURCES .....	5.4-1
5.4.1 Environmental Setting.....	5.4-1
5.4.2 Thresholds of Significance.....	5.4-8
5.4.3 Environmental Impacts.....	5.4-8
5.4.4 Cumulative Impacts .....	5.4-12
5.4.5 Level of Significance Before Mitigation .....	5.4-13
5.4.6 Mitigation Measures.....	5.4-13
5.4.7 Level of Significance After Mitigation .....	5.4-13
5.4.8 References.....	5.4-13
5.5 ENERGY.....	5.5-1
5.5.1 Environmental Setting.....	5.5-1

## Table of Contents

Contents	Page
5.5.2	Thresholds of Significance.....5.5-7
5.5.3	Environmental Impacts.....5.5-7
5.5.4	Cumulative Impacts ..... 5.5-13
5.5.5	Level of Significance Before Mitigation ..... 5.5-14
5.5.6	Mitigation Measures..... 5.5-14
5.5.7	Level of Significance After Mitigation ..... 5.5-14
5.5.8	References..... 5.5-14
5.6	GEOLOGY AND SOILS.....5.6-1
5.6.1	Environmental Setting.....5.6-1
5.6.2	Thresholds of Significance.....5.6-9
5.6.3	Environmental Impacts.....5.6-9
5.6.4	Cumulative Impacts ..... 5.6-15
5.6.5	Level of Significance Before Mitigation ..... 5.6-15
5.6.6	Mitigation Measures..... 5.6-15
5.6.7	Level of Significance After Mitigation ..... 5.6-16
5.6.8	References..... 5.6-16
5.7	GREENHOUSE GAS EMISSIONS.....5.7-1
5.7.1	Environmental Setting.....5.7-1
5.7.2	Thresholds of Significance..... 5.7-11
5.7.3	Environmental Impacts..... 5.7-13
5.7.4	Cumulative Impacts ..... 5.7-19
5.7.5	Level of Significance Before Mitigation ..... 5.7-20
5.7.6	Mitigation Measures..... 5.7-20
5.7.7	Level of Significance After Mitigation ..... 5.7-20
5.7.8	References..... 5.7-20
5.8	HAZARDS AND HAZARDOUS MATERIALS.....5.8-1
5.8.1	Environmental Setting.....5.8-1
5.8.2	Thresholds of Significance..... 5.8-12
5.8.3	Environmental Impacts..... 5.8-12
5.8.4	Cumulative Impacts ..... 5.8-19
5.8.5	Level of Significance Before Mitigation ..... 5.8-19
5.8.6	Mitigation Measures..... 5.8-19
5.8.7	Level of Significance After Mitigation ..... 5.8-19
5.8.8	References..... 5.8-20
5.9	HYDROLOGY AND WATER QUALITY .....5.9-1
5.9.1	Environmental Setting.....5.9-2
5.9.2	Thresholds of Significance..... 5.9-14
5.9.3	Environmental Impacts..... 5.9-15
5.9.4	Cumulative Impacts ..... 5.9-21
5.9.5	Level of Significance Before Mitigation ..... 5.9-21
5.9.6	Mitigation Measures..... 5.9-22
5.9.7	Level of Significance After Mitigation ..... 5.9-22
5.9.8	References..... 5.9-22
5.10	LAND USE AND PLANNING ..... 5.10-1
5.10.1	Environmental Setting..... 5.10-1
5.10.2	Thresholds of Significance..... 5.10-3
5.10.3	Environmental Impacts..... 5.10-3
5.10.4	Cumulative Impacts ..... 5.10-14
5.10.5	Level of Significance Before Mitigation ..... 5.10-15
5.10.6	Mitigation Measures..... 5.10-15
5.10.7	Level of Significance After Mitigation ..... 5.10-15
5.10.8	References..... 5.10-15

## Table of Contents

Contents	Page
5.11 NOISE.....	5.11-1
5.11.1 Environmental Setting.....	5.11-1
5.11.2 Thresholds of Significance.....	5.11-6
5.11.3 Environmental Impacts.....	5.11-8
5.11.4 Cumulative Impacts .....	5.11-17
5.11.5 Level of Significance Before Mitigation .....	5.11-17
5.11.6 Mitigation Measures.....	5.11-17
5.11.7 Level of Significance After Mitigation .....	5.11-18
5.11.8 References.....	5.11-18
5.12 PUBLIC SERVICES.....	5.12-1
5.12.1 Fire Protection and Emergency Services.....	5.12-1
5.12.2 Police Protection .....	5.12-5
5.12.3 School Services .....	5.12-8
5.12.4 Library Services .....	5.12-10
5.12.5 References.....	5.12-12
5.13 TRANSPORTATION.....	5.13-1
5.13.1 Environmental Setting.....	5.13-1
5.13.2 Thresholds of Significance.....	5.13-6
5.13.3 Environmental Impacts.....	5.13-6
5.13.4 Cumulative Impacts .....	5.13-12
5.13.5 Level of Significance Before Mitigation .....	5.13-13
5.13.6 Mitigation Measures.....	5.13-13
5.13.7 Level of Significance After Mitigation .....	5.13-14
5.13.8 References.....	5.13-14
5.14 TRIBAL CULTURAL RESOURCES .....	5.14-1
5.14.1 Environmental Setting.....	5.14-1
5.14.2 Thresholds of Significance.....	5.14-2
5.14.3 Environmental Impacts.....	5.14-3
5.14.4 Cumulative Impacts .....	5.14-4
5.14.5 Level of Significance Before Mitigation .....	5.14-5
5.14.6 Mitigation Measures.....	5.14-5
5.14.7 Level of Significance After Mitigation .....	5.14-6
5.14.8 References.....	5.14-6
5.15 UTILITIES AND SERVICE SYSTEMS .....	5.15-1
5.15.1 Wastewater Treatment and Collection.....	5.15-1
5.15.2 Water Supply and Distribution .....	5.15-8
5.15.3 Storm Drainage .....	5.15-16
5.15.4 Solid Waste .....	5.15-21
5.15.5 Other Utilities .....	5.15-26
5.15.6 References.....	5.15-30
<b>6. SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS .....</b>	<b>6-1</b>
<b>7. ALTERNATIVES TO THE PROPOSED PROJECT .....</b>	<b>7-1</b>
7.1 INTRODUCTION .....	7-1
7.1.1 Purpose and Scope.....	7-1
7.1.2 Project Objectives .....	7-2
7.1.3 Significant Impacts of the Project .....	7-2
7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS.....	7-4
7.2.1 Alternative Development Areas .....	7-4
7.2.2 Reduced Hours of Operation.....	7-5

## Table of Contents

Contents	Page
7.3.1 Alternatives Comparison .....	7-7
7.3.2 Environmental Impact Comparison .....	7-7
7.3.3 Conclusion .....	7-13
7.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE .....	7-14
7.5 REFERENCES .....	7-16
<b>8. IMPACTS FOUND NOT TO BE SIGNIFICANT .....</b>	<b>8-1</b>
8.1 IMPACTS FOUND NOT TO BE SIGNIFICANT .....	8-1
8.2 REFERENCES .....	8-5
<b>9. SIGNIFICANT IRREVERSIBLE CHANGES DUE TO THE PROPOSED PROJECT .....</b>	<b>9-1</b>
<b>10. GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT .....</b>	<b>10-1</b>
<b>11. ORGANIZATIONS AND PERSONS CONSULTED .....</b>	<b>11-1</b>
<b>12. QUALIFICATIONS OF PERSONS PREPARING EIR .....</b>	<b>12-1</b>
PLACEWORKS .....	12-1
ITERIS 12-2	
<b>13. BIBLIOGRAPHY .....</b>	<b>13-1</b>

## Table of Contents

Contents	Page
<b>APPENDICES</b>	
Appendix A	Notice of Preparation, NOP Comments, and Scoping Meeting Sign-In Sheet and Comments
Appendix B	Regulatory Standards
Appendix C	General Plan Goals and Policies
Appendix D-a	Air Quality/GHG Analysis
Appendix D-b	Health Risk Assessment
Appendix E	Protected Tree Report
Appendix F	Cultural Resources Records Search Results
Appendix G	Historic Built Environment Assessment
Appendix H	Geotechnical Investigation Report
Appendix I	Paleontological Resources Records Search Results
Appendix J-a	Phase I Environmental Site Assessment, Phase 1 & 2
Appendix J-b	Phase I Environmental Site Assessment, Phase 3
Appendix J-c	Phase I Environmental Site Assessment, Phase 4 & 5
Appendix J-d	Phase I Environmental Site Assessment, Phase 6
Appendix K-a	Low Impact Development Plan - Lot 1 South Lemon Avenue and Paseo Del Prado
Appendix K-b	Low Impact Development Plan - Lot 2 Paseo Del Prado and Paseo Sonrisa
Appendix K-c	Low Impact Development Plan - Lot 3 Valley Boulevard and Paseo Tesoro
Appendix K-d	Low Impact Development Plan - Lot 4 Valley Boulevard and Paseo Tesoro
Appendix L-a	Hydrology and Hydraulic Report - Lot 1 South Lemon Avenue and Paseo Del Prado
Appendix L-b	Hydrology and Hydraulic Report - Lot 2 Paseo Del Prado and Paseo Sonrisa
Appendix L-c	Hydrology and Hydraulic Report - Lot 3 Valley Boulevard and Paseo Tesoro
Appendix L-d	Hydrology and Hydraulic Report - Lot 4 Valley Boulevard and Paseo Tesoro
Appendix M	Noise Analysis
Appendix N	Responses from Service Providers
Appendix O	Traffic Impact Analysis
Appendix P	AB 52 Correspondences with Tribes
Appendix Q	Water Budget Workbook for New and Rehabilitated Nonresidential Landscapes

## Table of Contents

Figure		Page
Figure 1-1	Traffic Analysis Zones.....	1-9
Figure 3-1	Regional Location.....	3-3
Figure 3-2	Local Vicinity.....	3-5
Figure 3-3	Site Aerial.....	3-7
Figure 3-4	General Plan Land Use.....	3-9
Figure 3-5	Zoning Plan.....	3-13
Figure 3-6	Conceptual Site Plan.....	3-15
Figure 3-7a	Conceptual Building Elevations – Building 1.....	3-17
Figure 3-7b	Conceptual Building Elevations – Building 2.....	3-19
Figure 3-7c	Conceptual Building Elevations – Building 3.....	3-21
Figure 3-7d	Conceptual Building Elevations – Building 4.....	3-23
Figure 3-8a	Conceptual Building Renderings.....	3-25
Figure 3-8b	Conceptual Building Renderings.....	3-27
Figure 3-9	Conceptual Landscape Plan.....	3-29
Figure 3-10a	Circulation Plan (Ingress).....	3-33
Figure 3-10b	Circulation Plan (Egress).....	3-35
Figure 3-11a	Preliminary LID Plan Lot 1.....	3-39
Figure 3-11b	Preliminary LID Plan Lot 2.....	3-41
Figure 3-11c	Preliminary LID Plan Lot 3.....	3-43
Figure 3-11d	Preliminary LID Plan Lot 4.....	3-45
Figure 4-1a	Existing Site Conditions.....	4-5
Figure 4-1b	Existing Site Conditions.....	4-7
Figure 4-1c	Existing Site Conditions.....	4-9
Figure 4-1d	Existing Site Conditions.....	4-11
Figure 4-2	Pollution Burden Score Map.....	4-15
Figure 5.2-1	South Coast AQMD MATES V Cancer Risk in the Project Area.....	5.2-11
Figure 5.3-1	Project Site Proximity to California Gnatcatcher Habitat.....	5.3-5
Figure 5.3-2	Tree Survey Results.....	5.3-13
Figure 5.6-1	County- and State-Designated Liquefaction Hazard Zones.....	5.6-7
Figure 5.8-1	Phase I ESA Study Areas.....	5.8-9
Figure 5.9-1a	Existing Hydrology Map – Lot 1.....	5.9-5
Figure 5.9-1b	Existing Hydrology Map – Lot 2.....	5.9-7
Figure 5.9-1c	Existing Hydrology Map – Lot 3.....	5.9-9
Figure 5.9-1d	Existing Hydrology Map – Lot 4.....	5.9-11
Figure 5.13-1	Existing Site Access Points.....	5.13-3

## Table of Contents

Table	Page
Table 1-1	Land Use Summary for TAZ 9 .....1-5
Table 1-2	Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation ..... 1-13
Table 2-1	NOP and Scoping Meeting Comments Summary .....2-2
Table 3-1	Proposed Uses..... 3-11
Table 3-2	Construction Schedule and Equipment..... 3-47
Table 5.1-1	Regulations/Plans for Aesthetics..... 5.1-1
Table 5.2-1	Criteria Air Pollutant Health Effects Summary..... 5.2-5
Table 5.2-2	Regulations/Plans for Air Quality ..... 5.2-6
Table 5.2-3	Attainment Status of Criteria Air Pollutants in the South Coast Air Basin..... 5.2-9
Table 5.2-4	Ambient Air Quality Monitoring Summary ..... 5.2-13
Table 5.2-5	Existing (Approved Project) Operation Emissions..... 5.2-14
Table 5.2-6	South Coast AQMD Significance Thresholds..... 5.2-15
Table 5.2-7	South Coast AQMD Localized Significance Thresholds..... 5.2-18
Table 5.2-8	South Coast AQMD Screening-Level Significance Thresholds ..... 5.2-19
Table 5.2-9	South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds ..... 5.2-20
Table 5.2-10	MATES V–Adjusted Cumulative Significant Cancer Risk Thresholds..... 5.2-20
Table 5.2-11	Maximum Daily Regional Construction Emissions..... 5.2-27
Table 5.2-12	Maximum Daily Regional Operation Emissions..... 5.2-29
Table 5.2-13	Maximum Daily On-Site Localized Construction Emissions ..... 5.2-30
Table 5.2-14	Construction Health Risk Summary..... 5.2-32
Table 5.2-15	Localized On-Site Operational Emissions ..... 5.2-34
Table 5.2-16	Operational Health Risk Summary ..... 5.2-35
Table 5.2-17	Operation Plus Construction Health Risk Results..... 5.2-36
Table 5.2-18	Maximum Daily Regional Construction Emissions with Mitigation Incorporated..... 5.2-41
Table 5.2-19	Operation Plus Construction Health Risk Results with Mitigation ..... 5.2-42
Table 5.3-1	Regulations/Plans for Biological Resources ..... 5.3-1
Table 5.4-1	Regulations/Plans for Cultural Resources ..... 5.4-2
Table 5.4-2	Previous Cultural Resources Studies in the Vicinity of the Project Site..... 5.4-6
Table 5.4-3	Previously Recorded Cultural Resources Within a Half-Mile Radius of the Project Site..... 5.4-7
Table 5.5-1	Regulations/Plans for Energy ..... 5.5-1
Table 5.5-2	Existing Electricity Consumption..... 5.5-4
Table 5.5-3	Existing Natural Gas Consumption..... 5.5-5
Table 5.5-4	Approved Project Fuel Usage..... 5.5-6



## Table of Contents

Table		Page
Table 5.5-5	Construction-Related Fuel Usage .....	5.5-9
Table 5.5-6	Electricity Demand.....	5.5-10
Table 5.5-7	Annual Operation-Related Fuel Usage .....	5.5-12
Table 5.6-1	Regulations/Plans for Geology and Soils.....	5.6-1
Table 5.7-1	GHG Emissions and Their Relative Global Warming Potential Compared to CO <sub>2</sub> .....	5.7-2
Table 5.7-2	Summary of GHG Emissions Risks to California .....	5.7-5
Table 5.7-3	Regulations/Plans for Greenhouse Gas Emissions .....	5.7-6
Table 5.7-4	Existing (Approved Project) GHG Emissions.....	5.7-10
Table 5.7-5	Project-Related GHG Emissions.....	5.7-16
Table 5.8-1	Regulations/Plans for Hazards and Hazardous Materials.....	5.8-1
Table 5.8-2	Phase I Environmental Site Assessments.....	5.8-5
Table 5.8-3	Environmental Database Listings for the Project Site .....	5.8-6
Table 5.9-1	Regulations for Hydrology and Water Quality .....	5.9-2
Table 5.9-2	Stormwater Quality Design Volumes and BMP Capacities .....	5.9-17
Table 5.9-3	Existing and Proposed Pervious and Impervious Areas .....	5.9-19
Table 5.9-4	Existing and Proposed Peak Flow Rates .....	5.9-20
Table 5.10-1	Regulations/Plans for Land Use.....	5.10-1
Table 5.10-2	General Plan Consistency Analysis.....	5.10-5
Table 5.10-3	SCAG 2020-2045 RTP/SCS Goals Consistency Analysis .....	5.10-13
Table 5.11-1	Typical Noise Levels .....	5.11-4
Table 5.11-2	Regulations/Plans for Cultural Resources .....	5.11-5
Table 5.11-3	Existing Traffic Noise Levels .....	5.11-6
Table 5.11-4	Groundborne Vibration Damage Criteria.....	5.11-8
Table 5.11-5	Project-Related Construction Noise.....	5.11-11
Table 5.11-6	Project Traffic Related Noise Increases.....	5.11-13
Table 5.11-7	Delivery Truck Loading Activity Noise.....	5.11-14
Table 5.11-8	Worst-Case Annoyance Vibration Levels from Construction Equipment.....	5.11-15
Table 5.11-9	Vibration Damage Levels for Typical Construction Equipment .....	5.11-16
Table 5.12-1	Regulations/Plans for Fire Protection Services .....	5.12-1
Table 5.12-2	Fire Stations and Equipment Serving the Project Site .....	5.12-2
Table 5.12-3	Regulations/Plans for School Services .....	5.12-8
Table 5.13-1	Regulations/Plans for Transportation .....	5.13-1
Table 5.14-1	Regulations/Plans for Tribal Cultural Resources.....	5.14-1
Table 5.15-1	Regulations/Plans for Wastewater Treatment and Collection .....	5.15-1
Table 5.15-2	Sewer Demand Comparison.....	5.15-5

## Table of Contents

Table	Page
Table 5.15-3	Regulations/Plans for Water Supply and Distribution ..... 5.15-8
Table 5.15-4	Current and Projected Potable Water Demands for the WVWD (afy) ..... 5.15-10
Table 5.15-5	Current and Projected Recycled Water Demands for WVWD (afy) ..... 5.15-10
Table 5.15-6	Normal, Single Dry, and Multiple Dry Year Supply and Demand (afy) ..... 5.15-11
Table 5.15-7	Projected Water Demand..... 5.15-15
Table 5.15-8	Regulations/Plans for Storm Drainage..... 5.15-17
Table 5.15-9	Regulations/Plans for Solid Waste..... 5.15-21
Table 5.15-10	Landfill Summary..... 5.15-22
Table 5.15-11	Estimated Solid Waste Generation..... 5.15-24
Table 5.15-12	Regulations/Plans for Other Utilities ..... 5.15-27
Table 7-1	Alternatives Description and Statistical Comparison ..... 7-6
Table 7-2	Trip Generation Comparison ..... 7-7
Table 7-3	Vehicle Miles Traveled Comparison ..... 7-7
Table 7-4	Project Alternatives: Environmental Impact Comparison ..... 7-9
Table 7-5	Summary of Proposed Project and Alternatives Impacts..... 7-13
Table 7-6	Ability of Each Alternative to Meet the Project Objectives..... 7-14
Table 8-1	Impacts Found Not to Be Significant..... 8-1

## Abbreviations and Acronyms

### ABBREVIATIONS AND ACRONYMS

°C	degrees Celsius
°F	degrees Fahrenheit
µg/m <sup>3</sup>	microgram per cubic meter
AAQS	ambient air quality standards
AB	Assembly Bill
ACF	Advanced Clean Fleets
ACM	asbestos-containing materials
ACT	Advanced Clean Trucks
ADT	average daily traffic
afy	acre-feet per year
APN	Assessor's Parcel Number
AQMD	Air Quality Management District
AQMP	air quality management plan
AR4	IPCC Fourth Assessment Report
AR6	IPCC Sixth Assessment Report
bgs	below ground surface
BMP	best management practices
CAFE	corporate average fuel economy
Cal/OSHA	California Occupational Safety and Health Administration
CalEEMod	California Emissions Estimator Model
CalGEM	California Geologic Energy Management Division (formerly known as Division of Oil, Gas, and Geothermal Resources [DOGGR])
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CES	CalEnviroScreen

## Abbreviations and Acronyms

CESA	California Endangered Species Act
cf	cubic feet
CFGF	California Fish and Game Code
cfs	cubic feet per second
CGP	Construction General Permit
CGS	California Geologic Survey
CH <sub>4</sub>	methane
CHL	California Historical Landmarks
CHRIS	California Historical Resources Information System
CMP	Congestion Management Program
CNEL	community noise equivalent level
CO	carbon monoxide
CO <sub>2e</sub>	carbon dioxide equivalent
CPHI	California Point of Historical Interest
CSMD	Consolidated Sewer Maintenance District of Los Angeles County
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DWR	Department of Water Resources (California)
EDR	Environmental Data Resources (records search of environmental databases)
EO	Executive Order
EOC	emergency operations center
EPA	United States Environmental Protection Agency
ESA	environmental site assessment
EV	electric vehicle
FESA	Federal Endangered Species Act
FHSZ	fire hazard severity zone
FIRM	flood insurance rate map
FTA	Federal Transit Administration
GDP	gross domestic product
GHG	greenhouse gases

## Abbreviations and Acronyms

gpcd	gallons per capita per day
gpd	gallons per day
GPEIR	General Plan EIR
GPU	General Plan Update
GSA	groundwater sustainability agency
GSP	groundwater sustainability plan
GWP	global warming potential
HAZNET	Hazardous Waste Information System
HRA	health risk assessment
HVAC	heating, ventilating, and air conditioning system
Hz	Hertz
I-	Interstate
IPCC	Intergovernmental Panel on Climate Change
kBTU	thousand British thermal units
kWh	kilowatt-hour
L <sub>dn</sub>	day-night noise level
L <sub>eq</sub>	equivalent continuous noise level
LAC-DPW	Los Angeles County Department of Public Works
LAC-FCD	Los Angeles County Flood Control District
LACFD	Los Angeles County Fire District
LACSD	Los Angeles County Sheriff's Department
lbs/MWh	pounds per megawatt-hour
LID	low-impact development
LOS	level of service
LST	localized significance thresholds
LUST	leaking underground storage tank
MATES	Multiple Air Toxics Exposure Study
MBTA	Migratory Bird Treaty Act
MEIR	maximum exposed individual resident
mgd	million gallons per day
MMT	million metric tons
MPO	metropolitan planning organization
MS4	municipal separate storm sewer system

## Abbreviations and Acronyms

MT	metric ton
Mt. SAC	Mt. San Antonio College
NAHC	Native American Heritage Commission
NHPA	National Historic Preservation Act
N <sub>2</sub> O	nitrous oxide
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NOP	Notice of Preparation
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
O <sub>3</sub>	ozone
OEHHA	Office of Environmental Health Hazard Assessment
PCBs	polychlorinated biphenyls
PM	particulate matter
ppd	pounds per day
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RPS	renewable portfolio standard
RTP/SCS	regional transportation plan / sustainable communities strategy
RUSD	Rowland Unified School District
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCCIC	South Central Costal Information Center
SCE	Southern California Edison
SCS	Sustainable Communities Strategies
SEA	significant ecological area
SEIR	supplemental environmental impact report
SF <sub>6</sub>	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act

## Abbreviations and Acronyms

SGVCOG	San Gabriel Valley Council of Governments
SLF	Sacred Lands File
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
SoCAB	South Coast Air Basin
SoCalGas	Southern California Gas Company
SR-	State Route
SWPPP	Storm Water Pollution Prevention Plan
SWQD <sub>v</sub>	stormwater quality design volume
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TDM	Transportation Demand Management
TRU	transport refrigeration unit
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
VdB	velocity decibels
VMT	vehicle miles traveled
VOC	volatile organic compound
WMC	Walnut Municipal Code
WMP	watershed management plan
WVSP	West Valley Specific Plan
WVUSD	Walnut Valley Unified School District
WVWD	Walnut Valley Water District
ZE	zero emissions
ZEV	zero-emission vehicle

## Abbreviations and Acronyms

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# 1. Executive Summary

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## 1.1 INTRODUCTION

This Draft Supplemental Environmental Impact Report (Draft SEIR) addresses the environmental effects associated with the implementation of the Walnut Business Park project (proposed project). The California Environmental Quality Act (CEQA) requires that local government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. In this case, the City of Walnut, as lead agency, determined that a supplement to the 2018 General Plan Update and West Valley Specific Plan Environmental Impact Report (GPEIR) should be prepared for the proposed project.

An Environmental Impact Report (EIR) is a public document designed to provide the public and local and State governmental agency decision makers with an analysis of potential environmental consequences to support informed decision making. This document focuses on changes in circumstances and new information since the preparation of the GPEIR that could result in new significant impacts or an increase in the severity of significant impacts as disclosed in the GPEIR.

This Draft SEIR has been prepared pursuant to the requirements of CEQA and the City of Walnut's CEQA procedures. The City of Walnut, as the lead agency, has reviewed and revised all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment, including reliance on City technical personnel from other departments and review of all technical subconsultant reports.

Data for this Draft SEIR derive from on-site field observations, discussions with affected agencies, analysis of adopted plans and policies, review of available studies, reports, data and similar literature, and specialized environmental assessments (air quality, biological resources, cultural resources, hydrology and water quality, noise, transportation and traffic, and utilities and service systems).

## 1.2 ENVIRONMENTAL PROCEDURES

This Draft SEIR has been prepared pursuant to CEQA to assess the environmental effects associated with implementation of the proposed project as well as anticipated future discretionary actions and approvals. CEQA established six main objectives for an EIR:

1. Disclose to decision makers and the public the significant environmental effects of proposed activities.
2. Identify ways to avoid or reduce environmental damage.
3. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.

## 1. Executive Summary

4. Disclose to the public reasons for agency approval of projects with significant environmental effects.
5. Foster interagency coordination in the review of projects.
6. Enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation in CEQA and the CEQA Guidelines; it is intended to provide an objective, factually supported analysis and full disclosure of the environmental consequences of a proposed project with the potential to result in significant, adverse environmental impacts.

An EIR is one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Before approving a proposed project, the lead agency must consider the information in the EIR; determine whether the EIR was prepared in accordance with CEQA and the CEQA Guidelines; determine that it reflects the independent judgment of the lead agency; adopt findings concerning the project's significant environmental impacts and alternatives; and adopt a statement of overriding considerations if significant impacts cannot be avoided.

### 1.2.1 Type and Purpose of This Draft SEIR

#### 1.2.1.1 SUPPLEMENTAL EIR

CEQA dictates when a supplemental or subsequent EIR is required for a project that was previously analyzed under CEQA. Once a project has been approved based on a CEQA analysis in an EIR or negative declaration, and the EIR or negative declaration is no longer subject to challenge, CEQA Section 21166 provides that “no subsequent or supplemental environmental impact report shall be required by the lead agency or any responsible agency” unless one of three circumstances apply: (1) substantial changes to the approved project will require major revisions to the certified EIR, (2) substantial changes with respect to the circumstances under which the approved project is being undertaken will require major revisions to the certified EIR, or (3) new information, that was not known and could not have been known at the time the EIR for the approved project was certified becomes available (CEQA Section 21166).

In this case, in-depth review has already occurred and the time for challenging the sufficiency of the 2018 GPEIR has long since expired (CEQA Section 21167, subd. (c)). Moreover, as discussed subsequently, circumstances have changed enough to justify repeating a substantial portion of the process. The factors used to evaluate whether a subsequent or supplemental EIR should be prepared are in CEQA Guidelines Sections 15162 and 15163, and relate to whether “major revisions” to the EIR are required. CEQA Guidelines Section 15162 clarifies that major revisions to the EIR may be required:

- “Due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;” (CEQA Guidelines Section 15162, subd. (a)(1), (a)(2); see also, CEQA Guidelines Section 15162 subd. (a)(3)(A), (a)(3)(B))
- Where “[m]itigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents

## 1. Executive Summary

decline to adopt the mitigation measure or alternative;” or (CEQA Guidelines Section 15162 subd. (a)(3)(C))

- Where “[m]itigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.” (CEQA Guidelines Section 15162 subd. (a)(3)(D))

As disclosed in this Executive Summary, the analysis prepared for this SEIR substantiates that the proposed project would not result in new significant environmental effects in comparison to the 2018 General Plan Update (GPU) as adopted.

This Draft SEIR supplements the analyses in the certified GPEIR. Section 15163 of the CEQA Guidelines provides that:

- (a) The lead or responsible agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:
  - 1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and
  - 2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.
- (b) The supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.
- (c) A supplement to an EIR shall be given the same kind of notice and public review as is given to a draft EIR under Section 15087.
- (d) A supplement to an EIR may be circulated by itself without recirculating the previous draft or final EIR.
- (e) When the agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15091 shall be made for each significant effect shown in the previous EIR as revised.

In accordance with Section 15163 of the CEQA Guidelines, this document:

- Incorporates the certified GPEIR by reference, as discussed in Section 2.4, *Incorporation by Reference*.
- Contains information necessary to make the GPEIR adequate for the proposed project.
- Evaluates the potential environmental impacts of the proposed project that are a result of changed circumstances and new information since the GPEIR was certified.
- Evaluates the potential environmental impacts of the proposed changes to the assumed development capacity of the project site under the GPEIR.

## 1. Executive Summary

- Updates where necessary to the discussion of cumulative impacts, growth-inducing impacts, and other required sections of this Draft SEIR.

The proposed project is summarized in Section 1.4, *Project Summary*, and more fully described in Chapter 3, *Project Description*. The analysis in this SEIR confirms that the certified GPEIR is adequate for the proposed project, with the updated information contained herein. The proposed project is not within the West Valley Specific Plan area and would therefore not impact the analysis for this area in the GPEIR.

### 1.2.1.2 APPROACH/DEFINITION OF BASELINE

As described in Section 1.2.1.1, a supplement to an EIR need only contain the information necessary to make the previous EIR (GPEIR) adequate for the project as revised. The environmental impacts associated with the proposed project for this SEIR are defined as the incremental impacts between the approved GPU and the GPU upon implementation of the proposed project. Therefore, the scope of the review for project-related impacts for this SEIR is limited to the difference between the assumed buildout of the adopted GPU under the GPEIR to buildout of the GPU with the proposed project. The approved, designated land uses in the GPEIR and the GPU policies and mitigation measures identified in the GPEIR that mitigate potential environmental impacts for the site serve as the baseline for the environmental impact analysis of the proposed project.

The GPU land use designation for the site is Industrial and the project site is within Traffic Area Zone (TAZ) 9 (see Figure 1-1, *Traffic Analysis Zones*) per the GPEIR's Traffic Impact Analysis (TIA). Table 4, *Land Use Summary by Traffic Analysis Zone*, of the TIA (reproduced here for TAZ 9 as Table 1-1, *Land Use Summary for TAZ 9*) indicates that the GPEIR assumed that at GPU buildout TAZ 9 would include 893,600 square feet of industrial uses with no changes between the existing conditions and GPU buildout conditions (Kunzman 2017). The TIA uses a single Institute of Transportation Engineers (ITE) rate for the Industrial land use designation, including the project site. The TIA also considers that the entirety of the existing building square footage is occupied and operational. Therefore, the baseline condition for the SEIR is the existing 357,544 building square footage on the site considered to be all industrial uses, all occupied, and all operational (approved project).

The environmental setting of each topical section provides an update of existing conditions and changes in circumstances since certification of the GPEIR.

## 1. Executive Summary

**Table 1-1 Land Use Summary for TAZ 9**

Land Use (units)	TAZ 9		
	Existing	Proposed	Net
Single-family (du)	892	892	--
Multifamily (du)	--	--	--
Commercial/Retail (TSF)	141.060	141.060	--
Office (TSF)	19.300	19.300	--
Industrial (TSF)	893.600	893.600	--
Elementary School (ST)	563	618	<b>+55</b>
Middle School/K-8 (ST)	--	--	--
High School (ST)	--	--	--
Community College (ST)	--	--	--
Religious Institution (TSF)	--	--	--
Park/Recreation (AC)	--	--	--

Source: Kunzman 2017  
 du = dwelling units  
 TSF = thousand square feet  
 ST = students  
 AC = acres

### 1.2.2 SEIR Format

**Chapter 1. Executive Summary:** Summarizes the background and description of the proposed project, the format of this SEIR, project alternatives, any critical issues remaining to be resolved, areas of controversy, and the potential environmental impacts and mitigation measures identified for the proposed project.

**Chapter 2. Introduction:** Describes the purpose of this SEIR, the notice of preparation, the use of incorporation by reference, a summary of impact significance, mitigation measures, and Final SEIR certification.

**Chapter 3. Project Description:** A detailed description of the proposed project, including its objectives, its area and location, approvals anticipated to be required as part of the proposed project, necessary environmental clearances, and the intended uses of this SEIR.

**Chapter 4. Environmental Setting:** A description of the physical environmental conditions in the vicinity of the proposed project as they existed at the time the notice of preparation was published, from local and regional perspectives.

**Chapter 5. Environmental Analysis:** Each environmental topic is analyzed in a separate section that includes, a summary of the analysis in the GPEIR; the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the existing environmental setting; the potential adverse and beneficial effects of the proposed project as compared to the analysis in the GPEIR; the level of impact significance before mitigation; the mitigation measures for the proposed project;

# 1. Executive Summary

the level of significance after mitigation is incorporated; and the potential cumulative impacts of the proposed project and other existing, approved, and proposed development in the area.

**Chapter 6. Significant Unavoidable Adverse Impacts:** Describes the significant unavoidable adverse impacts of the proposed project.

**Chapter 7. Alternatives to the Proposed Project:** Describes the alternatives and compares their impacts to the impacts of the proposed project. Alternatives include the No Project Alternative and a Mixed-Use Alternative.

**Chapter 8. Impacts Found Not to Be Significant:** Briefly describes the potential impacts of the proposed project that were determined not to be significant and were therefore not discussed in detail in this SEIR.

**Chapter 9. Significant Irreversible Changes Due to the Proposed Project:** Describes the significant irreversible environmental changes associated with the proposed project.

**Chapter 10. Growth-Inducing Impacts of the Project:** Describes the ways in which the proposed project would cause increases in employment or population that could result in new physical or environmental impacts.

**Chapter 11. Organizations and Persons Consulted:** Lists the people and organizations that were contacted during the preparation of this SEIR.

**Chapter 12. Qualifications of Persons Preparing SEIR:** Lists the people who prepared this SEIR for the proposed project.

**Chapter 13. Bibliography:** The technical reports and other sources used to prepare this SEIR.

**Appendices:** The appendices for this document (in PDF format on a USB attached to the front cover) comprise these supporting documents:

- Appendix A: Notice of Preparation, NOP Comments, and Scoping Meeting Sign-In Sheet and Comments
- Appendix B: Regulatory Standards
- Appendix C: General Plan Goals and Policies
- Appendix D-a: Air Quality/GHG Analysis
- Appendix D-b: Health Risk Assessment
- Appendix E: Protected Tree Report
- Appendix F: Cultural Resources Records Search Results
- Appendix G: Historic Built Environment Assessment
- Appendix H: Geotechnical Investigation Report
- Appendix I: Paleontological Resources Records Search Results
- Appendix J-a: Phase I Environmental Site Assessment, Phase 1 & 2
- Appendix J-b: Phase I Environmental Site Assessment, Phase 3
- Appendix J-c: Phase I Environmental Site Assessment, Phase 4 & 5
- Appendix J-d: Phase I Environmental Site Assessment, Phase 6

## 1. Executive Summary

- Appendix K-a: Low Impact Development Plan - Lot 1 South Lemon Avenue and Paseo Del Prado
- Appendix K-b: Low Impact Development Plan - Lot 2 Paseo Del Prado and Paseo Sonrisa
- Appendix K-c: Low Impact Development Plan - Lot 3 Valley Boulevard and Paseo Tesoro
- Appendix K-d: Low Impact Development Plan - Lot 4 Valley Boulevard and Paseo Tesoro
- Appendix L-a: Hydrology and Hydraulic Report - Lot 1 South Lemon Avenue and Paseo Del Prado
- Appendix L-b: Hydrology and Hydraulic Report - Lot 2 Paseo Del Prado and Paseo Sonrisa
- Appendix L-c: Hydrology and Hydraulic Report - Lot 3 Valley Boulevard and Paseo Tesoro
- Appendix L-d: Hydrology and Hydraulic Report - Lot 4 Valley Boulevard and Paseo Tesoro
- Appendix M: Noise Analysis
- Appendix N: Responses from Service Providers
- Appendix O: Traffic Impact Analysis
- Appendix P: AB 52 Correspondences with Tribes
- Appendix Q: Water Budget Workbook for New and Rehabilitated Non-Residential Landscapes

### 1.3 PROJECT LOCATION

The proposed project is in the city of Walnut in southwestern Los Angeles County and adjacent to the cities of Diamond Bar, Industry, West Covina, San Dimas, and Pomona (see Figure 3-1, *Regional Location*). The approximately 23-acre project site is between Valley Boulevard to the south, S. Lemon Avenue to the west, Paseo Del Prado to the north, and an existing industrial development to the east. Beyond Valley Boulevard is the Southern Pacific Railroad line and San Jose Creek. The City of Industry, which is characterized by industrial land uses, lies south of these features. The site is approximately 0.8 mile north of State Route 60 and 1.5 miles northwest of State Route 57 (see Figure 3-2, *Local Vicinity*, and Figure 3-3, *Site Aerial*).

### 1.4 PROJECT SUMMARY

The project site is designated for industrial uses and in the Light Manufacturing (M-1) zoning district. The proposed project involves the development of four concrete tilt-up buildings that would encompass a total of 414,778 square feet of building space. The proposed project would include 392,488 square feet of light industrial and warehousing space, and 22,290 square feet of office/retail space. The buildings would also include 53,549 square feet of refrigerated area. Although specific tenants have yet to be identified, the applicant intends to file an application with the City for approval of a conditional use permit to allow up to 300,000 square feet of the proposed project to be used as a “logistics facility” and/or for “warehouses, storage” uses, as those terms are defined in Section 6.08.020 of the Walnut Municipal Code.

Additionally, the proposed project would include a total landscaped area of 115,026 square feet. The proposed project would also feature 1,097 parking stalls, 54 dock high doors, and 7 grade-level doors. Off-site improvements to accommodate project operations include the widening of Valley Boulevard at the northeast corner of the intersection with S. Lemon Street to include an additional right-turn lane from Valley Boulevard to S. Lemon Street.

## 1. Executive Summary

The proposed project would also involve demolition of the existing buildings on-site, which total 357,544 square feet of building area and include an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, a car body shop repair facility, pizza restaurant, Mexican food supply store, rent-a-car office, and pet food supply outlet.

### 1.5 SUMMARY OF PROJECT ALTERNATIVES

Two alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the proposed project and may avoid or substantially lessen significant effects of the project. These alternatives are analyzed in detail in Chapter 7, *Alternatives*.

- No Project/Existing General Plan Alternative
- Mixed-Use Alternative

#### 1.5.1 No Project/Existing General Plan Alternative

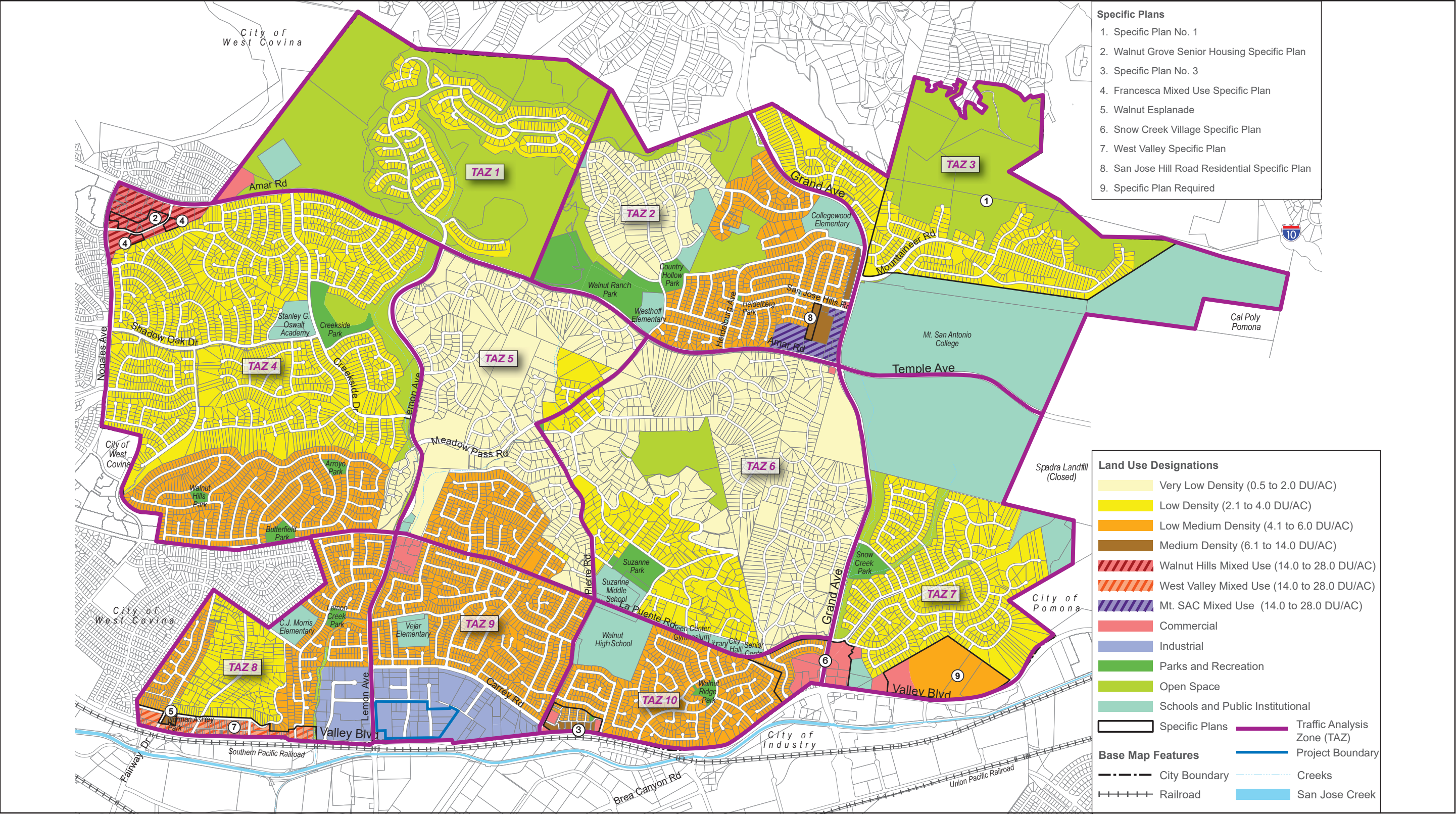
Under this alternative, it is assumed that existing uses on the project site would remain and operate as under existing conditions. The project site currently includes an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, car body shop repair facility, pizza restaurant, roofers' mart, Mexican food supply store, rent-a-car office, and pet food supply outlet. The 357,544 square feet of existing uses are all allowed under the site's GPU Industrial land use designation.

Under this alternative, impacts would be similar to the proposed project for aesthetics, agriculture, hazards and hazardous materials, mineral resources, population and housing, public services, recreation, and wildfire. This alternative would reduce impacts for air quality, biological resources, cultural resources, greenhouse gas emissions, noise, transportation, tribal cultural resources, and utilities and services systems as compared to the proposed project. Impacts to energy, hydrology and water quality, and land use and planning would be increased.

This alternative would meet two of the four project objectives, to provide for the development of the site consistent with the City's General Plan, and develop a diverse industrial campus that can accommodate a mix of industrial, retail, and office uses.



Figure 1-1 - Traffic Analysis Zones



Source: MIG Inc., and City of Walnut 2018.



## 1. Executive Summary

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## 1. Executive Summary

### 1.5.2 Mixed-Use Alternative

This alternative includes a mix of multifamily residential units and retail. This alternative was chosen for its potential to reduce air quality and greenhouse gas impacts and because it was requested by residents at the scoping meeting. Requests to include this alternative were also received during the public comment period after the release of the Notice of Preparation. The City's 2021-2029 Housing Element includes a residential sites inventory that includes properties that will be rezoned to meet the City's Regional Housing Needs Allocation (RHNA). The inventory includes five study areas. The proposed project site was not included as a study area. Study Area 4 is east of the project site and is closer in size to the project site than the rest of the study areas. Similar to the project site, all parcels in Study Area 4 have a General Plan designation of Industrial and are Zoned as Light Manufacturing (M-1). The proposed number of units for this study area is 575 units, 387 low-income units and 188 moderate-income units. This alternative proposes the same number of units for the project site as Study Area 4. This alternative includes 20,000 square feet of retail. This alternative would require a General Plan amendment since the current General Plan designation and zoning for the site does not allow for residential uses.

Impacts under this alternative would be similar to the proposed project for aesthetics, agriculture, biological resources, cultural resources, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, mineral resources, tribal cultural resources, and wildfire. This alternative would reduce impacts for air quality as compared to the proposed project. This alternative would increase impacts to land use and planning, noise, population and housing, public services, recreation, transportation, and utilities and service systems.

This alternative would meet one of the four project objective, to replace an aging industrial park with modern, attractive, efficient buildings.

## 1.6 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an SEIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the proposed project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this Draft SEIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the proposed project override the environmental impacts that cannot be feasibly avoided or mitigated to below a level of significance.
3. Whether the proposed land use changes are compatible with the character of the existing area.
4. Whether the identified goals, policies, or mitigation measures should be adopted or modified.

## 1. Executive Summary

5. Whether there are other mitigation measures that should be applied to the project besides the mitigation measures identified in the Draft SEIR.
6. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic project objectives.

### 1.7 AREAS OF CONTROVERSY

At the time of preparation of this Draft SEIR, there are no known areas of controversy. There were six attendees at the public scoping meeting that was noticed and held August 29, 2023, at 5:00 p.m. at the Walnut City Hall. Responses to the Notice of Preparation are summarized in Table 2-2, *NOP Written Comments Summary*. Comments were received from the Native American Heritage Commissions, the Office of the Attorney General, Los Angeles County Public Works, the Department of Transportation, the California Department of Fish and Wildlife, and the Los Angeles County Sanitation Districts. Each of these agencies recommended information and analyses that should be included in the Draft SEIR, but did not express opposition or controversy related to the proposed project.

### 1.8 SUMMARY OF ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Table 1-2 summarizes the conclusions of the environmental analysis contained in this SEIR. Impacts are identified as significant or less than significant, and mitigation measures are identified for all significant impacts. The level of significance after incorporation of mitigation measures is also presented.



## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
<b>5.1 AESTHETICS</b>			
<b>Impact 5.1-1:</b> The proposed project would not have a substantial adverse effect on a scenic vista and would not conflict with applicable zoning and other regulations governing scenic quality.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.1-2:</b> The proposed project would not alter scenic resources within a state scenic highway.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.1-3:</b> The proposed project would not generate additional light and glare.	Less than significant	No mitigation measures are required.	Less than significant
<b>5.2 AIR QUALITY</b>			
<b>Impact 5.2-1:</b> The proposed project would not conflict with the South Coast AQMD's Air Quality Management Plan.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.2-2:</b> Construction activities associated with the proposed project would generate short-term emissions that exceed South Coast AQMD's significance thresholds and would cumulatively contribute to the nonattainment designations of the SoCAB.	Potentially significant.	<p>AQ-1: The proposed project's construction contractors shall use equipment that meets the United States Environmental Protection Agency Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 25 horsepower, unless it can be demonstrated that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Tier 4 Final emissions standard for a similarly sized engine, as defined by the California Air Resources Board's regulations. The requirement to use Tier 4 Final equipment for engines over 25 horsepower shall be identified in construction bids.</p> <ul style="list-style-type: none"> <li>Have engines that meet either US EPA or California Air Resources Board (CARB) Tier 4 Final emission standards. Ensure that all construction plans clearly show the selected emission reduction strategy for construction equipment over 25 horsepower.</li> </ul>	Less than significant with mitigation incorporated

<sup>1</sup> Additions to the mitigation measures identified in the GPEIR are shown underlined and deletions are shown in cross-out format.

## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
		<ul style="list-style-type: none"> <li>Maintain a list of all operating equipment in use on the project site for verification by the City. The construction equipment list shall state the makes, models, and number of construction equipment on-site. Ensure that all equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations.</li> <li>Communicate with all sub-contractors in contracts and construction documents that all non-essential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board Rule 2449 and is responsible for ensuring that this requirement is met.</li> </ul> <p>These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division.</p>	
<b>Impact 5.2-3:</b> Operational activities associated with the proposed project would not generate long-term emissions that exceed South Coast AQMD's significance thresholds that cumulatively contribute to the nonattainment designations of the SoCAB..	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.2-4:</b> Construction of the proposed project would not expose sensitive receptors to substantial pollutant concentrations of toxic air contaminants.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.2-5:</b> Operation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations of criteria air pollutants and toxic air contaminants. However, combined construction and operational emissions would exceed the draft South Coast AQMD Cumulative cancer risk threshold.	Potentially significant	Implement Mitigation Measure AQ-1.	Less than significant with mitigation incorporated

## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
<b>Impact 5.2-6:</b> The proposed project would not result in other emissions that would adversely affect a substantial number of people.	Less than significant	No mitigation measures are required.	Less than significant
<b>5.3 BIOLOGICAL RESOURCES</b>			
<b>Impact 5.3-1:</b> The proposed project could have a substantial effect on species identified as candidate, sensitive, or special status species.	Potentially significant	<p><b>BIO-1B</b> Vegetation and buildings within the City of Walnut could provide suitable nesting habitat for six special status bird species, including: coastal cactus wren (<i>Campylorhynchus brunneicapillus sandeigensis</i>), coastal California gnatcatcher (<i>Poliophtila californica californica</i>), least Bell's vireo (<i>Vireo bellii pusillus</i>), Swainson's hawk (<i>Buteo swainsoni</i>), white-tailed kite (<i>Elanus leucurus</i>), and yellow warbler (<i>Setophaga petechia</i>) as well as common bird species with protection under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGF). General ground disturbance, including but not limited to, demolition, construction, or related activities may result in removal or disturbance of nests if present on a project site. These actions would constitute a significant impact under CEQA as they may result in mortality and/or reduction in reproductive success of birds. If work cannot avoid the nesting bird season (<u>generally which shall be defined as February January 1 through August 4531</u>, consistent with the recommendation from the California Department of Fish and Wildlife (CDFW), then preconstruction surveys shall be conducted in order to reduce these impacts to a less than significant level. A qualified biologist shall complete a nesting bird survey no more than 14 days prior to the start of any work, <u>within a radius of at least 300 feet of suitable nesting habitat that will be disturbed or to the extent allowable and accessible. The survey radius shall be expanded to 500 feet or 0.5-mile for special status species, if feasible.</u> If active nests are observed during pre-construction surveys, project-related activities <del>will</del> <u>shall</u> avoid the area via a protective no-work buffer determined by a qualified biologist and determined based on a species' legal protection and biological requirements. Work may resume within this protective no-work buffer after a qualified biologist has determined that young have fledged the nest or the nest otherwise becomes inactive (i.e. predation or natural nest failure). <u>Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area.</u></p> <p><b>BIO-24C</b> Tree stands, buildings, and other man-made structures on the project site could provide suitable roost habitat for six special status bat species: big free-tailed</p>	Less than significant with mitigation incorporated.

## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
		<p>bat (<i>Nyctinomops mactrotis</i>), pallid bat (<i>Antrozous pallidus</i>), pocketed free-tailed bat (<i>Nyctinomops femorosaccus</i>), western mastiff bat (<i>Eumops perotis californicus</i>), western yellow bat (<i>Lasiurus xanthinus</i>), and Yuma myotis (<i>Myotis yumanensis</i>). New development and/or demolition associated with implementation of the <u>proposed project</u> could result in removal or disturbance of bat roosts if present on <u>the</u> project site. These actions would constitute a significant impact under CEQA as they may result in mortality and/or reduction in reproductive success of bats. Implementation of Mitigation Measure BIO-24G would reduce these impacts to less than significant levels. A qualified biologist shall conduct a roost assessment survey of trees or human-made structures with potential to support bat roosts that are planned to be removed. The survey shall assess the use of the tree or structure for roosting as well as potential presence of bats. If the biologist finds no evidence of, or potential to support bat roosting, no further measures are recommended. However, if evidence of bat roosting is present, additional measures described below shall be implemented:</p> <ul style="list-style-type: none"> <li>• <i>Work activities outside the maternity roosting season:</i> If evidence of bat roosting is discovered during the pre-construction roost assessment and general ground disturbance, demolition, construction, or related activities is planned from August 1 through February 28 (outside of the bat maternity roosting season), a qualified biologist shall implement passive exclusion measures to prevent bats from reentering structures. After sufficient time to allow bats to escape and a follow-up survey to determine if bats have vacated the roost, work may continue and impacts to special status bat species shall be avoided. To offset the loss of occupied bat roosts, bat boxes shall be installed at a suitable location in the vicinity of a project site to provide roost locations for displaced bats, contingent on CDFW approval of project details.</li> <li>• <i>Work activities during the maternity roosting season:</i> If a pre-construction roost assessment discovers evidence of bat roosting in the trees or human-made structures during the maternity roosting season (March 1 through July 31), and determines maternity roosting bats are present, work shall be avoided during the maternity roosting season or until a qualified biologist determines the roost has been vacated.</li> </ul>	



## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
<b>Impact 5.3-2:</b> Development of the proposed project would not result in the loss of a sensitive natural community or riparian habitat.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.3-3:</b> The proposed project would not impact jurisdictional waters.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.3-4:</b> The proposed project would not affect wildlife movement.	Potentially significant	Implement Mitigation Measures BIO-1 and BIO-2	Less than significant with mitigation incorporated
<b>Impact 5.3-5:</b> The proposed project does not contain Oak or Walnut Trees and therefore would not conflict with the City's Oak/Walnut Tree Preservation Ordinance.	Less than significant	No mitigation measures are required.	Less than significant
<b>5.4 CULTURAL RESOURCES</b>			
<b>Impact 5.4-1:</b> The proposed project could impact potential historic resources.	Potentially significant	CR-1 <del>Requires that a Cultural Resources Assessment and Treatment Plan for prehistoric, historic, and built environment, and paleontological resources be conducted for all projects potentially affecting these resources prior to the issuance of a land use permit the issuance of grading permits, and prior to the removal of buildings older than 45 years. The cultural resources assessment must include an Archaeological Record Search through the South Central Coastal Information Center (CHRIS-SCCIC), a Sacred Lands File Search through the Native American Heritage Commission, and a Paleontological Record Search through the Natural History Museum of Los Angeles County's Vertebrate Paleontology Section shall be prepared by a qualified architectural historian meeting Secretary of the Interior Standards. The study shall evaluate the significance and data potential of the resources in accordance with these standards. Resources present on the proposed project site shall be evaluated for eligibility for the California Register of Historical Resources (CRHR), including buildings and structures. If the resource meets the criteria for listing on the CRHR (Pub. Res. Code Section 5024.1; Title 14 CCR, Section 4852), a program detailing how such long term avoidance or preservation is ensured shall be developed and approved prior to conditional approval.</del>	Less than significant with mitigation incorporated

## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
		<p>CR-2 <del>Coordinate with local Native American Tribal Governments that are traditionally and culturally affiliated with the geographic area for a proposed project pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18 (if applicable).</del></p> <p>CR-3 <del>Include the following statement as a condition of approval on all development projects: "If cultural (prehistoric, historic, or paleontological) resources are discovered during project construction, all work within 100 feet of the area of the find shall cease, and a qualified archaeologist or paleontologist shall be retained by the project applicant to investigate the find, and to make recommendations on its disposition. If human remains are encountered during construction, all work shall cease, and the Los Angeles County Coroner's Office shall be contacted pursuant to Health and Safety Code provisions."</del></p> <p>COA-CUL-1 <del>If cultural (prehistoric, historic, or paleontological) resources are discovered during project construction, all work within 100-feet of the area of the find shall cease, and a qualified archaeologist or paleontologist shall be retained by the project applicant to investigate the find, and to make recommendations on its disposition. If human remains are encountered during construction, all work shall cease, and the Los Angeles County Coroner's Office shall be contacted pursuant to Health and Safety Code provisions.</del></p>	
<b>Impact 5.4-2:</b> The proposed project would not impact archaeological resources with the implementation of conditions of approval.	Potentially significant	Implement COA-CUL-1	Less than significant with mitigation incorporated
<b>Impact 5.4-3:</b> Grading activities associated with the proposed project could potentially disturb human remains.	Potentially significant	Implement COA-CUL-1	Less than significant with mitigation incorporated
<b>5.5 ENERGY</b>			
<b>Impact 5.5-1:</b> Implementation of the proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	Less than significant	No mitigation measures are required.	Less than significant

## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
<b>Impact 5.5-2:</b> The proposed project would not conflict with or obstruct implementation of plans for renewable energy or energy efficiency.	Less than significant	No mitigation measures are required.	Less than significant
<b>5.6 GEOLOGY AND SOILS</b>			
<b>Impact 5.6-1:</b> As with development pursuant to the 2018 General Plan Update, project occupants, visitors, and/or patrons would not be subject to potential seismic-related hazards.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.6-2:</b> As with the 2018 General Plan Update, unstable geologic unit or soils conditions, including soil erosion, would not result from development of the project.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.6-3:</b> As with the 2018 General Plan, expansive soil conditions would not result in risks to life or property.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.6-4:</b> The proposed project would not include the use of septic tanks.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.6-5:</b> The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Less than significant	No mitigation measures are required.	Less than significant
<b>5.7 GREENHOUSE GAS EMISSIONS</b>			
<b>Impact 5.7-1:</b> The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.7-2:</b> The proposed project could conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Potentially significant	GHG-1 Prior to the issuance of a building permit, the site plan shall include automobile electric vehicle (EV) charging stations equal to the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code (CALGreen).	Less than significant with mitigation incorporated

## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
<b>5.8 HAZARDS AND HAZARDOUS MATERIALS</b>			
<b>Impact 5.8-1:</b> As with the 2018 General Plan, project construction and operations would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or through reasonably foreseeable upset and accidental release of hazardous materials; or emit hazardous emissions or handle hazardous or acutely hazardous materials within a quarter mile of an existing or proposed school.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.8-2:</b> Because the project site is not on a list of hazardous materials sites, it would not alter impacts related to these sites in comparison to the GPEIR.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.8-3:</b> The project site is not located in the vicinity of an airport or within the jurisdiction of an airport land use plan.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.8-4:</b> Project development would not impair or physically interfere with the implementation of an emergency response or evacuation plan.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.8-5:</b> Development of the project as proposed would increase the number of structures exposed to fire danger compared to the 2018 General Plan Update.	Less than significant	No mitigation measures are required.	Less than significant

## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
<b>5.10 HYDROLOGY AND WATER QUALITY</b>			
<b>Impact 5.9-1:</b> As with development pursuant to the GPU, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.9-2:</b> As with site land uses designated under the GPU, the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed project could impede sustainable groundwater management of the basin	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.9-3:</b> As with the GPU, the proposed project would not 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 a substantial erosion or siltation on- or off-site, result in flooding on- or off-site, or create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.9-4:</b> As with site development pursuant to the GPU, the proposed project would not 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 impede or	Less than significant	No mitigation measures are required.	Less than significant

## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
redirect flood flows, and would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.			
<b>Impact 5.9-5:</b> As with the GPU, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Less than significant	No mitigation measures are required.	Less than significant
<b>5.10 LAND USE AND PLANNING</b>			
<b>Impact 5.10-1:</b> The proposed project would not physically divide an established community.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.10-2:</b> The proposed project would not conflict with applicable plans adopted for the purpose of avoiding or mitigating environmental effect.	Less than significant	No mitigation measures are required.	Less than significant
<b>5.11 NOISE</b>			
<b>Impact 5.11-1:</b> Construction activities would result in temporary noise increases in the vicinity of the proposed project that would not exceed local standards.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.11-2:</b> Project implementation would result in long-term operation-related noise that would not exceed local standards.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.11-3:</b> The project would not create excessive short/long term groundborne vibration and groundborne noise.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.11-4:</b> The proximity of the project site to an airport or airstrip would not result in exposure of future resident/workers to airport-related noise.	Less than significant	No mitigation measures are required.	Less than significant

## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
<b>5.12 PUBLIC SERVICES</b>			
<i>FIRE PROTECTION AND EMERGENCY SERVICES</i>			
<b>Impact 5.12-1:</b> The proposed project would introduce new structures and workers into the LACFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel.	Less than significant	No mitigation measures are required.	Less than significant
<i>POLICE PROTECTION</i>			
<b>Impact 5.12-2:</b> The proposed project would introduce new structures and workers into the LACSD Walnut/Diamond Bar Station service boundaries, thereby increasing the requirement for police protection facilities and personnel.	Less than significant	No mitigation measures are required.	Less than significant
<i>SCHOOL SERVICES</i>			
<b>Impact 5.12-3:</b> The proposed project would not generate new students and therefore would not impact the school enrollment capacities of area schools.	Less than significant	No mitigation measures are required.	Less than significant
<i>LIBRARY SERVICES</i>			
<b>Impact 5.12-4:</b> The proposed project would not result in a substantial adverse physical impact associated with the provisions of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for library services.	Less than significant	No mitigation measures are required.	Less than significant

## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
<b>5.17 TRANSPORTATION</b>			
<b>Impact 5.13-1:</b> The proposed project would not result in a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.13-2:</b> The proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).	Potentially significant	<p>T-1 Prior to issuance of construction permits for the proposed project, the project applicant shall coordinate with the City to select one or more of the following mitigation measures:</p> <ul style="list-style-type: none"> <li>• <b>First-Mile/Last-Mile Space:</b> The proposed project shall dedicate space in a central location for first-mile/last-mile solutions, such as bike share, scooter share, or a future mode of transportation.</li> <li>• <b>Improved Pedestrian Network:</b> The proposed project shall develop additional pedestrian connectivity within the project site such as across Paseo Tesoro and Paseo Sonrisa or for connections outside the project site to Valley Boulevard, Lemon Avenue, and Paseo Del Prado.</li> <li>• <b>Car Sharing Program:</b> The proposed project shall provide on-site parking spaces for car sharing services such as ZipCar or GetAround.</li> </ul> <p>T-2 The applicant shall develop a mitigation implementation and monitoring program. If mitigation measures are physical features such as bicycle or pedestrian infrastructure improvements, their implementation prior to occupancy would satisfy the monitoring requirements. Programmatic mitigations such as the employee cash-out for parking or transit passes would require ongoing monitoring for implementation and designation of a staff member of the property management's team as a mitigation monitoring coordinator. The mitigation monitoring coordinator would oversee implementation and produce annual monitoring reports of the mitigation program for submittal to the City. Fees paid by tenants, as part of common area maintenance and management, could be used to fund the mitigation monitoring program.</p>	Less than significant



## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
<b>Impact 5.13-3:</b> The proposed project would not 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	No mitigation measures are required.	Less than significant
<b>Impact 5.13-4:</b> The proposed project would not result in inadequate emergency access.	Less than significant	No mitigation measures are required.	Less than significant
<b>5.14 TRIBAL CULTURAL RESOURCES</b>			
<b>Impact 5.14-1:</b> The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is: i) listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). ii) determined by the lead agency to be significant pursuant to criteria in Public Resources Code section 5024.1(c).	Potentially significant	TCR-1 <u>The project applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians–Kizh Nation. The monitor shall be retained prior to the commencement of any ground-disturbing activity for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). Ground-disturbing activity shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.</u> <u>A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity or the issuance of any permit necessary to commence a ground-disturbing activity, whichever is earlier.</u> <u>The monitor shall complete daily monitoring logs that shall provide descriptions of the relevant ground-disturbing activities; the type of construction activities performed; locations of ground-disturbing activities; soil types; cultural-related materials; and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc. (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the project applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project</u>	Less than significant with mitigation incorporated

## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
		<p>applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.</p> <p>TCR-2 Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery (i.e., not less than the surrounding 50 feet) shall cease and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh shall recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural, and/or historic purposes.</p> <p>TCR-3 Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.</p> <p>If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p>	
<b>5.15 UTILITIES AND SERVICE SYSTEMS</b>			
<b>Impact 5.15-1:</b> As with development pursuant to the GPU, the proposed project would not result in the relocation or construction of new or expanded wastewater facilities and, as with development pursuant to the GPU, would not cause significant environmental effects due to such activities.	Less than significant	No mitigation measures are required.	Less than significant

## 1. Executive Summary

**Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
<b>Impact 5.15-2:</b> As with development pursuant to the GPU, wastewater generated by the proposed project would be adequately treated by the wastewater service provider.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.15-3:</b> The proposed project would not result in the relocation or construction of new or expanded water facilities and, as with development pursuant to the GPU, would not cause significant environmental effects due to such activities.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.15-4:</b> As with development pursuant to the GPU, available water supplies are sufficient to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.15-5:</b> The proposed project would not result in the relocation or construction of new or expanded storm drainage facilities and, as with development pursuant to the GPU, would not cause significant environmental effects due to such activities.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.15-6:</b> As with development pursuant to the GPU, existing and/or proposed facilities would be able to accommodate project-generated solid waste and comply with related solid waste regulations.	Less than significant	No mitigation measures are required.	Less than significant
<b>Impact 5.16-7:</b> Project-generated solid waste would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	Less than significant	No mitigation measures are required.	Less than significant

## 1. Executive Summary

**Table 1-2      Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures/Conditions of Approval <sup>1</sup>	Level of Significance After Mitigation
<b>Impact 5.15-8:</b> The proposed project would not result in the relocation or construction of new or expanded electricity facilities and, as with development pursuant to the GPU, would not cause significant environmental effects due to such activities	Less than significant	No mitigation measures are required.	Less than significant

## 1. Executive Summary

### 1.9 REFERENCES

Kunzman Associates Inc. (Kunzman). 2017, November 22. *City of Walnut General Plan Update*. Traffic Impact Analysis.

<https://www.cityofwalnut.org/home/showpublisheddocument/20512/638290932302888226>.

## 1. Executive Summary

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## 2. Introduction

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### 2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The California Environmental Quality Act (CEQA; Sections 21000 et seq. of the California Public Resources Code [PRC]) requires that all State and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects. This draft supplemental environmental impact report (Draft SEIR) has been prepared to satisfy the requirements of CEQA and the CEQA Guidelines (California Code of Regulations [CCR] Title 14, Chapter 3, Sections 15000 et seq.). The environmental impact report (EIR) is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage, and to identify alternatives to the project. The EIR must also disclose significant environmental impacts that cannot be avoided; growth-inducing impacts; effects not found to be significant; and significant cumulative impacts of past, present, and reasonably foreseeable future projects.

The lead agency means “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment” (PRC Section 21067). The City of Walnut has the principal responsibility for approval of the Walnut Business Park project (proposed project). For this reason, the City of Walnut is the CEQA lead agency for this project.

The intent of the Draft SEIR is to provide sufficient information on the potential environmental impacts of the proposed project to allow the City of Walnut to make an informed decision regarding approval of the project. Specific discretionary actions to be reviewed by the City are described in Section 3.4, *Intended Uses of the Draft SEIR*.

The overall purpose of this Draft SEIR is to inform the lead agency, responsible agencies, decision makers, and the general public about the environmental effects of the development and operation of the proposed project. This Draft SEIR addresses effects that may be significant and adverse, evaluates alternatives to the project, and identifies mitigation measures to reduce or avoid adverse effects.

This Draft SEIR is a supplement to the City of Walnut General Plan Update and West Valley Specific Plan Final EIR, which was certified by the City of Walnut in May 2018 (GPEIR) and contains information necessary to make the GPEIR adequate for the proposed project. Pursuant to CEQA Guidelines section 15163, this Draft SEIR will be given the same kind of notice and public review as was given to the GPEIR. Although the GPEIR will not be recirculated with the Draft SEIR for comment, the City’s decision-making bodies will consider the GPEIR as revised by the SEIR.

## 2. Introduction

### 2.2 NOTICE OF PREPARATION

The City of Walnut determined that an SEIR would be required for this project and issued a Notice of Preparation (NOP) on August 16, 2023 (see Appendix A). The NOP process helps determine the scope of the environmental issues to be addressed in the Draft SEIR. Table 2-1, *NOP and Scoping Meeting Comments Summary*, summarizes the comments received during the NOP comment period.

A public scoping meeting was noticed and held on Tuesday, August 29, 2023, at 6:00 p.m. at Walnut City Hall. There were five attendees at the scoping meeting. The comments made during the scoping period are summarized in Table 2-1.

**Table 2-1 NOP and Scoping Meeting Comments Summary**

Commenting Agency/Person	Letter Dated	Summary of Comments	Issue Addressed In
<b>Agencies</b>			
Native American Heritage Commission	8/16/2023	<ul style="list-style-type: none"> <li>Summarizes the requirements of state laws assembly Bill (AB) 52 and Senate Bill (SB) 18</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.14, <i>Tribal Cultural Resources</i></li> </ul>
Office of the Attorney General	8/24/2023	<ul style="list-style-type: none"> <li>Provides examples of potential environmental impacts of the logistics industry on local communities</li> <li>Encourages project to reference the Attorney General Office's Bureau of Environmental Justice's published warehousing best practices document during preparation of the SEIR.</li> <li>States that priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.2, <i>Air Quality</i></li> </ul>
Los Angeles County Public Works	8/31/2023	<ul style="list-style-type: none"> <li>Notes that Los Angeles County Flood Control District (LACFCD) storm drain BI 8301 – Line B runs through the proposed development.</li> <li>States that an LACFCD permit is required for work occurring within the Flood Control easement, including, but limited to, demolition work and proposed surface improvements.</li> <li>Directs project applicant to apply for an LACFCD permit at the County's permit website</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.15, <i>Utilities and Service Systems</i></li> </ul>
Department of Transportation	8/8/2023	<ul style="list-style-type: none"> <li>States that the project site is less than a mile from State Route 60 and that the proposed project will likely result in impacts to transportation</li> <li>States that CEQA requires evaluation of vehicle miles traveled (VMT) impacts</li> <li>Encourages the lead agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to better manage the transportation network</li> <li>Encourages the project to evaluate transit service and bicycle/pedestrian connectivity improvements</li> <li>Encourages the lead agency to prepare a traffic safety analysis</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.13, <i>Transportation</i></li> <li>Appendix M, <i>Transportation Impact Analysis</i></li> </ul>



## 2. Introduction

**Table 2-1 NOP and Scoping Meeting Comments Summary**

<b>Commenting Agency/Person</b>	<b>Letter Dated</b>	<b>Summary of Comments</b>	<b>Issue Addressed In</b>
California Department of Fish and Wildlife (CDFW)	9/13/2023	<ul style="list-style-type: none"> <li>• Describes CDFW's role as a trustee agency</li> <li>• Provides a summary of the proposed project</li> <li>• States that the proposed project may result in impacts to nesting birds and loss of bird and raptor habitat</li> <li>• Recommends that the SEIR include measures to avoid potential impacts to nesting birds that may find habitat in the ornamental vegetation on-site by requiring all ground-disturbing activities to occur outside of the nesting bird breeding season and surveying suitable habitat</li> <li>• Recommends that the project avoids removal of any native trees, large and dense-canopied native and non-native trees, and trees occurring in high density and that if impacts to trees cannot be avoided that trees be replaced to compensate for losses</li> <li>• Recommends that the project incorporate native plants in the landscaping where possible</li> <li>• States that the SEIR should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the project and where ground disturbance may occur and includes instructions as to what should be included in this assessment</li> <li>• Notes that the SEIR should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment</li> <li>• Notes that a scientific collecting permit will be necessary if there is a plan to capture and relocate wildlife</li> <li>• Describes the requirements for mitigation measures under CEQA</li> <li>• Notes that CEQA requires that information developed in EIRs be incorporated into a database that may be used to make subsequent or supplemental environmental determinations</li> <li>• Recommends discussion of various potential direct, indirect, and cumulative impacts of the proposed project that should be documented within the SEIR, including impacts from lighting, noise, temporary and permanent human activity, and exotic species.</li> <li>• Describes provisions of the California Endangered Species Act relevant to the proposed project, including application for an Incidental Take Permit</li> <li>• Notes that if on-site mitigation is not feasible that off-site mitigation through habitat creation may be necessary to reduce impacts</li> </ul>	<ul style="list-style-type: none"> <li>• Section 5.3, <i>Biological Resources</i></li> </ul>

## 2. Introduction

**Table 2-1 NOP and Scoping Meeting Comments Summary**

Commenting Agency/Person	Letter Dated	Summary of Comments	Issue Addressed In
		<ul style="list-style-type: none"> <li>Notes that EIRs should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity</li> </ul>	
Los Angeles County Sanitation Districts	9/15/2023	<ul style="list-style-type: none"> <li>States that wastewater flow from the project would be conveyed to the District's Trunk Sewer on Lemon Avenue, which measures 18 inches and has a capacity of 7.6 million gallons per day (mgd) and has a peak flow of 0.6 mgd</li> <li>States that project wastewater will be treated at the San Jose Reclamation Plant, which has a capacity of 100 mgd and processes an average of 62.7 mgd</li> <li>Provides links to the District's average wastewater generation factors</li> <li>Explains that the District levies a connection fee for new development and that the project would have to pay this fee</li> <li>States that the District's long-range planning is consistent with the Southern California Association of Government's regional forecasts.</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.15, <i>Utilities and Service Systems</i></li> </ul>
<b>Organizations</b>			
Layne Faeau, Lozeau Drury LLP On behalf of Supporters Alliance for Environmental Responsibility	8/21/2023	<ul style="list-style-type: none"> <li>Requests that the City contact the commenter's firm regarding all notice periods pertaining to the environmental review process. *</li> </ul>	<p><i>* This Draft SEIR will be distributed for a 45-day public review. This review will be publicly noticed, and individual notices will be forwarded to public scoping attendees and NOP respondents (for which address information has been provided).</i></p>
Jeff Modrzejewski, On behalf of Coalition for Responsible Equitable Economic Development (CREED LA)	9/18/2023	<ul style="list-style-type: none"> <li>Requests a completed analysis of all identified impacts, imposition of all feasible mitigation, and consideration of a reasonable range of alternative</li> <li>Requests that the SEIR study an alternative that would reduce the hours of operation for the proposed warehouse uses</li> <li>States that the SEIR should clearly identify all known information about future tenants and uses of the proposed buildings</li> <li>States that impacts, such as food and beverage pick-ups and transportation of refrigeration units (TRUs), should be studied. Further states that California Air Resources Board recommends requiring contractual language in tenant lease agreements to prohibit use of TRUs.</li> <li>States that warehousing uses are expected to generate pollutants and greenhouse gases (GHGs) at a significant level and that the SEIR should fully mitigate these impacts for both the construction and operational phases</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.2, <i>Air Quality</i></li> <li>Section 5.7, <i>Greenhouse Gas Emissions</i></li> <li>Chapter 7, <i>Alternatives</i></li> </ul>

## 2. Introduction

**Table 2-1 NOP and Scoping Meeting Comments Summary**

Commenting Agency/Person	Letter Dated	Summary of Comments	Issue Addressed In
		<ul style="list-style-type: none"> <li>States that the SEIR should include a mobile source Health Risk Assessment</li> <li>States that the SEIR should detail the applicant's plan to offset GHG emissions</li> <li>States that the proposed project should consider implementing mitigation measures such as requiring a buffer zone with large drought-resistant trees, plug-in system for trucks with TRUs, zero-emission motorized operational equipment, 10% electric vehicle (EV) parking, solar panels for nonrefrigerated uses, cool roofs to reduce operational energy demand, and solar canopies on the parking lot to generate energy</li> </ul>	
<b>Residents</b>			
Rania Siddiq	8/20/2023	<ul style="list-style-type: none"> <li>Expresses objection to the proposed project</li> <li>States that the project will produce heavy truck traffic, noise, and pollution</li> <li>Claims that the project will not generate revenue for the city and instead benefit businesses and corporations exclusively **</li> <li>Expresses concern for preserving the existing environment of the city</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.2, <i>Air Quality</i></li> <li>Section 5.11, <i>Noise</i></li> <li>Section 5.13, <i>Transportation</i></li> <li>Section 5.13, <i>Transportation</i></li> <li>Appendix O, <i>Transportation Impact Analysis</i></li> </ul> <p><b>** Note that pursuant to CEQA Guidelines Section 15131, economic impacts are not considered environmental impacts of a project. An economic analysis for this project has not been prepared in conjunction with the SEIR.</b></p>
Jeannie Ingal	8/21/2023	<ul style="list-style-type: none"> <li>Expresses concern about the proposed project with regard to the addition of more trucks to the area</li> <li>Asks how the project benefits the community</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.13, <i>Transportation</i></li> <li>Appendix O, <i>Transportation Impact Analysis</i></li> </ul>
Sattar Siddiq	8/25/2023	<ul style="list-style-type: none"> <li>Expresses objection to the proposed project***</li> </ul>	*** No CEQA-related issues raised.
Helen Ton	8/26/2023	<ul style="list-style-type: none"> <li>Expresses objection to the proposed project due to truck traffic, noise, and pollution</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.2, <i>Air Quality</i></li> <li>Section 5.11, <i>Noise</i></li> <li>Appendix O, <i>Transportation Impact Analysis</i></li> </ul>
Wendy Toy	8/28/2023	<ul style="list-style-type: none"> <li>Asks for a copy of the developer's application for the proposed development to view ownership information</li> <li>Asks if the proposed project involves one or multiple-story buildings***</li> </ul>	*** No CEQA-related issues raised.
Andre X. Alatorre	9/12/2023	<ul style="list-style-type: none"> <li>Expresses concern about the safety impacts from increased traffic under the proposed project, including increased congestion from delivery trucks and employee vehicles</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.2, <i>Air Quality</i></li> <li>Section 5.13, <i>Transportation</i></li> <li>Appendix O, <i>Transportation Impact Analysis</i></li> </ul>

## 2. Introduction

**Table 2-1 NOP and Scoping Meeting Comments Summary**

Commenting Agency/Person	Letter Dated	Summary of Comments	Issue Addressed In
		<ul style="list-style-type: none"> <li>States that the proposed project would result in increased air pollution from diesel trucks and poses several questions with regard to truck trips from the proposed project, including the following: <ul style="list-style-type: none"> <li>How many semi-trucks will visit the project site?</li> <li>How many “last-mile” delivery trucks will the proposed project bring to the city on a daily basis?</li> <li>Will the proposed project estimate the number of hours that truck engines will run per day?</li> <li>Will the proposed project estimate the increase in air pollution in the surrounding community?</li> </ul> </li> <li>States that the proposed project will convert the neighborhood in the vicinity of the project site into a commercial warehouse hub that will not benefit residents of the city</li> </ul>	
Vijay Vakil, Wendy Toy, William Harrison, and Charles Isaac	9/15/2023	<ul style="list-style-type: none"> <li>States that the proposed project is contrary to the city’s character and that other warehousing development in the city has caused issues for homeowners</li> <li>States that the commenters have issues with all 13 topic areas identified in the NOP</li> <li>States that the height of the buildings proposed under the project would result in a more obtrusive aesthetic than the existing buildings</li> <li>States concern with the location of the project on a key corridor entrance to the city since the character of the buildings will not positively represent the community</li> <li>States concern of the mezzanine space in the buildings, which may double the usable space</li> <li>Expresses concern with the representation of the square footage stated in the NOP, further stating that the proposed project could result in triple the amount of usable space if three floors were to be built in the 37-foot-high buildings.</li> <li>Expresses concern that less than 5 percent of the building space under the proposed project would be dedicated to office/retail use</li> <li>Expresses disappointment that the existing building tenants will need to be relocated</li> <li>States that the NOP does not describe the future tenants and that the proposed project will not generate much sales tax</li> <li>Cites a 2022 University of California Irvine published 100-year flood risk map of Los Angeles County noting the flood risks in several areas of the city</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.1, <i>Aesthetics</i></li> <li>Section 5.2, <i>Air Quality</i></li> <li>Section 5.9, <i>Hydrology and Water Quality</i></li> <li>Section 5.10, <i>Land Use and Planning</i></li> <li>Section 5.11, <i>Noise</i></li> <li>Section 5.13, <i>Transportation</i></li> <li>Chapter 7, <i>Alternatives</i></li> <li>Appendix O, <i>Transportation Impact Analysis</i></li> </ul>

## 2. Introduction

**Table 2-1 NOP and Scoping Meeting Comments Summary**

Commenting Agency/Person	Letter Dated	Summary of Comments	Issue Addressed In
		<ul style="list-style-type: none"> <li>Requests that the SEIR study impacts associated with erosion, riparian habitat loss, and impacts of grading on the residential Brookside property at 800 Meadow Pass Road.</li> <li>States that the proposed project will contribute to truck traffic, including more noise and air quality issues</li> <li>Requests to know how many trucks will be entering and exiting the proposed project on a daily basis</li> <li>Asks the SEIR to consider an alternative for a mixed-use residential/commercial development</li> <li>Concludes that the proposed project offers no value to the city and its residents and that the project could have the cumulative effects of encouraging more industrial warehousing development in the city</li> </ul>	
Janel Law (Forwarded the 9/15/2023 letter from Vijay Vakil, Wendy Toy, William Harrison, and Charles Isaac to express agreement with the comments of the letter)	9/16/2023	<ul style="list-style-type: none"> <li>(See 9/15/2023 resident letter above)</li> </ul>	<ul style="list-style-type: none"> <li>(See 9/15/2023 resident letter above)</li> </ul>
Sharon Miller (Forwarded the 9/15/2023 letter from Vijay Vakil, Wendy Toy, William Harrison, and Charles Isaac to express agreement with the comments of the letter)	9/17/2023	<ul style="list-style-type: none"> <li>(See 9/15/2023 resident letter above)</li> </ul>	<ul style="list-style-type: none"> <li>(See 9/15/2023 resident letter above)</li> </ul>
<b>Scoping Meeting Comments</b>			
Hassan Sassi (Oral and Written)		<ul style="list-style-type: none"> <li>Asks for the EIR to review the no project alternative</li> <li>Asks the City to reconsider the zoning of the site to allow for mixed-use development, including commercial and residential uses.</li> <li>States that too many distribution center uses exist in the surrounding area</li> </ul>	<ul style="list-style-type: none"> <li>Chapter 7, <i>Alternatives</i></li> </ul>
Wendy Toy (Oral)		<ul style="list-style-type: none"> <li>States the maximum building height allowed under the site's General Plan designation is 35 feet and that the proposed project would develop to this maximum height.</li> <li>Inquires as to whether the GPEIR is available on the City's website</li> <li>Notes that the commercial portion of the proposed project would encompass 5% of the proposed project site</li> <li>States that the proposed project does not comply with the City's vision for future development</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.2, <i>Air Quality</i></li> <li>Section 5.9, <i>Hydrology and Water Quality</i></li> <li>Section 5.10, <i>Land Use and Planning</i></li> <li>Section 5.11, <i>Noise</i></li> <li>Section 5.13, <i>Transportation</i></li> <li>Chapter 7, <i>Alternatives</i></li> <li>Appendix O, <i>Transportation Impact Analysis</i></li> </ul>

## 2. Introduction

**Table 2-1 NOP and Scoping Meeting Comments Summary**

Commenting Agency/Person	Letter Dated	Summary of Comments	Issue Addressed In
		<ul style="list-style-type: none"> <li>Desires to see retailers and restaurants replace industrial uses on the site</li> <li>Cites a UC Irvine Flood Risk study that identifies a high flood risk on the property as well as north of the property</li> <li>States the project would induce traffic congestion, air pollution, and produce excessive levels of noise in the area</li> <li>States that the developers of the project should establish ongoing benefits for the community</li> <li>Recommends that the City pursue a different type of project for the site</li> </ul>	
Vijay Vikil (Oral)		<ul style="list-style-type: none"> <li>States that the City of Walnut is a residential city and expresses concern that the proposed project could contribute to the city becoming more like the City of Industry</li> <li>Claims that the proposed project would result in a loss of revenue for the city since the existing businesses on-site would produce more revenue than the proposed uses**</li> <li>Asks the project to study flooding and climate issues</li> <li>Asks what benefits the City and residents would get from the proposed project</li> <li>Discusses traffic issues on South Lemon Avenue and Valley Boulevard</li> <li>Inquires as to how many trucks would be on-site and whether the pollution from the trucks would be studied</li> <li>States that no benefits would result from the proposed project and asks the SEIR to state benefits as well as for the developer to consider implementing a benefit program in the form of park dedication **</li> <li>Asks for the SEIR to consider alternatives such as use of the site for retail or residential uses</li> <li>Supports the provision of housing to support the city/state housing crisis</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.2, <i>Air Quality</i></li> <li>Section 5.7, <i>Greenhouse Gas Emissions</i></li> <li>Section 5.9, <i>Hydrology and Water Quality</i></li> <li>Section 5.10, <i>Land Use and Planning</i></li> <li>Section 5.11, <i>Noise</i></li> <li>Section 5.13, <i>Transportation</i></li> <li>Chapter 7, <i>Alternatives</i></li> <li>Appendix O, <i>Transportation Impact Analysis</i></li> </ul> <p><b>** Note that pursuant to CEQA Guidelines Section 15131, economic impacts are not considered environmental impacts of a project. An economic analysis for this project has not been prepared in conjunction with the SEIR.</b></p>
Jose Garcia (Oral)		<ul style="list-style-type: none"> <li>Expresses support for the proposed project</li> <li>Expresses support for a local hub of warehousing for the city that would allow for the local community to be better served by warehousing industry</li> <li>States that the electrification of the logistics industry will reduce pollution burden and ultimately improve air quality over time</li> <li>States that the proposed project will result in more jobs for the city</li> <li>States that no zoning changes to the project site are required under the proposed project</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.2, <i>Air Quality</i></li> <li>Chapter 5.5, <i>Energy</i></li> <li>Section 5.7, <i>Greenhouse Gas Emissions</i></li> <li>Chapter 5.10, <i>Land Use and Planning</i></li> <li>Chapter 8, <i>Impacts Found Not to Be Significant</i></li> </ul>

## 2. Introduction

**Table 2-1 NOP and Scoping Meeting Comments Summary**

Commenting Agency/Person	Letter Dated	Summary of Comments	Issue Addressed In
Rania Saddiq (Oral)		<ul style="list-style-type: none"> <li>Expresses concern with impact of the project on the environment and local economy **</li> <li>States that the project will replace well-paying jobs in the city with lower-paying jobs</li> <li>States that project will impact traffic patterns</li> <li>States that mental health impacts result from increased noise and that the project will result in increased noise and pollution</li> <li>States that the project will have aesthetic impacts due to the demolition of existing uses on-site that embody the local character of architecture in the city</li> <li>States that the project will result in the loss of small businesses</li> <li>States that the project could result in the loss of native sycamore trees on the project site and requests that part of the site be returned to nature</li> </ul>	<ul style="list-style-type: none"> <li>Section 5.1, <i>Aesthetics</i></li> <li>Section 5.2, <i>Air Quality</i></li> <li>Section 5.3, <i>Biological Resources</i></li> <li>Section 5.11, <i>Noise</i></li> <li>Section 5.13, <i>Transportation</i></li> <li>Appendix O, <i>Transportation Impact Analysis</i></li> </ul> <p><b>** Note that pursuant to CEQA Guidelines Section 15131, economic impacts are not considered environmental impacts of a project. An economic analysis for this project has not been prepared in conjunction with the SEIR.</b></p>

## 2.3 SCOPE OF THIS DEIR

The scope of the Draft SEIR was determined based on the comments received in response to the NOP. Pursuant to Sections 15126.2 and 15126.4 of the CEQA Guidelines, the Draft SEIR should identify any potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance.

The information in Chapter 3, *Project Description*, establishes the basis for analyzing future, project-related environmental impacts. However, further environmental review by the City may be required as more detailed information and plans are submitted on a project-by-project basis.

### 2.3.1 Impacts Considered Less than Significant

As detailed in Chapter 8, *Impacts Found Not to Be Significant*, the City determined that the following environmental impact categories were not significantly affected by or did not affect the proposed project.

- Agriculture and Forestry Resources
- Mineral Resources
- Population and Housing
- Recreation
- Wildfire

## 2. Introduction

### 2.3.2 Potentially Significant Adverse Impacts

The following environmental factors were determined to have potentially significant impacts if the proposed project is implemented and were analyzed in detail throughout this Draft SEIR.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

### 2.3.3 Unavoidable Significant Adverse Impacts

Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. The City must prepare a “statement of overriding considerations” before it can approve a project with unavoidable significant impacts, attesting that the decision-making body has balanced the benefits of the proposed project against its unavoidable significant environmental effects and has determined that the benefits outweigh the adverse effects; therefore, the adverse effects are considered acceptable. This Draft SEIR did not identify any significant and unavoidable adverse impacts, as defined by CEQA, that would result from implementation of the proposed project.

## 2.4 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this Draft SEIR, consistent with Section 15150 of the CEQA Guidelines, and they are available for review at the City of Walnut Planning Division, 21201 La Puente Road, Walnut, California 91789, or at the provided URL.

- *City of Walnut General Plan*, prepared by MIG, May 9, 2018,  
<https://www.cityofwalnut.org/home/showpublisheddocument/12022/636705242381770000>.
- *City of Walnut General Plan Update and West Valley Specific Plan Draft EIR*, Volume I of II, prepared by MIG, February 2018,  
<https://www.cityofwalnut.org/home/showpublisheddocument/20510/638290932284449987>.
- *City of Walnut General Plan Update and West Valley Specific Plan Draft EIR*, Volume II of II, prepared by MIG, February 2018,  
<https://www.cityofwalnut.org/home/showpublisheddocument/20512/638290932302888226>.



## 2. Introduction

- *City of Walnut General Plan Update and West Valley Specific Plan Final EIR*, prepared by MIG, May 2018, <https://www.cityofwalnut.org/home/showpublisheddocument/11860/636606695123270000>.

### 2.5 FINAL EIR CERTIFICATION

This Draft SEIR is being circulated for public review for 45 days. Interested agencies and members of the public are invited to provide written comments on the Draft SEIR to the City address below. Upon completion of the 45-day review period, the City of Walnut will review all written comments received and prepare written responses for each. A Final SEIR will incorporate the received comments, responses to the comments, and any changes to the Draft SEIR that result from comments. The Final SEIR will be presented to the City of Walnut for potential certification as the environmental document for the project. All persons who comment on the Draft SEIR will be notified of the availability of the Final SEIR and the date of the City's public hearing.

The Draft SEIR is available to the general public for review in person and online at the following locations:

- In-Person: City of Walnut Planning Division, 21201 La Puente Road, Walnut, California 91789
- Online: <https://www.cityofwalnut.org/for-residents/departments/community-development/planning-division/subdivision-projects>

### 2.6 MITIGATION MONITORING

Public Resources Code Section 21081.6 requires that agencies adopt a monitoring or reporting program for any project for which it has made findings pursuant to Public Resources Code Section 21081 or adopted a negative declaration pursuant to Section 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR or negative declaration.

The Mitigation Monitoring Program for the Walnut Business Park project will be completed prior to consideration of the project by the City of Walnut City Council.

## 2. Introduction

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## 3. Project Description

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### 3.1 PROJECT LOCATION

The city of Walnut encompasses roughly 8.9 square miles in southwestern Los Angeles County, approximately 25 miles east of downtown Los Angeles. It is adjacent to the cities of Diamond Bar, Industry, West Covina, San Dimas, and Pomona. No freeways traverse the city limits because Walnut is south of Interstate 10, north of State Route 60, and west of State Route 57 (see Figure 3-1, *Regional Location*).

The approximately 23-acre project site is between Valley Boulevard to the south, S. Lemon Avenue to the west, Paseo Del Prado to the north, and an existing industrial development to the east. Beyond Valley Boulevard is the Southern Pacific Railroad line and San Jose Creek. The City of Industry, which is characterized by industrial land uses, lies south of these features. The site is approximately 0.8 mile north of SR-60 and 1.5 miles northwest of SR-57 (see Figure 3-2, *Local Vicinity*, and Figure 3-3, *Site Aerial*).

The project site consists of 20 parcels with Assessor's Parcel Numbers:

8720-024-058	8720-034-005	8720-034-019	8720-034-033
8720-034-001	8720-034-035	8720-034-020	8720-034-034
8720-034-002	8720-034-016	8720-034-030	8720-034-024
8720-034-003	8720-034-017	8720-034-031	8720-034-025
8720-034-004	8720-034-018	8720-034-032	8720-034-026

The property immediately northeast of the intersection of S. Lemon Avenue and Valley Boulevard is not a part of the project site. The property immediately southeast of the intersection of Paseo Del Prado and Paseo Tesoro is also not a part of the project site (see Figure 3-3).

### 3.2 STATEMENT OF OBJECTIVES

Objectives for the Walnut Business Park project (proposed project) will aid decision makers in their review of the project and associated environmental impacts:

1. Provide for the development of the site consistent with the City's General Plan.
2. Replace an aging industrial park with modern, attractive, efficient buildings.
3. Develop a diverse industrial campus that can accommodate a mix of industrial, retail, and office uses.

### 3. Project Description

4. Create an industrial and commercial development that provides employment opportunities to area residents, expands the industrial base within the City, and responds to the growing demand for warehousing and logistics businesses in the area.

## 3.3 PROJECT CHARACTERISTICS

“Project,” as defined by the CEQA Guidelines, means:

... the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)...enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700. (14 Cal. Code of Reg. Section 15378[a])

### 3.3.1 Land Use

#### 3.3.1.1 GENERAL PLAN LAND USE DESIGNATION (APPROVED PROJECT)

The City of Walnut adopted a General Plan Update (GPU) in May 2018, and the City of Walnut General Plan Update and West Valley Specific Plan Environmental Impact Report (State Clearinghouse #2017101010) was certified by the Walnut City Council in May 2018 (GPEIR). The City of Walnut’s General Plan land use designation for the project site is “Industrial” (see Figure 3-4, *General Plan Land Use*). The City adopted Ordinance No. 24-06 on January 8, 2025, which included amendments to Chapter 2, *Land Used and Community Design*, of the General Plan. As amended, the “Industrial” land use designation allows for, as either a permitted or conditional use, light manufacturing, commercial storage (including general warehouses<sup>1</sup>, storage warehouses<sup>2</sup>, and logistics facilities<sup>3</sup>), craftsman and artisan assembly and production, and limited vehicle service repair. Limited commercial retail and office uses are allowed as well. Logistics facilities are permitted subject to a conditional use permit (CUP). Storage warehouses in excess of 50,000 square feet of gross floor area are also permitted subject to a conditional use permit. Prohibited uses include, trucking and transportation-related businesses, large-scale utilities and energy production activities, and heavy manufacturing. This designation allows a maximum lot coverage of 60 percent and a maximum building height of two stories. The proposed project would not change the land use designation of the project site and would not exceed the lot coverage or maximum building height.

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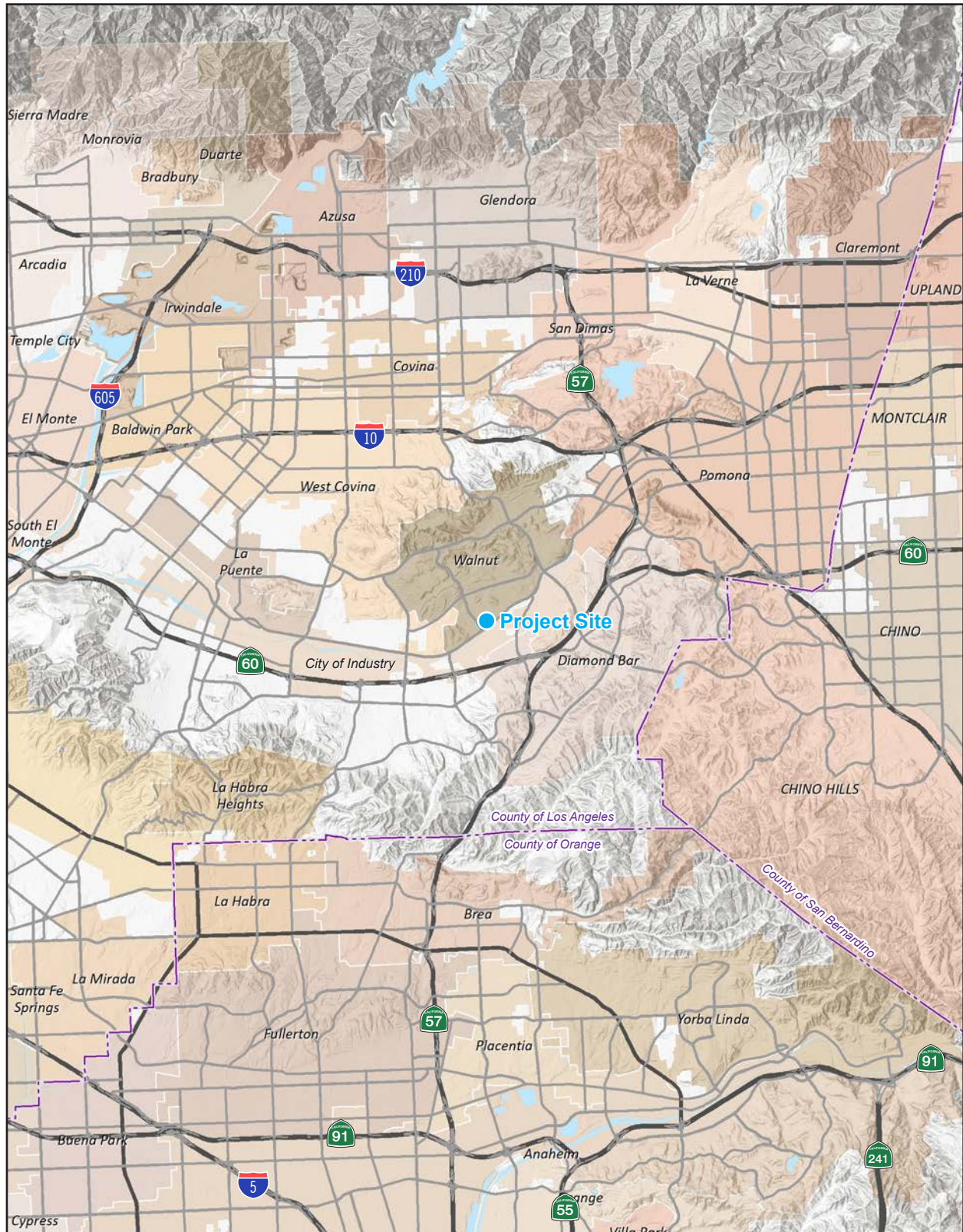
<sup>1</sup> The ordinance defines “General Warehouses” as that portion of a building ancillary to the conduct of a business where either materials used or goods produced by the business are stored prior to their use or distribution to a wholesale user or retail purchaser and which is not otherwise a logistics facility or storage warehouse.

<sup>2</sup> The ordinance defines “Storage Warehouses” as a facility for the storage of goods and which is not otherwise a logistics facility or general warehouse.

<sup>3</sup> The ordinance defines “Logistics Facility” as a site consisting of one or more structures whose primary purpose is to receive goods, sort them, and then facilitate their transport to another off-site location. Logistics facilities are characterized by a series roll-up type bay doors and/or loading docks that are internally accessed from adjacent storage areas that may or may not be partitioned from one another.

3. Project Description

Figure 3-1 - Regional Location



----- County Boundary

Note: Unincorporated county areas are shown in white.

Source: Generated using ArcMap 2023.

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Scale (Miles)



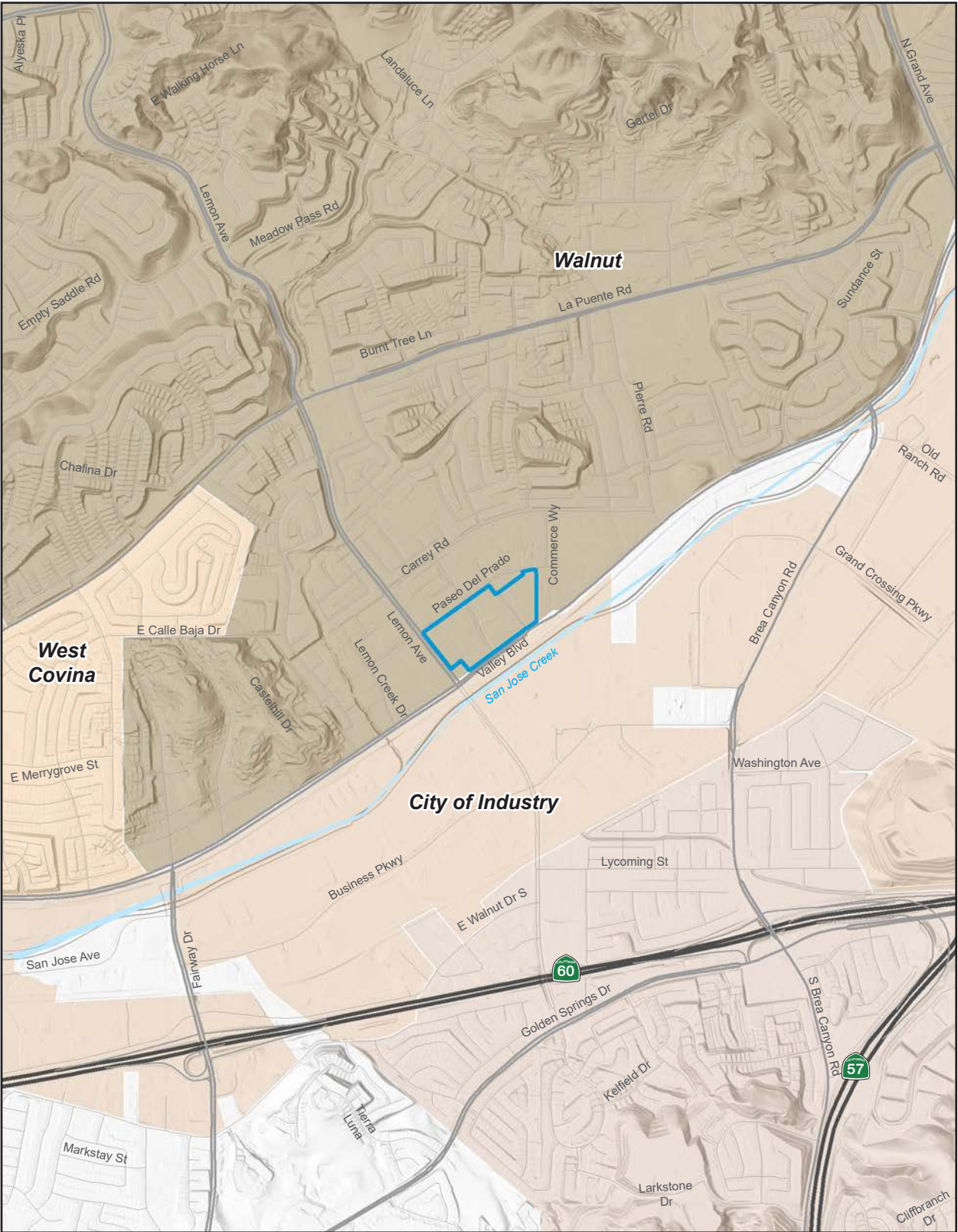
### 3. Project Description

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3. Project Description

Figure 3-2 - Local Vicinity



### 3. Project Description

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3. Project Description

Figure 3-3 - Aerial Photograph



--- Project Site Boundary

--- City Boundary

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Scale (Feet)



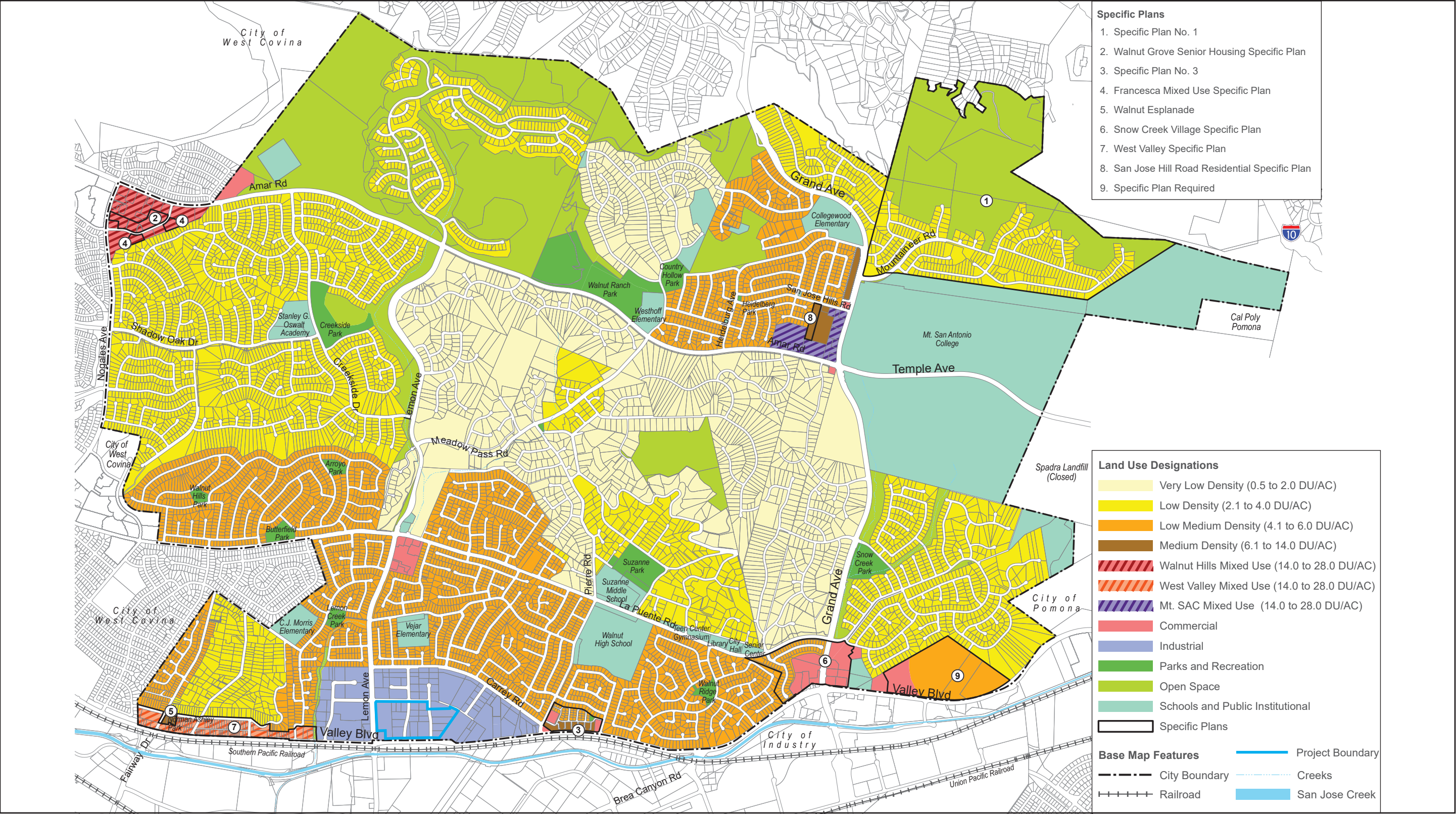
Source: Nearmap 2023.

### 3. Project Description

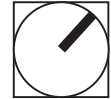
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Figure 3-4 - General Plan Land Use



Source: MIG Inc., and City of Walnut 2018.



### 3. Project Description

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## 3. Project Description

### 3.3.1.2 ZONING

As shown in Figure 3-5, *Zoning Plan*, the entire site is zoned Light Manufacturing (M-1). The City adopted Ordinance No. 24-6 on January 8, 2025, which included amendments to Sections 6.48.020 and 6.48.040 of the City’s Zoning Ordinance (Title 6 of the Walnut Municipal Code). As amended, the M-1 zone permits a variety of industrial, manufacturing, warehousing, and retail uses in addition to office and business uses. Storage warehouses where 50,000 square feet or more of the building’s gross square footage is used for warehouse purposes are subject to a CUP. Logistics facilities are also only allowed subject to a CUP . The height limit for development in this zone is two stories or 35 feet, whichever is less. The maximum lot coverage is 60 percent of the lot area. The proposed project would not change the zoning of the project site.

### 3.3.2 Baseline Conditions (Approved Project)

As described in Section 1.2.1.2, *Approach/Definition of Baseline*, the GPEIR considered that at buildout, the project site’s Traffic Assessment Zone would have no changes between the existing conditions and buildout conditions for industrial uses. For an SEIR, the activities evaluated in the GPEIR is the logical “baseline” to assess potential impacts associated with the proposed project. Therefore, as discussed in Chapter 1, Section 1.2.1.2, the baseline condition for the SEIR is the existing building square footage on the site of 357,544, considered to be all industrial uses, all occupied, and all operational (approved project).

### 3.3.3 Site Plan and Character

The project applicant proposes to develop four concrete tilt-up buildings that would encompass a total of 414,778 square feet of building space, as shown in Table 3-1, *Proposed Uses*. The proposed project would include 392,488 square feet of light industrial and warehousing space and 22,290 square feet of office/retail space. The buildings may also include up to 53,549 square feet of refrigerated area and up to 300,000 square feet of logistics facility or storage warehouse uses. Figure 3-6, *Conceptual Site Plan*, illustrates the proposed project’s overall site design. The gross coverage on the site would be 40.3 percent.

**Table 3-1 Proposed Uses**

	Warehouse/Industrial Uses (Square Feet)	Office/Retail Use (Square Feet)	Total (Square Feet)
Building 1	187,911	9,636	197,547
Building 2	35,968	2,224	38,192
Building 3	88,774	5,492	94,266
Building 4	79,835	4,938	84,773
<b>Total</b>	<b>392,488</b>	<b>22,290</b>	<b>414,778</b>

Other project features and improvements are discussed in detail below—such as architectural and landscape design and improvements; parking, vehicular access, and circulation improvements; infrastructure improvements; business operations; and construction schedule and activities. Future tenants have not yet been identified.

### 3. Project Description

The site's development would involve demolition of the existing buildings on-site, which total 357,544 square feet of building area and include an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, a car body shop repair facility, pizza restaurant, Mexican food supply store, rent-a-car office, and pet food supply outlet. Other existing site features and improvements to be demolished and removed are shown on Figure 3-3.

#### 3.3.4 Architectural Design and Character

The buildings would be designed as single-story, tilt-up industrial buildings up to 35 feet high with metal canopies, corrugated metal panels or similar-looking finished concrete panels, aluminum faux wood, and painted mural exteriors. The buildings would include office space in the mezzanine level and ample interior open-storage space and high ceilings. Figures 3-7a through d, *Conceptual Building Elevations*, and Figures 3-8a and b, *Conceptual Building Renderings*, illustrate the conceptual elevations and architectural design and features of the proposed buildings.

Building designs would be characterized by contemporary industrial design, and the buildings would be positioned to create a cohesive campus atmosphere with multiple areas to gather. Outdoor amenity areas would be scattered throughout the site. These areas would feature high-quality furnishings and landscaping with a rustic and natural aesthetic. Buildings would showcase colorful murals in key locations to create artistic focal points. Final architectural design of the buildings would be subject to review and approval by the City.

#### 3.3.5 Landscaping and Lighting

Approximately 11.5 percent of the project site would be landscaped, with a total landscaped area of 115,026 square feet. Landscaping would be drought-tolerant native plants accentuating several existing mature trees, as shown on Figure 3-9, *Conceptual Landscape Plan*.

Site lighting would consist of exterior, building-mounted light fixtures; lighting for pedestrian walkways; ground-mounted decorative lighting for landscape and architectural features; lighting for the new parking and loading dock areas; and security lighting per the landscaping, lighting, and photometric plans in accordance with the requirements of the municipal code and the California Green Building Standards Code (CALGreen).



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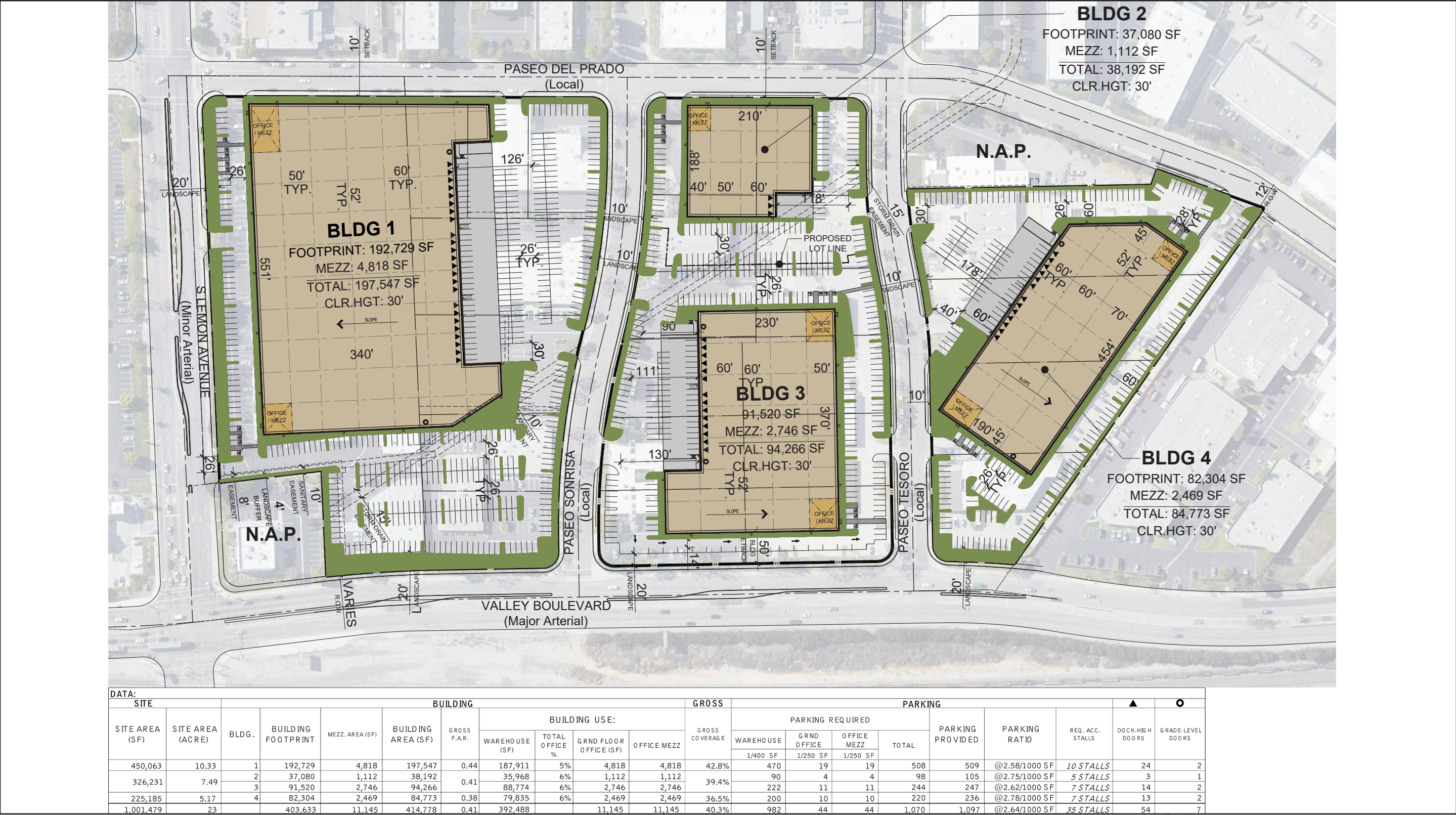


### 3. Project Description

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Figure 3-6 - Conceptual Site Plan



Source: Ware Malcomb 2023.

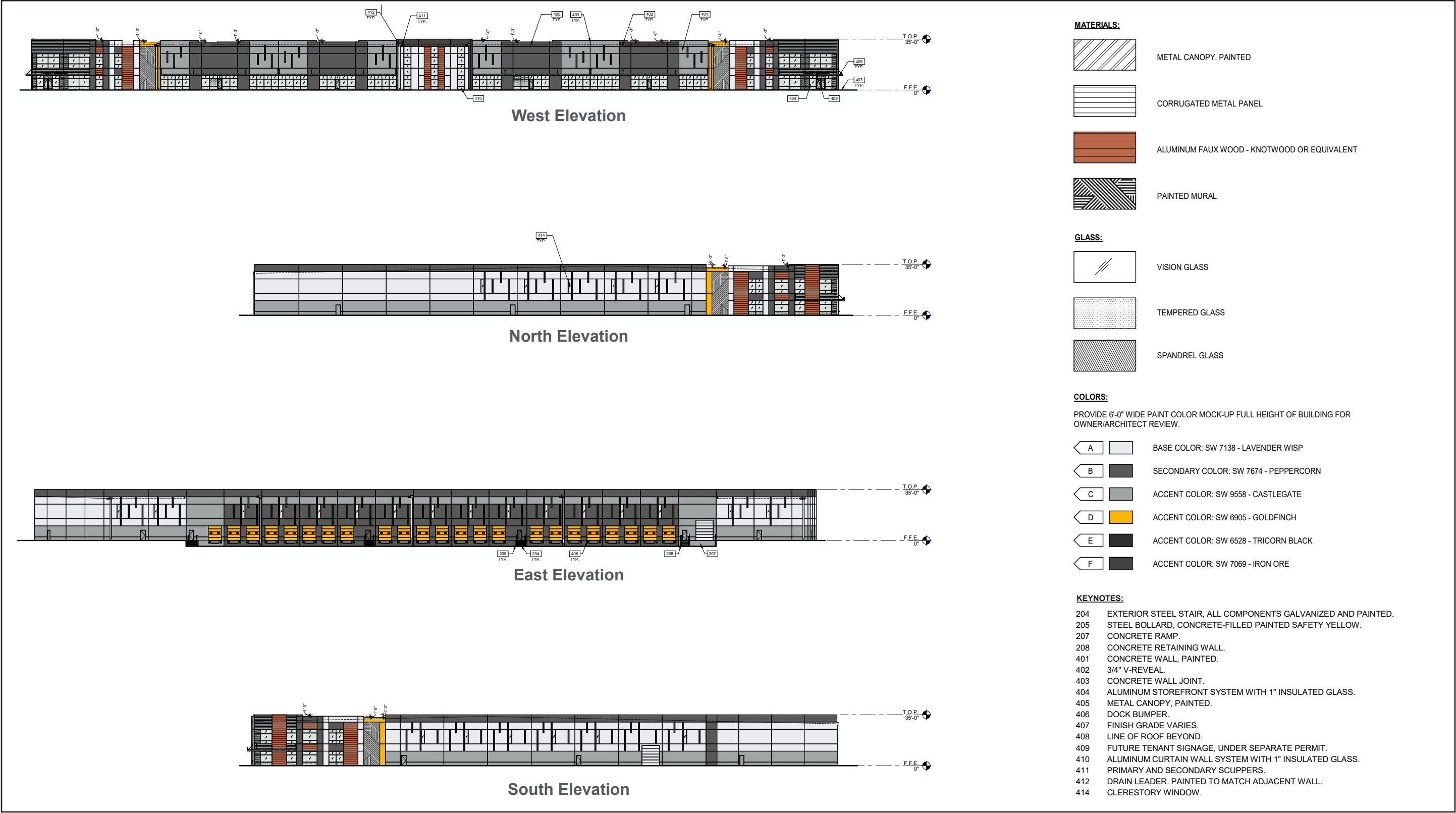


### 3. Project Description

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3. Project Description

Figure 3-7a - Conceptual Building Elevations – Building 1

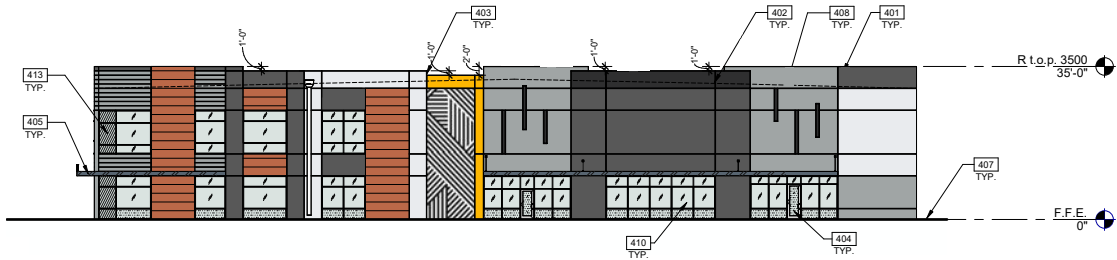


Source: Ware Malcomb 2023.

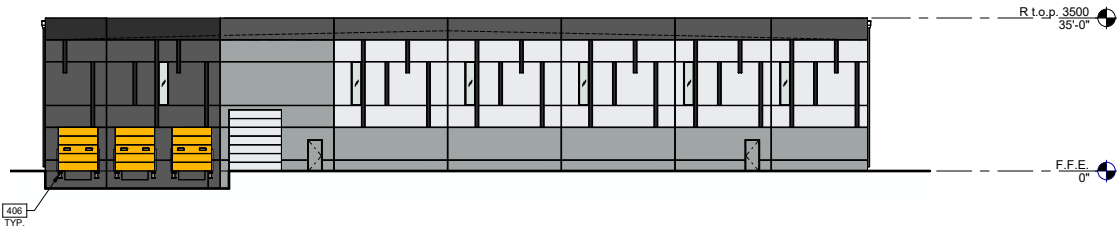
### 3. Project Description

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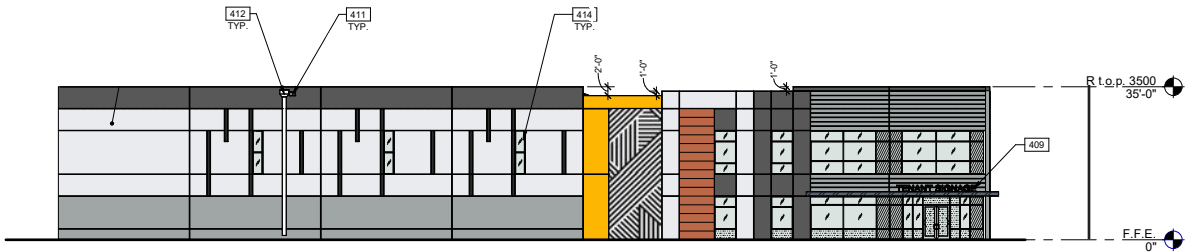
Figure 3-7b - Conceptual Building Elevations – Building 2



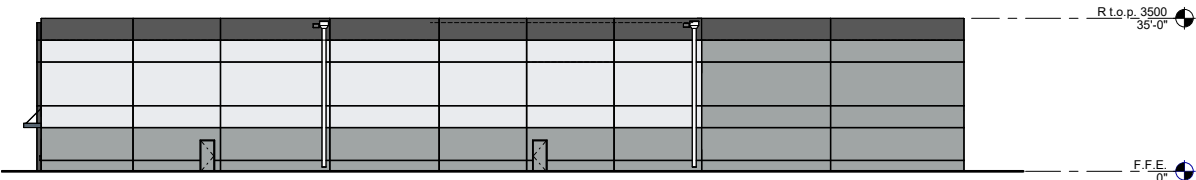
West Elevation



East Elevation









North Elevation




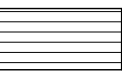
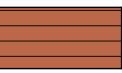

South Elevation

**COLORS:**


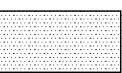

PROVIDE 6'-0" WIDE PAINT COLOR MOCK-UP FULL HEIGHT OF BUILDING FOR OWNER/ARCHITECT REVIEW.

- |          |   |                                       |
|----------|---|---------------------------------------|
| <b>A</b> |  | BASE COLOR: SW 7138 - LAVENDER WISP   |
| <b>B</b> |  | SECONDARY COLOR: SW 7674 - PEPPERCORN |
| <b>C</b> |  | ACCENT COLOR: SW 9558 - CASTLEGATE    |
| <b>D</b> |  | ACCENT COLOR: SW 6905 - GOLDFINCH     |
| <b>E</b> |  | ACCENT COLOR: SW 6528 - TRICORN BLACK |
| <b>F</b> |  | ACCENT COLOR: SW 7069 - IRON ORE      |

**MATERIALS:**

- |   |   |
|---|---|
|  | METAL CANOPY, PAINTED                       |
|  | CORRUGATED METAL PANEL                      |
|  | ALUMINUM FAUX WOOD - KNOTWOOD OR EQUIVALENT |
|  | PAINTED MURAL                               |

**GLASS:**

- |   |                |
|---|----------------|
|  | VISION GLASS   |
|  | TEMPERED GLASS |
|  | SPANDREL GLASS |

**KEYNOTES:**

- |     |   |
|-----|---|
| 401 | CONCRETE WALL, PAINTED.                               |
| 402 | 3/4" V-REVEAL.  |
| 403 | CONCRETE WALL JOINT.                                  |
| 404 | ALUMINUM STOREFRONT SYSTEM WITH 1" INSULATED GLASS.   |
| 405 | METAL CANOPY, PAINTED.                                |
| 406 | DOCK BUMPER.  |
| 407 | FINISH GRADE VARIES.                                  |
| 408 | LINE OF ROOF BEYOND.                                  |
| 409 | FUTURE TENANT SIGNAGE, UNDER SEPARATE PERMIT.         |
| 410 | ALUMINUM CURTAIN WALL SYSTEM WITH 1" INSULATED GLASS. |
| 411 | PRIMARY AND SECONDARY SCUPPERS.                       |
| 412 | DRAIN LEADER. PAINTED TO MATCH ADJACENT WALL.         |
| 413 | ALUMINUM WINDOW SYSTEM OVER RECESSED CONCRETE PANEL.  |
| 414 | CLERESTORY WINDOW.                                    |

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Scale (Feet)

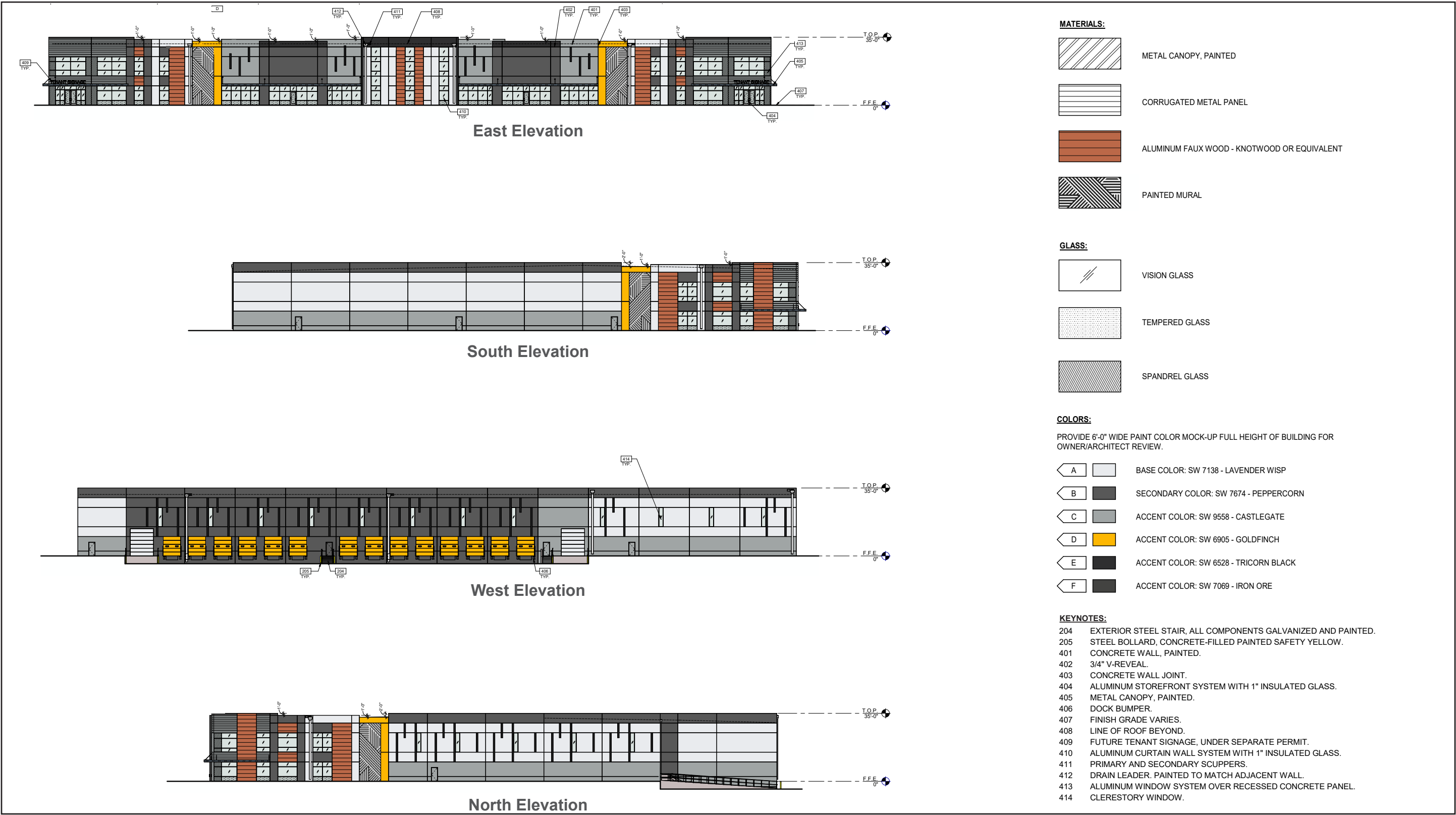
### 3. Project Description

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3. Project Description

Figure 3-7c - Conceptual Building Elevations – Building 3



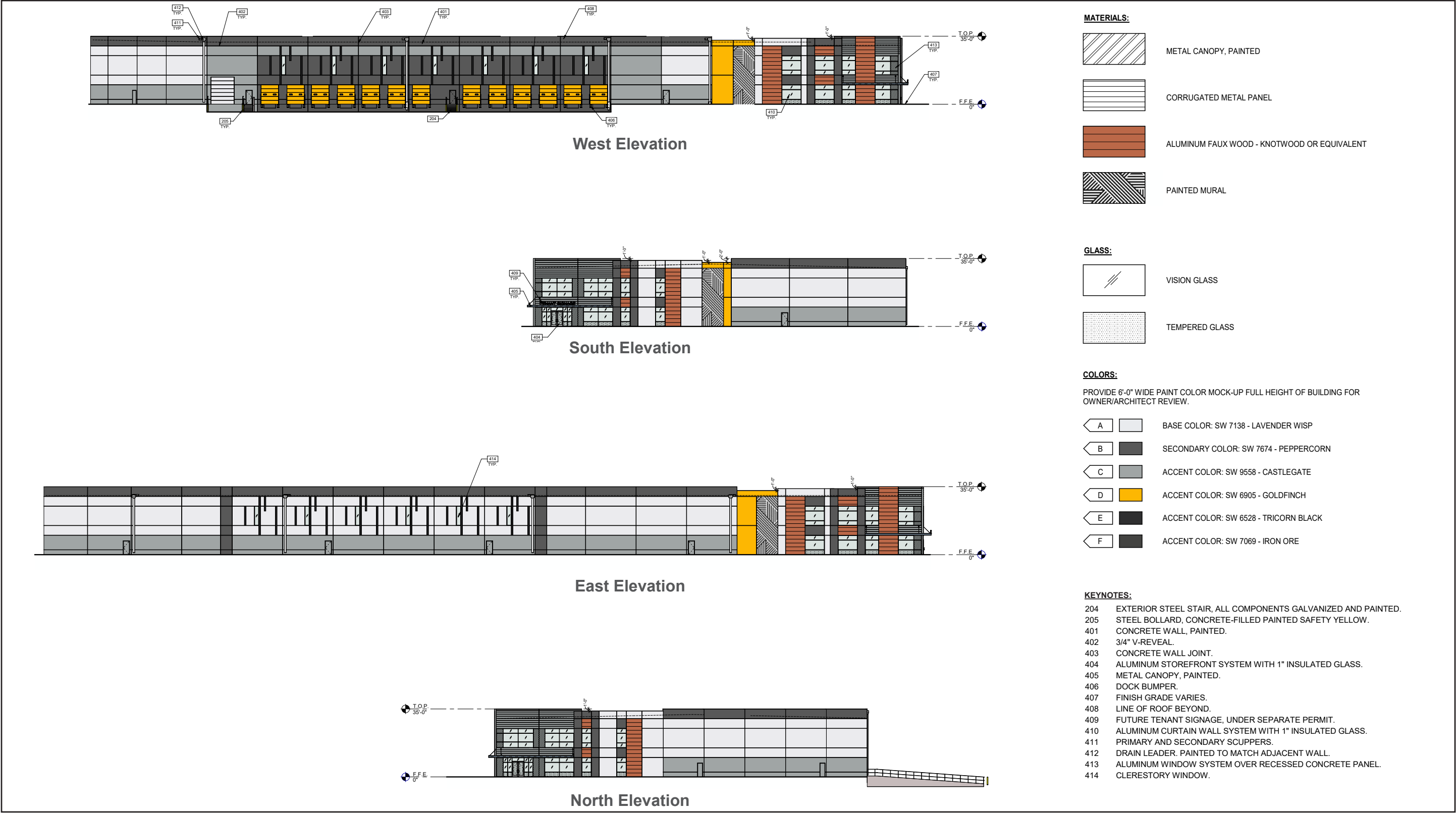
Source: Ware Malcomb 2023.

### 3. Project Description

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Figure 3-7d - Conceptual Building Elevations – Building 4



Source: Ware Malcomb 2023.

### 3. Project Description

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3. Project Description

**Figure 3-8a - Conceptual Building Renderings**



Source: Ware Malcomb 2022.

**Building 3 - Northeast Corner**

### 3. Project Description

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3. Project Description

**Figure 3-8b - Conceptual Building Renderings**



Source: Ware Malcomb 2022.

**Building 3 - Northwest Corner**

### 3. Project Description

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3. Project Description

Figure 3-9 - Conceptual Landscape Plan



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Scale (Feet)



### 3. Project Description

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### 3. Project Description

#### 3.3.1 Access, Circulation, and Parking

The project site is between Valley Boulevard to the south and S. Lemon Avenue to the west. Valley Boulevard is a heavily traveled major arterial, and S. Lemon Avenue is a minor arterial. Paseo Del Prado to the north of the site is a local street. Paseo Sonrisa and Paseo Tesoro run north to south through the project site and are both local streets. Access to Building 1 would be provided by two driveways along Paseo Del Prado, two driveways along South Lemon Avenue, and one driveway along Paseo Sonrisa. Truck access would be through the driveway along Paseo Sonrisa, the southerly driveway on Lemon Avenue, and the eastern Paseo Del Prado driveway. Access to Buildings 2 and 3 would be provided by two driveways along Paseo Del Prado, two driveways along Paseo Sonrisa, and two driveways along Paseo Tesoro. Truck access would be via the driveways on Paseo Sonrisa and the northern driveway on Paseo Tesoro. Access to Building 4 would be provided by three driveways along Paseo Tesoro and one on Paseo Del Prado. Truck access would be via the northerly two Paseo Tesoro driveways. Internal access roads are shown on Figure 3-6. The proposed project would include 1,097 parking stalls, 54 dock-high doors, and 7 grade-level doors. Off-site improvements include the widening of Valley Boulevard at the northeast corner of the intersection with S. Lemon Street to include an additional right turn lane from Valley Boulevard to S. Lemon Street. The circulation plan for access to and from the project site is shown on Figure 3-10a, *Circulation Plan (Ingress)*, and Figure 3-10b, *Circulation Plan (Egress)*.

Building 1 would have two main entrances on the west side of the building. Building 2 would have one main entrance on the west side, and Building 3 would have two main entrances on the east side of the building. Building 4 would have two main entrances, one on the north side of the building and one on the west side of the building. All main entrances could have tenant signage.

#### 3.3.2 Operational Characteristics

Based on the proposed construction timeline (see Section 3.3.9, *Project Phasing and Construction*), it is anticipated that the proposed project would be operational in December 2026. The specific business(es) and/or tenant(s) that would ultimately occupy the proposed building are unknown at this time. The buildings would be designed for multiuse, with the South Lemon Avenue frontage potentially used for retail and office uses, and the warehouse and manufacturing uses in the interior of the site. Food and beverage pick-up and e-commerce last-mile tenants are also possible future tenants. Any prospective user must be either permitted by right or conditionally permitted under the Walnut Zoning Code. Cold storage uses would be allowed in Buildings 1 and 4, in up to 20 percent of the total warehouse space for these buildings. The buildings are designed such that business operations would be conducted within the enclosed building, with the exception of traffic movement, parking, and the movement of truck trailers in the truck yard. Also, loading and unloading of truck trailers would be restricted to the exterior loading dock area.

The proposed operating hours of the potential business(es) that may occupy the buildings are 24 hours per day, seven days a week. Under a conservative scenario and based on employee figures from a report commissioned by the NAIOP Research Foundation (RPA 2010), the proposed project is anticipated to add approximately 230 jobs to the city based on a ratio of one employee per 1,800 square feet of floor area. However, the number of employees will ultimately depend on the business(es) and tenant(s) that operate out of the building.

### 3. Project Description

#### 3.3.3 Infrastructure Improvements and Utility and Service Systems

Following is a discussion of the infrastructure improvements and utility and service systems needed to accommodate the proposed project. All proposed infrastructure and improvements would require approval from the City and, where necessary, from the utility/service provider.

##### 3.3.3.1 WATER SYSTEM

Walnut Valley Water District (WVWD) would provide water delivery service to the project site. Under existing conditions, water service is provided to the project site via water mains beneath Paseo Del Prado, South Lemon Avenue, Valley Boulevard, Paseo Tesoro, and Paseo Sonrisa. As a part of the proposed project, new on-site water lines for Building 1 and 2 would connect to the existing water main in Paseo Del Prado. Proposed on-site water lines for Buildings 3 and 4 would connect to the water main in Paseo Tesoro. Separate water lines would be provided on-site for potable water and fire water. There are existing fire hydrants on South Lemon Avenue, Paseo Del Prado, Paseo Sonrisa, and Paseo Tesoro.

No off-site water line construction or upsizing would be required to accommodate the proposed project. However, Paseo Del Prado and Paseo Tesoro would require some construction to make the necessary infrastructure connections to the water mains. The proposed water system improvements would be designed and constructed in accordance with City and WVWD requirements and would require City and WVWD approval.

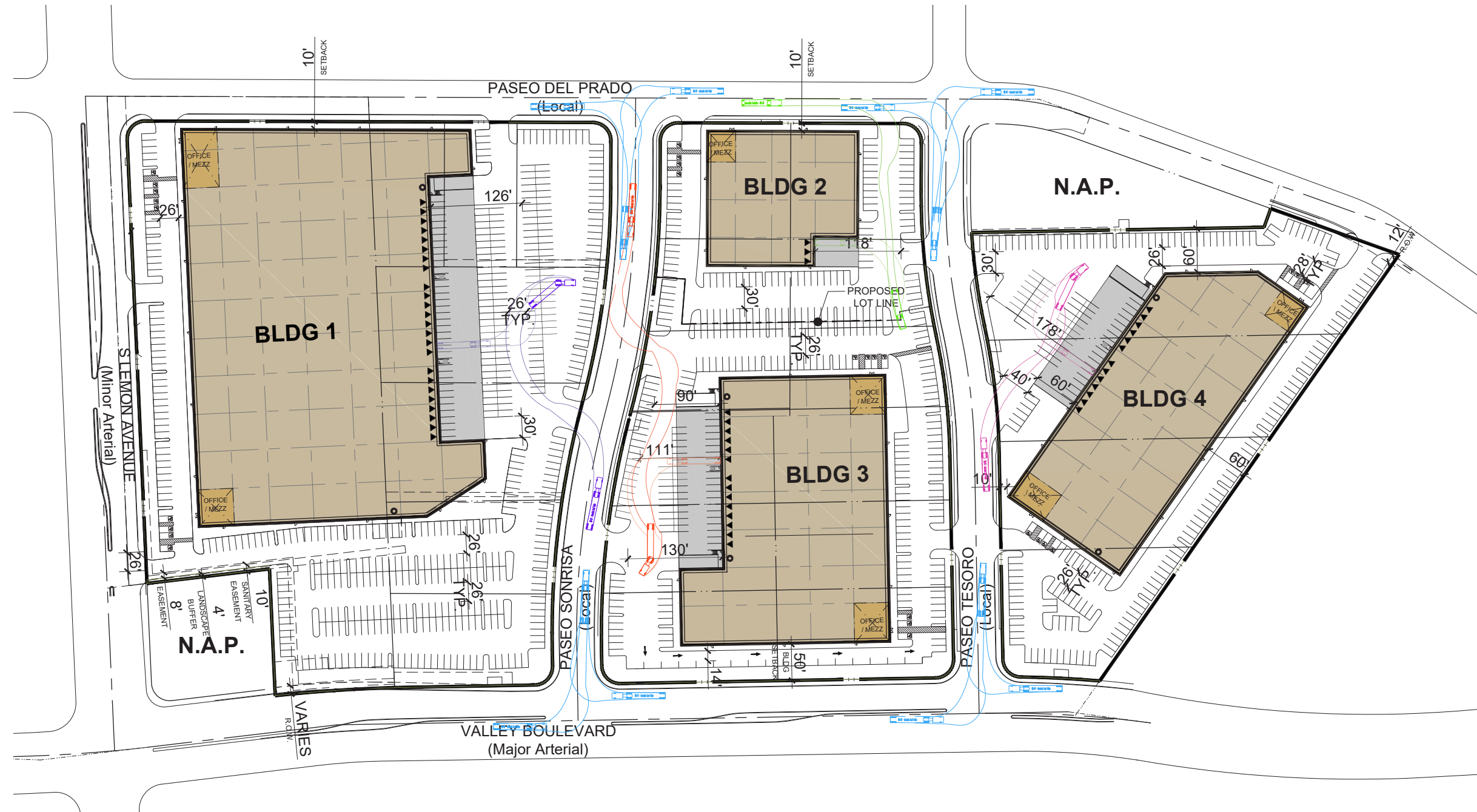
##### 3.3.3.2 WASTEWATER SYSTEM

The City is a member of the Consolidated Sewer Maintenance District of Los Angeles County (CSMD), administered and managed by the Los Angeles County Department of Public Works (LAC-DPW). There are existing sewer lines in Paseo Del Prado, South Lemon Avenue, Paseo Sonrisa, and Paseo Tesoro. As a part of the proposed project, new on-site sewer lines for Building 1 would connect to the existing sewer main in South Lemon Avenue. On-site sewer lines for Building 2 would connect to the existing sewer main in Paseo Del Prado. On-site sewer lines for Buildings 3 and 4 would connect to the existing sewer main in Paseo Del Tesoro. No off-site sewer line construction or upsizing would be required to accommodate the proposed project. However, the public right-of-way of South Lemon Avenue, Paseo Del Prado, and Paseo Del Tesoro would require some construction to make the necessary infrastructure connections to the existing sewer main. The proposed wastewater system improvements would be designed and constructed in accordance with City and LAC-DPW requirements and would require City and LAC-DPW approval.

##### 3.3.3.3 DRAINAGE SYSTEM

The ground surface at the site generally slopes down to the south, from approximately 525 feet to 520 feet above sea level (Lagan 201). As shown on Figure 3-3, the project site is developed with an industrial manufacturing park and associated landscaping, paving, and parking lots.

**Figure 3-10a - Circulation Plan (Ingress)**



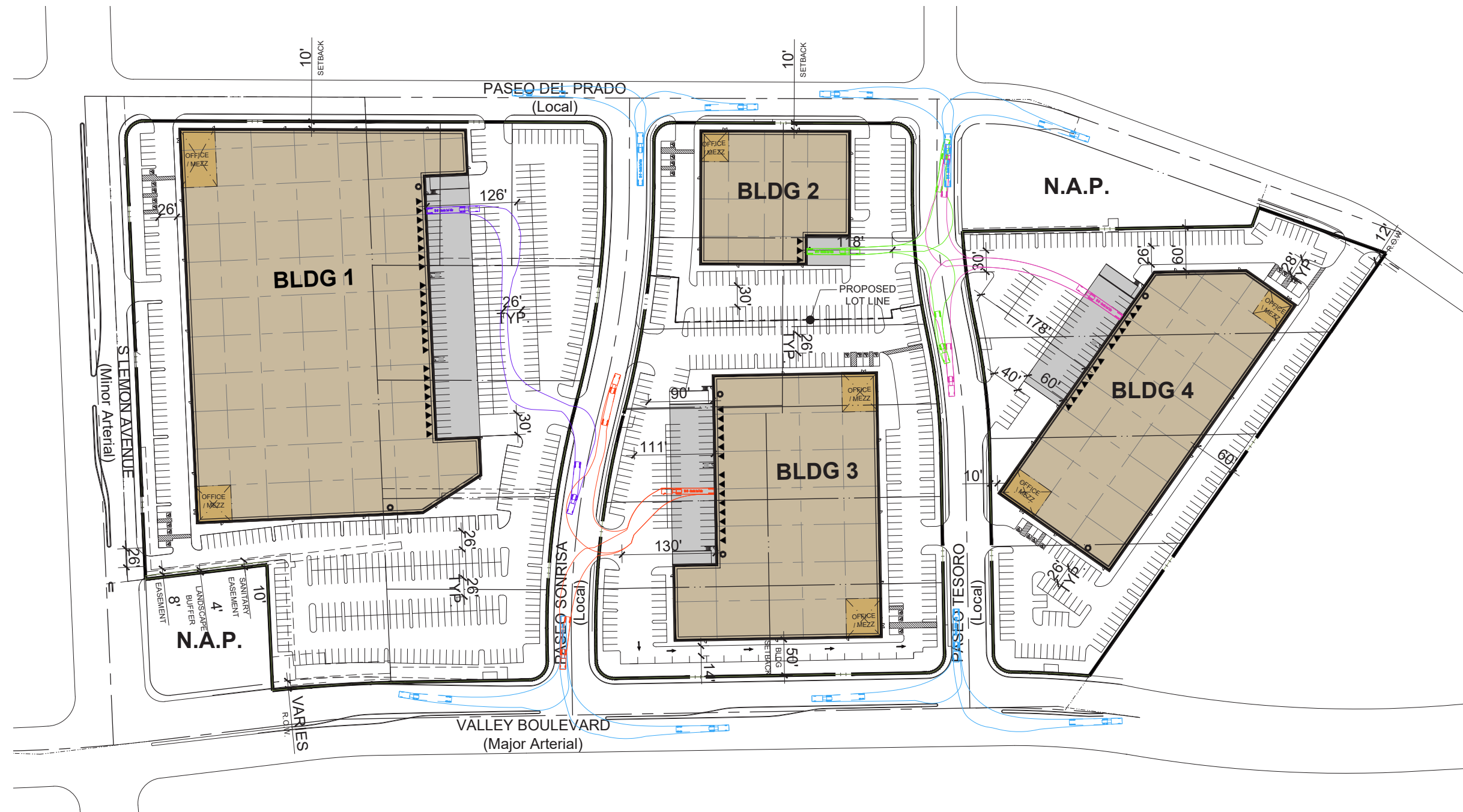
Source: Ware Malcomb 2023.



### 3. Project Description

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**Figure 3-10b - Circulation Plan (Egress)**



Source: Ware Malcomb 2023.



### 3. Project Description

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### 3. Project Description

For the lot proposed for Building 1 (see Figure 3-11a, *Preliminary LID Plan Lot 1*), stormwater runoff would drain to the southeast and sheet flow to multiple ribbon gutters, which direct runoff to catch basins along the southeast property line. The runoff would be directed to an underground detention system, then to a modular wetland system for treatment. Treated runoff would flow to a sump pump and be pumped to the existing on-site catch basin that is connected to the existing 90-inch storm drain maintained by the Los Angeles County Flood Control District (LAC-FCD). This storm drain runs from the northwest to the southeast of the site. The proposed project would increase the pervious area on this lot from 9.6 percent to 10.1 percent.

For the lot proposed for Building 2 (see Figure 3-11b, *Preliminary LID Plan Lot 2*), the site would drain to the southeast and sheet flow to multiple ribbon gutters, which would direct runoff to catch basins along the southeast property line. The runoff would be directed to an underground detention system and a modular wetland system. After treatment, the runoff would flow to a sump pump and be pumped to the curb and gutter in Paseo Tesoro. Runoff would then flow north to the existing curb inlet that is connected to the existing 90-inch storm drain. The proposed development on this lot would decrease the pervious area from 10.5 percent to 8.7 percent (Atlas 2023b).

For the lot proposed for Building 3 (see Figure 3-11c, *Preliminary LID Plan Lot 3*), the site would drain to the south and sheet flow to multiple ribbon gutters that would direct runoff to catch basins near the south property corner. The runoff would be directed to an underground detention system, then enter a modular wetland system for treatment. After treatment, the runoff would flow to a sump pump and would be pumped to the curb and gutter in Paseo Sonrisa. Runoff would flow north to the existing curb inlet, which is connected to the existing 90-inch storm drain. The proposed project would decrease the pervious area on this lot from 14.5 percent to 10.2 percent.

For the lot proposed for Building 4 (see Figure 3-11d, *Preliminary LID Plan Lot 4*), the site would drain to the south and would sheet flow to multiple ribbon gutters which direct runoff to catch basins near the south property corner. The runoff would be directed to an underground detention and modular wetland systems. After treatment, the runoff would flow to a sump pump and be pumped to the curb and gutter in Paseo Tesoro. Runoff would then flow north to the existing curb inlet, which is connected to the existing 90-inch storm drain. The proposed project would increase the pervious area on this lot from 10.3 percent to 10.8 percent.

All proposed drainage system improvements would be designed and constructed in accordance with City and LAC-FCD requirements and would require City and LAC-FCD approval.

#### 3.3.3.4 SOLID WASTE SYSTEM

Solid waste generated by the proposed project would be collected and hauled away by Valley Vista Services. Enclosures with a roof and double swing gates would accommodate trash bins for solid waste and recyclable materials.

### 3. Project Description

#### 3.3.3.5 TELECOMMUNICATION SYSTEMS

Plans for utilities that would serve the proposed project would include electricity (Southern California Edison) and telecommunications (various, including Frontier Communications). All new utility infrastructure would be installed underground or placed in enclosed spaces (e.g., utility closets).

#### 3.3.4 Green Building Standards

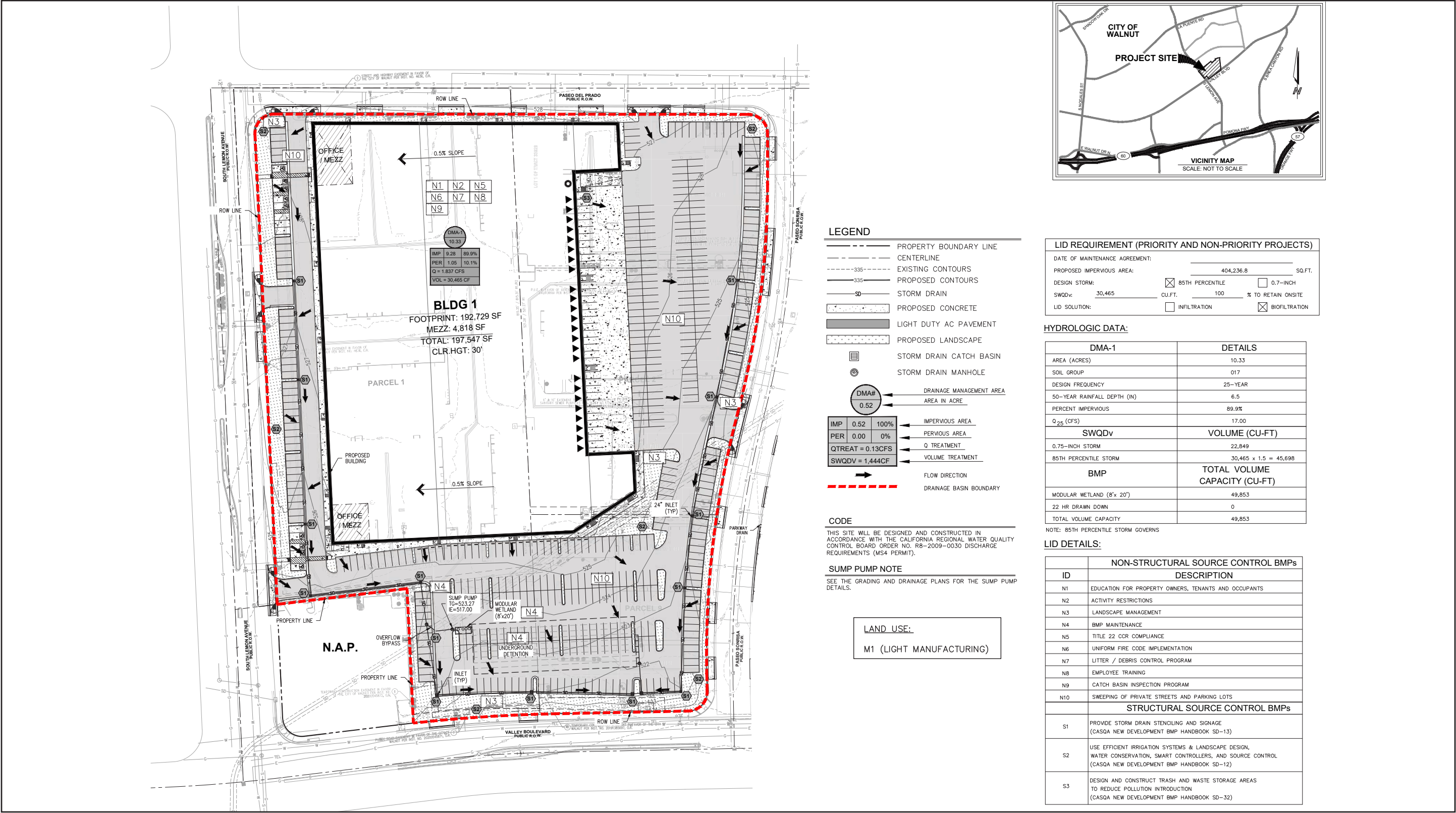
Green building is the practice of designing, constructing, and operating buildings to maximize occupant health and productivity, use fewer resources, reduce waste and negative environmental impacts, and decrease life-cycle costs. The proposed project would be designed using green building practices, including those of the most current Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6) and CALGreen (California Code of Regulations, Title 24, Part 11). The Building Energy Efficiency Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. CALGreen is California's statewide "green" building code. Its purpose is to improve public health, safety, and general welfare by enhancing the design and construction of buildings using building concepts that have a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, water conservation and resource efficiency, and environmental quality. Some of the green building standards that would be incorporated into the proposed project include:

- A construction waste management plan would be developed demonstrating a minimum of 65 percent recycling and/or salvaging of nonhazardous waste.
- Demolished asphalt and concrete would be reprocessed and recycled on-site when possible during the construction phase.
- All construction materials would comply with volatile organic compounds and toxin limits per CALGreen Section 5.504.
- "Clean Air" parking spaces would be provided on-site for carpools and fuel-efficient vehicles, for a minimum number of spaces proportional to the required vehicle parking per CALGreen.
- The proposed buildings would not utilize natural gas and would be 100 percent electric.
- Twenty percent of parking spaces would be EV capable, with 25 percent of those spaces including charging stations per CALGreen.
- Lighting design would comply with local codes and CALGreen.
- Plumbing fixtures would be 20 percent water conserving.
- Metering devices would be installed for outdoor potable water use for landscaped areas, and the irrigation system would have weather- or soil-moisture-based automatic controllers per CALGreen requirements.
- Visitor bicycle parking racks would be provided within 200 feet of building entrances for a minimum of 5 percent of new vehicular parking.



3. Project Description

Figure 3-11a - Preliminary LID Plan Lot 1



Source: Atlas Civil Design 2023.

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Scale (Feet)

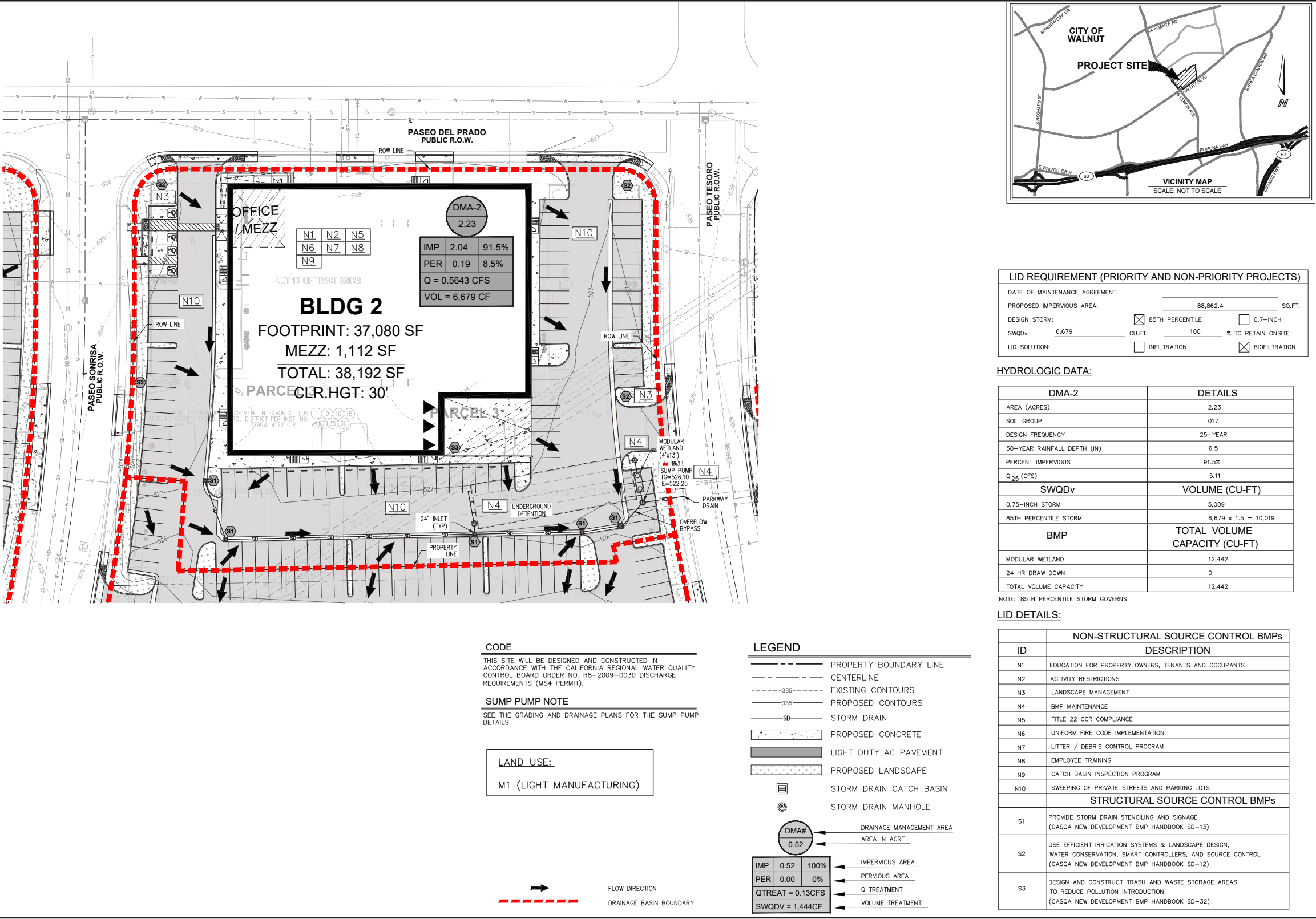


### 3. Project Description

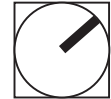
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3. Project Description

Figure 3-11b - Preliminary LID Plan Lot 2



Source: Atlas Civil Design 2023.

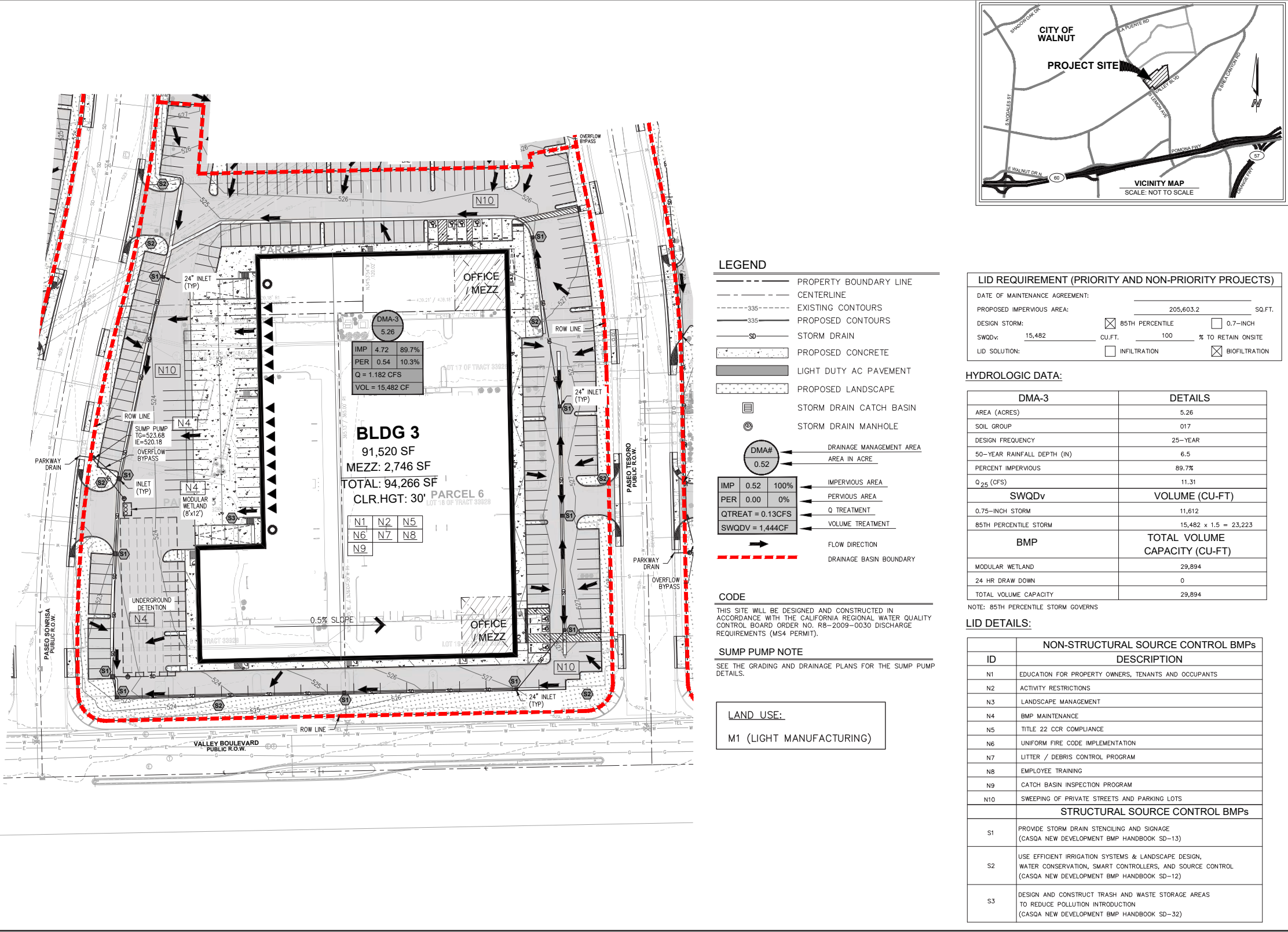


### 3. Project Description

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Figure 3-11c - Preliminary LID Plan Lot 3

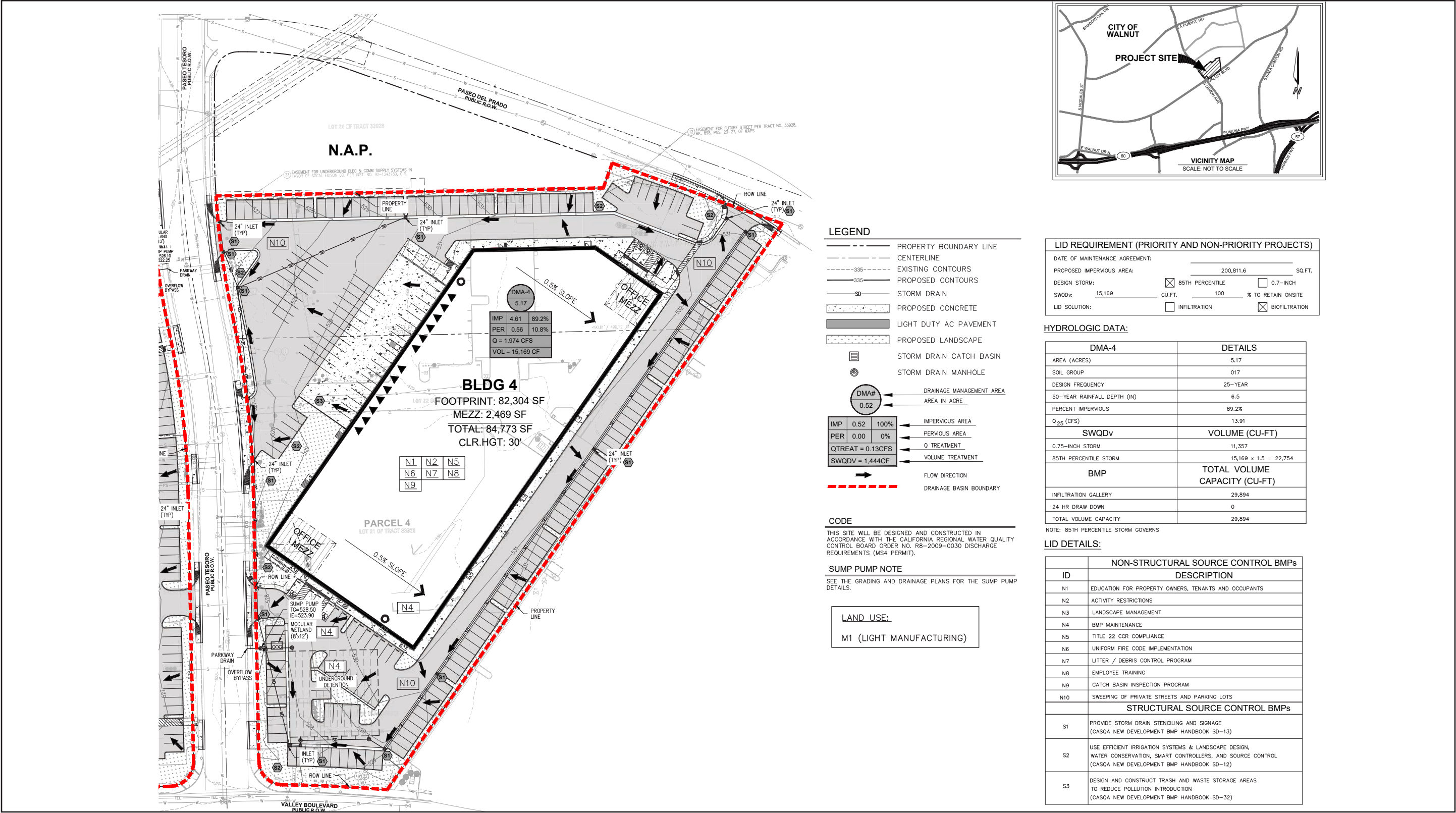


Source: Atlas Civil Design 2023.

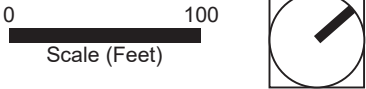
### 3. Project Description

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Figure 3-11d - Preliminary LID Plan Lot 4



Source: Atlas Civil Design 2023.



### 3. Project Description

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### 3. Project Description

#### 3.3.5 Project Phasing and Construction

Upon City approval, project development is anticipated to be completed in four phases: demolition, site preparation, grading/trenching, and building construction/finishing. Overall project development is estimated to take approximately 16 months, from August 2025 to December 2026. Construction activities, start and end dates, and equipment required are shown in Table 3-2. Construction would occur within the hours allowed by the City (7:00 am to 6:00 pm Monday through Friday) in compliance with the City's Municipal Code, Section 3.40, Noise.

**Table 3-2 Construction Schedule and Equipment**

Construction Activities	Months	Duration (workdays)	Equipment Required and Haul Volumes
Building and Asphalt Demolition	September – December 2025	69 days	<ul style="list-style-type: none"> <li>• 19,304 tons of demolition debris.</li> <li>• 2 Concrete Cutting Industrial Saws</li> <li>• 10 Excavators</li> <li>• 4 Wheel Loader</li> <li>• 5 Track Loader</li> <li>• 4 Rubber Track Skid Steer</li> <li>• 1 Crushing-Processing Equipment</li> </ul>
Site Preparation	November 2025 – January 2026	33 days	<ul style="list-style-type: none"> <li>• 3 Track Dozers</li> <li>• 2 Tractors/Loaders/Backhoes</li> </ul>
Rough Grading	December 2025 – February 2026	47 days	<ul style="list-style-type: none"> <li>• 3,000 cubic yards of import</li> <li>• 10 Excavators</li> <li>• 1 Track Dozer</li> <li>• 4 Scrapers</li> <li>• 4 Wheel Loader</li> </ul>
Fine Grading	January – April 2026	77 days	<ul style="list-style-type: none"> <li>• 614 cubic yards of import</li> <li>• 1 Track Dozer</li> <li>• 2 Blades (Graders)</li> <li>• 1 Tractor/Loader/Backhoe</li> <li>• 1 Skip Loader</li> </ul>
Utility Trenching	January – April 2026	67 days	<ul style="list-style-type: none"> <li>• 2 Excavators</li> <li>• 2 Tractors/Loaders/Backhoes</li> </ul>
Building Construction	February – December 2026	229 days	<ul style="list-style-type: none"> <li>• 1 Crawler Crane</li> <li>• 2 Forklifts</li> <li>• 4 Scissor lifts</li> <li>• 3 Tractors/Loaders/Backhoes</li> <li>• 1 Welder</li> </ul>
Paving	October – December 2026	54 days	<ul style="list-style-type: none"> <li>• 2 Paving Equipment</li> <li>• 4 Rollers</li> <li>• 2 Skip Loaders</li> </ul>
Architectural Coating	October – December 2026	64 days	<ul style="list-style-type: none"> <li>• Air Compressor</li> </ul>
Finishing/Landscaping	October – December 2026	54 days	<ul style="list-style-type: none"> <li>• 2 Excavators</li> <li>• 3 Tractors/Loaders/Backhoes</li> </ul>

Source: Construction information provided by project applicant.

### 3. Project Description

Demolition of the existing structures on site would require approximately 1,828 trip ends<sup>4</sup> to be hauled off-site. It is also anticipated that 9,540 tons of existing asphalt and concrete hardscaping would also need to be demolished. Up to 2,857 tons of demolition debris would be hauled offsite and the remaining 6,683 tons of asphalt and concrete would be recycled on-site. Asphalt and concrete to be hauled off-site would require 318 total trip ends.

It is anticipated that up to 3,614 cubic yards of soil would need to be imported during the grading phase to balance the site. Although the sites from which soil would be imported is unknown, it is anticipated that they would be less than 25 miles from the project site. All construction staging activities would take place within the project site.

### 3.4 INTENDED USES OF THE DRAFT SEIR

This Draft SEIR examines the environmental impacts of the proposed project compared to the impacts analyzed in the 2018 GPEIR. This Draft SEIR is also being prepared to address various actions by the City and others to adopt and implement the proposed project. It is the intent of this Draft SEIR to enable the City of Walnut, other responsible agencies, and interested parties to evaluate the environmental impacts of the proposed project compared to the impacts analyzed in the GPEIR, thereby enabling them to make informed decisions with respect to the requested entitlements. The anticipated approvals required for the proposed project are:

Lead Agency	Action
City of Walnut	<ul style="list-style-type: none"> <li>• Certification of the Supplemental Environmental Impact Report</li> <li>• Approval of Conditional Use Permit</li> <li>• Approval of Tentative Parcel Map</li> <li>• Approval of Site Plan Review</li> <li>• Approval of Design Review Permit</li> <li>• Approval of Development Agreement</li> <li>• Adoption of Mitigation Monitoring and Reporting Program</li> </ul>
Responsible Agencies	Action
Los Angeles Regional Water Quality Control Board	<ul style="list-style-type: none"> <li>• Issuance of a National Pollution Discharge Elimination System Permit (NPDES) for future construction activities</li> <li>• Issuance of Industrial General Permit Coverage</li> </ul>
Los Angeles County Flood Control District (LACFD)	<ul style="list-style-type: none"> <li>• LACFCD permit for work occurring within the Flood Control easement.</li> </ul>

<sup>4</sup> Total trip ends represent the “to” and “from” trips between the soil import site and the project site.

## 3. Project Description

### 3.5 REFERENCES

- Langan. 2021, December 15. Geotechnical Investigation Report for Proposed Walnut Business Park 20401 Velly Boulevard, Walnut, California 91789.
- Regional Planning Association (RPA). 2010, March. Logistics Trends and Specific Industries That Will Drive Warehouse and Distribution Growth and Demand for Space. <https://s3.us-east-1.amazonaws.com/rpa-org/pdfs/LR-18-Logistics-Drive-Warehouse-Growth.pdf>.

### 3. Project Description

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## 4. Environmental Setting

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### 4.1 INTRODUCTION

Chapter 4 provides a “description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, ... from both a local and a regional perspective” (CEQA Guidelines Section 15125[a]), pursuant to provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The environmental setting provides the baseline physical conditions from which the lead agency will determine the significance of environmental impacts resulting from the proposed project.

### 4.2 REGIONAL ENVIRONMENTAL SETTING

#### 4.2.1 Regional Location

The City of Walnut encompasses roughly 8.9 square miles in southwestern Los Angeles County and is approximately 25 miles east of downtown Los Angeles. It is adjacent to the cities of Diamond Bar, Industry, West Covina, San Dimas, and Pomona. No freeways traverse the city limits because Walnut is south of Interstate 10, north of State Route 60, and west of State Route 57 (see Figure 3-1, *Regional Location*).

#### 4.2.2 Regional Planning Considerations

##### 4.2.2.1 SCAG REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

The Southern California Association of Governments (SCAG) is a council of governments representing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG is the federally recognized metropolitan planning organization for this region, which encompasses over 38,000 square miles. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the southern California region’s metropolitan planning organization, SCAG cooperates with the South Coast Air Quality Management District (AQMD), the California Department of Transportation, and other agencies in preparing regional planning documents. SCAG has developed regional plans to achieve specific regional objectives, as discussed below.

The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), known as Connect SoCal, is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods. On September 3, 2020, SCAG’s Regional Council unanimously voted to approve and

## 4. Environmental Setting

fully adopt Connect SoCal (2020–2045 RTP/SCS) and the addendum to the Connect SoCal Program EIR. Connect SoCal is a long-range visioning plan that builds on and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The 2020–2045 RTP/SCS includes a “core vision” that centers on better maintaining and managing the transportation network for moving people and goods; expanding mobility choices by locating housing, jobs, and transit closer together; and increasing investments in transit and complete streets (SCAG 2020).

The RTP/SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce greenhouse gas (GHG) emissions from transportation (excluding goods movement). The RTP/SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets identified by the California Air Resources Board. However, the RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the RTP/SCS; instead, it provides incentives to governments and developers for consistency. The proposed project’s consistency with the applicable 2020–2045 RTP/SCS policies is analyzed in detail in Section 5.7, *Greenhouse Gas Emissions*, and Section 5.10, *Land Use and Planning*.

### 4.2.2.2 SOUTH COAST AIR BASIN AIR QUALITY MANAGEMENT PLAN

The City is in the South Coast Air Basin (SoCAB), which is managed by the South Coast AQMD. The SoCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Pollutants emitted into the ambient air by stationary and mobile sources and are regulated by federal and state law and standards are detailed in the SoCAB Air Quality Management Plan (AQMP). Air pollutants for which Ambient Air Quality Standards (AAQS) have been developed are known as criteria air pollutants and are ozone (O<sub>3</sub>), carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), sulfur dioxide, coarse inhalable particulate matter (PM<sub>10</sub>), fine inhalable particulate matter (PM<sub>2.5</sub>), and lead. VOCs and NO<sub>x</sub> are criteria pollutant precursors and go on to form secondary criteria pollutants, such as O<sub>3</sub>, through chemical and photochemical reactions in the atmosphere. Air basins are classified as attainment/nonattainment areas for particular pollutants depending on whether they meet AAQS for that pollutant. Based on the SoCAB AQMP, the SoCAB is designated nonattainment for O<sub>3</sub> and PM<sub>2.5</sub> under the California and National AAQS, nonattainment for lead (Los Angeles County only) under the National AAQS, and nonattainment for PM<sub>10</sub> under the California AAQS.<sup>1</sup> The proposed project’s consistency with the applicable AAQS is discussed in Section 5.2, *Air Quality*.

### 4.2.2.3 GREENHOUSE GAS EMISSIONS REDUCTIONS LEGISLATION

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in Executive Order (EO) S-03-05, EO B-30-15, EO B-55-18, Assembly Bill (AB) 32 32, AB 1279, Senate Bill (SB) 32, and SB 375. The California Air Resources Board (CARB) adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) on December 15, 2022, which lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the state’s anthropogenic GHG emissions (CARB 2022). The Scoping

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<sup>1</sup> CARB approved South Coast AQMD’s request to redesignate the SoCAB from serious nonattainment for PM<sub>10</sub> to attainment for PM<sub>10</sub> under the national AAQS on March 25, 2010, because the SoCAB has not violated federal 24-hour PM<sub>10</sub> standards during the period from 2004 to 2007. In June 2013, the EPA approved the State of California’s request to redesignate the South Coast PM<sub>10</sub> nonattainment area to attainment of the PM<sub>10</sub> National AAQS, effective on July 26, 2013.

## 4. Environmental Setting

Plan was updated to address the carbon neutrality goals of EO B-55-18 and the ambitious GHG reduction target as directed by AB 1279. Previous Scoping Plans focused on specific GHG reduction targets for our industrial, energy, and transportation sectors to meet 1990 levels by 2020, then the more aggressive 40 percent below 1990 levels for the 2030 target. This plan expands on earlier Scoping Plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. Carbon neutrality takes it one step further by expanding actions to capture and store carbon, including through natural and working lands and mechanical technologies, while drastically reducing anthropogenic sources of carbon pollution.

The proposed project's ability to meet these regional GHG emissions reduction target goals is analyzed in Section 5.7, *Greenhouse Gas Emissions*.

### 4.3 LOCAL ENVIRONMENTAL SETTING

#### 4.3.1 Location

The approximately 23-acre project site is between Valley Boulevard to the south, S. Lemon Avenue to the west, Paseo Del Prado to the north, and an existing industrial development to the east. Beyond Valley Boulevard are the Southern Pacific Railroad line and San Jose Creek. The City of Industry, which is characterized by industrial land uses, lies south of these features. The site is approximately 0.8 mile north of SR-60 and 1.5 miles northwest of SR-57 (see Figure 3-2, *Local Vicinity*, and Figure 3-3, *Aerial Photograph*).

#### 4.3.2 Surrounding Land Uses

Surrounding land uses directly adjacent to the project site include commercial and industrial business parks to the north, west, and east of the project site, as seen on Figure 3-3, *Aerial Photograph*. These include the Walnut Tech Business Park to the west and the Walnut Valley Business Park to the east. South of the project site are the Southern Pacific Railroad line and San Jose Creek in addition to warehousing and other industrial uses in the City of Industry. Farther north of the project site is a residential area that includes Vejar Elementary School. Residential uses also surround the site farther to the west and east.

#### 4.3.3 Physical Site Conditions

The existing development on the project site includes 357,544 square feet of building area consisting of an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, car body shop repair facility, pizza restaurant, roofers mart, Mexican food supply store, rent-a-car office, and pet food supply outlet.

#### 4.3.4 General Plan and Zoning

##### 4.3.4.1 GENERAL PLAN

The City of Walnut's General Plan land use designation for the project site is "Industrial" (see Figure 3-4, *General Plan Land Use*). The City adopted Ordinance No. 24-06 on January 8, 2025, which included amendments to Chapter 2, *Land Used and Community Design*, of the General Plan. As amended, the "Industrial" land use

## 4. Environmental Setting

designation allows for, as either a permitted or conditional use, light manufacturing, commercial storage (including general warehouses, storage warehouses, and logistics facilities), craftsman and artisan assembly and production, and limited vehicle service repair. Limited commercial retail and office uses are allowed as well. Logistics facilities are permitted subject to a conditional use permit (CUP). Storage warehouses in excess of 50,000 square feet of gross floor area are also permitted subject to a conditional use permit. Prohibited uses include, trucking and transportation-related businesses, large-scale utilities and energy production activities, and heavy manufacturing. This designation allows a maximum lot coverage of 60 percent and a maximum building height of two stories. The proposed project would not change the land use designation of the project site.

### 4.3.4.2 ZONING

As shown on Figure 3-5, *Zoning Plan*, the entire site is zoned Light Manufacturing (M-1). The City adopted Ordinance No. 24-06 on January 8, 2025, which included amendments to Sections 6.48.020 and 6.48.040 of the City's Zoning Ordinance (Title 6 of the Walnut Municipal Code). As amended, the M-1 zone permits a variety of industrial, manufacturing, warehousing, and retail uses in addition to office and business uses. Storage warehouses where 50,000 square feet or more of the building's gross square footage is used for warehouse purposes are allowed subject to a CUP. Logistics facilities are also only allowed subject to a CUP. The maximum lot coverage is 60 percent of the lot area. The proposed project would not change the zoning of the project site.

### 4.3.5 Aesthetic Resources

Land uses surrounding the project site include industrial and commercial development. The San Jose Hills, further north of the project site, and the Puente Hills south of the project site have dramatic, sloping terrains that provide natural scenic backdrops for the City of Walnut and can be partially seen from the project site.

Under existing conditions (September 2023), the project site is developed with the Walnut Business Park. Figures 4-1a through 4-1d, *Existing Site Conditions*, show the existing businesses on-site, which include restaurants, retail businesses, and light-industrial manufacturer uses. Ornamental trees grow along the project site's frontage with Valley Boulevard and South Lemon Avenue. The project site is visible from the surrounding roadways, including South Lemon Avenue, which abuts the western project site boundary; Valley Boulevard, which abuts the southern project site boundary; and Paseo del Prado, which abuts the northern project site boundary.

Please refer to Section 5.1, *Aesthetics*, for additional information concerning regulations governing scenic quality and light and glare, and an analysis of the project-related impacts.



4. Environmental Setting

**Figure 4-1a - Photographs of Existing Conditions**



Commercial Uses on Paseo Del Prado.



Distribution Uses on Paseo Robles.

## 4. Environmental Setting

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4. Environmental Setting

**Figure 4-1b - Photographs of Existing Conditions**



Retail-Commercial Uses on Paseo Sonrisa.



Commercial Uses on Paseo Tesoro.

## 4. Environmental Setting

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4. Environmental Setting

**Figure 4-1c - Photographs of Existing Conditions**



Restaurant and Retail Uses on S. Lemon Avenue.



Commercial Uses on Valley Blvd.

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Figure 4-1d - Photographs of Existing Conditions



East-Facing View of Project Area.

## 4. Environmental Setting

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## 4. Environmental Setting

### 4.3.6 Air Quality and Climate

The project site is within the SoCAB, which is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and includes all of Orange County and the none desert portions of Los Angeles, Riverside, and San Bernardino counties. The regional climate in the SoCAB is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. Air quality is primarily influenced by meteorology and a wide range of emissions sources, such as dense population centers, substantial vehicular traffic, and industry.

The SoCAB is designated nonattainment for O<sub>3</sub>, PM<sub>2.5</sub>, and lead (Los Angeles County only) under the California and National AAQS and nonattainment for PM<sub>10</sub> and nitrogen dioxide (NO<sub>2</sub>) under the California AAQS.

Additional information regarding air quality and climate change regulations affecting the City of Walnut is provided in Section 4.2.2, Regional Planning Considerations, above.

The California Communities Environmental Health Screening Tool (CalEnviroScreen) is a tool developed by the California Office of Environmental Health Hazard Assessment that helps identify California communities that are most affected by many sources of pollution, and where people are especially vulnerable to pollution's effects. CalEnviroScreen uses environmental, health, and socioeconomic information, or indicators, to produce scores for every census tract in the state. Overall scores are calculated from the scores for two groups of indicators: pollution burden and population characteristics. Pollution burden scores represent the potential exposures to pollutants and the adverse environmental conditions caused by pollution (OEHHA 2021). As shown in Figure 4-2, Pollution Burden Score Map, the pollution burden score for the project site and surrounding areas do not exceed the 75 percent threshold used to define disadvantaged communities. The project site's CalEnviroScreen overall burden percentile is 38 percent. Although land uses immediately surrounding the project site are primarily industrial and commercial, sensitive residential receptors are located further north, west, and east of the project site, the closest of which is a residence approximately 515 feet north of the site at 20332 Carrey Road.

Project impacts on climate and air quality conditions in the city are analyzed in Sections 5.2, Air Quality, and 5.7, Greenhouse Gas Emissions, of this DEIR.

### 4.3.7 Geology and Landform

The project site is in the Los Angeles Basin, a northwest-trending, alluvium-filled lowland at the north end of the Peninsular Ranges geomorphic province of coastal southern California. This basin, which is the surface expression of a deep structural trough, has been subdivided into four primary structural blocks distinguished from one another by contrasting basement rock types and stratigraphy. These structural blocks are generally separated by zones of faulting along which movement has occurred intermittently since middle Miocene time (Langan 2021).

The site is in the central portion of the Northeastern Block of the Los Angeles Basin, a roughly triangular area bounded on the south by the Elsinore/Whittier fault, on the east by the Chino fault, and on the north by the

## 4. Environmental Setting

Sierra Madre/Cucamonga fault. The city of Walnut is between the San Jose and Puente Hills in an alluvial valley. Bedrock of these hills generally consists of the Puente Formation. Drainage through the area is controlled by San Jose Creek, which flows toward the west-southwest (Langan 2021).

The project site is underlain by Middle Holocene Age, young alluvial-fan deposits. These alluvial fans are noted to consist primarily of boulder alluvial in the headward portions of the fan, grading southward into dominantly sand and gravel (Langan 2021). Additional information regarding the project site's geology and its project-related impacts are provided in Section 5.6, *Geology and Soils*.

### 4.3.8 Hazards and Hazardous Materials

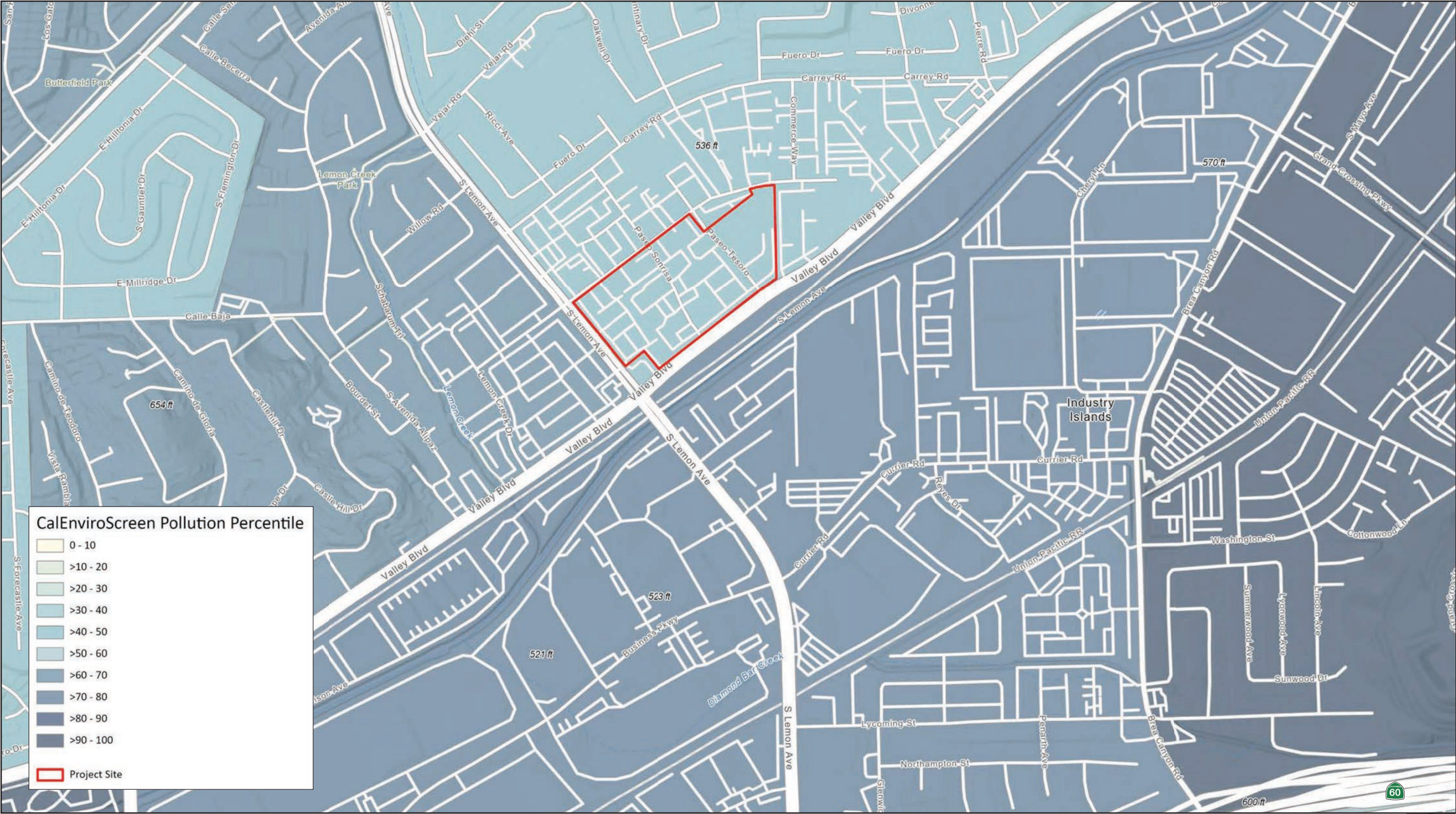
The project site was evaluated under four Phase I Environmental Site Assessments (ESA) completed in October 2021. These Phase I ESAs evaluated different sections of the project site, as shown on Figure 5.8-1, *Phase I ESA Study Areas*, in Section 5.8, *Hazards and Hazardous Materials*. The Phase I ESAs found that previous uses of the project site have resulted in its listing on environmental databases for hazardous materials sites. The Phase I ESAs identified Resource Conservation and Recovery Act generators on the project site, underground storage tanks, and one former leaking underground storage tank. The studies concluded that no recognized environmental conditions are present on the site, but three Business Environmental Risks and three *de minimis* conditions were identified due to the possibility of the existing buildings containing lead-based paints and asbestos. Additional information regarding hazardous materials at the project site are provided in Section 5.8, *Hazards and Hazardous Materials*.

### 4.3.9 Hydrology

The project site lies within the San Gabriel River Watershed. The watershed receives drainage from 689 square miles of eastern Los Angeles County; its headwaters originate in the San Gabriel Mountains. The watershed consists of extensive areas of undisturbed riparian and woodland habitats in its upper reaches. Much of the watershed of the West Fork and East Fork of the river is set aside as wilderness area; other areas in the upper watershed are subject to heavy recreational use. The upper watershed also contains a series of flood control dams. Further downstream, toward the middle of the watershed, are large spreading grounds utilized for groundwater recharge. The watershed is hydraulically connected to the Los Angeles River through the Whittier Narrows Reservoir. The lower part of the river flows through a concrete-lined channel in a heavily urbanized portion of the county before becoming a soft-bottom channel once again near the ocean in the city of Long Beach. A majority of the 58 National Pollution Discharge Elimination System permittees in the watershed discharge directly to the San Gabriel River, and fewer numbers discharge to Coyote and San Jose Creeks (Los Angeles RWQCB 2023).



Figure 4-2 - Pollution Burden Score Map



Source: OEHHA 2021



## 4. Environmental Setting

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## 4. Environmental Setting

Under existing conditions, stormwater generated on the northwest half of the site drains to the southeast and sheet flows to multiple ribbon gutters that direct runoff to an existing on-site catch basin near the south corner of the site as well as toward two existing driveways at the southwest corner of the site and into Paseo Sonrisa. The existing catch basin is directly connected to a 90-inch storm drain maintained by the Los Angeles County Flood Control District. The eastern portion of the site drains to the southwest and sheet flows toward the existing driveways along the west property line and into Paseo Tesoro (Atlas Civil Design 2023a, 2023b, 2023c, 2023d).

Refer to Section 5.9, *Hydrology and Water Quality*, for additional information regarding hydrological conditions and an analysis of project impacts on hydrology and water quality.

### 4.3.10 Noise

The primary noise source in the vicinity of the project site are the surrounding roadways, including South Lemon Avenue and Valley Boulevard. Intermittent noise associated with operations of the Southern Pacific Railroad and stationary-source noise associated with surrounding existing industrial and commercial uses are also audible from the project site.

Refer to Section 5.11, *Noise*, for additional information concerning the noise environment and an analysis of the proposed project's noise impacts.

### 4.3.11 Public Services

#### 4.3.11.1 FIRE SERVICES

The City contracts fire and emergency medical services with the Los Angeles County Fire Department. Station 61 is the nearest County Fire station to the project site, approximately 0.8 mile north of the project site at 20011 La Puente Road in Walnut.

#### 4.3.11.2 POLICE SERVICES

Police protection services are provided to the project site by the Los Angeles County Sheriff's Department from the Walnut Sheriff's Station. The Walnut Sheriff's Station is at 21695 Valley Boulevard, approximately 2.1 roadway miles east of the project site.

#### 4.3.11.3 SCHOOL SERVICES

Public school students in Walnut are served by two school districts, the Walnut Valley School District and the Rowland Unified School District. The nearest schools are Vejar Elementary School, 0.24 miles north of the project site; Del Paso High School, approximately 880 feet south of the project site; and Montessori of Walnut, 0.26 miles northwest of the project site.

## 4. Environmental Setting

### 4.3.11.4 LIBRARY SERVICES

Public library services are provided by the Walnut Library, which is owned by the County of Los Angeles Public Library. Walnut Library is approximately 1.17 miles northeast of the project site.

### 4.3.11.5 PARKS AND RECREATION

Park and recreation services are provided by the City of Walnut Parks and Recreation Department. The closest park facility is Norm Ashley Park, 0.86 mile west of the project site. Lemon Creek Park is 0.34-mile northwest of the project site.

Refer to Section 5.12, *Public Services*, for additional information concerning public services.

### 4.3.12 Transportation

Major regional travel routes in the vicinity of the project site include the SR-60, 0.79 miles south of the project site; SR-57, 2.92 miles south of the project site; and I-10, 4.08 miles north of the project site. Direct vehicular access to the project site is from Lemon Avenue on the western border of the project site, Valley Boulevard on the southern border of the project site, and Paseo Del Prado on the northern border of the project site. Paseo Sonrisa and Paseo Del Tesoro provide internal north-south access through the site between Paseo Del Prado and Valley Boulevard. Valley Boulevard is classified as a major arterial by the City of Walnut, and Lemon Avenue is classified as a minor arterial (Walnut 2018). Paseo Del Prado, Paseo Sonrisa, and Paseo Del Toro are considered local streets (2018).

Public transit in the City of Walnut is provided by Foothill Transit. Foothill Transit operates bus services in the vicinity of the project site via Foothill Transit Route 194 along Valley Boulevard for service to Cal Poly Pomona. There are eastbound and westbound bus stops at the intersection of Valley Boulevard and Lemon Avenue, which is the closest stop to the project site. Service frequency during weekdays is every 20 minutes in the morning peak hours and every 30 minutes in the afternoon peak hours (Iteris 2023). Foothill Transit also offers a park and ride service 0.67 mile southeast of the project site in the City of Industry that travels to downtown Los Angeles.

MetroLink operates a commuter rail station in the City of Industry approximately 0.67 mile from the project site and offers connection to downtown Los Angeles as well as a variety of locations in the Inland Empire.

Pedestrian sidewalks exist along all streets that front the project site. There are no bike lanes along these roadways.

Refer to Section 5.13, *Transportation*, for additional information concerning existing transportation facilities and traffic conditions and an analysis of project-related impacts.

## 4. Environmental Setting

### 4.3.13 Utilities and Service Systems

#### 4.3.13.1 WASTEWATER TREATMENT AND COLLECTION

The City of Walnut is a member of the Consolidated Sewer Maintenance District of Los Angeles County administered and managed by the Los Angeles County Department of Public Works. The collection system in Walnut consists of about 97 miles of sewer lines that discharge into the Los Angeles County Sanitation Districts' (LACSD) facilities for treatment and disposal. Wastewater from Walnut Treatment is treated at the LACSD's San Jose Creek Water Reclamation Plant (WRP) near Whittier; biosolids and waste flows that exceed the capacity of the San Jose Creek WRP are diverted to the LACSD's facility in Carson.

#### 4.3.13.2 WATER SUPPLY AND DISTRIBUTION

The Walnut Valley Water District (WVWD) is the water provider for the project site. WVWD depends on a combination of imported and local supplies to meet its water demands and projects that water demand for its service area in a normal year for 2045 will be 18,529 acre-feet and with recycled water demands projected to be 1,664 acre-feet. According to WVWD's 2021 Urban Water Management Plan, the District will be able to meet demand with projected supplies between 2020 and 2045 during normal years, single dry years, and multiple dry years. Water service is provided to the project site via water mains beneath Paseo Del Prado, South Lemon Avenue, Valley Boulevard, Paseo Tesoro, and Paseo Sonrisa.

#### 4.3.13.3 STORM DRAINAGE

The City of Walnut's storm drain system consists of 644 City-owned catch basins and 142 catch basins owned by the Los Angeles County Flood Control District (LAC-FCD). LAC-FCD also maintains the storm drain lines in the City of Walnut. Under existing conditions, storm drainage on-site is provided via four storm drains adjacent to the project site.

Section 5.15, *Utilities and Service Systems*, provides additional info regarding existing utilities conditions.

## 4.4 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS

Section 15130 of the CEQA Guidelines states that cumulative impacts shall be discussed where they are significant. It further states that this discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the project alone. Section 15355 of the Guidelines defines cumulative impacts to be "...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts represent the change caused by the incremental impact of a project when added to other proposed or committed projects in the vicinity.

The CEQA Guidelines (Section 15130 [b][1]) state that the information utilized in an analysis of cumulative impacts should come from one of two sources:

- A. A list of past, present and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency.

## 4. Environmental Setting

- B. A summary of projections contained in an adopted General Plan or related planning document designed to evaluate regional or area-wide conditions.

As a supplement to the GPEIR, this document need contain only the information necessary to make the previous EIR adequate as revised by the buildout of the proposed project. Given that the original EIR was for a General Plan update, the cumulative impact analyses in Chapter 5, *Environmental Analysis*, of this SEIR uses Source B. The approach is discussed in each respective topical section.

## 4.5 REFERENCES

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## 5. Environmental Analysis

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Chapter 5 provides a detailed discussion of the environmental setting, impacts associated with the proposed project, and mitigation measures designed to reduce significant impacts where required and when feasible. The residual impacts following the implementation of any mitigation measure are also discussed.

This chapter has a separate section for each environmental issue area that was determined to need further study in the SEIR. This scope was determined in the Notice of Preparation (NOP), which was published August 16, 2023 (see Appendix A), and through public and agency comments received during the NOP comment period from August 16, 2023, to September 18, 2023 (see Appendix A). Environmental issues and their corresponding sections are:

- 5.1 Aesthetics
- 5.2 Air Quality
- 5.3 Cultural Resources
- 5.4 Biological Resources
- 5.5 Energy
- 5.6 Geology and Soils
- 5.7 Greenhouse Gas Emissions
- 5.8 Hazards and Hazardous Materials
- 5.9 Hydrology and Water Quality
- 5.10 Land Use and Planning
- 5.11 Noise
- 5.12 Public Services
- 5.13 Transportation
- 5.14 Tribal Cultural Resources
- 5.15 Utilities and Service Systems

Topics that initial review determined did not to have the potential to result in significant impacts are addressed in Chapter 8.0, *Impacts Found Not to Be Significant*.

### **Review of 2018 GPEIR**

As described in Section 1.2.1, *Type and Purpose of this Draft SEIR*, this EIR is a Supplement to the 2018 General Plan Update and West Valley Specific Plan Environmental Impact Report (GPEIR). The potential impacts of the Walnut Business Park project (proposed project) are compared to the environmental impacts for the project site in the GPEIR for the approved land uses. As detailed below, each environmental impact section has separate subsections to summarize the impact assessment in GPEIR. The proposed project's impact analysis then

## 5. Environmental Analysis

evaluates the net impacts in comparison to the GPEIR. Similarly, mitigation measures recommended for implementation of the proposed project integrate applicable measures from the GPEIR.

### Organization of Environmental Analysis

To assist the reader with comparing information between environmental issues, each section is organized under eight major headings:

- Environmental Setting
- Thresholds of Significance
- Environmental Impacts from the 2018 GPEIR
- Cumulative Impacts
- Level of Significance Before Mitigation
- Mitigation Measures
- Level of Significance After Mitigation
- References

Chapter 1, *Executive Summary*, includes a table that summarizes all impacts and mitigation measures by environmental issue.

### Terminology Used in This Draft SEIR

For each impact identified in this Draft SEIR, a statement of the level of significance of the impact is provided. While criteria for determining significant impacts are unique to each issue area, the environmental analysis applies a uniform classification of the impacts based on the following definitions consistent with CEQA and the CEQA Guidelines:

- A designation of no impact is given when no changes in the environment would occur.
- A less than significant impact would cause no substantial adverse change in the environment.
- A less than significant impact with mitigation incorporated avoids substantial adverse impacts on the environment through mitigation measures.
- A significant unavoidable impact would cause a substantial adverse effect on the environment, and no feasible mitigation measures would be available to reduce the impact to a less than significant level.

## 5. Environmental Analysis

### 5.1 AESTHETICS

This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates potential impacts to visual character and quality in areas proposed for land use changes under the Walnut Business Park (proposed project). The evaluation addresses the potential for project implementation to degrade or alter visual character or to affect protected scenic views in the City of Walnut in comparison to the impacts evaluated for the project site in the General Plan Environmental Impact Report (GPEIR). Consistency of the proposed project with established relevant policies regarding visual character and resources is also summarized.

There was one comment letter and one oral comment received from residents in response to the Notice of Preparation (NOP) and scoping meeting related to aesthetic and visual resource impacts. The relevant issues raised in those comments are addressed throughout this section. For a summary of the comment letters, refer to Chapter 2, Table 2-1, *NOP and Scoping Meeting Comments Summary*, or Appendix A.

#### 5.1.1 Environmental Setting

##### 5.1.1.1 REGULATORY BACKGROUND

Federal, State, regional, and local regulations are listed in Table 5.1-1, *Regulations/Plans for Aesthetics*. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of General Plan Update (GPU) policies.

**Table 5.1-1 Regulations/Plans for Aesthetics**

<b>Federal</b>	
National Scenic Byways Program	The National Scenic Byways Program recognizes certain roads as National Scenic Byways or All-American Roads based on their archaeological, cultural, historic, natural, recreational, and scenic qualities.
<b>State</b>	
State Scenic Highway Program	The State Scenic Highway Program was established to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to highways.
<b>Local</b>	
City of Walnut General Plan (see Appendix C)	Land Use and Community Design Element policies Conservation, Open Space, and Recreation Element policies Circulation Element Community Facilities and Infrastructure Element policies
City of Walnut Municipal Code (see Appendix B)	Chapter 6.84, Site Plan and Architectural Review Chapter 6.52, Article V Oak/Walnut Tree Preservation Ordinance

## 5. Environmental Analysis

### AESTHETICS

#### 5.1.1.2 EXISTING CONDITIONS

##### Visual Character

The proposed project is between Valley Boulevard to the south, S. Lemon Avenue to the west, Paseo del Prado to the north, and an existing industrial development to the east. The City of Walnut's General Plan land use designation for the project site is "Industrial," which allows for light manufacturing, commercial storage, craftsman and artisan assembly and production, and limited vehicle service repair. The project site is generally characterized by industrial properties, consisting of an industrial business park accommodating multiple uses, primarily commercial and light industrial. Figure 3-2 in Chapter 3, *Project Description*, presents an aerial view of the project site and surrounding uses. Surrounding land uses directly adjacent to the project site include commercial and industrial business parks to the north, west, and east of the project site, including the Walnut Tech Business Park to the west and the Walnut Valley Business Park to the east. South of the project site is the Southern Pacific Railroad line and San Jose Creek in addition to warehousing and other industrial uses in the City of Industry. Additionally, north of the project site, across from Carrey Road, is a residential area that includes Vejar Elementary School. Residential uses also surround the site further to the west and east. Further south of the project site are additional manufacturing and warehousing uses in the City of Industry. Development in the immediate vicinity of the project site primarily consists of industrial and commercial properties along the east and west side of Lemon Avenue that contain landscaped front lawns, tree-lined streets, and surface parking lots. Similarly, properties along Paseo del Prado contain landscaped front lawns, tree-lined streets, and surface parking lots along the north and south sides of the street, and available street parking. Properties along Valley Boulevard contain landscaped front lawns, tree-lined streets, and surface parking lots along the north side of the street, and views of the Southern Pacific Railroad line and San Jose Creek on the south side of the street. The project site is not located along or in the viewshed of a designated scenic corridor and views in the vicinity of the site are generally industrial and commercial in character.

The project site is approximately 23 acres and consists of an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, a car body shop repair facility, pizza restaurant, Mexican food supply store, rent-a-car office, and pet food supply outlet. Figure 4-1a through Figure 4-1d, *Photographs of Existing Conditions*, provide photographs of the site from various vantage points in the immediate vicinity.

Figure 4-1a depicts one-story buildings, which include commercial uses on Paseo del Prado and industrial uses on Paseo Robles within the project site, street lighting, grass and landscaped areas, several ornamental trees, surface parking lots for on-site parking, and additional parking provided off-site along the streets. Figure 4-1b depicts one-story buildings, which include retail-commercial uses on Paseo Sonrisa and commercial uses on Paseo Tesoro within the project site, surface parking lot with on-site parking, street lighting, grass and landscaped areas, and ornamental trees along the boundary of the parking lots. Figure 4-1c depicts one-story buildings, which include restaurant-retail uses on S. Lemon Avenue and commercial uses on Valley Boulevard within the project site, surface parking lot with on-site parking, grass and landscaped areas, and ornamental trees along the boundary of the parking lots.

## 5. Environmental Analysis

### AESTHETICS

According to the GPU, residential properties make up approximately 58.4 percent of the total land uses in the City of Walnut; with 58.1 percent being single-family residences, and 0.3 percent being multifamily residences. Walnut has several shopping centers that provide space for retail, restaurant, financial, personal services, education, medical offices, and fitness businesses. Commercial/Industrial properties make up approximately 4.2 percent of the city's total land uses, including 2 percent for light industrial, 1.7 percent for general commercial, and 0.5 percent for offices. Industrial land uses occupy a larger building footprint than commercial and office uses in the city; however, it is a relatively small portion of the overall land uses in Walnut. Low-impact light industrial uses, such as light manufacturing, similar to the project site, are the predominant types of industrial businesses. These areas include buildings that are well-maintained, and public infrastructure that is adequate to serve these types of activities. Most of Walnut's industrial land uses are located on the southern portion of the city, on parcels bounded by single-family residential properties and Carrey Road to the north, Valley Boulevard to the south, Lemon Creek to the west, and Specific Plan No. 3, which facilitates new mixed-use development, including townhomes, single-family residences, commercial, office, retail, and restaurant uses to the east (see Figure 3-4, *General Plan Land Use*).

### Visual Resources

According to the GPEIR, the City of Walnut is surrounded by the region's natural hilly topography and panoramic views of the San Gabriel Mountains. Three walnut woodland trees (*Juglans californica*) on the San Jose Hills around the Mt. San Antonio College (Mt. SAC) campus in Walnut are considered scenic resources. The largest of these walnut woodland trees are found above the houses on Shadow Mountain Road near Grand Avenue. The Voorhis Ecological Reserve, on the northeastern side of the city and operated by Cal Poly Pomona, also contains an existing community of black walnut tree woodland that is an important scenic resource in the city. Additional scenic resources can be found along Lemon Creek in the southern portion of the city, approximately 0.2 mile west of the project site; and Snow Creek in the eastern portion of the city, approximately 1.6 miles northeast of the project site. These waterways feed into the San Gabriel River watershed via San Jose Creek. The scenic quality of Lemon Creek has been recognized in the GPU and designated for preservation as one of the natural areas of the city.

The project is currently accessible to the public; however, no designated scenic views currently exist on or are available from the project site. The mountains to the north of the site are visible from the project, but these views are generally limited by intervening homes, businesses, and trees. Additionally, there are no natural open spaces in the vicinity of the project site.

The nearest recreational amenity is Lemon Creek, approximately 0.25 mile west of the project site, which includes a walking trail and Lemon Creek Park at the northern end. There are no significant natural features (e.g., rock outcroppings, bodies of water, or substantial stands of native vegetation) or native California trees of particular aesthetic value (e.g., oak trees) in the project site or the immediate vicinity. The project site is not in proximity to a City or State-designated scenic highway (Caltrans 2023).

### Existing Viewsheds

Viewsheds refer to the visual qualities of a geographical area that are defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by development that has become a

## 5. Environmental Analysis

### AESTHETICS

prominent visual component of the area. Public views are those that can be seen from vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than are private views that can be seen from vantage points on private property. Lemon Avenue, Paseo del Prado, and Valley Boulevard are the primary public view corridors with the most direct views of the project site. These roadways run along the west, north, and south boundary of the project site, respectively; and cars and businesses on the roadway have relatively unimpeded views of the project site.

Existing view corridors in the vicinity of the project site include Lemon Avenue, Paseo del Prado, Paseo Sonrisa, Paseo Tesoro, and Valley Boulevard, which are defined primarily by single-story industrial and commercial buildings. Due to its flat topography, views of the San Gabriel Mountains to the north are limited from the project site by existing topography and development in the vicinity.

#### Light and Glare

The project site is surrounded by developed urban areas regularly exposed to existing glare during the daytime and light during the evening hours. Current sources of light and glare in the project site result from existing commercial and industrial uses to the west, east, and north. Sources of light include interior and exterior lighting, street lights and signals, automobile and truck headlights, train headlights, and reflection of light from windows and other reflective surfaces primarily from adjacent buildings.

Sources of glare are primarily from sunlight reflecting off cars along Paseo Sonrisa, Paseo Tesoro, Lemon Avenue, Paseo del Prado, and Valley Boulevard, train windows and exterior surfaces along Valley Boulevard, and from windows on adjacent buildings to the west, east, and north of the project site. Overall, the level of light and glare on-site is typical of an industrial and commercial area.

#### Existing Shade and Shadow

Shadow impacts are generated by developments and land uses that create sources of shade to nearby areas. In general, shadows cast by buildings are shortest on the summer solstice (June 21) and longest on the winter solstice (December 21). Shadow-sensitive uses include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to their function, physical comfort, and/or commerce. There are no shadow-sensitive uses near or within the project site. Land uses immediately surrounding the project site are primarily industrial and commercial, and the nearest sensitive residential receptors are further north, west, and east of the project site, the closest of which is a residence approximately 515 feet north of the site at 20332 Carrey Road. Additionally, the nearest schools are Vejar Elementary School, 0.24 miles north of the project site; Del Paso High School, approximately 880 feet south of the project site; and Montessori of Walnut, 0.26 miles northwest of the project site. The overall level of shade and shadow created by existing development is typical of an industrial and commercial area.

## 5. Environmental Analysis

### AESTHETICS

#### 5.1.2 Thresholds of Significance

Appendix G of the California Environmental Quality Act (CEQA) Guidelines states that, “except as provided in Public Resources Code Section 21099,” a project would normally have a significant effect on the environment if the project would:

- AE-1 Have a substantial adverse effect on a scenic vista.
- AE-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- AE-3 In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.
- AE-4 Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

#### 5.1.3 Environmental Impacts

##### 5.1.3.1 2018 GENERAL PLAN UPDATE

The GPEIR found that impacts to scenic vistas, resources, and visual character and quality of the City of Walnut could occur if existing regulations and/or proposed policies are not sufficient to preserve and enhance those areas that contribute to a sense of place and provide distinctive community identity. The City of Walnut is almost fully developed, and future development supported by the GPU would generally be constructed within the context of an urbanized environment. The GPU concluded that with the implementation of regulatory requirements and the policies of the GPU, impacts related to aesthetics and visual resources would be less than significant and no mitigation would be required.

Development directed by the goals and policies of the GPU could produce new sources of light and/or glare that may potentially cause significant impacts to daytime and/or nighttime views. Impacts associated with glare range from simple nuisance to potentially dangerous situations (e.g., if glare is directed into the eyes of motorists). New commercial development could introduce inappropriate lighting and/or use building materials that could cause inappropriate glare in the city. Impacts related to aesthetics could include excessive or inappropriately directed lighting that can adversely impact nighttime views by reducing the ability to see the night sky and stars; glare caused from unshielded or misdirected lighting sources, such as a floodlight attached to the side of a single-family residence that could be oriented to shine into a neighbor’s house; and reflective surfaces (e.g., polished metal) that can also cause glare. The GPU concluded that with the implementation of regulatory requirements and the policies of the GPU, impacts related to light and glare would be less than significant and no mitigation would be required.



## 5. Environmental Analysis

### AESTHETICS

#### 5.1.3.2 IMPACT ANALYSIS

The following impact analysis addresses the thresholds of significance in Section 5.1.2. The applicable thresholds are identified in brackets after the impact statement.

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<b>Impact 5.1-1:</b>	<b>The proposed project would not have a substantial adverse effect on a scenic vista and would not conflict with applicable zoning and other regulations governing scenic quality. [Thresholds AE-1 and AE-3]</b>
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#### Construction

Construction activities would occur entirely within the project site. During construction, different types of equipment (e.g., backhoes, forklifts, skip loaders, and compaction rollers) would be on-site for various periods and in various locations, depending on phase and activity. Construction activities would occur within the hours allowed by the City (7:00 a.m. to 6:00 p.m. Monday through Friday) in compliance with the City's Municipal Code, Section 3.40, *Noise* (City of Walnut 2023). Before construction activities begin for any phase of the proposed project, temporary fencing would be installed around the construction areas. Construction activities at ground level would be largely obscured from off-site viewpoints by intervening fencing, buildings, and vegetation on- and off-site. Furthermore, visual effects from construction activities would be temporary and short term. As such, construction of the proposed project would not conflict with applicable zoning and other regulations governing scenic quality of the project site. Therefore, impacts would be less than significant. The proposed project would not result in new or substantially more severe significant impacts when compared to the impacts determined in the GPEIR.

#### Operation

The project site is currently developed and consists of an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, a car body shop repair facility, pizza restaurant, roofers' mart, Mexican food supply store, rent-a-car office, and pet food supply outlet.

The proposed project would involve demolition of the existing buildings on-site, which total 357,544 square feet of building area. Development of the proposed project would include four concrete tilt-up buildings that would encompass a total of 414,778 square feet of building space. The proposed project would include 392,488 square feet of warehousing and/or industrial space, and 22,290 square feet of office/retail space. The proposed buildings would be designed for multiuse, with the South Lemon Avenue frontage catering to retail and office uses, and the warehouse and manufacturing uses in the interior of the site, and food and beverage pick-up and e-commerce last-mile tenants are also possible future tenants.

The buildings would be designed as single-story, tilt-up industrial buildings up to 35 feet, which would generally reflect the height and scale of existing structures in the surrounding area. The buildings would include metal canopies, corrugated metal panels or similar-appearing finished concrete panels, aluminum faux wood, and painted mural exteriors. The buildings would include office space in the mezzanine level and ample interior open-storage space and high ceilings. Figures 3-7a through 3-7d, *Conceptual Building Elevations*, and Figures 3-8a

## 5. Environmental Analysis

### AESTHETICS

and 3-8b, *Conceptual Building Renderings*, illustrate the conceptual elevations and architectural design and features of the proposed buildings.

Building designs would be characterized by contemporary industrial design, and the buildings would be positioned to create a cohesive atmosphere with multiple areas to gather. Outdoor amenity areas would be scattered throughout the site. These areas would feature high-quality furnishings and landscaping with a rustic and natural aesthetic. Buildings would showcase colorful murals in key locations to create artistic focal points. Final architectural design of the buildings would be subject to review and approval by the City. The buildings have been designed to reflect the visual character and appearance of the surrounding area in materials and color and to respect and maintain the architectural design of the project site and its vicinity.

New development in the City of Walnut is governed by the City's zoning ordinance and the GPU, which include development standards and design policies. The new proposed buildings would have a maximum height of 35 feet, in compliance with Section 6.48.050(c) of the Walnut Municipal Code (WMC), which states that no lot or parcel of land shall have a building or structure in excess of two stories or 35 feet in height, whichever is less. The proposed project would also comply with Section 6.48.050(d) of the WMC, which states that no lot or parcel of land shall have lot coverage by building or structures in excess of 60 percent of the lot area. The proposed project would not change the land use designation of the project site, which allows for light manufacturing, commercial storage, craftsman and artisan assembly and production, limited vehicle service repair, and logistic facilities (as a conditional use). Limited commercial retail and office uses are allowed as well. Additionally, in compliance with the allowed development of the industrial land use, the one-story buildings would not exceed the allowed maximum two-story height. Thus, the proposed project would be compatible with the existing scale, mass, and character of the surrounding area.

The proposed project would not change the zoning designation of Light Manufacturing (M-1) at the project site, which provides integrated light manufacturing areas and the use of land by industrial enterprises that are compatible with each other, including warehouses and storage facilities, as stated in Section 6.48.20 of the WMC. Commercial uses are also permitted to be integrated into the industrial area.

The proposed new buildings would be of quality design and would incorporate design features, colors, and exterior materials that are compatible with the existing area and surrounding landscape in compliance with GPU Policy LCD 3.6, *Façade Upgrades*, which states that proposed development should target design upgrades and other façade enhancements that maintain the City's standards for high-quality and prevailing desired design aesthetics, and LCD 8.3, *Consistent Building Themes*, which encourages nonresidential development to use a unified or consistent design theme, particularly when involving multiple structures as part of one project (City of Walnut 2018). Thematic and stylistic diversity may be allowed when the overall project design achieves a harmonious effect.

Scenic vistas are panoramic views of features such as mountains, forests, the ocean, or urban skylines. As described previously, the City of Walnut is surrounded by the region's natural hilly topography and panoramic views of the San Gabriel Mountains. The City's scenic resources include three walnut woodland trees on the San Jose Hills around the Mt. SAC campus, and scenic resources along Lemon Creek, approximately 0.2 mile west of the project site, and Snow Creek, approximately 1.6 miles northeast of the project site. There are no

## 5. Environmental Analysis

### AESTHETICS

protected or designated scenic vistas or views in the vicinity of the project site, and the proposed project would not obscure any scenic vistas. The project site and surrounding area lack significant topography and are developed with urban land uses. Thus, due to its flat topography, views of the San Gabriel Mountains to the north are limited from the project site by existing topography and development in the vicinity.

As demonstrated, development of the proposed project would be consistent and would comply with the policies in the WMC and General Plan. Compliance with these goals and policies would ensure that implementation of the proposed project would not result in the significant degradation of the visual quality of the project site and surrounding area. Therefore, implementation of the proposed project would not negatively impact the visual character or quality of the project site. The proposed project would not result in new or substantially more severe significant impacts when compared to the impacts determined in the GPEIR and impacts would be less than significant.

***Level of Significance Before Mitigation:*** Less than Significant.

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**Impact 5.1-2: The proposed project would not alter scenic resources within a state scenic highway. [Threshold AE-2]**

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The California Scenic Highway Program was created in 1963 to preserve and protect highway corridors in areas of outstanding natural beauty from changes that would diminish the aesthetic value of the adjacent lands. The California Department of Transportation (Caltrans) designates highways based on how much of the landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which views are compromised by development.

The GPEIR concluded that there are no known state scenic highways within the City of Walnut. The nearest eligible state scenic highway is State Route (SR-) 57, beginning in the City of Diamond Bar and ending in the City of Brea. This eligible state scenic highway is approximately 1.5 miles south of the proposed project. Additionally, the nearest officially designated state scenic highway is a portion of SR-91 in the City of Anaheim. This officially designated state scenic highway is approximately 12 miles south of the proposed project (Caltrans 2023). Therefore, implementation of the proposed project would not negatively impact any scenic highways. The proposed project would not result in new or substantially more severe significant impacts to scenic resources when compared to the impacts determined in the GPEIR and no impact would occur.

***Level of Significance Before Mitigation:*** No Impact.

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**Impact 5.1-3: The proposed project would not generate additional light and glare. [Threshold AE-4]**

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### Construction

As described in Chapter 3, *Project Description*, overall project development would occur in one phase, and is estimated to take approximately 16 months, from January 2025 to May 2026. Construction activities would occur within the hours allowed by the City (7:00 a.m. to 6:00 p.m. Monday through Friday) in compliance with Section 3.40 of the WMC. Thus, the extensive use of portable temporary construction lighting would not be required during construction activities. Before construction activities begin for any phase of the proposed

## 5. Environmental Analysis

### AESTHETICS

project, temporary fencing would be installed around the construction areas. Construction activities at ground level would be largely obscured from off-site viewpoints by intervening fencing, buildings, and vegetation on- and off-site. Furthermore, visual effects from construction activities would be temporary and short term. Therefore, light and glare impacts during construction of the proposed project would be less than significant and the proposed project would not result in new or substantially more severe significant impacts when compared to the impacts determined in the GPEIR.

#### Operation

The project site is in a developed urban area that includes various sources of light and glare, including interior and exterior lighting, streetlights and signals, automobile and truck headlights, train headlights, and reflection of light from windows and other reflective surfaces primarily from adjacent buildings.

#### Glare Impacts

In comparison to existing conditions, windows on the proposed commercial and industrial buildings would not increase reflected sunlight during the day. The proposed buildings would be designed to include metal canopies, concrete and corrugated metal panels or similar-appearing finished concrete panels, aluminum faux wood, and painted mural exteriors, which would reduce window light exposure and reflection. Additionally, as shown in Figure 3-9, *Conceptual Landscaping Plan*, the proposed project would include landscape areas that would have trees, shrubs, and groundcovers which would also provide a vegetative barrier between drivers on Lemon Avenue, Paseo del Prado, and Valley Boulevard and potential reflected light from development within the project site. With these design features incorporated, potential glare impacts would be less than significant.

#### Light Impacts

The proposed project would not create new sources of light from the project site, since the existing project site is currently developed with an industrial business park accommodating multiple uses, primarily commercial and light industrial. Lighting on the project site would consist of exterior, building-mounted light fixtures; interior lighting; lighting for pedestrian walkways; ground-mounted decorative lighting for landscape and architectural features; lighting for the new parking and loading dock areas; and security lighting per the landscaping, lighting, and photometric plans conforming in accordance with the requirements of the WMC and the California Green Building Standards Code (CALGreen).

Lighting associated with the proposed project would be similar to existing industrial and commercial uses of the project site. Furthermore, the Walnut General Plan Land Use and Community Design Element includes policies to address lighting and glare from on-site development, including Policy LCD-1.6, *Commercial Compatibility with Residential Zones*. This policy ensures that commercial uses are built and operated to minimize conflicts with adjacent residential uses, including the use of compatible lighting within commercial and industrial developments. Additionally, Policy LCD-7.4, *Night Sky*, ensures that unnecessary light and spill-over of glare from signage, buildings, and landscape illumination and other sources of outdoor lighting do not disrupt the community's night sky. Since the project site is not directly adjacent to any residential properties, implementation of the proposed project would not negatively impact any residential properties that are north,

## 5. Environmental Analysis

### AESTHETICS

west, and east of the project site; the closest of which is a residence approximately 515 feet north of the site at 20332 Carrey Road.

The project applicant would be required to provide on-site lighting plans that would be reviewed by the City prior to issuance of development permits. In addition, the exterior facades of the proposed structures would be constructed with neutral, muted, and earth-tone-colored nonreflective materials. Overall, the proposed project would not substantially alter levels of lighting or glare in the surrounding area. Therefore, implementation of the proposed project would not increase light and glare impacts at the project site. The proposed project would not result in new or substantially more severe significant impacts related to light and glare when compared to the impacts determined in the GPEIR and impacts would be less than significant.

***Level of Significance Before Mitigation:*** Less than Significant.

#### 5.1.4 Cumulative Impacts

The City of Walnut is largely built out with few remaining areas of undeveloped open space. Future development in the city has the potential to alter the visual quality and character of the surrounding community through use of new architectural styles and designs as well as increased building heights. However, future projects in the City of Walnut would be required to adhere to specific development standards in the City's zoning ordinance and General Plan designed to enhance the visual appeal of development and public views in the city. Additionally, future projects in the city would be required to comply with CEQA Guidelines to determine if a project would result in a significant impact to scenic resources, visual character, or light and glare. The proposed project would not result in a cumulatively considerable impact to aesthetics.

In addition, as discussed previously, the proposed project would not have a significant negative impact on the aesthetics of the project site or its surroundings and therefore would not contribute to cumulative aesthetic impacts. Development of the proposed project would not increase light and glare in the immediate area since the project site is currently developed. Thus, lighting impacts on the project site would be similar to existing conditions. Although cumulative development may, over time, alter the visual character of this part of the city, it would be subject to the same policies and regulations as the proposed project. As a result, potential impacts related to aesthetics would not be cumulatively considerable and would be less than significant.

#### 5.1.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements, General Plan policies, and standard conditions of approval, Impacts 5.1-1 through 5.1-3 would be less than significant.

#### 5.1.6 Mitigation Measures

##### 5.1.6.1 MITIGATION MEASURES FROM GPEIR

There are no aesthetics mitigation measures in the GPEIR.

## 5. Environmental Analysis

### AESTHETICS

#### 5.1.6.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

No new mitigation measures or conditions of approval are required.

#### 5.1.7 Level of Significance After Mitigation

Aesthetic impacts for the proposed project would be less than significant without mitigation measures.

#### 5.1.8 References

California Department of Transportation (Caltrans). 2023. *California State Scenic Highway System Map*.  
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html>.

Walnut, City of. 2018. *The City of Walnut General Plan*. <https://www.cityofwalnut.org/for-residents/departments/community-development/planning-division/walnut-general-plan-and-zoning>.

———. 2023, October. Walnut, CA Municipal Code.  
[https://library.qcode.us/lib/walnut\\_ca/pub/municipal\\_code/item/title\\_3-chapter\\_3\\_40?view=all](https://library.qcode.us/lib/walnut_ca/pub/municipal_code/item/title_3-chapter_3_40?view=all).

## 5. Environmental Analysis

### AESTHETICS

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## 5. Environmental Analysis

### 5.2 AIR QUALITY

This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates the potential for the Walnut Business Park (proposed project) to impact air quality in a local and regional context in comparison to the impacts evaluated for the project site in the General Plan EIR (GPEIR). This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (South Coast AQMD). The analysis focuses on air pollution from regional emissions and localized pollutant concentrations. In this section, “emissions” refers to the actual quantity of pollutant, measured in pounds per day (lbs./day), and “concentrations” refers to the amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million, parts per billion, or micrograms per cubic meter. Criteria air pollutant emissions modeling is included in Appendix D-a, *Air Quality and Greenhouse Gas Emissions Modeling*. An evaluation of localized construction and operational health risks is in Appendix D-b, *Health Risk Assessment*. Cumulative impacts related to air quality are based on the regional boundaries of the South Coast Air Basin (SoCAB) and South Coast AQMD’s Multiple Air Toxics Exposure Study (MATES) mapping.

There were several comment letters received from the Office of the Attorney General, CREED LA, and City residents in response to the NOP related to air quality. The relevant issues raised in these comment letters are addressed throughout this section.

#### Terminology

- **AAQS.** Ambient Air Quality Standards
- **CES.** CalEnviroScreen. CES is a mapping tool that helps identify the California communities most affected by sources of pollution and where people are often especially vulnerable to pollution’s effects.
- **Concentrations.** Refers to the amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ).
- **Criteria Air Pollutants.** Those air pollutants specifically identified for control under the Federal Clean Air Act (currently seven—carbon monoxide, nitrogen oxides, lead, sulfur oxides, ozone, and coarse and fine particulates).
- **DPM.** Diesel particulate matter.
- **Emissions.** Refers to the actual quantity of pollutant, measured in pounds per day or tons per year.
- **ppm.** Parts per million.
- **Sensitive receptor.** Land uses that are considered more sensitive to air pollution than others due to the types of population groups or activities involved. These land uses include residential, retirement facilities, hospitals, and schools.
- **TAC.** Toxic air contaminant.



## 5. Environmental Analysis

### AIR QUALITY

- $\mu\text{g}/\text{m}^3$ . Micrograms per cubic meter.
- **VMT**. Vehicle miles traveled.

### 5.2.1 Environmental Setting

#### 5.2.1.1 AIR POLLUTANTS OF CONCERN

The pollutants emitted into the ambient air by stationary and mobile sources are categorized as primary and/or secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), coarse inhalable particulate matter (PM<sub>10</sub>), fine inhalable particulate matter (PM<sub>2.5</sub>), and lead (Pb) are primary air pollutants. Of these, CO, SO<sub>2</sub>, nitrogen dioxide (NO<sub>2</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub> are “criteria air pollutants,” which means that ambient air quality standards (AAQS) have been established for them. VOC and NO<sub>x</sub> are criteria pollutant precursors that form secondary criteria air pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O<sub>3</sub>) and NO<sub>2</sub> are the principal secondary pollutants.

Each of the primary and secondary criteria air pollutants and its known health effects are described below.

- **Carbon Monoxide (CO)** is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines and motor vehicles operating at slow speeds are the primary source of CO in the SoCAB, the highest ambient CO concentrations are generally found near traffic-congested corridors and intersections. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation (South Coast AQMD 2005; South Coast AQMD 2022; US EPA 2023a). The SoCAB is designated as being in attainment under the California AAQS and attainment (serious maintenance)<sup>1</sup> under the National AAQS (CARB 2023a).
- **Volatile Organic Compounds (VOC)** are composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of VOCs. Other sources include evaporative emissions from paints and solvents, asphalt paving, and household consumer products such as aerosols (South Coast AQMD 2005). There are no AAQS for VOCs. However, because they contribute to the formation of O<sub>3</sub>, South Coast AQMD has established a significance threshold (South Coast AQMD 2023a). The health effects for ozone are described later in this section.
- **Nitrogen Oxides (NO<sub>x</sub>)** are a by-product of fuel combustion and contribute to the formation of ground-level O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The two major forms of NO<sub>x</sub> are nitric oxide (NO) and nitrogen dioxide (NO<sub>2</sub>). NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. The principal form of NO<sub>x</sub> produced by combustion

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<sup>1</sup> A maintenance area refers to a previously nonattainment area that has been redesignated to “maintenance” after it meets the standards and additional redesignation requirements in the Clean Air Act [Section 107(d)(3)(E)].

## 5. Environmental Analysis

### AIR QUALITY

is NO, but NO reacts quickly with oxygen to form NO<sub>2</sub>, creating the mixture of NO and NO<sub>2</sub> commonly called NO<sub>x</sub>. NO<sub>2</sub> is an acute irritant and more injurious than NO in equal concentrations. At atmospheric concentrations, however, NO<sub>2</sub> is only potentially irritating. NO<sub>2</sub> absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. NO<sub>2</sub> exposure concentrations near roadways are of particular concern for susceptible individuals, including asthmatics, children, and the elderly. Current scientific evidence links short-term NO<sub>2</sub> exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects, including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Also, studies show a connection between elevated short-term NO<sub>2</sub> concentrations and increased visits to emergency departments and hospital admissions for respiratory issues, especially asthma (South Coast AQMD 2005, 2022; US EPA 2023a). The SoCAB is designated in attainment (maintenance) under the National AAQS and attainment under the California AAQS (CARB 2023a).

- **Sulfur Dioxide (SO<sub>2</sub>)** is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of burning high-sulfur-content fuel oils and coal and chemical processes at plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of SO<sub>2</sub>. When sulfur dioxide forms sulfates (SO<sub>4</sub>) in the atmosphere, together these pollutants are referred to as sulfur oxides (SO<sub>x</sub>). Thus, SO<sub>2</sub> is both a primary and secondary criteria air pollutant. At sufficiently high concentrations, SO<sub>2</sub> may irritate the upper respiratory tract. Current scientific evidence links short-term exposures to SO<sub>2</sub>, ranging from 5 minutes to 24 hours, with an array of adverse respiratory effects, including bronchoconstriction and increased asthma symptoms. These effects are particularly adverse for asthmatics at elevated ventilation rates (e.g., while exercising or playing) at lower concentrations and when combined with particulates, SO<sub>2</sub> may do greater harm by injuring lung tissue. Studies also show a connection between short-term exposure and increased visits to emergency facilities and hospital admissions for respiratory illnesses, particularly in at-risk populations such as children, the elderly, and asthmatics (South Coast AQMD 2005, 2022; US EPA 2023a). The SoCAB is designated as attainment under the California and National AAQS (CARB 2023a).
- **Suspended Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)** consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized and regulated. Inhalable coarse particles, or PM<sub>10</sub>, include particulate matter with an aerodynamic diameter of 10 microns or less (i.e., ≤0.01 millimeter). Inhalable fine particles, or PM<sub>2.5</sub>, have an aerodynamic diameter of 2.5 microns or less (i.e., ≤0.0025 millimeter). Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Both PM<sub>10</sub> and PM<sub>2.5</sub> may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems. The US Environmental Protection Agency's (EPA) scientific review concluded that PM<sub>2.5</sub>, which penetrates deeply into the lungs, is more likely than PM<sub>10</sub> to contribute to health effects and at far lower concentrations. These health effects include premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms (e.g., irritation of the airways, coughing, or difficulty breathing) (South Coast AQMD 2005, 2022). There has been emerging evidence that ultrafine particulates, which are even smaller particulates with an aerodynamic diameter of <0.1 microns or less (i.e., ≤0.0001 millimeter) have human health implications because their toxic components may initiate or facilitate biological processes that may lead to

## 5. Environmental Analysis

### AIR QUALITY

adverse effects to the heart, lungs, and other organs (South Coast AQMD 2022). However, the EPA and the California Air Resources Board (CARB) have not adopted AAQS to regulate these particulates. Diesel particulate matter is classified by CARB as a carcinogen (CARB 1999, 2023d). Particulate matter can also cause environmental effects such as visibility impairment,<sup>2</sup> environmental damage,<sup>3</sup> and aesthetic damage<sup>4</sup> (South Coast AQMD 2005, 2022; US EPA 2023a). The SoCAB is a nonattainment area for PM<sub>2.5</sub> under California and National AAQS and a nonattainment area for PM<sub>10</sub> under the California AAQS (CARB 2023a).<sup>5</sup>

- **Ozone (O<sub>3</sub>)** is a key ingredient of “smog” and is a gas that is formed when VOCs and NO<sub>x</sub>, both by-products of internal combustion engine exhaust, undergo photochemical reactions in sunlight. O<sub>3</sub> is a secondary criteria air pollutant. O<sub>3</sub> concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for its formation. O<sub>3</sub> poses a health threat to those who already suffer from respiratory diseases as well as to healthy people. Breathing O<sub>3</sub> can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level O<sub>3</sub> also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. O<sub>3</sub> also affects sensitive vegetation and ecosystems, including forests, parks, wildlife refuges, and wilderness areas. In particular, O<sub>3</sub> harms sensitive vegetation during the growing season (South Coast AQMD 2005, 2022; US EPA 2023a). The SoCAB is designated extreme nonattainment under the California AAQS (1-hour and 8-hour) and National AAQS (8-hour) (CARB 2023a).
- **Lead (Pb)** is a metal found naturally in the environment as well as in manufactured products. Once taken into the body, lead distributes throughout the body in the blood and accumulates in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The effects of lead most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ (South Coast AQMD 2005, 2022; US EPA 2023a). The major sources of lead emissions have historically been mobile and industrial sources. As a result of the EPA’s regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector dramatically declined by 95 percent between 1980 and 1999, and levels of lead in the air decreased by 94 percent between 1980 and 1999. Today, the highest levels of lead in air are usually found near lead smelters. The major sources of lead emissions today are ore and metals processing and piston-

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<sup>2</sup> PM<sub>2.5</sub> is the main cause of reduced visibility (haze) in parts of the United States.

<sup>3</sup> Particulate matter can be carried over long distances by wind and then settle on ground or water, making lakes and streams acidic; changing the nutrient balance in coastal waters and large river basins; depleting the nutrients in soil; damaging sensitive forests and farm crops; and affecting the diversity of ecosystems.

<sup>4</sup> Particulate matter can stain and damage stone and other materials, including culturally important objects such as statues and monuments.

<sup>5</sup> CARB approved the South Coast AQMD’s request to redesignate the SoCAB from serious nonattainment for PM<sub>10</sub> to attainment for PM<sub>10</sub> under the National AAQS on March 25, 2010, because the SoCAB did not violate federal 24-hour PM<sub>10</sub> standards from 2004 to 2007. The EPA approved the State of California’s request to redesignate the South Coast PM<sub>10</sub> nonattainment area to attainment of the PM<sub>10</sub> National AAQS, effective on July 26, 2013.

## 5. Environmental Analysis

### AIR QUALITY

engine aircraft operating on leaded aviation gasoline. However, in 2008 the EPA and CARB adopted more strict lead standards, and special monitoring sites immediately downwind of lead sources recorded very localized violations of the new state and federal standards.<sup>6</sup> As a result of these violations, the Los Angeles County portion of the SoCAB is designated as nonattainment under the National AAQS for lead (South Coast AQMD 2012; CARB 2023a). However, lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011 (South Coast AQMD 2012). Because emissions of lead are found only in projects that are permitted by South Coast AQMD, lead is not a pollutant of concern for the proposed project.

Table 5.2-1, *Criteria Air Pollutant Health Effects Summary*, summarizes the potential health effects associated with the criteria air pollutants.

**Table 5.2-1 Criteria Air Pollutant Health Effects Summary**

Pollutant	Health Effects	Examples of Sources
Carbon Monoxide (CO)	<ul style="list-style-type: none"> <li>• Chest pain in heart patients</li> <li>• Headaches, nausea</li> <li>• Reduced mental alertness</li> <li>• Death at very high levels</li> </ul>	Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves
Ozone (O <sub>3</sub> )	<ul style="list-style-type: none"> <li>• Cough, chest tightness</li> <li>• Difficulty taking a deep breath</li> <li>• Worsened asthma symptoms</li> <li>• Lung inflammation</li> </ul>	Atmospheric reaction of organic gases with nitrogen oxides in sunlight
Nitrogen Dioxide (NO <sub>2</sub> )	<ul style="list-style-type: none"> <li>• Increased response to allergens</li> <li>• Aggravation of respiratory illness</li> </ul>	Same as carbon monoxide sources
Particulate Matter (PM <sub>10</sub> and PM <sub>2.5</sub> )	<ul style="list-style-type: none"> <li>• Hospitalizations for worsened heart diseases</li> <li>• Emergency room visits for asthma</li> <li>• Premature death</li> </ul>	Cars and trucks (particularly diesels) Fireplaces and woodstoves Windblown dust from overlays, agriculture, and construction
Sulfur Dioxide (SO <sub>2</sub> )	<ul style="list-style-type: none"> <li>• Aggravation of respiratory disease (e.g., asthma and emphysema)</li> <li>• Reduced lung function</li> </ul>	Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, and industrial processes
Lead (Pb)	<ul style="list-style-type: none"> <li>• Behavioral and learning disabilities in children</li> <li>• Nervous system impairment</li> </ul>	Contaminated soil

Source: CARB 2023b.

### Toxic Air Contaminants

CARB has identified other air pollutants as TACs, which are pollutants that may cause serious, long-term effects. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting

<sup>6</sup> Source-oriented monitors record concentrations of lead at lead-related industrial facilities in the SoCAB, which include Exide Technologies in the City of Commerce; Quemetco, Inc., in the City of Industry; Trojan Battery Company in Santa Fe Springs; and Exide Technologies in Vernon. Monitoring conducted between 2004 through 2007 showed that the Trojan Battery Company and Exide Technologies exceed the federal standards (South Coast AQMD 2012).

## 5. Environmental Analysis

### AIR QUALITY

cancer or experiencing other serious health effects. These health effects can include damage to the immune system as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (US EPA 2023b). By the last update to the TAC list in December 1999, CARB had designated 244 compounds as TACs (CARB 1999). Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. There are no air quality standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most relevant to the proposed project being particulate matter from diesel-fueled engines.

#### *Diesel Particulate Matter*

In 1998, CARB identified DPM as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particles are 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs. Long-term (chronic) inhalation of DPM is likely a lung cancer risk. Short-term (i.e., acute) exposure can cause irritation and inflammatory systems and may exacerbate existing allergies and asthma systems (US EPA 2002).

#### 5.2.1.2 REGULATORY BACKGROUND

Ambient air quality standards have been adopted at the state and federal levels for criteria air pollutants. In addition, both the state and federal government regulate the release of TACs. The proposed project is in the SoCAB and is subject to the rules and regulations imposed by the South Coast AQMD as well as the California AAQS adopted by CARB and National AAQS adopted by the EPA. Federal, state, and regional laws, regulations, plans, or guidelines that are potentially applicable to the proposed project are listed in Table 5.2-2. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements.

**Table 5.2-2 Regulations/Plans for Air Quality**

<b>Federal and State</b>	
Ambient Air Quality Standards	Standards established for criteria air pollutants to provide a margin of safety in the protection of public health and welfare.
<b>State</b>	
Assembly Bill 1493: Pavley Fuel Efficiency Standards	Clean-car standard that reduces greenhouse gas (GHG) emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and 2017 through 2025.
Heavy-Duty (Tractor-Trailer) GHG Regulation.	Tractors and trailers must use EPA SmartWay-certified tractors and trailers or retrofit with SmartWay-verified technologies for aerodynamic technologies and low rolling resistance tires.
Senate Bill (SB) 1078 and SB 107: Renewables Portfolio Standards	Required certain retail sellers of electricity to increase the amount of renewable energy each year by at least 1 percent to reach at least 20 percent by December 30, 2010.
20 California Code of Regulations (CCR): Appliance Energy Efficiency Standards	The regulations include energy efficiency standards for both federally regulated appliances and non-federally regulated appliances.

## 5. Environmental Analysis

### AIR QUALITY

**Table 5.2-2 Regulations/Plans for Air Quality**

24 CCR, Part 6: Building and Energy Efficiency Standards	Energy conservation standards for new residential and nonresidential buildings adopted by the California Energy Commission.
24 CCR, Part 11: Green Building Standards Code	Establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants
Tanner Air Toxics Act and Air Toxics Hot Spot Information and Assessment Act	The Tanner Air Toxics Act established the program to identify and manage TACs. Under the Air Toxics Hot Spot Information and Assessment Act, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High-priority facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public through notices and public meetings.
13 CCR Chapter 10 section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling	Generally restricts on-road diesel-powered commercial motor vehicles with a gross vehicle weight rating of greater than 10,000 pounds from idling more than five minutes.
13 CCR Chapter 10 section 2480: Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools	Generally restricts a school bus or transit bus from idling for more than five minutes when within 100 feet of a school.
13 CCR section 2477 and Article 8: Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate	Regulations established to control emissions associated with diesel-powered TRUs.
<b>Regional</b>	
2016 Air Quality Management Plan	The 2016 Air Quality Management Plan (AQMP), which is an update to the 2012 AQMP, includes strategies and measures to attain the 1997 and 2008 federal 8-hour ozone standards, the 1979 federal 1-hour standard, the 2006 federal 24-hour PM <sub>2.5</sub> standard, and the 2012 federal annual PM <sub>2.5</sub> standard.
2022 Air Quality Management Plan	The 2022 AQMP, which is an update to the 2016 AQMP, includes control strategies to meet the 2015 federal 8-hour ozone standard.
South Coast AQMD PM <sub>2.5</sub> Redesignation Request and Maintenance Plan	The South Coast AQMD developed the "2021 Redesignation Request and Maintenance Plan" demonstrating that the SoCAB has met the 1997 and 2006 24-hour PM <sub>2.5</sub> standards (South Coast AQMD 2021b).
AB 617, Community Air Protection Program (C. Garcia, Chapter 136, Statutes of 2017)	AB 617 requires local air districts to monitor and implement air pollution control strategies that reduce localized air pollution in communities that bear the greatest burdens.
Lead Implementation Plan	The plan addresses strategies and control measures to meet the 2008 federal lead standard.
South Coast AQMD Rule 401, Visible Emissions	This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in visible emissions.
South Coast AQMD Rule 402, Nuisance	This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in a public nuisance.
South Coast AQMD Rule 403, Fugitive Dust	This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions.
South Coast AQMD Rule 445, Wood Burning Devices	In general, the rule prohibits new developments from the installation of wood-burning devices.

## 5. Environmental Analysis

### AIR QUALITY

**Table 5.2-2 Regulations/Plans for Air Quality**

South Coast AQMD Rule 1113, Architectural Coatings	This rule serves to limit the VOCs content of architectural coatings used on projects in the South Coast AQMD.
South Coast AQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities	The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

#### 5.2.1.3 EXISTING CONDITIONS

The plan area is in the SoCAB, which includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. The SoCAB is in a coastal plain with connecting broad valleys and low hills, is bounded by the Pacific Ocean in the southwest quadrant, and high mountains form the remainder of the perimeter. The region lies in the semipermanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. This usually mild weather pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds (South Coast AQMD 2005).

#### Meteorology

##### *Temperature and Precipitation*

The annual average temperature varies little throughout the SoCAB, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The climatological station nearest to the proposed project site with temperature data is the San Gabriel Canyon Monitoring Station (ID 047776). The average low is reported at 47.2 °F in January, and the average high is 91.7 °F in August (WRCC 2023).

In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from October through April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains. Rainfall averages 22.28 inches per year in the plan area (WRCC 2023).

##### *Humidity*

Although the SoCAB has a semiarid climate, the air near the Earth's surface is typically moist because of a shallow marine layer. This "ocean effect" is dominant except for infrequent periods when dry, continental air is brought into the SoCAB by offshore winds. Periods of heavy fog are frequent, given the air basin's location along the coast. Low clouds, often referred to as high fog, are a characteristic climatic feature. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SoCAB (South Coast AQMD 1993).

## 5. Environmental Analysis

### AIR QUALITY

#### *Wind*

Wind patterns across the southern coastal region are characterized by westerly or southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Wind speed is somewhat greater during the dry summer months than during the rainy winter season.

Between periods of wind, periods of air stagnation may occur in the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall months, surface high-pressure systems over the SoCAB combined with other meteorological conditions can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east inhibit the eastward transport and diffusion of pollutants. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions (South Coast AQMD 2005).

#### *Inversions*

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two distinct types of temperature inversions<sup>7</sup> control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion (sinking air from high pressure systems) and the radiation inversion (cooling of the earth's surface by radiation). The height of the base of the inversion at any given time is known as the "mixing height." The combination of winds and inversions are critical determinants in leading to the highly degraded air quality in summer and the generally good air quality in the winter in the air basin (South Coast AQMD 2005).

#### **SoCAB Nonattainment Areas**

The attainment status for the SoCAB is shown in Table 5.2-3, Attainment Status of Criteria Air Pollutants in the South Coast Air Basin.

**Table 5.2-3 Attainment Status of Criteria Air Pollutants in the South Coast Air Basin**

Pollutant	State	Federal
Ozone – 1-hour	Extreme Nonattainment	No Federal Standard
Ozone – 8-hour	Extreme Nonattainment	Extreme Nonattainment
PM <sub>10</sub>	Serious Nonattainment	Attainment
PM <sub>2.5</sub>	Nonattainment	Nonattainment <sup>1</sup>
CO	Attainment	Attainment
NO <sub>2</sub>	Attainment	Attainment/Maintenance
SO <sub>2</sub>	Attainment	Attainment

<sup>7</sup> Air temperature typically decreases with an increase in altitude. In a temperature inversion, the normal temperature pattern of the atmosphere is reversed and the air temperature increases rather than decreases with height above mean sea level.



## 5. Environmental Analysis

### AIR QUALITY

**Table 5.2-3 Attainment Status of Criteria Air Pollutants in the South Coast Air Basin**

Pollutant	State	Federal
Lead	Attainment	Nonattainment (Los Angeles County only) <sup>2</sup>
All others	Attainment/Unclassified	Attainment/Unclassified

Source: CARB 2023a.

<sup>1</sup> The SoCAB is pending a resignation request from nonattainment to attainment for the 24-hour federal PM<sub>2.5</sub> standards. The 2021 PM<sub>2.5</sub> Redesignation Request and Maintenance Plan demonstrates that the SoCAB meets the requirements of the CAA to allow US EPA to redesignate the SoCAB to attainment for the 65 µg/m<sup>3</sup> and 35 µg/m<sup>3</sup> 24-hour PM<sub>2.5</sub> standards. CARB has reviewed and adopted the 2021 PM<sub>2.5</sub> Redesignation Request and Maintenance Plan to the US EPA as a revision to the California State Implementation Plan (SIP) (CARB 2021).

<sup>2</sup> In 2010, the Los Angeles portion of the SoCAB was designated nonattainment for lead under the new 2008 federal AAQS as a result of large industrial emitters. Remaining areas for lead in the SoCAB are unclassified. However, lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011 (South Coast AQMD 2012). CARB's SIP revision was submitted to the EPA for approval.

### Multiple Air Toxics Exposure Study V

MATES is a monitoring and evaluation study on existing ambient concentrations of TACs and the potential health risks from air toxics in the SoCAB. In April 2021, South Coast AQMD released the latest update to the MATES study, MATES V. The first MATES analysis, MATES I, began in 1986 but was limited because of the technology available at the time. Conducted in 1998, MATES II was the first MATES iteration to include a comprehensive monitoring program, an air toxics emissions inventory, and a modeling component. MATES III was conducted in 2004 to 2006, with MATES IV following in 2012 to 2013.

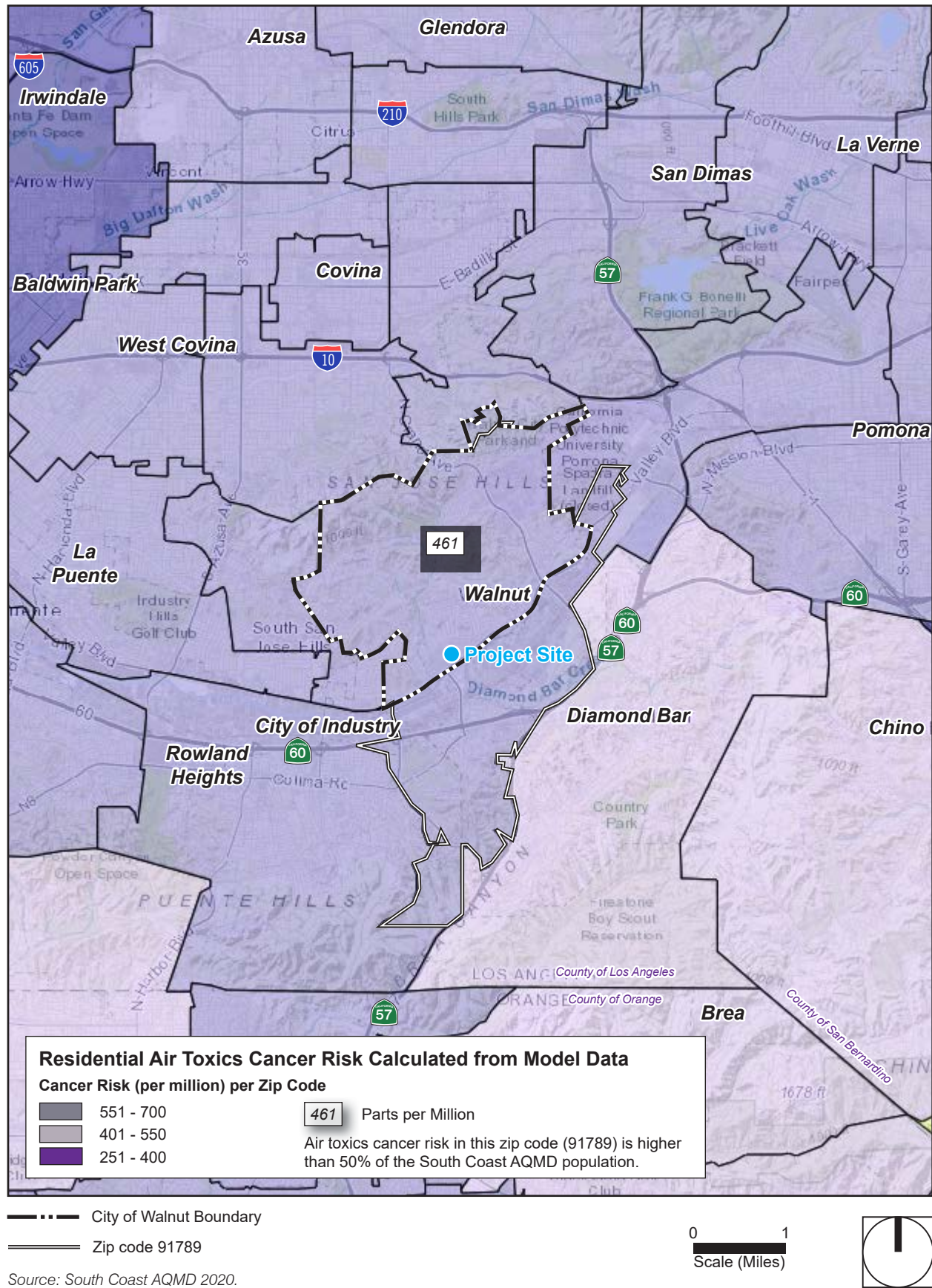
MATES V uses measurements taken during 2018 and 2019, with a comprehensive modeling analysis and emissions inventory based on 2018 data. The previous MATES studies quantified the cancer risks based on the inhalation pathway only. MATES V includes information on the chronic noncancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic noncancer risks from MATES II through IV measurements have been reexamined using current Office of Environmental Health Hazards Assessment and California Environmental Protection Agency risk assessment methodologies and modern statistical methods to examine the trends over time.

The MATES V study showed that cancer risk in the SoCAB decreased to 454 in a million from 997 in a million in the MATES IV study. Overall, air toxics cancer risk in the SoCAB decreased by 54 percent since 2012 when MATES IV was conducted. MATES V showed the highest risk locations near the Los Angeles International Airport and the Ports of Long Beach and Los Angeles. DPM continues to be the major contributor to air toxics cancer risk (approximately 72 percent of the total cancer risk). Goods movement and transportation corridors have the highest cancer risk. Transportation sources account for 88 percent of carcinogenic air toxics emissions, and the remainder is from stationary sources, which include large industrial operations such as refineries and power plants as well as smaller businesses such as gas stations and chrome-plating facilities. (South Coast AQMD 2021a).

Figure 5.2-1, *South Coast AQMD MATES V Cancer Risk in the Project Area*, identifies that the maximum cancer risk in the plan area is 461 per million, which is higher than 50 percent of the South Coast AQMD population (South Coast AQMD 2023c). The primary factor contributing to this risk is DPM.

5. Environmental Analysis

Figure 5.2-1 - South Coast AQMD MATES V Cancer Risk in the Project Area



## 5. Environmental Analysis

### AIR QUALITY

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## 5. Environmental Analysis

### AIR QUALITY

#### Existing Ambient Air Quality

Existing levels of ambient air quality and historical trends and projections in the vicinity of the project site are best documented by measurements taken by the South Coast AQMD. The project site is located within Source Receptor Area (SRA) 10: Pomona/Walnut Valley. The air quality monitoring station closest to the project site is the Pomona Monitoring Station, which is one of 31 monitoring stations South Coast AQMD operates and maintains within the SoCAB.<sup>8</sup> Data from this station includes O<sub>3</sub> and NO<sub>2</sub> and is summarized in Table 5.2-4, *Ambient Air Quality Monitoring Summary*. Data from the Azusa Monitoring Station has been used to supplement PM<sub>10</sub> and PM<sub>2.5</sub>. The data show that the area regularly exceeds the state and federal one-hour and eight-hour O<sub>3</sub> standards within the last five recorded years. Additionally, the area has regularly exceeded the state PM<sub>10</sub> standards and federal PM<sub>2.5</sub> standard.

**Table 5.2-4 Ambient Air Quality Monitoring Summary**

Pollutant/Standard	Number of Days Threshold Were Exceeded and Maximum Levels during Such Violations <sup>1,2</sup>				
	2018	2019	2020	2021	2022
<b>Ozone (O<sub>3</sub>)</b>					
State 1-Hour $\geq 0.09$ ppm (days exceed threshold)	7	3	51	27	28
State & Federal 8-hour $\geq 0.070$ ppm (days exceed threshold)	10	12	84	41	46
Max. 1-Hour Conc. (ppm)	0.112	0.098	0.180	0.120	0.131
Max. 8-Hour Conc. (ppm)	0.092	0.083	0.124	0.092	0.096
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>					
State 1-Hour $\geq 0.18$ ppm (days exceed threshold)	0	0	0	0	0
Federal 1-Hour $\geq 0.100$ ppm (days exceed threshold)	0	0	0	0	0
Max. 1-Hour Conc. (ppb)	0.0679	0.0644	0.0679	0.0714	0.0584
<b>Coarse Particulates (PM<sub>10</sub>)</b>					
State 24-Hour $> 50$ $\mu\text{g}/\text{m}^3$ (days exceed threshold)	10	4	9	11	7
Federal 24-Hour $> 150$ $\mu\text{g}/\text{m}^3$ (days exceed threshold)	0	0	0	0	0
Max. 24-Hour Conc. ( $\mu\text{g}/\text{m}^3$ )	78.3	82.0	152.3	79.4	98.2
<b>Fine Particulates (PM<sub>2.5</sub>)</b>					
Federal 24-Hour $> 35$ $\mu\text{g}/\text{m}^3$ (days exceed threshold)	1	1	5	3	0
Max. 24-Hour Conc. ( $\mu\text{g}/\text{m}^3$ )	41.8	70.3	102.7	61.9	18.4

Source: CARB 2023c.

Notes: ppm = parts per million; ppb = parts per billion;  $\mu\text{g}/\text{m}^3$  = micrograms per cubic meter; \* = Data not available

<sup>1</sup> Data for O<sub>3</sub> and NO<sub>2</sub> obtained from the Pomona Monitoring Station. Data for PM<sub>10</sub> and PM<sub>2.5</sub> obtained from the Azusa Monitoring Station.

<sup>2</sup> Most recent data available as of November 2023.

#### Existing Emissions (Approved Project)

The existing warehouse developments on-site reflects the assumed land use buildout for the project site in the GPEIR. Therefore, for this SEIR, emissions from existing developments on the project site serve as the environmental baseline. The existing development includes 357,544 square feet of building area consisting of an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, a car body shop repair facility, pizza restaurant, roofers mart, Mexican food supply store, rent-a-car office, and pet food supply outlet. These

<sup>8</sup> Locations of the SRAs and monitoring stations are shown here: <http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf>.

## 5. Environmental Analysis

### AIR QUALITY

operations currently generate criteria air pollutant emissions from area sources (e.g., consumer cleaning products, landscaping equipment, and VOC emissions from paints), energy consumption (e.g., natural gas used for cooking, heating, etc.), and mobile sources (employee and vendor vehicle trips). Table 5.2-5, *Existing (Approved Project) Operation Emissions*, shows the existing criteria pollutant emissions generated at the project site.

**Table 5.2-5 Existing (Approved Project) Operation Emissions**

Source	Maximum Daily Emissions (lbs./Day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Off-Road <sup>1,2</sup>	<1	1	3	<1	<1	<1
Transport Refrigeration Units <sup>3</sup>	0	0	0	0	0	0
Mobile (Truck) <sup>4,5</sup>	1	22	11	<1	8	2
Mobile (Passenger) <sup>4,6</sup>	2	2	36	<1	9	2
Area	11	<1	16	<1	<1	<1
Energy	<1	2	2	<1	<1	<1
<b>Total</b>	<b>14</b>	<b>27</b>	<b>67</b>	<b>&lt;1</b>	<b>17</b>	<b>5</b>
<b>South Coast AQMD Regional Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>550</b>
<b>Exceeds Threshold?</b>	No	No	No	No	No	No

Source: CalEEMod Version 2022.1. Highest winter or summer emissions are reported.

Notes: lbs. = Pounds.

<sup>1</sup> Based on 17 electric-powered forklifts and 1 diesel-powered yard truck at the facility operating for eight hours per day. Number of forklifts under existing buildout has been extrapolated from forklift data for proposed project provided by applicant. Number of yard trucks is based on the South Coast AQMD assumption of 3.6 yard trucks per million square feet of building space (South Coast AQMD 2014).

<sup>2</sup> Based on calendar year 2023 emission rates for a 25-horsepower industrial electric forklift and 175-horsepower yard truck derived from OFFROAD2021, Version 1.0.5.

<sup>3</sup> As information regarding cold storage was not available, modeling assumes that industrial operations onsite under the GPU would conservatively not involve cold storage.

<sup>4</sup> Vehicle fleet mix for the exiting development adjusted based on mix provided by Iteris.

<sup>5</sup> Truck trip lengths are based on an average trip length of 39.9 miles per trip from SCAG's Heavy-Duty Truck Regional Travel Demand model and represents the average Class 8 truck trip distance within the South Coast Air Basin (South Coast AQMD 2021c).

<sup>6</sup> Passenger trip lengths are based on the default CalEEMod trip length of 20.20 miles per trip.

### Sensitive Receptors

Some land uses are considered more sensitive to air pollution (i.e., TACs) than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to pollutants. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent because the majority of workers tend to stay indoors most of the time. In addition, the workforce is generally the healthiest segment of the population. The nearest receptors are the residences to the north and northeast along Carrey Road and west of the project site along South Avenida Alipaz. Other nearby receptors include Vejar Elementary School students, Ron Hockwalt Academies students, and Montessori of Walnut preschool.

## 5. Environmental Analysis

### AIR QUALITY

### 5.2.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- AQ-1 Conflict with or obstruct implementation of the applicable air quality plan.
- AQ-2 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.
- AQ-3 Expose sensitive receptors to substantial pollutant concentrations.
- AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

#### 5.2.2.1 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT THRESHOLDS

South Coast AQMD has established thresholds of significance for air quality for construction activities and project operation in the SoCAB, as shown in Table 5.2-6, *South Coast AQMD Significance Thresholds*. The table lists thresholds that are applicable for all projects uniformly, regardless of size or scope. As discussed in Section 5.2.1.1, there is growing evidence that although ultrafine particulate matter contributes a very small portion of the overall atmospheric mass concentration, it represents a greater proportion of the health risk from PM. However, because the EPA and CARB have not adopted AAQS to regulate ultrafine particulate matter, South Coast AQMD has not developed thresholds for it.

**Table 5.2-6 South Coast AQMD Significance Thresholds**

Air Pollutant	Construction Phase	Operational Phase
Volatile Organic Compounds (VOC)	75 lbs./day	55 lbs./day
Carbon Monoxide (CO)	550 lbs./day	550 lbs./day
Nitrogen Oxides (NO <sub>x</sub> )	100 lbs./day	55 lbs./day
Sulfur Oxides (SO <sub>x</sub> )	150 lbs./day	150 lbs./day
Coarse Particulates (PM <sub>10</sub> )	150 lbs./day	150 lbs./day
Fine Particulates (PM <sub>2.5</sub> )	55 lbs./day	55 lbs./day

Source: South Coast AQMD 2023a.

#### Health Outcomes Associated with the AQMD Regional Significance Thresholds

Projects that exceed the AQMD's regional significance threshold contribute to the nonattainment designation of the SoCAB. The attainment designations are based on the AAQS, which are set at levels of exposure that are determined to not result in adverse health effects. Exposure to fine particulate pollution and ozone causes myriad health impacts, particularly to the respiratory and cardiovascular systems:

## 5. Environmental Analysis

### AIR QUALITY

- Increases cancer risk (PM<sub>2.5</sub>, TACs)
- Aggravates respiratory disease (O<sub>3</sub>, PM<sub>2.5</sub>)
- Increases bronchitis (O<sub>3</sub>, PM<sub>2.5</sub>)
- Causes chest discomfort, throat irritation, and increased effort to take a deep breath (O<sub>3</sub>)
- Reduces resistance to infections and increases fatigue (O<sub>3</sub>)
- Reduces lung growth in children (PM<sub>2.5</sub>)
- Contributes to heart disease and heart attacks (PM<sub>2.5</sub>)
- Contributes to premature death (O<sub>3</sub>, PM<sub>2.5</sub>)
- Contributes to lower birth weight in newborns (PM<sub>2.5</sub>) (South Coast AQMD 2015a)

Exposure to fine particulates and ozone aggravates asthma attacks and can amplify other lung ailments such as emphysema and chronic obstructive pulmonary disease. Exposure to current levels of PM<sub>2.5</sub> is responsible for an estimated 4,300 cardiopulmonary-related deaths per year in the SoCAB. In addition, University of Southern California scientists, in a landmark children's health study, found that lung growth improved as air pollution declined for children aged 11 to 15 in five communities in the SoCAB (South Coast AQMD 2015b).

South Coast AQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals exposed to elevated concentrations of air pollutants in the SoCAB and has established thresholds that would be protective of these individuals. To achieve the health-based standards established by the EPA, South Coast AQMD prepares an AQMP that details regional programs to attain the AAQS. Mass emissions thresholds shown in Table 5.2-6 are not correlated with concentrations of air pollutants but contribute to the cumulative air quality impacts in the SoCAB. These thresholds are based on the trigger levels for the federal New Source Review Program, which was created to ensure projects are consistent with attainment of health-based federal AAQS. Regional emissions from a single project do not trigger a regional health impact, and it is speculative to identify how many more individuals in the air basin would be affected by the health effects listed previously. Projects that do not exceed the South Coast AQMD regional significance thresholds in Table 5.2-6 would not violate any air quality standards or contribute substantially to an existing or projected air quality violation.

If projects exceed the emission levels in Table 5.2-6, those emissions would cumulatively contribute to the nonattainment status of the air basin and would contribute to elevating health effects associated with these criteria air pollutants. Reducing emissions would contribute to reducing possible health effects related to criteria air pollutants. However, for projects that exceed the emissions in Table 5.2-6, it is speculative to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment, because mass emissions are not correlated with concentrations of emissions or how many additional individuals in the air basin would be affected by the health effects cited previously.

South Coast AQMD has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health to address the issue raised in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 ("Friant Ranch"). South Coast AQMD currently does not have methodologies that would provide the City with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a

## 5. Environmental Analysis

### AIR QUALITY

proposed project's mass emissions.<sup>9</sup> Ozone concentrations are dependent on a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Because of the complexities of predicting ground-level ozone concentrations in relation to the National and California AAQS, and the absence of modeling tools that could provide statistically valid data and meaningful additional information regarding health effects from criteria air pollutants generated by individual projects, it is not possible to link specific health risks to the magnitude of emissions exceeding the significance thresholds. However, if a project in the SoCAB exceeds the regional significance thresholds, the project could contribute to an increase in health effects in the basin until the attainment standards are met in the SoCAB.

### CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQSs is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles and introduction of cleaner fuels, as well as implementation of control technology on industrial facilities, CO concentrations in the SoCAB and the state have steadily declined.

In 2007, the SoCAB was designated in attainment for CO under both the California AAQS and National AAQS. The CO hotspot analysis conducted for attainment by South Coast AQMD did not predict a violation of CO standards at the busiest intersections in Los Angeles during the peak morning and afternoon periods.<sup>10</sup> As identified in South Coast AQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SoCAB in years before the 2007 redesignation were a result of unusual meteorological and topographical conditions and not of congestion at a particular intersection. Under existing and future vehicle emission rates, a project would have to increase traffic volumes

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<sup>9</sup> In April 2019, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published an Interim Recommendation on implementing *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 ("Friant Ranch") in the review and analysis of proposed projects under CEQA in Sacramento County. Consistent with the expert opinions submitted to the court in Friant Ranch by the San Joaquin Valley Air Pollution Control District (SJVAPCD) and South Coast AQMD, the SMAQMD guidance confirms the absence of an acceptable or reliable quantitative methodology that would correlate the expected criteria air pollutant emissions of projects to likely health consequences for people from project-generated criteria air pollutant emissions. The SMAQMD guidance explains that while it is in the process of developing a methodology to assess these impacts, lead agencies should follow the Friant Court's advice to explain in meaningful detail why this analysis is not yet feasible. Since this interim memorandum SMAQMD has provided methodology to address health impacts. However, a similar analysis is not available for projects within the South Coast AQMD region.

<sup>10</sup> The four intersections were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning peak hour and LOS F in the evening peak hour.



## 5. Environmental Analysis

### AIR QUALITY

at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—to generate a significant CO impact (BAAQMD 2023).<sup>11</sup>

### Localized Significance Thresholds

South Coast AQMD identifies localized significance thresholds (LST), shown in Table 5.2-7, *South Coast AQMD Localized Significance Thresholds*. Emissions of NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> generated at a project site could expose sensitive receptors to substantial concentrations of criteria air pollutants. Off-site mobile-source emissions are not included in the LST analysis. A project would generate a significant impact if it generates emissions that, when added to the local background concentrations, violate the AAQS.

**Table 5.2-7 South Coast AQMD Localized Significance Thresholds**

Air Pollutant (Relevant AAQS)	Concentration
1-Hour CO Standard (CAAQS)	20 ppm
8-Hour CO Standard (CAAQS)	9.0 ppm
1-Hour NO <sub>2</sub> Standard (CAAQS)	0.18 ppm
Annual NO <sub>2</sub> Standard (CAAQS)	0.03 ppm
24-Hour PM <sub>10</sub> Standard – Construction (South Coast AQMD) <sup>1</sup>	10.4 µg/m <sup>3</sup>
24-Hour PM <sub>2.5</sub> Standard – Construction (South Coast AQMD) <sup>1</sup>	10.4 µg/m <sup>3</sup>
24-Hour PM <sub>10</sub> Standard – Operation (South Coast AQMD) <sup>1</sup>	2.5 µg/m <sup>3</sup>
24-Hour PM <sub>2.5</sub> Standard – Operation (South Coast AQMD) <sup>1</sup>	2.5 µg/m <sup>3</sup>
Annual Average PM <sub>10</sub> Standard (South Coast AQMD) <sup>1</sup>	1.0 µg/m <sup>3</sup>

Source: South Coast AQMD 2023a.

Notes: ppm – parts per million; µg/m<sup>3</sup> – micrograms per cubic meter

<sup>1</sup> Threshold is based on South Coast AQMD Rule 403. Since the SoCAB is in nonattainment for PM<sub>10</sub> and PM<sub>2.5</sub>, the threshold is established as an allowable change in concentration. Therefore, background concentration is irrelevant.

To assist lead agencies, South Coast AQMD developed screening-level LSTs to back-calculate the mass amount (pounds per day) of emissions generated on-site that would trigger the levels shown in Table 5.2-7 for projects under five acres. These “screening-level” LST tables are the LSTs for all projects of five acres and less and are based on emissions over an 8-hour period; however, they can be used as screening criteria for larger projects to determine whether or not dispersion modeling may be required.

<sup>11</sup> The CO hotspot analysis refers to the modeling conducted by the Bay Area Air Quality Management District for its CEQA Guidelines because it is based on newer data and considers the improvement in mobile-source CO emissions. Although meteorological conditions in the Bay Area differ from those in the Southern California region, the modeling conducted by BAAQMD demonstrates that the net increase in peak hour traffic volumes at an intersection in a single hour would need to be substantial. This finding is consistent with the CO hotspot analysis South Coast AQMD prepared as part of its 2003 AQMP to provide support in seeking CO attainment for the SoCAB. Based on the analysis prepared by South Coast AQMD, no CO hotspots were predicted for the SoCAB. As noted in the preceding footnote, the analysis included some of Los Angeles’ busiest intersections, with daily traffic volumes of 100,000 or more peak hour vehicle trips operating at LOS E and F (South Coast AQMD 2003).

## 5. Environmental Analysis

### AIR QUALITY

The construction screening-level LSTs in SRA 10 are shown in Table 5.2-8, *South Coast AQMD Screening-Level Localized Significance Thresholds*. For construction activities, LSTs are based on the acreage disturbed per day associated with the equipment used, up to a project site's maximum disturbed acreage (South Coast AQMD 2011). The different types of construction activities would require different equipment mixes, resulting in multiple LSTs. The screening-level LSTs reflect the thresholds for sensitive receptors within 82 feet (25 meters) for NO<sub>x</sub> and CO and 515 feet (157 meters) for PM<sub>10</sub> and PM<sub>2.5</sub>. These two distances represent residences at 515 feet, which are assumed to be exposed to construction emissions 24 hours a day, and employees of nearby businesses at 82 feet, who would not be exposed to construction emissions for most of the day. For operation, LSTs are based on the maximum screening size of five acres.

**Table 5.2-8 South Coast AQMD Screening-Level Significance Thresholds**

Acreage Disturbed	Threshold (lbs./day)			
	Nitrogen Oxides (NO <sub>x</sub> )	Carbon Monoxide (CO)	Coarse Particulates (PM <sub>10</sub> )	Fine Particulates (PM <sub>2.5</sub> )
<b>Construction<sup>1</sup></b>				
1.31 Acre Disturbed per Day	117	697	45.85	14.20
3.63 Acres Disturbed per Day	196	1,254	60.41	19.59
4.81 Acres Disturbed per Day	231	1,523	67.54	22.02
≥5.00 Acres Disturbed per Day	236	1,566	68.66	22.41
<b>Operation<sup>2</sup></b>				
≥5.00 Acres Disturbed per Day	236	1,566	16.99	5.71

Source: South Coast AQMD 2008, 2011.

Note:

<sup>1</sup> LSTs are based on sensitive receptors within 82 feet (25 meters) for NO<sub>x</sub> and CO and 515 feet (157 meters) for PM<sub>10</sub> and PM<sub>2.5</sub> in SRA 10. These two distances represent residences at 515 feet, which are assumed to be exposed to construction emissions 24 hours a day, and employees of nearby businesses at 82 feet, who would not be exposed to construction emissions for most of the day.

<sup>2</sup> Operational LSTs are based on the maximum site acreage of 5 acres and sensitive receptors within 515 feet (157 meters) in SRA 10.

## Health Risk

Whenever a project would require use of chemical compounds that have been identified in South Coast AQMD Rule 1401, placed on CARB's air toxics list pursuant to AB 1807, or placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, a health risk assessment is required by the South Coast AQMD. Table 5.2-9, *South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds*, lists the TAC incremental risk thresholds for operation of a project. The type of land uses that typically generate substantial quantities of criteria air pollutants and TACs from operations include industrial (stationary sources) and warehousing (truck idling) land uses (CARB 2005). Thus, these thresholds are typically applied to new industrial projects only. These thresholds are applied to the proposed project's construction due to the scope and nature of the proposed project. Additionally, the purpose of this environmental evaluation is to identify the significant effects of the proposed project on the environment, not the significant effects of the environment on the proposed project. *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (Case No. S213478).

## 5. Environmental Analysis

### AIR QUALITY

**Table 5.2-9 South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds**

Maximum Incremental Cancer Risk (Project-Level)	≥ 10 in 1 million
Cancer Burden (in areas ≥ 1 in 1 million)	> 0.5 excess cancer cases
Hazard Index (project increment)	≥ 1.0

Source: South Coast AQMD 2023a.

#### *Draft Operational Cumulative Health Risk Thresholds*

South Coast AQMD initiated a Working Group to identify cumulative health risk thresholds for development projects in order to address community concerns of health risk impacts of new projects being developed in areas where there is a higher pollution burden. The cumulative health risk threshold methodology first utilizes a screening approach to identify whether projects can qualitatively address cumulative health risk or quantitatively address health risk:

- **Low Cancer Risk Project Types:** Residential, commercial, recreational, educational, and retail.
- **Medium Cancer Risk Project Types:** Truck yards, gas stations, small industrial projects, and linear projects.
- **High Cancer Risk Project Types.** Industrial, major transportation projects (airports, port, railyard, bus/train station), and major planning projects.

For projects with low and medium cancer risks, no quantitative analysis is required. For projects that result in potentially high cancer risk impacts, such as the proposed project, a quantitative analysis is recommended. Additionally, the project-level health risk threshold of 10 in a million is adjusted based on the underlying health risk of the zip code the project is in, based on South Coast AQMD's MATES V mapping. MATES V identifies a gradient of the effects of air pollution on cancer risk in the South Coast AQMD region, which is then used to adjust the project-level cancer risk levels, as shown in Table 5.2-10, *MATES V–Adjusted Cumulative Significant Cancer Risk Thresholds*.

**Table 5.2-10 MATES V–Adjusted Cumulative Significant Cancer Risk Thresholds**

Threshold Increment	MATES V Cancer Risk	Adjusted Cumulative Cancer Risk Threshold
A	Most Stringent	≥ 1 in 1 million
B	>90th Percentile	≥ 3 in 1 million
C	90th Percentile to 50th Percentile	≥ 5 in 1 million
D	50th Percentile to 30th Percentile	≥ 7 in 1 million
E	< 30th Percentile	≥ 10 in 1 million

Source: South Coast AQMD 2023b.

## 5. Environmental Analysis

### AIR QUALITY

The plan area is in a zip code that includes receptors within the 50th percentile of MATES V (South Coast AQMD 2023c), resulting in a baseline cumulative risk threshold of 7 in a million cancer risk. However, South Coast AQMD has identified that the thresholds in Table 5.2-9 should be adjusted if any of the following criteria apply:

- **Criterion #1, Post-2018 High Volume Diesel-Fueled Mobile Sources.** If there are post-2018 high-volume highways or railroad mainlines, then increase the threshold increment by 1 (e.g., from step “D” to “C”). As there are no new roadways within the vicinity of the project site, this criterion is not applicable.
- **Criterion #2, Post-2018 Projects with High Volume Diesel Fueled Trucks.** Post-2018 projects are not accounted for in MATES V. Therefore, if new warehousing projects along the truck route have been constructed, then increase the threshold increment by 1 (e.g., from D to C). There is one additional warehouse within 1,000 feet of the project site that has been constructed since 2018. Therefore, this criterion is applicable, and the risk threshold would need to be adjusted.
- **Criterion #3, Sensitive Receptor Population.** If the project site is in an AB 617 community or within the 80th percentile of CalEnviroScreen (CES) 4.0, then increase the threshold increment by 1 (e.g., from D to C). The project site is not within the 80th percentile of CES 4.0 or within an AB 617 community; therefore, this criterion is not applicable.

Based on the plan area being within the 50th percentile of MATES V and meeting criterion #2, the adjusted cumulative cancer risk threshold for the proposed project is:

- **Cumulative Risk Threshold =  $\geq 5$  in a million cancer risk**

This cumulative risk threshold is applied to the operational phases for the proposed project and the combined construction plus operational risk. Because South Coast AQMD only recommends applying this threshold to the operational phase emissions, construction cancer risks are evaluated to a 10 in a million cancer risk threshold.

### 5.2.3 Environmental Impacts

#### 5.2.3.1 2018 GENERAL PLAN UPDATE

The GPEIR identified that maximum daily construction emissions associated with implementation of the GPU would not exceed the South Coast AQMD regional criteria pollutant thresholds for all pollutants. In addition, maximum daily construction emissions also would not exceed the South Coast AQMD’s 5-acre LSTs for SRA 10. Impacts from construction under the GPU would be less than significant. Maximum daily operational emissions would be reduced for all criteria pollutants except for PM<sub>10</sub> and PM<sub>2.5</sub>, which would both exceed their respective thresholds. As such, projects under the GPU have the potential to generate significant emissions of DPM. While criteria pollutant emissions under GPU buildout would be partially offset by implementation of existing regulations and new policies, operational impacts to sensitive receptors would be significant and unavoidable, as feasible mitigation for future projects could not be determined at the time the GPEIR was adopted. The GPEIR also determined that the maximum number of vehicles moving through any study

## 5. Environmental Analysis

### AIR QUALITY

intersection would be substantially below the screening threshold 44,000 vehicles per hour and impacts regarding CO hotspots would be less than significant. The GPEIR determined that impacts related to odors would be less than significant with implementation of existing development review practices. Buildout under the GPU would result in a population 8 percent greater than the 2016 RTP/SCS projections. As operational emissions would also exceed the PM<sub>10</sub> and PM<sub>2.5</sub> thresholds, the GPU would not be consistent with the 2016 RTP/SCS and the South Coast AQMD's 2016 AQMP, and impacts would be significant and unavoidable.

#### 5.2.3.2 PROPOSED PROJECT

##### Methodology

This air quality evaluation was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur in conjunction with future development that would be accommodated by the proposed project. South Coast AQMD's *CEQA Air Quality Handbook* (Handbook) and updates on its website are intended to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. The Handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs that were used in this analysis.

Since future businesses and/or tenants are unknown at this time, and could include warehousing, manufacturing, and retail/office uses, all building space was conservatively modeled as unrefrigerated and refrigerated warehouse uses.

##### Criteria Air Pollutant Emissions

Air pollutant emissions are calculated using CalEEMod, version 2022.1 (CAPCOA 2022). CalEEMod compiles an emissions inventory of construction (fugitive dust, off-gas emissions, on-road emissions, and off-road emissions), area sources, indirect emissions from energy use, mobile sources, indirect emissions from waste disposal (annual only), and indirect emissions from water/wastewater (annual only). Criteria air pollutant emissions modeling is included in Appendix D-a of this Draft SEIR. The calculated emissions of the proposed project are compared to thresholds of significance for individual projects, as shown in Table 5.2-6, using the South Coast AQMD Handbook. The following is a summary of the assumptions used for the proposed project analysis.

##### Construction Phase

Construction would entail site preparation, rough grading, fine grading, utilities trenching, building construction, paving, architectural coating, and finishing and landscaping as well as offsite improvements and sewer and storm drain construction on the 22.99-acre project site. The proposed project construction would occur over 16 months between August 2025 and December 2026.

##### Construction Health Risk Assessment

A construction HRA for TACs associated with construction equipment exhaust was prepared for the proposed project. Sources evaluated in the HRA include off-road construction equipment and heavy-duty diesel trucks along the truck haul route. Modeling is based on the EPA's AERMOD (v. 11.2) air dispersion modeling program

## 5. Environmental Analysis

### AIR QUALITY

and the latest HRA guidance from the Office of Environmental Health Hazard Assessment (OEHHA) to estimate excess lifetime cancer risks and chronic noncancer hazard indices at the nearest maximum exposed off-site sensitive receptors (OEHHA 2015).

DPM emissions were based on the CalEEMod construction model runs using annual exhaust PM<sub>10</sub> construction emissions presented in pounds (lbs.) per day. Construction of the proposed project would occur over a total of 16 months, between August 2025 and December 2026. The average daily emission rates from construction equipment used during the proposed project were determined by dividing the annual average emissions for each construction year by the number of construction days per year for each calendar year of construction. The off-site hauling emission rates were adjusted to evaluate localized emissions from the haul route distance within 1,000 feet of the project site.

Air dispersion modeling using the EPA's AERMOD program was conducted to assess the impact of emitted compounds on sensitive receptors. The model is a steady-state Gaussian plume model, approved by South Coast AQMD for estimating ground level impacts from point and fugitive sources in simple and complex terrain. Meteorological data from the South Coast AQMD for the nearest representative meteorological station (Azusa Monitoring Station) with the five latest available years (2012 to 2016) of record were used to represent local weather conditions and prevailing winds.

A unit emission rate of 1 gram per second was used for all modeling runs. The unit emission rates were proportioned over the poly-area sources for on-site construction emissions and divided between the volume sources for off-site hauling emissions. The maximum modeled concentrations at each sensitive receptor were then multiplied by the construction emission rates to obtain the maximum concentrations at the maximum exposed individual resident (MEIR), the maximum exposed receptor for the high school and the elementary school, and the preschool receptor. The calculated total cancer risk conservatively assumes that the risk for the MEIR consists of a pregnant woman in the third trimester that subsequently gives birth to an infant during the construction period spanning from 2025 to 2026; therefore, because construction would occur in less than 2.25 years, all calculated risk values were multiplied by a factor of 10. In addition, it was conservatively assumed that the residents were outdoors 8 hours a day, 260 construction days per year, and exposed to all of the daily construction emissions.

#### *Operational Phase*

- **Transportation.** The primary source of mobile criteria air pollutant emissions is tailpipe exhaust emissions from the combustion of fuel (i.e., gasoline and diesel). Additionally, for criteria air pollutants, brake and tire wear and fugitive dust created from vehicles traveling on roadways also generate particulate matter. The GPEIR assumed that the project site would generate up to 215 truck trips and 611 passenger trips for a total of 826 non-passenger-equivalent trips per day. The proposed project would generate up to 236 truck trips and 793 passenger trips for a total of 1,029 non-passenger-equivalent trips per day upon buildout<sup>12</sup>. Modeling of truck trip lengths are based on an average trip length of 39.9 miles per trip, which is derived

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<sup>12</sup> The number of trips generated is based on the trip generation provided by Iteris without passenger car equivalents (see Appendix D-a). Trips are based on 392,488 sf of warehousing and 22,290 sf of office space. This results in a more conservative analysis since warehouses result in more truck trips than manufacturing use.

## 5. Environmental Analysis

### AIR QUALITY

from the Southern California Association of Governments' (SCAG) Heavy-Duty Truck Regional Travel Demand model and represents the average Class 8 truck trip distance within the South Coast Air Basin (South Coast AQMD 2021c). For non-truck vehicles (e.g., passenger vehicles), the default CalEEMod trip length of 20.20 miles per trip was utilized. Project-related on-road criteria air pollutant emissions are based on year 2026 emission rates for the project buildout year and 2023 for the baseline year.

- **Transport Refrigeration Units.** Emissions from transport refrigeration units (TRU) are based on the operation of 15 trucks with TRUs per day, 120 minutes of idling per unit, and calendar year 2026 aggregated Instate Trailer TRU emission rates obtained from OFFROAD2021 (version 1.0.5).
- **Off-Road Equipment.** It is anticipated the proposed project would utilize up to 20 electric-powered forklifts and 1 diesel-powered yard truck for daily operations. The yard truck would consist of a diesel-powered unit that would operate for 8 hours per day and 365 days per year.<sup>13</sup> Electric-powered forklifts and the diesel-powered yard truck emissions are based on calendar year 2026 OFFROAD2021 emission factors for a 25-horsepower electric forklift and 175-horsepower industrial yard truck, respectively. For baseline conditions, diesel-powered forklift and yard truck emissions are based on calendar year 2023 OFFROAD2021 emission factors for a 25-horsepower electric forklift and 175-horsepower industrial yard truck, respectively.
- **Area Sources.** Area source emissions from use of consumer cleaning products, landscaping equipment, and VOC emissions from paints are based on CalEEMod default values and the square footage of the proposed buildings and surface parking lot areas.
- **Energy.** Criteria air pollutant emissions from energy use (natural gas used for cooking, heating, etc.) are based on the CalEEMod defaults for natural gas usage for industrial land uses, which provide conservative estimates for building energy use under baseline conditions. As future buildout under the proposed project would result in all-electric buildings, the proposed project would not generate criteria air pollutant emissions from energy use.

#### *Operational Health Risk Assessment*

An operational HRA for TACs associated with diesel exhaust was conducted for the proposed project and for the Walnut Business Park project-level analysis. Sources evaluated in the HRA include heavy-duty diesel trucks, TRUs, and offroad cargo handling equipment. Modeling is based on the EPA's AERMOD (version 11.2) air dispersion modeling program and the latest HRA guidance from OEHHA to estimate excess lifetime cancer risks and chronic noncancer hazard indices at the nearest maximum exposed off-site sensitive receptors (OEHHA 2015). DPM emissions were based on EMFAC2021 (version 1.0.2).

Air dispersion modeling using the US EPA's AERMOD program was conducted to assess the impact of emitted compounds on sensitive receptors. The model is a steady-state Gaussian plume model, approved by South Coast AQMD for estimating ground level impacts from point and fugitive sources in simple and complex terrain. Meteorological data obtained from the South Coast AQMD for the nearest representative

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<sup>13</sup> Based on 3.6-yard trucks per million square feet of building space (South Coast AQMD 2014).

## 5. Environmental Analysis

### AIR QUALITY

meteorological station (Azusa Monitoring Station) with the five latest available years (2012 to 2016) of record were used to represent local weather conditions and prevailing winds.

The EPA AERMOD air dispersion modeling program and CARB's Hotspots Analysis and Reporting Program (HARP2) Risk Assessment Standalone Tool were used to estimate excess lifetime cancer risks and chronic noncancer hazard indices at the MEIR (CARB 2022). For the MEIR, who would be approximately 515 feet north of the project site, calculated risk for infants from third trimester to age 2 years is multiplied by a factor of 10 and for children from 2 to 16 years is multiplied by a factor of 3 to account for early life exposure and uncertainty in child versus adult exposure impacts (OEHHA 2015). For student receptors at Vejar Elementary School, who would be approximately 1,150 feet away north the project site, risk exposure parameters were tailored for children ages 2 to 9 and included elevated breathing rates due to exercise and a daily exposure of 8 hours per day. For the preschool receptors, who would be approximately 830 feet west from the project site, risk exposure parameters were tailored for children ages 2 to 6 and a daily exposure of 8 hours per day. For the high school receptors, who would be approximately 940 feet south from the project site, risk exposure parameters were tailored for children ages 2 to 16 and a daily exposure of 8 hours per day.

A unit emission rate of 1 gram per second was used for all modeling runs. On-site operational emissions from truck travel and yard trucks were modeled as poly-area sources (i.e., area source), and truck and TRU idling at the loading docks were modeled as point sources. The off-site truck travel emissions were modeled as adjacent volume sources for surface streets (South Lemon Avenue, Valley Boulevard, Paseo Del Prado, Paseo Tesoro, and Paseo Sonrisa). A 20-meter by 20-meter receptor grid was used for residential, school, and preschool receptors. A larger 50-meter by 50-meter receptor grid was used for the high school based on the distance of the high school from the project site and its location upwind of the project site. The maximum modeled concentrations at each sensitive receptor were then multiplied by the construction emission rates to obtain the maximum concentrations at each receptor.

#### 5.2.3.3 IMPACT ANALYSIS

The following impact analysis addresses the thresholds of significance in Section 5.2.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.2-1: The proposed project would not conflict with the South Coast AQMD's Air Quality Management Plan. [Threshold AQ-1]**

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The GPEIR identified that buildout under the GPU would result in a population 8 percent greater than the 2016 RTP/SCS projections, and operational emissions would exceed the PM<sub>10</sub> and PM<sub>2.5</sub> thresholds. Thus, the GPU was not consistent with the 2016 RTP/SCS and the South Coast AQMD's 2016 AQMP, and impacts were significant and unavoidable.

South Coast AQMD is directly responsible for reducing emissions from area, stationary, and mobile sources in the SoCAB to achieve the National and California AAQS and responds to this requirement by preparing AQMPs. Since the GPEIR was certified, the South Coast AQMD Governing Board adopted the 2022 AQMP, which is a regional and multiagency effort (South Coast AQMD, CARB, SCAG, and EPA).



## 5. Environmental Analysis

### AIR QUALITY

A consistency determination with the AQMP plays an important role in local agency project review by linking local planning and individual projects to the AQMP. It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration early enough to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to the clean air goals in the AQMP.

The two principal criteria for conformance with an AQMP are:

1. Whether the project would exceed the assumptions in the AQMP.
2. Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards.

SCAG provides the latest economic and demographic forecasts and develops transportation measures. Regional population, housing, and employment projects developed by SCAG are based, in part, on general plan land use designations. These projections form the foundation for the emissions inventory of the AQMP.

Section 15206(b) of the CEQA Guidelines states that a proposed project is of statewide, regional, or area-wide significance if the project would involve a net increase of over 500,000 square feet of business establishment. The proposed project would develop 414,778 square feet of industrial space, which is 57,234 square feet larger than the existing building area, but still less than a project of statewide, regional, or area-wide significance. As discussed in the population and housing impacts in Table 8-1, there is currently no housing present, and no housing would be developed on the project site. Implementation of the proposed project would be similar to development under the GPU and no displacement of people or housing would happen. Thus, implementation of the proposed project would not have the potential to substantially affect demographic projections beyond what is accounted for in the current 2022 AQMP.

In addition, the long-term emissions generated by the proposed project would not produce criteria air pollutants that exceed the South Coast AQMD significance thresholds during the proposed project's operations (see Impact 5.2-3). South Coast AQMD's significance thresholds identify whether a project has the potential to cumulatively contribute to the SoCAB's nonattainment designations. Because the proposed project would not exceed the South Coast AQMD's regional significance thresholds (see Impact 5.2-3) and growth is consistent with regional growth projections, the proposed project would not interfere with South Coast AQMD's ability to achieve the long-term air quality goals identified in the AQMP. Therefore, the proposed project would be considered consistent with the AQMP. The proposed project would not result in new impacts or a substantial increase in magnitude of impacts compared to the GPEIR.

***Level of Significance Before Mitigation:*** Less than significant.

## 5. Environmental Analysis

### AIR QUALITY

#### Impact 5.2-2: Construction activities associated with the proposed project would generate short-term emissions that exceed South Coast AQMD's significance thresholds and would cumulatively contribute to the nonattainment designations of the SoCAB. [Thresholds AQ-2]

The GPEIR identified that maximum daily construction emissions associated with implementation of the GPU would not exceed the South Coast AQMD regional criteria pollutant thresholds for all pollutants.

Construction activities produce combustion emissions from various sources, such as on-site heavy-duty construction vehicles, vehicles hauling materials to and from the site, motor vehicles transporting the construction crew, building and asphalt demolition, site preparation, rough grading and soil haul, fine grading and soil haul, utilities trenching, building construction, paving, architectural coating, finishing and landscaping, and off-site improvements. Air pollutant emissions from construction activities on-site would vary daily as construction activity levels change. An estimate of maximum daily construction emissions for the proposed project is provided in Table 5.2-11, *Maximum Daily Regional Construction Emissions*. The table shows the highest daily emissions that would be generated over the anticipated development period.

**Table 5.2-11 Maximum Daily Regional Construction Emissions**

Construction Phase	Pollutants (lbs./day) <sup>1, 2, 3</sup>					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Year 2025	56	188	240	1	34	15
Year 2026	35	34	53	<1	5	2
<b>Maximum Daily Construction Emissions</b>						
Maximum Daily Emissions	56	188	240	1	34	15
South Coast AQMD Regional Construction Threshold	75	100	550	150	150	55
<b>Significant?</b>	No	Yes	No	No	No	No

Source: CalEEMod Version 2022.1.0. Highest winter or summer emissions are reported.

Note: Emissions are based on a previous construction schedule with an earlier project horizon. As a result, emissions shown in the table are conservative because equipment exhaust emissions rates are higher in earlier years as a result of turnover of older equipment and replacement with newer equipment that meets higher emission tiers.

<sup>1</sup> Based on the preliminary information provided by the Applicant. Where specific information regarding proposed project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.

<sup>2</sup> Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, and street sweeping with Rule 1186-compliant sweepers.

<sup>3</sup> Linear construction phases are associated with offsite roadway improvements.

The SoCAB is designated nonattainment for O<sub>3</sub> and PM<sub>2.5</sub> under the California and National AAQS, nonattainment for PM<sub>10</sub> under the California AAQS,<sup>14</sup> and nonattainment for lead (Los Angeles County only) under the National AAQS. According to South Coast AQMD methodology, any project that does not exceed or can be mitigated to less than the daily threshold values would not add significantly to a cumulative impact (South Coast AQMD 1993). As shown in Table 5.2-11, the maximum daily emissions for VOC, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. However, the construction-related NO<sub>x</sub> emissions generated from overlapping phases that involve off-site improvements, demolition, site preparation, rough and fine grading and soil hauling,

<sup>14</sup> Portions of the SoCAB along SR-60 in Los Angeles, Riverside, and San Bernardino Counties are proposed as nonattainment for NO<sub>2</sub> under the California AAQS.

## 5. Environmental Analysis

### AIR QUALITY

or utilities trenching activities would exceed the South Coast AQMD regional significance threshold. Therefore, short-term air quality impacts from proposed project-related construction activities would exceed South Coast AQMD's threshold criteria for NO<sub>x</sub>. Impacts would be **potentially significant**, so the proposed project could result in new significant impacts or a substantial increase in significant impacts compared to impacts identified in the GPEIR.

***Level of Significance Before Mitigation:*** Potentially significant.

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**Impact 5.2-3: Operational activities associated with the proposed project would not generate long-term emissions that exceed South Coast AQMD's significance thresholds that cumulatively contribute to the nonattainment designations of the SoCAB. [Thresholds AQ-2]**

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The GPEIR identified that implementation of the GPU would generate criteria air pollutants that exceed the South Coast AQMD thresholds for PM<sub>10</sub> and PM<sub>2.5</sub> for operational activities, resulting in significant and unavoidable operational phase impacts.

Like the project evaluated in the GPEIR, the proposed project would generate criteria air pollutant emissions from on-road mobile sources (passenger vehicles and trucks), refrigerant use, and area sources (e.g., landscaping equipment, architectural coating). Unlike the project evaluated in the GPEIR, the proposed project would also generate emissions from cold storage, TRUs, and offroad cargo handling equipment associated with the warehousing uses. However, the proposed buildings would be all electric, so the proposed project would not utilize natural gas and therefore would not generate criteria pollutants from energy use.

Table 5.2-12, *Maximum Daily Regional Operation Emissions*, provides an estimate of the maximum daily operations emissions associated with the proposed project and the net change in maximum daily emissions from its implementation compared to the project evaluated in the GPEIR. As shown in this table, implementation of the proposed project would not exceed the South Coast AQMD regional significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. Projects that do not exceed the South Coast AQMD regional significance thresholds do not result in an incremental increase in health impacts in the SoCAB from project-related increases in criteria air pollutants. Therefore, the proposed project would not result in new significant impacts or a substantial increase in significant impacts compared to the project evaluated in the GPEIR.

## 5. Environmental Analysis AIR QUALITY

**Table 5.2-12 Maximum Daily Regional Operation Emissions**

Source	Maximum Daily Emissions (lbs./Day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Proposed Project</b>						
Off-Road <sup>1,2</sup>	<1	1	3	<1	<1	<1
Transport Refrigeration Units <sup>3</sup>	6	6	1	<1	<1	<1
Mobile (Truck) <sup>4,5</sup>	1	24	12	<1	9	3
Mobile (Passenger) <sup>4,6</sup>	3	3	47	<1	11	3
Area	12	<1	18	<1	<1	<1
Energy <sup>7</sup>	0	0	0	0	0	0
<b>Total</b>	<b>23</b>	<b>34</b>	<b>80</b>	<b>&lt;1</b>	<b>20</b>	<b>6</b>
<b>Net Change</b>						
Approved Project (Existing Development) Maximum Daily Emissions	14	27	67	<1	17	5
Proposed Project Maximum Daily Emissions	23	34	80	<1	20	6
<b>Net Change</b>	<b>8</b>	<b>7</b>	<b>14</b>	<b>&lt;1</b>	<b>3</b>	<b>1</b>
<b>South Coast AQMD Regional Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod Version 2022.1. Highest winter or summer emissions are reported. (see Appendix D-a)

Notes: lbs = Pounds; () = negative value.<sup>1</sup> Based on 20 electric-powered forklifts and 1 diesel-powered yard trucks at the facility operating for eight hours per day. Number of yard trucks is based on the South Coast AQMD assumption of 3.6 yard trucks per million square feet of building space for Building 1, as specified by the applicant (South Coast AQMD 2014).

<sup>2</sup> Based on year 2026 emission rates for a 25-horsepower industrial electric forklift and 175-horsepower yard truck derived from OFFROAD2021, Version 1.0.5.

<sup>3</sup> Based on calendar year 2026 Instate Trailer TRU and TRU-Instate Genset emission rates from OFFROAD2021, Version 1.0.5 for 15 trucks with TRUs and 30 mins of idling per TRU per day.

<sup>4</sup> Vehicle fleet mix for the proposed project adjusted based on mix provided by Iteris.

<sup>5</sup> Truck trip lengths are based on an average trip length of 39.9 miles per trip from the SCAG's Heavy-Duty Truck Regional Travel Demand model and represents the average Class 8 truck trip distance within the South Coast Air Basin (South Coast AQMD 2021c).

<sup>6</sup> Passenger trip lengths are based on the default CalEEMod trip length of 20.20 miles per trip.

<sup>7</sup> Buildings under the proposed project would be all electric and would not utilize natural gas, which is the primary contributor to criteria pollutant for energy sources.

**Level of Significance Before Mitigation:** Less than significant.

### **Impact 5.2-4: Construction of the proposed project would not expose sensitive receptors to substantial pollutant concentrations of toxic air contaminants. [Threshold AQ-3]**

The GPEIR identified that maximum daily construction emissions would not exceed the South Coast AQMD's 5-acre LSTs for SRA 10. Therefore, construction under the GPU would not result in substantial concentrations of air pollutants proximate to sensitive receptors.

## **Construction**

### *Construction-Phase Localized Significance Thresholds*

Screening-level LSTs (pounds per day) are the amount of project-related mass emissions at which localized concentrations (ppm or µg/m<sup>3</sup>) could exceed the AAQS for criteria air pollutants for which the SoCAB is designated nonattainment. They are based on the acreage disturbed and distance to the nearest sensitive receptor. Screening-level LSTs are based on the proposed project site size and distance to the nearest sensitive

## 5. Environmental Analysis

### AIR QUALITY

receptor. Thresholds are based on the California AAQS, which are the most stringent, established to provide a margin of safety in the protection of the public's health and welfare. They are designed to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. The nearest receptors are the residences to the north and northeast along Carrey Road and west of the project site along S Avenida Alipaz. Other nearby receptors include Vejar Elementary School students, Ron Hockwalt Academies High School students, and Montessori of Walnut preschool.

Tables 5.2-13, *Maximum Daily On-Site Localized Construction Emissions* shows the maximum daily construction emissions (pounds per day) generated during on-site construction activities compared with the South Coast AQMD's screening-level LSTs, for sensitive receptors within 82 feet (25 meters) for NO<sub>x</sub> and CO and 515 feet (157 meters) for PM<sub>10</sub> and PM<sub>2.5</sub>. These two distances represent residences at 515 feet who are assumed to be exposed to construction emissions 24 hours a day, and employees of nearby businesses at 82 feet who are not anticipated to be on-site 24 hours a day.

The on-site PM<sub>10</sub> and PM<sub>2.5</sub> emissions shown represent the total on-site particulate matter emissions from vehicle exhaust and fugitive dust. On-site NO<sub>x</sub> emissions are from off-road equipment exhaust. Like the buildout under the GPU, construction of the proposed project would not generate construction-related on-site emissions that would exceed the screening-level LSTs. Therefore, the proposed project would not result in new significant impacts or a substantial increase in significant impacts compared to the GPEIR, and impacts would be less than significant.

**Table 5.2-13 Maximum Daily On-Site Localized Construction Emissions**

	Pollutants (lbs./day) <sup>1,2,3,4</sup>			
	NO <sub>x</sub>	CO	PM <sub>10</sub> <sup>3</sup>	PM <sub>2.5</sub> <sup>3</sup>
<b>South Coast AQMD 1.31-Acre LSTs</b>	<b>117</b>	<b>697</b>	<b>45.85</b>	<b>14.20</b>
Buildings 1, 2, 3 Construction (2025)	11	13	0.37	0.34
Buildings 1, 2, 3, 4 Construction (2025)	11	13	0.37	0.34
Buildings 1, 3, 4 Construction (2025)	11	13	0.37	0.34
Buildings 1, 3, 4 Construction (2026)	10	13	0.33	0.30
Buildings 1, 3, 4 Construction   Architectural Coating	11	14	0.35	0.32
<b>Exceeds LST?</b>	No	No	No	No
<b>South Coast AQMD 3.63-Acre LSTs</b>	<b>196</b>	<b>1,254</b>	<b>60.41</b>	<b>19.59</b>
Buildings 1, 3, 4 Construction   Architectural Coating   Paving   Finishing/Landscaping	30	36	1.51	1.38
Buildings 1 and 4 Construction   Architectural Coating   Paving,   Finishing/Landscaping	30	36	1.51	1.38
Building 4 Construction   Architectural Coating   Paving   Finishing/Landscaping	30	36	1.51	1.38
<b>Exceeds LST?</b>	No	No	No	No
<b>South Coast AQMD 4.81-Acre LSTs</b>	<b>231</b>	<b>1,523</b>	<b>67.54</b>	<b>22.02</b>
Fine Grading   Utilities Trenching   Buildings 1, 2, 3 Construction	33	35	5.40	2.98

## 5. Environmental Analysis

### AIR QUALITY

**Table 5.2-13 Maximum Daily On-Site Localized Construction Emissions**

	Pollutants (lbs./day) <sup>1,2,3,4</sup>			
	NO <sub>x</sub>	CO	PM <sub>10</sub> <sup>3</sup>	PM <sub>2.5</sub> <sup>3</sup>
<b>Exceeds LST?</b>	No	No	No	No
<b>South Coast AQMD ≥5.00-Acre LSTs</b>	<b>236</b>	<b>1,566</b>	<b>68.66</b>	<b>22.41</b>
Building and Asphalt Demolition	61	59	4.36	2.38
Building and Asphalt Demolition, Debris Haul, and Onsite Reprocessing	62	107	9.38	3.49
Building and Asphalt Demolition, Debris Haul, and Onsite Reprocessing   Site Preparation	91	133	19.09	8.69
Building and Asphalt Demolition   Site Preparation   Linear, Grading, and Excavation	119	163	21.54	9.93
Building and Asphalt Demolition, Debris Haul, and Onsite Reprocessing   Site Preparation   Linear, Grading, and Excavation   Rough Grading	177	225	30.05	13.75
Site Preparation   Linear, Grading, and Excavation   Rough Grading	115	118	20.67	10.26
Site Preparation   Linear, Grading, and Excavation   Rough Grading   Fine Grading	134	134	25.56	12.77
Linear, Grading, and Excavation   Rough Grading   Fine Grading	104	108	15.85	7.57
Linear, Grading, and Excavation   Rough Grading   Fine Grading   Utilities Trenching	108	114	15.99	7.70
Linear, Drainage, and Utilities   Rough Grading   Fine Grading   Utilities Trenching	81	85	13.70	6.50
Linear, Drainage, and Utilities   Fine Grading   Utilities Trenching	22	23	5.19	2.68
Linear, Drainage, and Utilities   Fine Grading   Utilities Trenching   Building 1 Construction	33	36	5.56	3.02
Linear, Paving   Fine Grading   Utilities Trenching   Building 1 Construction	40	46	5.74	3.29
Linear, Paving   Fine Grading   Utilities Trenching   Buildings 1 and 2 Construction	40	46	5.74	3.29
<b>Exceeds LST?</b>	No	No	No	No

Sources: CalEEMod Version 2022.1; South Coast AQMD 2008, 2011. Highest winter or summer emissions are reported.

Note: Emissions are based on a previous construction schedule with an earlier project horizon. As a result, emissions shown in the table are conservative because equipment exhaust emissions rates are higher in earlier years as a result of turnover of older equipment and replacement with newer equipment that meets higher emission tiers.

<sup>1</sup> In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment occurring on the project site are included in the analysis. LSTs are based on sensitive receptors within 82 feet (25 meters) for NO<sub>x</sub> and CO and 750 feet (157 meters) for PM<sub>10</sub> and PM<sub>2.5</sub>.

<sup>2</sup> Based on information provided or verified by the Applicant. Where specific information regarding project-related construction activities or processes was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the South Coast AQMD.

<sup>3</sup> Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, and street sweeping with Rule 1186-compliant sweepers.

<sup>4</sup> Linear construction phases are associated with offsite roadway improvements.

**Level of Significance Before Mitigation:** Less than significant.

## 5. Environmental Analysis

### AIR QUALITY

#### Construction Phase Toxic Air Contaminants

The proposed project would elevate concentrations of TACs (i.e., DPM) in the vicinity of sensitive land uses during temporary construction activities that would use off-road equipment operating on-site and at different levels depending on the type of activity (for example, limited use during installation of utilities, and more during grading activities). Construction of the proposed project would occur between August 2025 and December 2026.

The nearest air quality sensitive receptors to the project site include a single-family residence approximately 515 feet to the north, Ron Hockwalt Academies (high school) approximately 940 feet to the south, Montessori of Walnut preschool approximately 830 feet to the west, and Vejar Elementary School 1,150 ft to the north. A site-specific construction HRA of TACs was prepared to quantify potential health risk emissions during construction (see Appendix D-b). The latest OEHHA guidance was used to determine risks to residential receptors (OEHHA 2015). The results of the analysis are shown in Table 5.2-14, *Construction Risk Summary*, and demonstrate that there would be no exceedance of identified thresholds.

**Table 5.2-14 Construction Health Risk Summary**

Receptor	Cancer Risk (per million)	Chronic Hazards
Maximum Exposed Individual Resident (MEIR)	8.6	0.017
Maximum Exposed Receptor – High School	0.3	0.005
Maximum Exposed Receptor – Elementary School	0.5	0.005
Maximum Exposed Preschool Receptor	0.5	0.005
South Coast AQMD Threshold	10	1.0
<b>Exceeds Threshold?</b>	No	No

Source: Appendix D-b.

Note: Emissions are based on a previous construction schedule with an earlier project horizon. As a result, emissions shown in the table are conservative because equipment exhaust emissions rates are higher in earlier years as a result of turnover of older equipment and replacement with newer equipment that meets higher emission tiers.

The results of the HRA are based on the maximum receptor concentration over the entire construction exposure duration for receptors.

- Cancer risk for the MEIR from construction activities would be 8.6 in a million, which would not exceed the 10 in a million-significance threshold.
- Cancer risk for the maximum exposed high school student receptor from construction activities would be 0.3 in a million, which would not exceed the 10 in a million-significance threshold.
- Cancer risk for the maximum exposed elementary school student receptor from construction activities would be 0.5 in a million, which would not exceed the 10 in a million-significance threshold.
- Cancer risk for the maximum exposed preschool receptor from construction activities would be 0.5 in a million, which would not exceed the 10 in a million-significance threshold.

## 5. Environmental Analysis

### AIR QUALITY

- For noncarcinogenic effects, the chronic hazard index identified for each toxicological endpoint totaled less than one for all the sensitive receptors (see Appendix D-b). Therefore, chronic noncarcinogenic hazards are less than significant.

Because cancer risks for the MEIR would not exceed South Coast AQMD significance threshold, construction activities associated with the proposed project are less than significant. Therefore, the proposed project would not result in new significant impacts or a substantial increase in significant impacts compared to the GPEIR.

***Level of Significance Before Mitigation:*** Less than significant.

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**Impact 5.2-5: Operation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations of criteria air pollutants and toxic air contaminants. However, combined construction and operational emissions would exceed the draft South Coast AQMD cumulative cancer risk threshold. [Threshold AQ-3]**

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The GPEIR identified that maximum daily operational emissions would exceed the PM<sub>10</sub> and PM<sub>2.5</sub> thresholds. As such, projects under the GPU have the potential to generate significant emissions of DPM. While criteria pollutant emissions under buildout of the GPU would be partially offset by implementation of the existing regulations and new policies, operational impacts to sensitive receptors would be significant and unavoidable because feasible mitigation for future projects could not be determined at the time the GPEIR was adopted. Operational impacts associated with buildout of the GPU would be significant and unavoidable due to TAC emissions. The GPEIR determined that the maximum number of vehicles moving through any study intersection would be substantially below the screening threshold 44,000 vehicles per hour, and impacts regarding CO hotspots would be less than significant.

This impact analysis describes changes in localized impacts from long-term operation. The proposed project could expose sensitive receptors to elevated pollutant concentrations during operation-phase activities if it would cause or contribute significantly to elevated pollutant levels. Unlike the mass of emissions shown in the regional emissions analysis in Table 5.2-13, which is described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or µg/m<sup>3</sup>) and can be correlated to potential health effects.

### Operation

#### *Operational Phase LSTs*

The screening-level LSTs are the amount of project-related stationary and area sources of emissions at which localized concentrations (ppm or µg/m<sup>3</sup>) would exceed the ambient air quality standards for the criteria air pollutants for which the SoCAB is designated a nonattainment area. Land uses that have the potential to generate substantial sources of emissions or would require a permit from South Coast AQMD include industrial land uses, such as chemical processing, and warehousing operations where substantial truck idling could occur on-site. On-site emissions include truck maneuvering and idling, TRUs, and diesel-powered forklifts and yard trucks. Table 5.2-15, *Localized On-Site Operational Emissions*, shows that on-site project-related operational emissions would not exceed the screening-level LSTs. Therefore, localized criteria air pollutant emissions impacts from project-related operations would be less than significant.



## 5. Environmental Analysis

### AIR QUALITY

**Table 5.2-15 Localized On-Site Operational Emissions**

Source	Pollutants (lbs./day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Sources	<1	18	0.03	0.02
Off-Road Equipment <sup>1,2</sup>	1	3	0.03	0.03
Onsite Truck Travel <sup>3,4</sup>	<1	<1	0.12	0.04
Truck Idling <sup>3</sup>	4	4	0.03	0.03
Transport Refrigeration Units <sup>5,6</sup>	3	<1	0.04	0.03
Maximum Daily Onsite Operation Emissions	9	25	0.25	0.15
South Coast AQMD Screening-Level LST	<b>236</b>	<b>1,566</b>	<b>16.99</b>	<b>5.71</b>
<b>Exceeds Screening-Level LST?</b>	No	No	No	No

Source: CalEEMod Version 2022.1; South Coast AQMD 2008.

Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment occurring on the proposed project site are included in the analysis. Operational LSTs are based on sensitive receptors within 82 feet (25 meters) for NO<sub>x</sub> and CO and 515 feet (157 meters) for PM<sub>10</sub> and PM<sub>2.5</sub> in SRA 10.

<sup>1</sup> Based on 20 electric-powered forklifts and 1 diesel-powered yard trucks at the facility operating for eight hours per day.

<sup>2</sup> Based on calendar year 2026 emission rates for a 25-horsepower industrial electric forklift and 175-horsepower yard truck derived from OFFROAD2021, Version 1.0.5.

<sup>3</sup> Based on year 2026 emission rates derived EMFAC2021 Version 1.0.2 and CalEEMod methodology.

<sup>4</sup> Based on the proportion of distance traveled onsite compared to the overall distance traveled. It is anticipated that each truck would travel approximately 0.62 miles onsite on average.

<sup>5</sup> Based on 15 trucks with TRUs per day and 120 mins of idling per TRU per day.

<sup>6</sup> Based on calendar year 2026 aggregated Instate Trailer TRU emission rates obtained from OFFROAD2021, Version 1.0.5.

**Level of Significance Before Mitigation:** Less than significant.

### Operational Phase Toxic Air Contaminants

The South Coast AQMD requires an analysis of toxic air contaminants when the project generates emissions proximate to sensitive receptors in order to ensure that the proposed project does not expose sensitive receptors to substantial pollutant concentrations. Land uses that generate more than 100 truck trips per day have the potential to substantially increase TAC concentrations and health risks at off-site sensitive land uses within 1,000 feet of the facility (CARB 2005).

An operational HRA was prepared for the proposed project and is provided in Appendix D-b. Operation of the proposed project would generate DPM emissions from diesel truck activity (truck maneuvering and idling), TRUs, and diesel-fueled off-road equipment (i.e., yard trucks) in proximity to the same sensitive receptors evaluated in the construction HRA (i.e., residents to the north and northwest, high school students to the south, elementary school students to the north, and preschool to the northwest).

The EPA AERMOD air dispersion modeling program and CARB's Hotspots Analysis and Reporting Program (HARP2) Risk Assessment Standalone Tool were used to estimate excess lifetime cancer risks and chronic noncancer hazard indices at the maximum exposed sensitive receptors (CARB 2022). The results of the operational HRA are provided in Table 5.2-16, *Operational Health Risk Assessment Results*.

## 5. Environmental Analysis

### AIR QUALITY

**Table 5.2-16 Operational Health Risk Summary**

Receptor	Cancer Risk (per million)	Chronic Hazards
Maximum Exposed Individual Resident (MEIR)	3.0	<0.001
Maximum Exposed Receptor – High School	0.1	0.001
Maximum Exposed Receptor – Elementary School	0.2	< 0.001
Maximum Exposed Preschool Receptor	0.2	< 0.001
South Coast AQMD Project Threshold	10	1.0
Draft South Coast AQMD Cumulative Threshold	5	1.0
<b>Exceeds Threshold?</b>	No	No

Source: Appendix D-b.

As shown in the table, carcinogenic risks are below the significance threshold value of 10 in a million for all receptors in the vicinity of the project site. For noncarcinogenic effects, the chronic hazard index identified for each toxicological endpoint totaled less than one for all sensitive receptors (see Appendix D-b). Thus, chronic noncarcinogenic hazards are below the significance threshold. Therefore, the project would not expose off-site sensitive receptors to substantial concentrations of air pollutant emissions during project operation, and impacts would be less than significant. The proposed project would not result in new significant impacts or a substantial increase in significant impacts compared to the GPEIR.

***Level of Significance Before Mitigation:*** Less than significant.

#### ***Combined Construction Phase and Operational Phase Toxic Air Contaminants***

Sensitive receptors proximate to the project site would be exposed to elevated levels of air pollutants during construction activities and subsequent operational activities. The combined health risks from project-related construction and operational activities for the maximum exposed receptors can be determined in several ways. The most conservative calculation for combining health risks is to sum the highest predicted construction and operational health risks for each receptor type. The sum of the health risks for the receptors are shown in Table 5.2-17, *Operation Plus Construction Health Risk Results*; the total chronic hazard index would be less than one, and noncarcinogenic risk impacts would be less than significant. However, total cancer risks from project-related construction and operational activities would be 11.6 in a million at the MEIR without mitigation and would exceed the adjusted cumulative threshold value of 5 per million. Thus, the proposed project could pose a significant health risk impact to nearby sensitive receptors from construction and subsequent operational activities. Since combined construction and operational phase TACs were not analyzed in the GPEIR, the proposed project could result in new or substantially more severe significant impacts when compared to buildout under the GPEIR.

## 5. Environmental Analysis

### AIR QUALITY

**Table 5.2-17 Operation Plus Construction Health Risk Results**

Receptor	Project Phase	Cancer Risk (per million)	Chronic Hazards
MEIR	Project Construction	8.6	0.017
	Project Operation	3.0	0.001
	<b>Combined Total</b>	<b>11.6</b>	<b>0.018</b>
Maximum Exposed Receptor – High School	Project Construction	0.3	0.005
	Project Operation	0.1	0.001
	<b>Combined Total</b>	<b>0.4</b>	<b>0.006</b>
Maximum Exposed Receptor - Elementary School	Project Construction	0.5	0.005
	Project Operation	0.2	< 0.001
	<b>Combined Total</b>	<b>0.7</b>	<b>0.005</b>
Maximum Exposed Preschool Receptor	Project Construction	0.5	0.005
	Project Operation	0.2	< 0.001
	<b>Combined Total</b>	<b>0.7</b>	<b>0.005</b>
South Coast AQMD Project Threshold		10	1.0
Draft South Coast AQMD Cumulative Threshold		5	1.0
<b>Exceeds Threshold?</b>		<b>Yes (at MEIR)</b>	<b>No</b>

Source: Appendix D-b, Health Risk Assessment.

Note: Emissions are based on a previous construction schedule with an earlier project horizon. As a result, emissions shown in the table are conservative because equipment exhaust emissions rates are higher in earlier years as a result of turnover of older equipment and replacement with newer equipment that meets higher emission tiers.

**Level of Significance Before Mitigation:** Potentially significant.

#### Carbon Monoxide Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the State one-hour standard of 20 ppm or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse in the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hot spots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. The SoCAB has been designated in attainment of both the National and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—to generate a significant CO impact (BAAQMD 2023). The GPU determined that the maximum number of vehicles moving through any study intersection would be substantially below this screening threshold. The proposed project would generate 118 AM peak hour trips and 127 PM peak hour trips, which is substantially below the peak hour vehicle trips needed

## 5. Environmental Analysis

### AIR QUALITY

to generate a significant CO impact. Therefore, implementation of the proposed project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the project area. The proposed project would not result in new impacts or a substantial increase in severity of impacts compared to the GPEIR. Impacts would be less than significant.

*Level of Significance Before Mitigation:* Less than significant.

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**Impact 5.2-6: The proposed project would not result in other emissions that would adversely affect a substantial number of people. [Threshold AQ-4]**

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The GPEIR determined that impacts related to odors would be less than significant with implementation of existing development review practices.

The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

### Construction

During construction activities, construction equipment exhaust and application of asphalt and architectural coatings would generate odors. Any construction-related odor emissions would be temporary and intermittent. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment. By the time such emissions reached any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of odor-producing materials. Therefore, impacts associated with construction-generated odors are considered less than significant. The proposed project would not result in new impacts or a substantial increase in severity of impacts compared to the GPEIR.

### Operation

The type of facilities that are considered to have objectionable odors include wastewater treatment plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. Similar to the project evaluated in the GPEIR, the proposed project could result in retail and office uses, warehousing and manufacturing, food and beverage pick-up, and e-commerce. These and other types of industrial land uses associated with the proposed project would be required to comply with South Coast AQMD Rule 402. Therefore, like the project evaluated in the GPEIR, the proposed project would not generate potentially significant odor impacts affecting a substantial number of

## 5. Environmental Analysis

### AIR QUALITY

people. The proposed project would not result in new impacts or a substantial increase in severity of impacts compared to the GPEIR.

***Level of Significance Before Mitigation:*** Less than significant.

#### 5.2.4 Cumulative Impacts

In accordance with the South Coast AQMD methodology, any project that produces a significant project-level regional air quality impact in an area that is in nonattainment contributes to the cumulative impact. Cumulative projects in the local area include new development and general growth in the project area. The greatest source of emissions in the SoCAB is mobile sources. Due to the extent of the area potentially impacted by cumulative project emissions (i.e., the SoCAB), the South Coast AQMD considers a project cumulatively significant when project-related emissions exceed the South Coast AQMD regional emissions thresholds shown in Table 5.2-6. In addition, per the draft guidelines released by the South Coast AQMD cumulative risk Working Group, projects that result in project risk impacts are also considered to result in cumulative risk impacts (South Coast AQMD 2023b).

#### Construction

The SoCAB is designated nonattainment for O<sub>3</sub>, PM<sub>2.5</sub>, and lead (Los Angeles County only) under the California and National AAQS and nonattainment for NO<sub>2</sub> and PM<sub>10</sub> under the California AAQS.<sup>15</sup> Construction of cumulative projects would further degrade the regional and local air quality. Air quality would be temporarily impacted during construction activities. While construction activities associated with the development of the proposed project would not exceed cancer risk significance thresholds, these activities would exceed the South Coast AQMD regional thresholds for NO<sub>x</sub>. As discussed in Section 5.2.7, implementation of mitigation would contribute to reducing emissions. Thus, the proposed project's construction-related emissions would not exceed the South Coast AQMD significance thresholds with incorporation of mitigation and would not result in cumulative construction-related impacts.

#### Operation

For operational air quality emissions, any project that does not exceed or can be mitigated to less than the daily regional and/or cancer risk threshold values is not considered a substantial source of air pollution by the South Coast AQMD and does not add significantly to a cumulative impact. As discussed in Impact 5.2-3, implementation of the overall proposed project would not result in emissions that exceed the South Coast AQMD regional significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>, and would have reductions in NO<sub>x</sub> and CO emissions compared to the project evaluated in the GPEIR. In addition, emissions of criteria air pollutants would not result in localized impacts that exceed the South Coast AQMD localized significance thresholds and cancer risk threshold.

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<sup>15</sup> CARB approved the South Coast AQMD's request to redesignate the SoCAB from serious nonattainment for PM<sub>10</sub> to attainment for PM<sub>10</sub> under the national AAQS on March 25, 2010, because the SoCAB has not violated federal 24-hour PM<sub>10</sub> standards during the period from 2004 to 2007. In June 2013, the EPA approved the State of California's request to redesignate the South Coast PM<sub>10</sub> nonattainment area to attainment of the PM<sub>10</sub> National AAQS, effective on July 26, 2013.

## 5. Environmental Analysis

### AIR QUALITY

However, the combined construction and operational phase toxic air contaminants would exceed South Coast AQMD threshold for cancer risk. As discussed in Section 5.2.7, implementation of mitigation would contribute to reducing cancer risk to below the threshold. Thus, the proposed project would not result in a cumulative impact.

Therefore, the air pollutant emissions associated with the proposed project would not be cumulatively considerable, and impacts would be less than significant.

### 5.2.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, some impacts would be less than significant: 5.2-1, 5.2-3, 5.2-4, 5.2-5, and 5.2-6.

Without mitigation, these impacts would be **potentially significant**:

- **Impact 5.2-2** Construction activities associated with the proposed project would generate short-term emissions that exceed South Coast AQMD's significance thresholds and would cumulatively contribute to the nonattainment designations of the SoCAB.
- **Impact 5.2-5:** Combined construction and operational emissions would exceed the draft South Coast AQMD cumulative cancer risk threshold.

### 5.2.6 Mitigation Measures

#### 5.2.6.1 MITIGATION MEASURES FROM THE GPEIR

The GPEIR did not identify mitigation measures for air quality.

#### 5.2.6.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

#### Mitigation Measures

##### *Impact 5.2-2*

- AQ-1 The proposed project's construction contractors shall use equipment that meets the United States Environmental Protection Agency Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 25 horsepower, unless it can be demonstrated that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Tier 4 Final emissions standard for a similarly sized engine, as defined by the California Air Resources Board's regulations. The requirement to use Tier 4 Final equipment for engines over 25 horsepower shall be identified in construction bids.

## 5. Environmental Analysis

### AIR QUALITY

- Have engines that meet either US EPA or California Air Resources Board (CARB) Tier 4 Final emission standards. Ensure that all construction plans clearly show the selected emission reduction strategy for construction equipment over 25 horsepower.
- Maintain a list of all operating equipment in use on the project site for verification by the City. The construction equipment list shall state the makes, models, and number of construction equipment on-site. Ensure that all equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations.
- Communicate with all sub-contractors in contracts and construction documents that all non-essential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board Rule 2449 and is responsible for ensuring that this requirement is met.

These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division.

#### *Impact 5.2-5*

Implementation of Mitigation Measure AQ-1.

#### **Conditions of Approval**

No additional conditions of approval are required to reduce impacts to less than significant.

### **5.2.7 Level of Significance After Mitigation**

#### **Impact 5.2-2**

Construction of the proposed project would exceed the South Coast AQMD regional significance thresholds for NO<sub>x</sub>. Table 5.2-18, *Maximum Daily Regional Construction Emissions with Mitigation Incorporated*, shows the maximum daily construction emissions with implementation of Mitigation Measures AQ-1, which requires use of newer, lower emitting construction equipment. As shown in the table, implementation of mitigation would reduce construction-related NO<sub>x</sub> emissions below the regional significance thresholds. Therefore, the proposed project would not expose off-site sensitive receptors to substantial concentrations of air pollutant emissions during construction, and impacts would be less than significant with mitigation.

## 5. Environmental Analysis

### AIR QUALITY

**Table 5.2-18 Maximum Daily Regional Construction Emissions with Mitigation Incorporated**

Construction Phase	Pollutants (lbs./day) <sup>1, 2, 3</sup>					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Year 2025</b>						
Building and Asphalt Demolition, Debris Haul, and Onsite Reprocessing   Site Preparation	38	29	221	<1	19	7
Building and Asphalt Demolition   Site Preparation   Linear, Grading, and Excavation	38	36	261	<1	21	7
Building and Asphalt Demolition, Debris Haul, and Onsite Reprocessing   Site Preparation   Linear, Grading, and Excavation   Rough Grading	41	50	392	1	29	10
Site Preparation   Linear, Grading, and Excavation   Rough Grading	4	23	196	<1	18	7
Site Preparation   Linear, Grading, and Excavation   Rough Grading   Fine Grading	4	28	210	<1	22	9
Linear, Grading, and Excavation   Rough Grading   Fine Grading	4	25	185	<1	13	4
Linear, Grading, and Excavation   Rough Grading   Fine Grading   Utilities Trenching	4	26	191	<1	14	4
<b>Maximum Daily Construction Emissions</b>						
Maximum Daily Emissions	41	50	392	1	29	10
South Coast AQMD Regional Construction Threshold	75	100	550	150	150	55
<b>Significant?</b>	No	No	No	No	No	No

Source: CalEEMod Version 2022.1.0. Highest winter or summer emissions are reported.

Note: Emissions are based on a previous construction schedule with an earlier project horizon. As a result, emissions shown in the table are conservative because equipment exhaust emissions rates are higher in earlier years as a result of turnover of older equipment and replacement with newer equipment that meets higher emission tiers.

<sup>1</sup> Based on the preliminary information provided by the Applicant. Where specific information regarding proposed project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.

<sup>2</sup> Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, and street sweeping with Rule 1186-compliant sweepers.

<sup>3</sup> Linear construction phases are associated with offsite roadway improvements.

### Impact 5.2-5

Combined construction and operation of the proposed project would exceed the draft South Coast AQMD cumulative cancer risk threshold at the MEIR. Table 5.2-19, *Operation Plus Construction Health Risk Results with Mitigation*, shows the effect on cancer risk with implementation of Mitigation Measure AQ-1, which requires use of newer, lower emitting construction equipment. Implementation of MM AQ-1 would reduce DPM emissions from off-road construction equipment by over 80 percent. As shown in the table, implementation of mitigation would result in a total cancer risk below 5 in a million at the MEIR for the combined operation and construction phases of the project. Therefore, the proposed project would not expose off-site sensitive receptors to substantial concentrations of air pollutant emissions, and impacts would be less than significant with mitigation.



## 5. Environmental Analysis

### AIR QUALITY

**Table 5.2-19 Operation Plus Construction Health Risk Results with Mitigation**

Receptor	Project Construction and Operations	Cancer Risk (per million)	Chronic Hazards
MEIR	Project Construction	1.7	0.003
	Project Operation	3.0	0.001
	<b>Combined Total</b>	<b>4.7</b>	<b>0.004</b>
South Coast AQMD Project Threshold		10	1.0
Draft South Coast AQMD Cumulative Threshold		5	1.0
Exceeds Threshold?		<b>No</b>	<b>No</b>

Source: Appendix D-b.

Note: Emissions are based on a previous construction schedule with an earlier project horizon. As a result, emissions shown in the table are conservative because equipment exhaust emissions rates are higher in earlier years as a result of turnover of older equipment and replacement with newer equipment that meets higher emission tiers.

### 5.2.8 References

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## 5. Environmental Analysis

### 5.3 BIOLOGICAL RESOURCES

This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates the potential for implementation of the proposed project to impact biological resources in comparison to the impacts evaluated for the General Plan EIR (GPEIR). Potential changes to circumstances since the GPEIR that could result in new significant or substantially more severe environmental impacts from the proposed project are also reviewed, and cumulative impacts are considered.

The analysis in this section is based in part on the following technical study, which is included as Appendix E to this Draft SEIR:

- *Protected Tree Report*, Lisa Smith, The Tree Resource, April 14, 2024

One comment letter was received regarding biological resources from the California Department of Fish and Wildlife (CDFW) on September 13, 2023 (see Appendix A). One comment was made during the scoping meeting regarding the preservation of on-site trees. The relevant issues from these comments are addressed throughout this section.

#### 5.3.1 Environmental Setting

##### 5.3.1.1 REGULATORY BACKGROUND

Federal, State, regional, and local regulations are listed in Table 5.3-1, *Regulations/Plans for Biological Resources*. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of GPU policies.

**Table 5.3-1 Regulations/Plans for Biological Resources**

Federal	
Endangered Species Act (FESA)	Protects and conserves any species of plant or animal that is endangered or threatened with extinction, as well as the habitats where these species are found. Requires that critical habitat be designated by the United States Fish and Wildlife Service (USFWS) and provides a regulatory mechanism for the incidental take.
Migratory Bird Treaty Act (MBTA)	Governs the take, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. It prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these items, except under a valid permit or as permitted in the implementing regulations.
Clean Water Act (CWA), Section 404	Regulates discharge of dredged or fill material into "waters of the United States." Establishes the requirements for filling or dredging within waters of the United States.
CWA, Sections 401 and 402	Specifies that any applicant for a federal license or permit to conduct any activity that may result in any discharge into navigable waters shall provide the federal permitting agency with a certification, issued by the state in which the discharge originates, that any such discharge will comply with the applicable provisions of the CWA.

## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

**Table 5.3-1 Regulations/Plans for Biological Resources**

<b>State</b>	
California Fish and Game Code (CFGF), Section 1600	Requires a project proponent to notify CDFW of any proposed alteration of streambeds, rivers, and lakes.
California Endangered Species Act (CESA)	Prohibits take and protect state-listed endangered and threatened species of fish, wildlife, and plants. The protections also apply the take prohibitions to species petitioned for listing (state candidates). Establishes some sensitive mammals and birds are protected by the state as “fully protected species.”
<b>Regional</b>	
County of Los Angeles Significant Ecological Areas	Inventory of undeveloped lands designated as Significant Ecological Areas (SEA) in the County of Los Angeles. SEAs are defined as ecologically important land and water systems that support valuable habitat for plants and animals, and are often integral to the preservation of rare, threatened, or endangered species and the conservation of biological diversity in the county.
<b>Local</b>	
City of Walnut General Plan	Policies related to biological resources can be found in the Conservation, Open Space, and Recreation Element.
City of Walnut Municipal Code	Chapter 6.52, Article V, Oak/Walnut Tree Preservation

#### 5.3.1.2 EXISTING CONDITIONS

##### Regional and Local Setting

The City of Walnut is in the greater Walnut Valley, which extends from the San Jose Hills to the north to the Puente Hills to the south. Prior to development, much of this area had a decades-long history of cultivation and/or grazing. In this context, the San Jose Hills have been a focus of the City’s conservation efforts because of their steep slopes, rugged terrain, canyons, drainages, and remnant native vegetation that was once more widespread (e.g., oak groves, coastal sage scrub, sycamore woodlands, black walnut woodlands). Outside of the San Jose Hills, remnant native habitats exist in isolated pockets on a landscape of residential and commercial development. Undeveloped areas that were once farmland are now primarily characterized by invasive plant species that recolonized after the land was abandoned. The city’s several small creeks (e.g., Snow Creek, Lemon Creek) flow south in between developed parcels to the San Jose Creek, which flows west into the San Gabriel River. The project site is approximately 300 feet north of the San Jose Creek Channel and approximately 0.2 mile east of Lemon Creek near its confluence with San Jose Creek. Remnant native habitats in the San Jose Hills—in pockets throughout the city and along the creeks—provide the most value for supporting high diversity and abundance of wildlife. Species that have been able to adapt to human-dominated landscapes are able to take greatest advantage of the developed, landscaped, and remaining open areas in the region and city (City of Walnut 2017).

##### Vegetation Communities

The GPEIR and existing conditions report prepared for the 2017 Walnut General Plan Update identified six vegetation types in the city that include the California annual grassland, Venturan coastal sage scrub, coast live oak-canyon live oak woodland, California walnut woodland, riparian scrub/woodland, and ornamental

## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

vegetation (City of Walnut 2017). The project site is developed and contains cultivated plant species in the landscaped areas of the development and is characterized as an ornamental vegetation community.

#### Wildlife

Common urban-tolerant birds in the city include American crow (*Corvus brachyrhynchos*), black phoebe (*Sayornis nigricans*), northern mockingbird (*Mimus polyglottos*), house sparrow (*Passer domesticus*), mourning dove (*Zenaidura macroura*), house finch (*Carpodacus mexicanus*), the nonnative European starling (*Sturnus vulgaris*) and various other migrant songbirds, such as warblers, vireos, and grosbeaks. Common small mammals expected in the urban setting include, but are not limited to, western gray squirrel (*Sciurus griseus*), raccoon (*Procyon lotor*), California mouse (*Peromyscus californicus*), Virginia opossum (*Didelphis virginiana*), and Botta's pocket gopher (*Thomomys bottae*). Several bat species have also been documented in the city, including the big free-tailed bat (*Nyctinomops mactrotis*), pallid bat (*Antrozous pallidus*), pocketed free-tailed bat (*Nyctinomops femorosaccus*), western mastiff bat (*Eumops perotis californicus*), western yellow bat (*Lasiurus xanthinus*), and Yuma myotis (*Myotis yumanensis*) (City of Walnut 2018).

Common wildlife species expected in open space areas that support nonnative annual grassland, coastal scrub, California walnut woodland/forest, and oak woodland habitats include small mammals, such as ground squirrel (*Spermophilus beecheyi*), striped skunk (*Mephitis mephitis*), deer mouse (*Peromyscus maniculatus*), California vole (*Microtus californicus*), black-tailed jackrabbit (*Lepus californicus*), western gray squirrel, Audubon's cottontail (*Sylvilagus auduboni*); larger mammals include coyote (*Canis latrans*) and mule deer (*Odocoileus hemionus*). Common birds in these habitats may include bushtit (*Psaltirparus minimus*), acorn woodpecker (*Melanerpes formicivorus*), ash-throated flycatcher (*Myiarchus cinerascens*), western scrub jay (*Aphelocoma californica*), western meadowlark (*Sturnella neglecta*), California quail (*Callipepla californica*), wrentit (*Chamaea fasciata*), and California towhee (*Melospiza crissalis*). These habitats also provide year-round hunting grounds for many birds of prey, such as red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), and American kestrel (*Falco sparverius*). Reptiles that may also be found in open space areas in the city include the gopher snake (*Pituophis catenifer*), western rattlesnake (*Crotalus viridis*), western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), coast horned lizard (*Phrynosoma coronatum*), and the southern alligator lizard (*Elgaria multicarinata*). Amphibian presence is limited to intermittent or perennial water sources, including Lemon Creek and Snow Creek corridors when they contain water, which may support the disturbance-tolerant Sierran treefrog (*Pseudacris sierra*) (formerly Pacific treefrog [*Pseudacris regilla*] or Pacific tree chorus frog [*Hyla regilla*]) (City of Walnut 2018).

#### Special-Status Wildlife

The GPEIR reviewed the California Natural Diversity Data Base (CNDDB) and the USFWS's Quadrangle Species Lists and identified 16 bird, 11 mammal, 6 reptile, 3 amphibian, and 3 invertebrate species of special status that are known or have potential to occur in the city vicinity (the surrounding eight USGS quadrangles). The GPEIR notes that six occurrences have been documented of the federally designated coastal California gnatcatcher (*Poliioptila californica californica*) in the city and that the species has USFWS-designated critical habitat on the south-facing slopes of the San Jose Hills in the city. The coastal California gnatcatcher habitat in the vicinity of the city is shown on Figure 5.3-1, *Project Site Proximity to California Gnatcatcher Habitat*. Furthermore, one occurrence of federal- and State-threatened least Bell's vireo (*Vireo bellii pusillus*) and one occurrence of

## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

coastal whiptail (*Aspidoscelis tigris stejnegeri*) were observed in the vicinity of the city. However, additional special status species, including the coastal cactus wren (*Campylorhynchus brunneicapillus sandeigensis*), Swainson's hawk (*Buteo swainsoni*), white-tailed kite (*Elanus leucurus*), and yellow warbler (*Setophaga petechia*), have the potential to occur in the city due to the presence of suitable habitat (City of Walnut 2018).

The GPEIR also notes that the vegetation communities within the city also support suitable nesting habitat for common and special status bird species with baseline protections under the MBTA and CFGC. For example, planted shrubs and trees in landscaped portions of the city may provide suitable nesting habitats for common bird species that are adapted to ambient noise levels of existing development. In addition, a variety of raptor and passerine species have the potential to nest in shrubs and trees in adjacent open space areas. Also, special status bats may use these trees for roosting as well as uninhabited buildings within city limits (City of Walnut 2018).

#### *Special-Status Plants*

The GPEIR noted that 28 special status plant species have been documented from habitats known to occur in the vicinity of the city, including oak woodland, grassland, chaparral, coastal sage scrub, riparian woodland and scrub, and stream habitats. Two special status plant species have been documented by CNDDDB within city limits: Plummer's Mariposa-lily (*Calochortus plummerae*) and intermediate Mariposa-lily (*Calochortus weedii* var. *intermedius*) (City of Walnut 2017). There are no known special-status plant species on the project site.

#### *Wildlife Corridors*

Wildlife corridors refer to linkages between habitat areas that allow for movement of resident and migratory species and facilitate genetic interchange between populations. Los Angeles County designates significant ecological areas in the county that represent major open space areas for wildlife movement. The closest SEA to the city is in the East San Gabriel Valley (SEA #6), inside the north and northeastern boundary of the city. This SEA is shown on Figure BR-3, Significant Ecological Areas, of the Walnut General Plan Existing Conditions report (City of Walnut 2017).

#### *Wetlands*

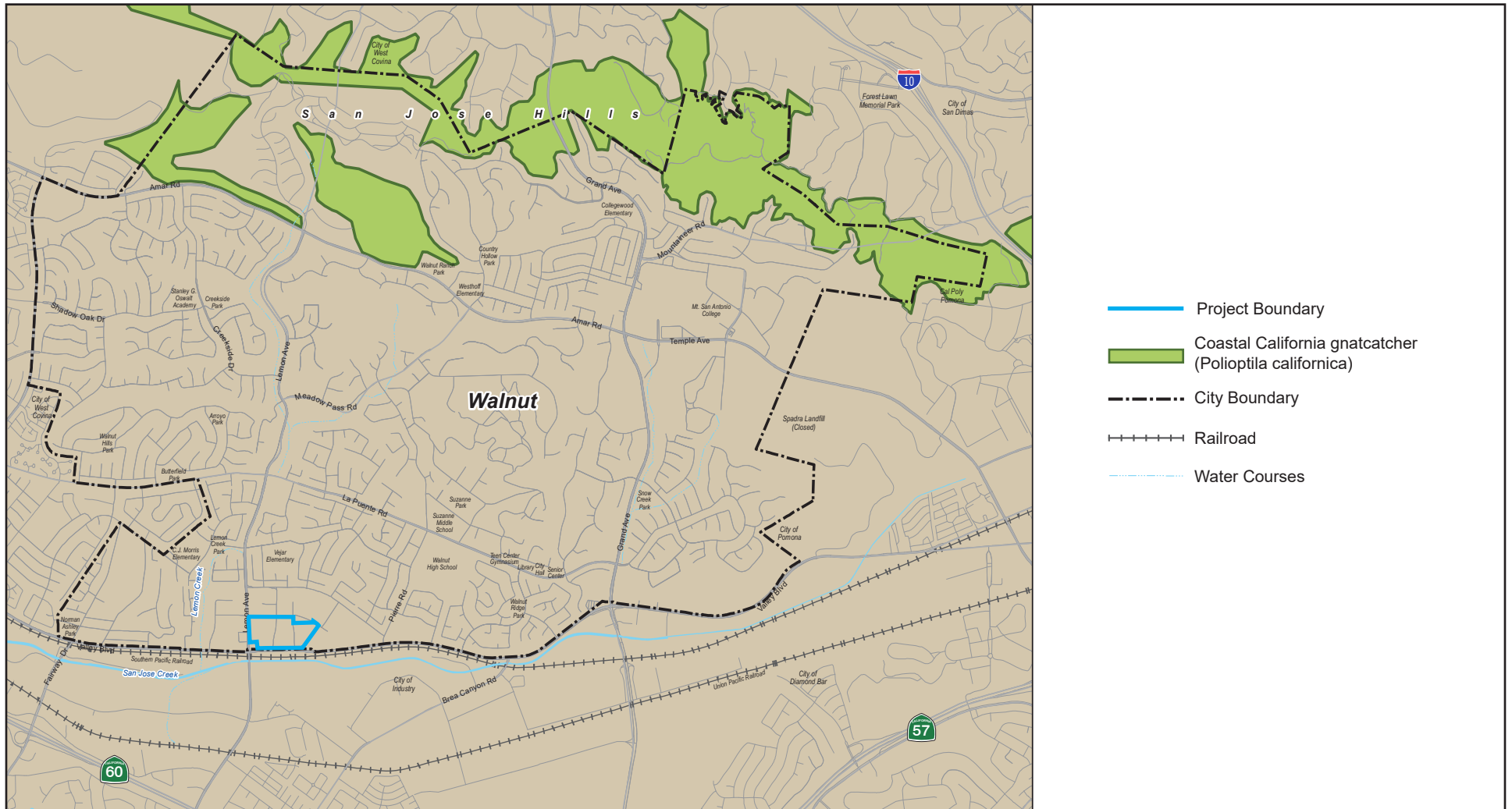
The GPEIR states that three unnamed tributaries to the San Jose Creek Diversion Channel are in the western portion of the city; they are mainly concrete-lined channels and an underground stormwater system that flow to the southwest, cross the City of West Covina, and eventually drain into San Jose Creek. Lemon Creek and its tributaries traverse the central portion of the city and generally flow north to south along Meadowpass Road, shifting to the southwest along Lemon Avenue and crossing East Valley Boulevard to the south (City of Walnut 2018).

### Project Site

The project site is approximately 23 acres between Valley Boulevard to the south, S. Lemon Avenue to the west, Paseo Del Prado to the north, and an existing industrial development to the east. The site is currently developed with a commercial business park. The uses surrounding the site are fully developed and include additional business parks, industrial uses, and single-family homes.

5. Environmental Analysis

Figure 5.3-1 - Project Site Proximity to California Gnatcatcher Habitat



Source: U.S. Fish and Wildlife Service, Critical Habitat Data, 2007.





## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

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## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

Vegetation in and around the project site primarily consists of ornamental trees, grass lawns, and shrubs (see Figures 4-1a through 4-1c, *Photographs of Existing Site Conditions*, in Chapter 4, Environmental Setting). A total of 191 trees exist at the project site. These include six coast live oak (*Quercus agrifolia*) and three Western sycamore (*Platanus racemosa*) trees for a total of nine protected trees, per the City of Walnut's Public Tree Preservation Ordinance (Smith 2024).

The existing vegetation and buildings on-site provide suitable habitat for special-status bird and bat species that are known to occur in the city. The project site does not contain any wetland or riparian habitat but is in the vicinity of Lemon Creek and the San Jose Creek Channel. The project site is not in a designated LA County SEA or within the designated critical habitat of the California gnatcatcher.

### 5.3.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- B-1 Have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- B-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- B-3 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.
- B-4 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.
- B-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- B-6 Conflict with the provisions of an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

### 5.3.3 Environmental Impacts

#### 5.3.3.1 2018 GENERAL PLAN UPDATE

##### Special-Status Species

The GPEIR noted that several special status wildlife species have the potential to occur in the city, including coastal California gnatcatcher, least Bell's vireo, and coastal whiptail. In addition, two special status plant species have been documented within the city limits: Plummer's Mariposa-lily and intermediate Mariposa-lily. The GPEIR also notes that development under the GPU has the potential to impact trees, shrubs, and other potentially suitable nesting and roosting habitat for migratory and/or nonstatus nesting birds protected by the MBTA and CFGC, in addition to potential habitat for special status bat species. The GPEIR concluded that Mitigation Measures BIO-1A, through BIO-1C would be required to reduce impacts to less than significant. Mitigation Measure BIO-1A requires surveys for sensitive plant or animal species to be conducted for project sites that contain suitable habitat for these species, and the implementation of applicable FESA and CESA measures to minimize adverse impacts to these species. Mitigation Measure BIO-1B requires that nesting bird surveys be performed on project sites that contain vegetation and buildings suitable for nesting bird habitat. In the event that active nests are found, BIO-1B requires that a qualified biologist establish a no-work buffer around the nests until otherwise determined by the biologist. Mitigation Measure BIO-C requires survey of roosting bat habitat and the implementation of measures that would protect roosting bats if discovered at the project site. Impacts to special-status species were considered less than significant after the incorporation of Mitigation Measures BIO-1A through BIO-1C.

##### Riparian Habitat and Wetlands

The GPEIR determined that existing riparian habitat and sensitive plant communities, including California walnut woodland and walnut forest, could be impacted by new development on vacant and undeveloped lands where these vegetation communities currently exist. Mitigation Measure BIO-2 was incorporated to reduce these potential impacts by requiring evidence to be provided that all necessary permits have been obtained from CDFW for projects that may affect riparian or wetland habitat. After implementation of Mitigation Measure BIO-2, impacts to riparian habitat are considered less than significant.

The GPEIR also determined that impacts to federally and State protected waters and wetlands could occur under development of undeveloped/vacant lands in the city, particularly in proximity to the riparian zones of Lemon and Snow Creeks. The GPEIR notes that projects containing jurisdictional waters and wetlands would comply with the CWA and Mitigation Measure BIO-3. Mitigation Measure BIO-3 would require the delineation of jurisdictional features on project sites and that project applicants seek formal authorization (i.e., permits) for impacts to federally protected waters and wetlands, as defined by CWA Sections 404 and Section 401 from the US Army Corp of Engineers (USACE) and the Regional Water Quality Control Board (RWQCB), respectively. Mitigation Measure BIO-3 notes that impacts minimization measures would likely be required as a condition of the CWA permits. After implementation of Mitigation Measure BIO-3, impacts would be less than significant.

## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

#### Migratory Corridors

The GPEIR notes that most wildlife movement is expected in the Open Space areas of the San Gabriel Mountains in the northern and eastern portions of the city. Areas where development and infrastructure projects are likely to occur are concentrated in the southern portions of the city, where there is existing development. The GPEIR concludes that development under the GPU would not affect these existing open space corridors since it would occur in areas of the city where no viable wildlife linkage corridors exist. Impacts were considered less than significant.

#### Local Biological Resource Policies, Ordinances, and Habitat Conservation Plans

The GPEIR notes that development under the GPU would comply with all applicable federal, State, and regional policies and regulations related to the protection of important biological resources. Additionally, development would be subject to the provisions of the City's Oak/Walnut Tree Preservation Ordinance, which requires a request form for any type of work on any City trees (generally defined as those trees in public spaces) from the Community Services Department. The ordinance also specifies that impacts to California black walnut trees, if they cannot be avoided, should be mitigated by the replacement of the impacted trees. The GPEIR concluded that impacts with regard to compliance with biological resource related policies, ordinances, and regulations would be less than significant.

The GPEIR also concluded that the GPU would not conflict with an adopted local, regional, or State habitat conservation plan since no adopted plans cover land in the city. Impacts were considered less than significant.

#### 5.3.3.2 IMPACT ANALYSIS

The following impact analysis addresses the thresholds of significance in Section 5.3.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.3-1: The proposed project could have a substantial effect on species identified as candidate, sensitive, or special status species. [Threshold B-1]**

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The project site is developed with an existing industrial business park and is in a highly urbanized area of the city and surrounded by industrial and commercial uses. Vegetation at the project site consists of trees, shrubs, and landscaping along all street frontages of the project site. There are no known special-status plant species on the project site.

Since the site is developed, the potential of suitable habitat for threatened, endangered, or rare species on or near the project site is limited. However, as concluded in the GPEIR, existing vegetation and buildings could provide habitat for nesting birds. Special status species that occur in Walnut, as documented in the biological resources analysis for the GPEIR and GPU existing conditions report, include the coastal cactus wren, coastal California gnatcatcher, least Bell's vireo, Swainson's hawk, white-tailed kite, and yellow warbler.

Sections 3503, 3503.5, and 3513 of the CFGC prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the MBTA). Project activities during the bird breeding and nesting season could result in the incidental loss of fertile eggs or nestlings or lead to nest abandonment.

## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

Therefore, similar to the impacts identified in the GPEIR, impacts to nesting birds under the proposed project are potentially significant. To reduce these impacts to less than significant, the proposed project would incorporate Mitigation Measure BIO-1B from the GPEIR (renumbered to BIO-1 in the SEIR) which would require construction activities to occur outside of the avian breeding season or for a qualified biologist to conduct nesting bird surveys before the start of ground-disturbing activities and implement the appropriate measures to reduce nesting bird impacts during construction. Mitigation Measure BIO-1 has also been revised to include updated guidance provided by the CDFW in the agency's comment letter for the proposed project's NOP (see Appendix A). Implementation of Mitigation Measure BIO-1 would reduce impacts to nesting birds to less than significant.

The existing buildings and vegetation on the project site also provide suitable habitat for special status bat species, as discussed in the GPEIR. The species of bat known to occur in Walnut, as documented in the biological resources assessment of the GPEIR and the GPU existing conditions report, include the big free-tailed bat, pallid bat, pocketed free-tailed bat, western mastiff bat, western yellow bat, and Yuma myotis. The proposed project would involve the demolition of the existing buildings on-site and removal of approximately 32 trees. Therefore, the implementation of Mitigation Measure BIO-1C from the GPEIR (renumbered to Mitigation Measure BIO-2 in the SEIR) would be required to reduce impacts to roosting bats on the project site. Mitigation Measure BIO-2 requires a qualified biologist to conduct a roost assessment survey of trees or human-made structures with the potential to support bat roosts that are planned to be removed. If bats are found to be present in these habitats, the proposed project would implement additional measures to reduce impacts to bats specific to the occurrence of construction activities inside and outside of the bat maternity roosting season.

The project site does not contain habitat that would be suitable for other types of sensitive plant and animal species besides nesting birds/raptors and roosting bats. Therefore, Mitigation Measure BIO-1A, which requires surveys for sensitive plant and animal species on project sites that contain suitable habitat for any sensitive species, would not be necessary to reduce impacts under the proposed project. Mitigation Measures BIO-1 and BIO-2 would require surveys and the implementation of protective measures for bird and bat species, since potentially suitable habitat exists for these species types on the project site. Overall, the impacts of the proposed project would be similar to those identified within the GPEIR. The implementation of Mitigation Measures BIO-1 and BIO-2 would reduce impacts to sensitive species to less than significant.

***Level of Significance Before Mitigation:*** Impact 5.3-1 would be potentially significant.

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**Impact 5.3-2: Development of the proposed project would not result in the loss of a sensitive natural community or riparian habitat. [Threshold B-2]**

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Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies; that are known to provide habitat for sensitive animal or plant species; or are known to be important wildlife corridors. Riparian habitats are along the banks of rivers and streams. As noted in the GPEIR, impacts to sensitive natural communities and riparian habitat could occur on vacant and undeveloped lands through construction and/or maintenance of trails, park facilities, and other infrastructure improvements. The project site is fully developed as a business park, and the conditions for impacts do not apply to the proposed project.

## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

Furthermore, there is no potential for riparian or wetland habitat on the project site. Therefore, GPEIR Mitigation Measure BIO-2, which requires project sites that contain riparian or wetland habitat to obtain a CDFW 1602 Permit, would not be required to reduce impacts under the proposed project. The proposed project would not result in any new or increased impacts when compared to the impacts identified in the GPEIR. A less than significant impact would occur.

***Level of Significance Before Mitigation:*** Impact 5.3-2 would be less than significant.

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**Impact 5.3-3: The proposed project would not impact jurisdictional waters. [Threshold B-3]**

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Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as streams, swamps, marshes, and bogs. No wetlands regulated by the USACE, USFWS, CDFW, or Los Angeles RWQCB exist on the project site. According to the USFWS Wetlands Mapper, San Jose Creek, located across Valley Boulevard from the project site, is mapped as a riverine habitat (USFWS 2023). However, the creek is a concrete canal and therefore does not support wetland resources such as saturated soil or wetland vegetation. Furthermore, compliance with the discharge requirements of the CWA would be required for the proposed project, as further discussed in Section 5.9, *Hydrology and Water Quality*. Mitigation Measure BIO-3 of the GPEIR, which requires projects containing potential wetlands or waters of the US and/or waters of the State to conduct and submit a jurisdictional delineation study for review by federal and State agencies, is therefore not applicable to the proposed project and would not be incorporated. Impacts under the proposed project would be less than those identified in the GPEIR and less than significant impacts would occur.

***Level of Significance Before Mitigation:*** Impact 5.3-3 would be less than significant.

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**Impact 5.3-4: The proposed project would not affect wildlife movement. [Threshold B-4]**

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There are no corridors valuable for overland wildlife movement or migration on, adjacent to, or in proximity to the project site. The project site and surroundings are in an urbanized area and not available for overland wildlife movement. The San Jose Creek, located across Valley Boulevard from the southern project site boundary, is a concrete canal. Project development would take place within the boundaries of the project site and is not anticipated to impact the creek. However, the project site is developed with ornamental trees, shrubs, and landscaping along street frontages, which may be potential habitat for nesting birds. The proposed project would incorporate Mitigation Measure BIO-1B from the GPEIR (now Mitigation Measure BIO-1), which largely implements the requirements of the MBTA. For example, ground-disturbing activities would only occur outside of the breeding season (September 1 through January 14) unless it is determined via a preconstruction survey that no nesting birds (or birds displaying breeding or nesting behavior) are present immediately prior to ground-disturbing activities. Similarly, the GPEIR Mitigation Measure BIO-1C (now Mitigation Measure BIO-2) would require roosting bat surveys on the project site and the implementation of protective measures to reduce impacts to roosting bats. Compliance with these mitigation measures would avoid impacts to nesting birds and roosting bats during the proposed project's ground-disturbing construction activities.

## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

Moreover, the GPEIR notes that no planned development under the GPU would impact areas of the city that accommodate wildlife movement, which are primarily lands within the San Gabriel Mountains in the northern and eastern portion of the city. The proposed project would not result in any new or more substantial impacts when compared to those identified in the GPEIR and impacts regarding migratory corridors would be less than significant.

***Level of Significance Before Mitigation:*** Impact 5.3-4 would be potentially significant.

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<b>Impact 5.3-5:</b>	<b>The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. [Thresholds B-5 and B-6]</b>
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The project site contains 191 mature street trees, 66 of which would be impacted by construction and are recommended for removal and replacement to the satisfaction of the City. The remaining 125 trees would be retained. Among the trees that would be retained are the nine protected trees—six coast live oaks and three Western sycamores (Smith 2024). The locations of the surveyed trees and their protection status are shown on Figure 5.3-2, *Tree Survey Results*. The City's Tree Preservation Ordinance requires a valid tree permit, issued by the City, prior to cutting, pruning, removing, relocating, endangering, or damaging any tree protected by this ordinance. The ordinance also requires that protected trees be preserved if they are healthy trees unless compelling reasons justify the removal of such trees. The policy applies to the removal, pruning, cutting, and/or encroachment into the protected zone of the trees. Project construction activities would proceed in compliance with the requirements of the City's Tree Preservation Ordinance, and no protected trees would be removed as part of the proposed project.

The project site is within an urban and developed area. Like the rest of the city, the project site is not in the area of an adopted habitat conservation plan or natural community conservation plan (CDFW 2019; CBI 2023). Therefore, no new or more substantial impacts would occur under the proposed project when compared to the GPEIR, and impacts would be less than significant.

***Level of Significance Before Mitigation:*** Impact 5.3-5 would have no impact.



Figure 5.3-2 - Tree Survey Results



Source: The Tree Resource 2024.



## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

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## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

#### Cumulative Impacts

The area considered for cumulative impacts to biological resources is the city limits. As noted in the GPEIR, development on undeveloped and vacant areas of the city under the GPU have the most potential for incurring impacts to biological resources. Other projects under the GPU would be required to comply with existing laws and regulations protecting biological resources, including CEQA requirements for identifying and mitigating these impacts. The proposed project has the potential to impact nesting birds and roosting bats that may exist on the project site; however, implementation of GPEIR Mitigation Measures BIO-1B and BIO-1C (as modified and renumbered to BIO-1 and BIO-2, respectively, in the SEIR) would reduce these impacts to less than significant. Therefore, the project's contribution to cumulative impacts on biological resources would not be cumulatively considerable.

#### 5.3.4 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, some impacts would be less than significant: 5.3-2, 5.3-3, and 5.3-5.

Without mitigation, these impacts would be **potentially significant**:

- Impact 5.3-1      The proposed project contains suitable habitat for nesting birds and roosting bats and therefore may result in significant impacts to these specie types.
- Impact 5.3-4      The proposed project would remove suitable habitat for nesting birds and roosting bats and could therefore disrupt existing wildlife migratory corridors for these species.

#### 5.3.5 Mitigation Measures

##### 5.3.5.1 MITIGATION MEASURES FROM THE GPEIR

The following mitigation measures were taken directly from the GPEIR. Modifications to the mitigation measures from the certified EIR are shown in ~~strike through~~ for deleted text and underline for new, inserted text.

Mitigation Measure BIO-1A does not apply to the proposed project because the project site is fully developed and does not contain habitat for sensitive plant and animal species, outside of bird and bat species. The requirements of BIO-1A that would reduce impacts to less than significant for nesting birds and roosting bats are implemented by Mitigation Measures BIO-1B and BIO-1C (renamed to Mitigation Measures BIO-1 and BIO-2, respectively). Mitigation Measure BIO-1B has been revised to incorporate the guidance provided by the CDFW in the agency's comment letter, submitted September 13, 2023, in response to the proposed project NOP (see Appendix A).

GPEIR Mitigation Measures BIO-2 and BIO-3 are not applicable to the proposed project since the project site does not include riparian/wetland habitat or jurisdictional waters.

## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

BIO-1B Vegetation and buildings within the City of Walnut could provide suitable nesting habitat for six special status bird species, including: coastal cactus wren (*Campylorhynchus brunneicapillus sandeigensis*), coastal California gnatcatcher (*Polioptila californica californica*), least Bell's vireo (*Vireo bellii pusillus*), Swainson's hawk (*Buteo swainsoni*), white-tailed kite (*Elanus leucurus*), and yellow warbler (*Setophaga petechia*) as well as common bird species with protection under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFG). General ground disturbance, including but not limited to, demolition, construction, or related activities may result in removal or disturbance of nests if present on a project site. These actions would constitute a significant impact under CEQA as they may result in mortality and/or reduction in reproductive success of birds. If work cannot avoid the nesting bird season (generally which shall be defined as February January 1 through August 4531, consistent with the recommendation from the California Department of Fish and Wildlife (CDFW)), then preconstruction surveys shall be conducted in order to reduce these impacts to a less than significant level. A qualified biologist shall complete a nesting bird survey no more than 14 days prior to the start of any work, within a radius of at least 300 feet of suitable nesting habitat that will be disturbed or to the extent allowable and accessible. The survey radius shall be expanded to 500 feet or 0.5-mile for special status species, if feasible. If active nests are observed during pre-construction surveys, project-related activities ~~will~~ shall avoid the area via a protective no-work buffer determined by a qualified biologist and determined based on a species' legal protection and biological requirements. Work may resume within this protective no-work buffer after a qualified biologist has determined that young have fledged the nest or the nest otherwise becomes inactive (i.e. predation or natural nest failure). Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area.

BIO-24C Tree stands, buildings, and other man-made structures on the project site could provide suitable roost habitat for six special status bat species: big free-tailed bat (*Nyctinomops mactrotis*), pallid bat (*Antrozous pallidus*), pocketed free-tailed bat (*Nyctinomops femorosaccus*), western mastiff bat (*Eumops perotis californicus*), western yellow bat (*Lasiurus xanthinus*), and Yuma myotis (*Myotis yumanensis*). New development and/or demolition associated with implementation of the proposed project could result in removal or disturbance of bat roosts if present on the project site. These actions would constitute a significant impact under CEQA as they may result in mortality and/or reduction in reproductive success of bats. Implementation of Mitigation Measure BIO-24C would reduce these impacts to less than significant levels. A qualified biologist shall conduct a roost assessment survey of trees or human-made structures with potential to support bat roosts that are planned to be removed. The survey shall assess the use of the tree or structure for roosting as well as potential presence of bats. If the biologist finds no evidence of, or potential to support bat roosting, no further measures are recommended. However, if evidence of bat roosting is present, additional measures described below shall be implemented:

- *Work activities outside the maternity roosting season:* If evidence of bat roosting is discovered during the pre-construction roost assessment and general ground disturbance, demolition,

## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

construction, or related activities is planned from August 1 through February 28 (outside of the bat maternity roosting season), a qualified biologist shall implement passive exclusion measures to prevent bats from reentering structures. After sufficient time to allow bats to escape and a follow-up survey to determine if bats have vacated the roost, work may continue and impacts to special status bat species shall be avoided. To offset the loss of occupied bat roosts, bat boxes shall be installed at a suitable location in the vicinity of a project site to provide roost locations for displaced bats, contingent on CDFW approval of project details.

- *Work activities during the maternity roosting season:* If a pre-construction roost assessment discovers evidence of bat roosting in the trees or human-made structures during the maternity roosting season (March 1 through July 31), and determines maternity roosting bats are present, work shall be avoided during the maternity roosting season or until a qualified biologist determines the roost has been vacated.

#### 5.3.5.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

No additional mitigation measures or conditions of approval are required to reduce impacts to biological resources to less than significant.

#### 5.3.6 Level of Significance After Mitigation

The implementation of Mitigation Measures BIO-1 and BIO-2 would reduce potential impacts to biological resources to a level that is less than significant. No significant unavoidable adverse impacts to biological resources have been identified.

#### 5.3.7 References

- California Department of Fish and Wildlife (CDFW). 2019, April. California Natural Community Conservations Plans. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>.
- Conservation Biology Institute (CBI). 2023, July 31 (accessed). Habitat Conservation Plan (HCP), California. <https://databasin.org/datasets/c116dd0d32df408cb44ece185d98731c/>.
- Los Angeles County. 2023, November 14 (accessed). Significant Ecological Areas-Inventory. GIS webmap. <https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=9c9047fe1d2844f387f8ca1777f009fc>.
- Smith, Lisa. 2024, April 14. Protected Tree Report. The Tree Resource. (Appendix E)
- United States Fish and Wildlife Service (USFWS). 2023, July 31 (accessed). Wetlands Mapper. <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>.
- Walnut, City of. 2017, February. Existing Conditions Report. Walnut General Plan and West Valley Specific Plan.

## 5. Environmental Analysis

### BIOLOGICAL RESOURCES

———. 2018, February. Draft Environmental Impact Report Volume I of II. General Plan Update and West Valley Specific Plan (SCH # 2017101010).

## 5. Environmental Analysis

### 5.4 CULTURAL RESOURCES

Cultural resources comprise archaeological and historical resources. Archaeology studies human artifacts, such as places, objects, and settlements that reflect group or individual religious, cultural, or everyday activities. Historical resources include sites, structures, objects, or places that are at least 50 years old and are significant for their engineering, architecture, cultural use or association, etc. This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates the potential for implementation of the Walnut Business Park to impact cultural resources in the City of Walnut in comparison to the impacts evaluated for the project site in the General Plan Environmental Impact Report (GPEIR). Paleontological resources are discussed in Section 5.6, *Geology and Soils*, and tribal cultural resources are discussed in Section 5.14, *Tribal Cultural Resources*.

The analysis in this section is based in part on the results of the Native American consultation conducted by the City in compliance with Assembly Bill (AB) 52, a Sacred Lands File (SLF) search, and a California Historical Resources Information System (CHRIS) search.

There was one comment letter received from the Native American Heritage Commission (NAHC) in response to the Notice of Preparation (NOP) related to cultural resources and tribal consultation as required by AB 52. The relevant issues raised in that comment letter are addressed throughout this section and in Section 5.14, *Tribal Cultural Resources*.

The analysis in this section is based in part on the following information:

- *Records Search Results for the COW-05.0 Project*, South Central Costal Information Center (SCCIC), May 9, 2023.
- *Historic Built Environment Assessment for the Walnut Business Park Project*, Cogstone Resources Management, August 2024.
- *AB 52 Correspondences with Tribes*, Various, June 5, 2023.

Complete copies of these studies are included in the technical appendices to this Draft SEIR (Appendices F, G, and P).

#### 5.4.1 Environmental Setting

##### 5.4.1.1 REGULATORY BACKGROUND

Federal, State, regional, and local regulations are listed in Table 5.4-1, *Regulations/Plans for Cultural Resources*. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of General Plan Update (GPU) policies.

## 5. Environmental Analysis

### CULTURAL RESOURCES

**Table 5.4-1 Regulations/Plans for Cultural Resources**

<b>Federal</b>	
National Historic Preservation Act (NHPA)	Coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties.
Archaeological Resources Protection Act	Regulates the protection of archaeological resources and sites on federal and Indian lands.
<b>State</b>	
California Environmental Quality Act	Requires a lead agency to analyze whether historic and/or archaeological resources may be adversely impacted by a proposed project.
California Public Resources Code Sections 5020 to 5029.5	Establishes the State Historical Resources Commission to oversee the administration of the California Register of Historical Resources and is responsible for designating State Historical Landmarks and Historical Points of Interest.
California Public Resources Code Sections 5079 to 5079.65	Defines the functions and duties of the Office of Historic Preservation (OHP), which administers federal- and state-mandated historic preservation programs in California as well as the California Heritage Fund.
<b>Local</b>	
City of Walnut Municipal Code Chapter 6.104, Historical Preservation	Establishes the City's procedures and guidelines for the preservation of historically and culturally significant cultural resources.
City of Walnut General Plan	Goals and policies relevant to cultural resources are listed in the Conversation, Open Space, and Recreation Element.

#### 5.4.1.2 EXISTING CONDITIONS

##### Natural Setting

The project site is plotted in Section 00, Township 2 South, Range 9 West, as depicted on the United States Geological Survey (USGS) San Dimas, California 7.5-minute topographic quadrangle (CDOC 2019). The project site currently operates as a business park with a variety of commercial and light-industrial uses.

##### Regional Geologic Setting

The project site is in the Los Angeles Basin, a northwest-trending, alluvium-filled lowland at the north end of the Peninsular Ranges geomorphic province of coastal southern California. This basin, which is the surface expression of a deep structural trough, has been subdivided into four primary structural blocks distinguished from one another by contrasting basement rock types and stratigraphy. These structural blocks are generally separated by zones of faulting along which movement has occurred intermittently since middle Miocene time (Langan 2021).

The site is in the central portion of the Northeastern Block of the Los Angeles Basin, a roughly triangular-shaped area bounded on the south by the Elsinore/Whittier fault, on the east by the Chino fault, and on the north by the Sierra Madre/Cucamonga fault. The city of Walnut is between the San Jose and Puente Hills in an alluviated valley. Bedrock of these hills generally consists of the Puente Formation. Drainage through the area is controlled by San Jose Creek, which flows toward the west-southwest (Langan 2021).

## 5. Environmental Analysis

### CULTURAL RESOURCES

The project site is underlain by middle Holocene-aged young alluvial-fan deposits. These alluvial fans are noted to consist primarily of boulder alluvial in the headward portions of the fan, grading southward into dominantly sand and gravel (Yerkes and Campbell 2005).

#### Ethnographic Setting

The project site is in the ethnographic and historic territory traditionally inhabited by the Gabrielino, who subsisted on hunting and gathering and lived in small, dispersed villages. The Gabrielino culture was adversely affected following the arrival of the Spanish Missionaries to the San Fernando and San Gabriel Missions in the 1770s. The name Gabrielino denotes those people who were subjugated by the Spanish from Mission San Gabriel, which included people from the Gabrielino proper, as well as other social groups. Therefore, in the post-Contact period, the name does not necessarily identify a specific ethnic or tribal group. The names Native Americans in southern California used to identify themselves have, for the most part, been lost. Many modern-day Gabrielino identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and refer to themselves as the *Tongva*. The Gabrielino language, as well as that of the Juaneño and Luiseño to the south, was derived from the Takic family of the Uto-Aztecan linguistic stock, which can be traced to the Great Basin area (City of Walnut 2019).

Gabrielino lands encompassed the greater Los Angeles Basin and the three southern Channel Islands: San Clemente, San Nicolas, and Santa Catalina. Inland, their territory was bounded on the north by the Chumash at Topanga Creek, the Serrano at the San Gabriel Mountains to the east, and the Juaneño on the south at Aliso Creek. This southern boundary of Gabrielino territory at Aliso Creek was recorded based on anthropological fieldwork conducted by Kroeber in 1907, and the Juaneño currently dispute the defined northern boundary of their lands with the Gabrielino at Aliso Creek. They had a complex social, economic, and political structure and are known for their steatite, or soapstone industry originating on Santa Catalina Island. At the time of historic contact there were probably 50 to 100 mainland villages, each with a population of 50 to 100 inhabitants (County of San Bernardino 2019).

#### Local Historic Overview

The Spaniards who arrived in the Los Angeles region in the early 1800s introduced the concept of ranchos and started agricultural development and the creation of home sites. The first land grants in the Walnut area were those of the Rancho de San Jose granted to Don Ricardo Vejar and Don Ygnacio Palomares; the Rancho de Los Nogales, issued to Jose de La Cruz Linares; and Rancho La Puente, issued to John Rowland and William Workman in 1842, which consisted of a total of 48,790.5 acres. The City of Walnut was included as part of 1 of the 24 ranchos belonging to the San Gabriel Mission (City of Walnut 2023).

In 1868, John Rowland and William Workman divided Rancho La Puente, leaving Rowland the eastern half and Workman the western half. Rowland's land included the western portion of Walnut. The land was used for raising cattle and growing wheat, grapes, and fruit trees. Many years earlier, in 1840, Mexican Governor Juan Alvarado awarded a man named Jose de La Cruz Linares a land grant of 4,340 acres, land which included a portion of Walnut. This land was known as Rancho de Los Nogales, or Ranch of the Walnut Trees. In 1847, seven years after the death of Linares, the rancho was acquired by Ricardo Vejar. This land included the eastern



## 5. Environmental Analysis

### CULTURAL RESOURCES

portion of Walnut and became part of Rancho de San Jose. The City of Walnut originally obtained its name from the Rancho de Los Nogales land grant, Nogales being the Spanish word for walnut (City of Walnut 2023).

The City of Walnut was incorporated in 1959 by local farmers who sought to protect the rural lifestyle of the area and rebut attempts at annexation from the surrounding cities of West Covina and Industry (City of Walnut 2018). At annexation, the city's population was 934 residents (Scauzillo 2012). The population of the city has since grown to 28,430 residents (US Census).

Historically and culturally significant resources listed in the City's General Plan include (City of Walnut 2018):

- **Suzanne Park** (625 Suzanne Road). The first park to be developed after the city was incorporated in 1959. The park was built by Walnut residents.
- **Bob Quattlebaum Windmill** (Fuerte Drive). This metal windmill was donated to the City by the Quattlebaum family in memory of their father, Bob Quattlebaum. It was on the family's property on Kelso Road and is now located at Suzanne Park.
- **Brookside Equestrian Center** (800 Meadow Pass Road). This site first belonged to the Sentous family, holders of the 2,200-acre Sentous Ranch.
- **Bourdet Home** (166 Lemon Avenue). Pete Bourdet became the first mayor of Walnut in 1959. He was born here, farmed here, and helped establish the first Walnut water system. His house was built in the 1920s.
- **W. R. Rowland Adobe Ranch House** (130 Avenida Alipaz). This adobe ranch house, with its thick adobe walls, heavy wide doors, wood-shingled roof, and dirt floors, is the oldest building in the City of Walnut. It belonged to the owner of the Rowland Ranch, an area which incorporated all of Walnut. The structure was built in 1883.
- **Martinez Adobe Site** (Vejar Elementary School Site). The Martinez Adobe was on the current site of Vejar Elementary School and was built in the 1840s by Santiago Martinez. Adobe homes were advantageous in California's hot climate due to their efficient insulation. The Martinez Adobe is no longer standing, but the site still represents an important part in Walnut history.
- **Carrey Home** (20330 Carrey Road). Pierre Carrey found employment on a Walnut ranch and used the money he earned to buy the site of present-day Walnut High School. His grandson, Robert Carrey, was one of the first City Council members and held meetings in his small garage. He also helped to build the first City Hall. Walnut's Carrey and Pierre Roads honor this family's contributions to the city.
- **Site of First Walnut City Hall** (20550 Carrey Road). Walnut was incorporated as a city on January 19, 1959, and the new town established a City Hall that same year.

## 5. Environmental Analysis

### CULTURAL RESOURCES

- **Wildlife Sanctuary, Mt. SAC** (1100 N. Grand Avenue). This 10-acre nature preserve was established in 1964 to serve as a protected example of Walnut's natural habitat. It contains a stream, pond, and countless species of birds.
- **Grove of Walnut Trees** (Grand Avenue). Walnut trees along Grand Avenue provide a representative example of Southern California Black Walnut trees (*Juglans californica*) native to the area and found growing throughout the city.

The closest historic resources to the project site include the site of the first Walnut City Hall approximately 0.15 mile from the northeastern edge of the project site. Additionally, the historic home of the Carrey Family is approximately 0.10 mile north of the project site.

### History of Project Site

The project site consists of 34 buildings that accommodate the current commercial and industrial uses. Across the entire site, the land remained undeveloped until 1928, when it was used for agricultural uses. As shown in Table 5.8-2, the first buildings were built on the project site in 1976 and 1977 and consisted of 10 single-story buildings. By 1978, the next set of buildings were built, which consisted of seven single-story buildings, and one single-story building. The next cluster of buildings were built sometime between 1981 and 1983 and consisted of 10 single-story buildings. The remaining buildings were built in 1985—specifically, a two-story and five single-story buildings (AES 2021). Therefore, 18 building on the project site are within the 45-year threshold to be considered historic in age under CEQA (Cogstone 2024).

### Building Survey

The built environment resources survey identified and verified the location of all structures and buildings within the project site aged 45 years or older. Once identified, the historic built environment resources were examined to ascertain if they are recommended eligible for listing as a historical resource at the local, state, or national level and if the original integrity of the resource remains intact. The seven aspects of integrity that are considered part of a determination of eligibility are location, design, setting, materials, feeling, workmanship, and association (Cogstone 2024). As described in the Historic Built Environment Assessment (Appendix G), 18 buildings of historic age were documented and evaluated for potential historical significance in the survey. While most of these buildings contain minimal architectural detail, their respective designs emulate a variety of architectural styles, including Modern, Brutalist, and Mission Revival. A unifying design detail on 11 of the buildings is entryways with an arch composed of painted bricks stacked in a rowlock course (Cogstone 2024).

### Cultural Resources in the Vicinity of the Project Site

#### Records Search

In April 2023, PlaceWorks requested a records search of the CHRIS at the SCCIC at California State University, Fullerton. The purpose of the records search was to determine the extent and location of previous cultural resources studies, cultural resources surveys, previously identified prehistoric or historic archaeological site locations, architectural resources, historic properties, cultural landscapes, or tribal cultural resources within a half-mile radius of the project site. Additional sources consulted included the National Register of Historic

## 5. Environmental Analysis

### CULTURAL RESOURCES

Places (NRHP), the Historic Property Data File, the listing of California Historical Landmarks (CHL), the California Register of Historic Resources (CRHR), the California Inventory of Historic Resources, and the list of California Points of Historical Interest (CPHI).

The results of the records search indicated that 13 cultural resources studies have been conducted within one half-mile of the project site. The studies conducted in the vicinity of the project site are listed in Table 5.4-2, *Previous Cultural Resources Studies in the Vicinity of the Project Site*. The historic built environment assessment conducted by Cogstone in August 2024 is the first historic resources survey to assess potential historic resources on the project site. The records search conducted by Cogstone for this assessment concurs with the findings of the CHRIS records search.

**Table 5.4-2 Previous Cultural Resources Studies in the Vicinity of the Project Site**

Report No. (LA)	Author(s)	Title	Year
LA-00342	Taylor, Thomas T.	Report of the Archaeological Survey of Five Possible Steel Tank Reservoir Sites and Pipe Routes for the Walnut Valley Water District	1978
LA- 00591	Daly, Ken, James D. Swenson, and Philip J. Wilke	An Archaeological and Historical Assessment of a Portion of Tentative Tract 36450, City of Walnut, Los Angeles County, California	1979
LA- 01434	King, Jane	Vejar Adobe Archaeology Walnut, California	1984
LA- 01984	Leonard, Nelson N. III	City of Walnut, Survey.	1975
LA- 02882	McKenna, Jeanette A.	Cultural Resources Investigations, Site Inventory, and Evaluations, the Cajon Pipeline Project Corridor, Los Angeles and San Bernadino Counties, California	1993
LA-02970	Chamberlaine, Pat and Jean Rivers-Council	Cajon Pipeline Project Draft Environmental Impact Statement Environmental Impact Report	1992
LA-04612	Duke, Curt	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 952-01, County of Los Angeles, California	1999
LA-04835	Ashkar, Shahira	Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Riverside, Los Angeles and Riverside Counties	1999
LA-08249	Peterson, Patricia A.	Cultural Resources Records Search and Survey Report for the Reclaimed Water Backbone Transmission Project, Los Angeles County, California	2002
LA-08821	Bonner, Wayne H.	Cultural Resources Records Search and Site Visit Results for Royal Street Communications, Llc Candidate La0449a (nogales Sub-sce), 574 South Lemon Avenue, City of Industry, Los Angeles County, California	2006
LA-11065	Hatoff, Brian	Verizon— Fairlance 574 South Lemon Ave., City of Industry, CA 91787	2009
LA-11821	Panich, Lee and Holson, John	Archaeological Survey Report, Tehachapi Renewable transmission Project Segment 8 Telecommunications route, Los Angeles and San Bernardino Counties, California	2010
LA-13222	Roland, Jennifer	Phase I Investigation for the Crown Castle VY220 SCE Nogalas Substat Antenna Installation Project, City of Industry, Los Angeles County, California	2016

Three historic resources were identified within a half-mile radius of the project site, including the Site of Vejar (19-001040), the Union Pacific Railroad (19-186112), and the W R Rowland Adobe Redwood Ranch House (19-186579). These resources are described in Table 5.4-3, *Previously Recorded Cultural Resources Within a Half-Mile Radius of the Project Site*.

## 5. Environmental Analysis

### CULTURAL RESOURCES

**Table 5.4-3 Previously Recorded Cultural Resources Within a Half-Mile Radius of the Project Site**

Primary (P-19)	Recorder and Year	Age/Period	Site Description	Location in Relation to the Project Site
P-19-001040	Ken Daly, 1979	Prehistoric era	Site of Vejar Adobe	20701 Carrey Road, Walnut, CA, 918 feet north of the project site
P-19-192581	S. Ashkar, 1999; R. Ramirez and F. Smith, 2009; F. Smith and J. Steely, 2009; Rand F. Herbert, 2002; Alyssa Newcomb, 2012; Audrey von Ahrens, 2018; Jenna Kachour, 2019	Historic era	Union Pacific Railroad, Southern Pacific Railroad Los Angeles Division	200 feet south of the project site parallel to Valley Boulevard
P-19-186579	James Mize, 1975	Historic era	W R Rowland Adobe Redwood Ranch House	130 Avenida Alipaz, Walnut, CA, approximately 0.37-mile northwest of project site

#### *Sacred Lands File Search Results*

PlaceWorks submitted an SLF request to the NAHC to determine whether there are sensitive or sacred Native American resources in the vicinity of the project site that could be affected by the proposed project. The NAHC responded on April 21, 2023, with a positive SLF search, indicating the presence of Native American sacred land within the project site specifically associated with the Gabrieleno Band of Mission Indians – Kizh Nation (see Section 5.14, *Tribal Cultural Resources*). NAHC provided a consultation list of tribes with traditional lands or cultural places within the boundaries of the city. The tribes listed by the NAHC include the Gabrieleno Band of Mission Indians – Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrieleno/Tongva Nation, Gabrieleno Tongva Indians of California Tribal Council, Gabrieleno-Tongva Tribe, Santa Rosa Band of Cahuilla Indians, and Soboba Band of Luiseno Indians.

#### *Tribal Consultation*

In accordance with Public Resources Code Section 21080.3.1(d), a lead agency is required to provide formal notification of intended development projects to Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief description of the proposed project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation regarding potential impacts to tribal cultural resources.

The City of Walnut sent letters to the seven Native American contacts on June 5, 2023, requesting any information related to cultural resources or heritage sites within or adjacent to the project site (Appendix P). The Gabrieleno Tongva Indians of California responded on June 13, 2023, noting that they had no comments on the proposed project. The Gabrieleno Band of Mission Indians – Kizh Nation provided comments on the proposed project in written form on August 10, 2023, in lieu of in-person consultation. Their written correspondence included confidential archival information that identifies the high cultural sensitivity of the project location. The tribe included documents from historic books and screenshots of historic maps. The Gabrieleno Band of Mission Indians – Kizh Nation stated that since the site is of high importance to the tribe, tribal participation is recommended during all ground-disturbing activities.

## 5. Environmental Analysis

### CULTURAL RESOURCES

#### 5.4.2 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines Section 15064.5 provides direction on determining significance of impacts to archaeological and historical resources. Generally, a resource shall be considered “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources:

- Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Is associated with lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history (Public Resources Code Section 5024.1; Title 14 California Code of Regulations Section 4852)

The fact that a resource is not listed in the California Register of Historical Resources, not determined to be eligible for listing, or not included in a local register of historical resources does not preclude a lead agency from determining that it may be a historical resource.

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- C-1 Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.
- C-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.
- C-3 Disturb any human remains, including those interred outside of dedicated cemeteries.

#### 5.4.3 Environmental Impacts

##### 5.4.3.1 2018 GENERAL PLAN UPDATE

Note that impacts to paleontological resources and tribal cultural resources discussed in Chapter 9 of the GPEIR are discussed in Section 5.6, *Geology and Soils*, and Section, 5.14, *Tribal Cultural Resources*, respectively in this Draft SEIR.

##### Historic Resources

The GPEIR identified impacts to historic resources in cases where new development replaces old development under buildout of the GPU and Walnut Valley Specific Plan (WVSP). Impacts associated with the destruction or alteration of historic resources would constitute a significant impact. The GPEIR notes that the City’s

## 5. Environmental Analysis

### CULTURAL RESOURCES

historic preservation ordinance provides policies and standards relating to the protection of historic resources and/or built environments during development, demolition, and/or related activities. To reduce impacts to less than significant, the GPEIR adopted Mitigation Measures CR-1, CR-2, and CR-3 to ensure that new development is compatible with historic resources and ensure that restoration of historic structures preserves the character of the resource. Impacts to historic resources were therefore considered less than significant with mitigation.

#### Archaeological Resources

The GPEIR also identified potential impacts to archaeological resources when excavation and other ground-disturbing activities are required. Therefore, the GPEIR incorporated Mitigation Measures CR-1, CR-2, and CR-3 to outline proper procedures in the event of the unanticipated discovery of archaeological resources. These mitigation measures would ensure that newly discovered artifact(s) found within the proposed project site(s) would receive a Cultural Resources Assessment and Treatment Plan to avoid impacts and preserve archaeological resources. Upon implementation of these mitigation measures, impacts were considered less than significant.

#### Human Remains

The GPEIR noted that the potential exists for as-yet undiscovered human remains to be encountered during future development activities within the planning area for the GPU and WVSP. In the event human remains are encountered, the discovery would be required to comply with State of California Public Resources Health and Safety Code Section 7050.5-7055. The GPEIR concludes that compliance with the applicable State regulations further outlined in Mitigation Measure CR-3 would ensure that impacts with respect to human remains are less than significant.

#### 5.4.3.2 IMPACT ANALYSIS

The following impact analysis addresses the thresholds of significance in Section 5.4.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.4-1: The proposed project could impact potential historic resources. [Threshold C-1]**

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As described in Section 5.4.1, *Environmental Setting*, the project site is fully developed and operating as a business park. The proposed project would demolish the existing structures on-site to develop a new business park with industrial and commercial uses. A historic built environment assessment was conducted to assess 18 buildings on the project site that are older than the 45-year threshold for historic age. The results of the assessment were used to determine whether these buildings would be eligible for the NRHP or the CRHR. The criteria used to assess eligibility for the NRHP and CRHR and the existing developments' conformance with these criteria are as follows.

- **Are these resources associated with events that have made a significant contribution to the broad patterns of history? (Criteria A/1):** Based on a search of newspaper articles and building permits, the historic-age buildings in the Walnut Business Park are not associated with events considered significant to

## 5. Environmental Analysis

### CULTURAL RESOURCES

history. Therefore, these resources are recommended not eligible for listing in the NRHP under Criterion A or the CRHR under Criterion 1.

- **Are these resources associated with the lives of significant persons of the past? (Criteria B/2):** Based on a search of newspaper articles and building permits, the historic-age buildings in the Walnut Business Park are not associated with the lives of people considered significant to history. Therefore, these resources are recommended not eligible for listing in the NRHP under Criterion B or the CRHR under Criterion 2.
- **Do these resources embody distinctive characteristics of type, period, or method of construction or represent the work of a master, or possess high artistic value, or represent a significant and distinguishable entity those components may lack individual distinction? (Criteria C/3):** The historic-age buildings are examples of Vernacular with Mission Revival Elements and Modern Style architecture. Building permits indicate these resources were designed by American engineer H. M. Hansen. Hansen's body of known work largely consists of commercial and industrial buildings. The buildings are not exemplary representations of a particular style, do not possess high artistic value, nor represent the exemplary work of a master architect. Therefore, these resources are recommended not eligible for listing in the NRHP under Criterion C or the CRHR under Criterion 3.
- **Have these resources yielded or may likely yield information important in history or prehistory? (Criteria D/4):** Criterion 4 is most often applied to archaeological sites and districts but can also apply to buildings, structures, and/or objects. These resources do not exhibit a local variation of a standard design or construction technique that can yield important information (such as construction expertise or availability of local materials). Therefore, these resources are recommended not eligible for listing in the NRHP under Criterion D or the CRHR under Criterion 4.

As described above, based on a historic review of these buildings and the pedestrian survey, these buildings lack historical significance and are recommended not eligible for listing in the NRHP or the CRHR. Therefore, the proposed project would not result in adverse impacts to historic resources on the project site. The project site is within a half-mile of three historic/prehistoric resources (the Site of Vejar Adobe, the Union Pacific Railroad, and the W. R. Rowland Adobe Redwood Ranch House), but all construction and operational activities of the proposed project would occur within the footprint of the project site.

The GPEIR determined that implementation of the GPU could result in significant impacts to historic resources and incorporated Mitigation Measures CR-1, CR-2, and CR-3 to mitigate impacts to less than significant. Mitigation Measure CR-1 directs projects tiering from the GPEIR to complete a Cultural Resources Assessment and Treatment Plan for projects potentially affecting historic and built environment resources prior to the issuance of a land use permit. The cultural resources assessment must include an Archaeological Record Search through the CHRIS-SCCIC and an SLF search through the NAHC. A records search was completed for the proposed project, the findings of which are documented within this section of the SEIR. The Historic Built Environment Assessment conducted for the proposed project determined that the existing buildings on the project site do not meet the criteria for listing on the NRHP or CRHR. Implementation of the proposed project would not impact any historic or built environment resources that would require a Cultural Resources

## 5. Environmental Analysis

### CULTURAL RESOURCES

Assessment and Treatment Plan under Mitigation Measure CR-1. Therefore, implementation of Mitigation Measure CR-1 would not be required for the proposed project.

Mitigation Measure CR-3 requires projects to incorporate a condition of approval that outlines the procedures to take place in event of discovery of a historic resource. Mitigation Measure CR-3 is incorporated with the proposed project as a condition of approval to ensure that impacts are reduced with respect to historic resources. Mitigation Measure CR-2 relates to AB 52 consultation with relevant tribes. AB 52 consultation has been completed, and its findings are documented in this section and Section 5.14 of this SEIR.

Overall, the proposed project would not result in new or substantially more severe significant impacts to historic resources when compared to the impacts determined in the GPEIR.

***Level of Significance Before Mitigation:*** Impact 5.4-1 would be less than significant.

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**Impact 5.4-2: The proposed project would not impact archaeological resources with the implementation of conditions of approval. [Threshold C-2]**

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The project site is currently developed as a business park and therefore its surface and subsurface have been previously disturbed by previous excavation and grading activity. According to the records search (see Appendix P), there are no Archaeological Determinations of Eligibility (i.e., archaeological resources assessed by the Office of Historic Preservation with respect to National Register eligibility) on the project site. However, one archaeological resource has been identified within a one-mile radius of the project site (SCCIC 2023). Additionally, according to the NAHC's SLF record search, the potential for tribal cultural resources exists at the project site and its vicinity (see Section 5.14). Mitigation Measure CR-1 directs projects tiering from the GPEIR to complete a Cultural Resources Assessment and Treatment Plan for projects potentially affecting archaeological resources prior to the issuance of a land use permit. The cultural resources assessment must include an Archaeological Record Search through the CHRIS-SCCIC and a SLF search through the NAHC. A records search was completed for the proposed project, the findings of which are documented within this section of the SEIR. Since the records search shows no Archaeological Determinations of Eligibility, a Cultural Resources Assessment and Treatment Plan related to archaeological resources is not required for the proposed project.

Although archaeological resources were not identified on the project site, and the project site is developed, the proposed project would require excavations below the current foundations, and it is possible that subsurface archaeological resources exist and may be encountered during construction activities that disturb soil. Mitigation Measure CR-3 requires a condition of approval for projects that provide procedures for the proper handling of cultural resources in the event of their unanticipated discovery during project activities. Mitigation Measure CR-3 is incorporated within the proposed project as a condition of approval to ensure that impacts are reduced with respect to archaeological resources. Mitigation Measure CR-2 relates to AB 52 consultation with relevant tribes. AB 52 consultation has been completed, the findings of which are documented within this section and Section 5.14 of this SEIR.

The proposed project could result in significant impacts to archaeological resources; however, incorporation of Mitigation Measure CR-3 in the form of a Condition of Approval would reduce impacts to less than



## 5. Environmental Analysis

### CULTURAL RESOURCES

significant. Furthermore, the proposed project would not result in new or substantially more severe significant impacts to archaeological resources when compared to the impacts determined in the GPEIR.

***Level of Significance Before Mitigation:*** Impact 5.4-2 would be less than significant.

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**Impact 5.4-3: Grading activities associated with the proposed project could potentially disturb human remains. [Threshold C-3]**

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The project site is currently developed and would require demolition, ground clearing, excavation, grading, and other construction activities to accommodate the proposed improvements on-site. California Health and Safety Code, Section 7050.5; CEQA Section 15064.5; and Public Resources Code, Section 5097.98, mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, California Health and Safety Code, Section 7050.5, requires that if human remains are discovered on a project area, disturbance of the site shall remain halted until the coroner has conducted an investigation into 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, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC. In the unlikely event soil-disturbing activities associated with the proposed project would result in the discovery of human remains, compliance with existing law would ensure that significant impacts to human remains would not occur.

The GPEIR incorporated Mitigation Measure CR-3 to help ensure that in the event of discovery of human remains, that the applicable Health and Safety Code provisions are followed by projects under the GPU. Therefore, the proposed project shall incorporate Mitigation Measure CR-3 as a Condition of Approval to help reduce impacts with regard to human remains. The impacts of the proposed project are similar to those determined in the GPEIR with regard to human remains; the proposed project would not result in any new or more severe impacts.

***Level of Significance Before Mitigation:*** Impact 5.4-3 would be less than significant.

#### 5.4.4 Cumulative Impacts

The area considered for cumulative impacts to historic and archaeological resources is the project site and lands proximate to the project site. Cultural resource impacts are generally localized to a project site and its immediate surroundings. Three previously recorded historical and/or archaeological resources were identified within one mile of the project site, according to the records search conducted by SCCIC. Other projects in the region could demolish or otherwise alter historical and archaeological resources. Other projects would be required to comply with CEQA Guidelines Section 15064.5, which requires the lead agency to determine if discovered resources are unique or historically significant, and if so, to avoid or mitigate impacts to such resources in accordance with the provisions of Public Resources Code Section 21083.2. The project would not result in a cumulatively considerable impact related to cultural resources.

## 5. Environmental Analysis CULTURAL RESOURCES

### 5.4.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements, General Plan policies, and standard conditions of approval, Impacts 5.4-1, 5.4-2, and 5.4-3 would be less than significant.

### 5.4.6 Mitigation Measures

#### 5.4.6.1 MITIGATION MEASURES FROM THE GPEIR

GPEIR Mitigation Measure CR-1 requires the preparation of a Cultural Resources Assessment and Treatment Plan for cultural and paleontological resources that would be affected by the proposed project. A historic built environment assessment was conducted to determine whether the existing buildings on the project site could be considered cultural resources. The assessment concluded that no buildings on the project site have historical significance. Therefore, Mitigation Measure CR-1 does not apply to the proposed project. Mitigation Measure CR-2 does not apply to the proposed project as it was completed during the preparation of this SEIR. Additionally, Mitigation Measure CR-3 will be incorporated into the proposed project as a new Condition of Approval as discussed in Section 5.4.6.2.

#### 5.4.6.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

##### Mitigation Measures

No new mitigation measures are required.

##### Conditions of Approval

##### *Impacts 5.4-1, 5.4-2, and 5.4-3*

COA-CUL-1 If cultural (prehistoric, historic, or paleontological) resources are discovered during project construction, all work within 100 feet of the find shall cease, and a qualified archaeologist or paleontologist shall be retained by the project applicant to investigate the find, and to make recommendations on its disposition. If human remains are encountered during construction, all work shall cease, and the Los Angeles County Coroner's Office shall be contacted pursuant to Health and Safety Code provisions.

### 5.4.7 Level of Significance After Mitigation

With the implementation of COA-CUL-1, Impacts 5.4-1, 5.4-2, and 5.4-3 would be less than significant.

### 5.4.8 References

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## 5. Environmental Analysis

### CULTURAL RESOURCES

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## 5. Environmental Analysis

### 5.5 ENERGY

This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates the energy implications of the Walnut Business Park (proposed project) in comparison to the impacts evaluated for the project site in the General Plan EIR (GPEIR) in a local and regional context. The SEIR will evaluate the potential for energy-related impacts associated with the proposed project and ways in which it would reduce unnecessary energy consumption, consistent with the suggestions in Appendix F of the CEQA Guidelines. Energy service providers to the project area include Southern California Edison (SCE) for electrical service and Southern California Gas Company (SoCalGas) for natural gas. Energy model outputs sheets are included in Appendix D-a.

#### 5.5.1 Environmental Setting

Section 21100(b)(3) of the CEQA Guidelines requires that an EIR include a detailed description of mitigation measures proposed to minimize significant effects on the environment, including but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Appendix F of the State CEQA Guidelines states that, to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered in an EIR, to the extent relevant and applicable to the project. Appendix F further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the project description, environmental setting, and impact analysis portions of technical sections as well as through mitigation measures and alternatives.

In accordance with Appendices G and F of the State CEQA Guidelines, this Draft SEIR includes relevant information and analyses that address the energy implications of the proposed project. This section summarizes the proposed project's anticipated energy needs, impacts, and conservation measures. Other aspects of the proposed project's energy implications are discussed elsewhere in this Draft SEIR, including Chapter 3, *Project Description*; Sections 5.2, *Air Quality*; and Section 5.7, *Greenhouse Gas Emissions*.

##### 5.5.1.1 REGULATORY BACKGROUND

Federal and State regulations and plans as well as state energy regulations by sector are listed in Table 5.5-1. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements.

**Table 5.5-1 Regulations/Plans for Energy**

Federal	
Federal Energy Policy and Conservation Act	Establishes measures to enhance energy efficiency, reduce dependence on foreign oil, and promote conservation through the regulation of energy standards for products, and fuel economy requirements for vehicles. This act also created the Strategic Petroleum Reserve and Corporate Average Fuel Economy (CAFE) standards for passenger cars starting in model year 1978, with new standards issued in 2012 for model years 2017 to 2025.
Energy Independence and Security Act of 2007	Enhances energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government.

## 5. Environmental Analysis

### ENERGY

**Table 5.5-1 Regulations/Plans for Energy**

Energy Policy Act of 2005	Provides a comprehensive set of provisions to address energy issues, including tax incentives for energy conservation improvements in commercial and residential buildings, fossil fuel production and clean coal facilities, and construction and operation of nuclear power plants.	
National Energy Policy	Promotes dependable, affordable, and environmentally sound production and distribution of energy for the future in the private sector and state and local governments	
Natural Gas Pipeline Safety Act of 1968	Authorizes the United States Department of Transportation to regulate pipeline transportation of flammable, toxic, or corrosive natural gas and other gases as well as the transportation and storage of liquefied natural gas	
State		
Warren-Alquist Act	Created the California Energy Commission (CEC) in 1974 to advance State energy policy, encouraging energy efficiency, certify thermal power plants, invest in energy innovation, develop renewable energy, transform transportation, and prepare for energy emergencies	
California Public Utilities Commission Long-Term Energy Efficiency Strategic Plan	Provides a framework, including goals and strategies to achieve these goals, for energy efficiency in California through the year 2020 and beyond	
State Energy Regulations by Sector		
Sector	Regulation	Description
Transportation	Assembly Bill 1493	AB 1493 (Pavley I) Reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016.
	Executive Order N-79-20	Establishes a time frame for the transition to zero-emission passenger vehicles and trucks in addition to off-road equipment. It directs the California Air Resources Board to: 1) establish passenger vehicle and truck regulations requiring increasing volumes of new zero emission vehicles sold California toward the target of 100 percent of in-state sales by 2035; 2) establish medium- and heavy-duty vehicle regulations requiring increasing volumes of new zero-emission (ZE) trucks and buses sold and operated in California toward the target of 100 percent of the fleet transitioning to ZE by 2045 everywhere feasible, and for all drayage trucks to be ZE by 2035; and 3) develop strategies to achieve 100 percent zero emission from all off-road vehicles and equipment operations in California by 2035, in cooperation with other State agencies, the Environmental Protection Agency, and local air districts.
Renewable Energy	Senate Bills (SB) 107 and X1-2 Executive Order S-14-08	Renewables Portfolio Standard. Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. Executive Order S-14-08, signed in November 2008, expanded the state's renewable energy standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2).
	SB 350	Established tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures.
	SB 100	RPS for publicly owned facilities and retail sellers will consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill establishes an overall state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

## 5. Environmental Analysis

### ENERGY

**Table 5.5-1 Regulations/Plans for Energy**

	Senate Bill 1020	SB 1020 was signed into law on September 16, 2022. It requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent by 2040. Additionally, SB 1020 requires all state agencies to procure 100 percent of electricity from renewable energy and zero-carbon resources by 2035.
Energy Efficiency	California Code of Regulations (CCR), Title 24, Part 6, Building Energy Efficiency Standards	Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977. Part 6 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Building Energy Efficiency Standards were approved by the California Building Standards Commission in December 2021. The 2022 standards became effective January 1, 2023. The 2022 standards require mixed-fuel single-family homes to be electric-ready to accommodate replacement of gas appliances with electric appliances. In addition, the new standards include prescriptive standards for photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers (CEC 2021).
	24 CCR Part 11, Green Building Standards Code (CALGreen)	On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards, CALGreen, as part of the California Building Standards Code. CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The mandatory provisions of CALGreen became effective January 1, 2011, and the 2022 CALGreen standards became effective January 1, 2023.
	20 CCR, Sects. 1601–1608, Appliance Efficiency Regulations	The 2006 Appliance Efficiency Regulations were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances. Though these regulations are now often viewed as “business as usual,” they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.

#### 5.5.1.2 EXISTING CONDITIONS

##### Electricity

The project site is in SCE's service area, which spans much of Southern California—from Orange and Riverside counties in the south to Santa Barbara County in the west to Mono County in the north (CEC 2022a). Total electricity consumption in SCE's service area was 103,045 gigawatt-hours in 2021 (CEC 2023b).<sup>1</sup> Sources of electricity sold by SCE in 2021, the latest year for which data are available, were:


- 31.4 percent renewable, consisting mostly of solar and wind
- 2.3 percent large hydroelectric

<sup>1</sup> One gigawatt-hour is equivalent to one million kilowatt-hours.

## 5. Environmental Analysis

### ENERGY

- 22.3 percent natural gas
- 9.2 percent nuclear
- 0.2 percent other
- 34.6 percent unspecified sources—that is, not traceable to specific sources (SCE 2023)<sup>2</sup>

The existing development on the project site includes 357,544 square feet of building area consisting of an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, a car body shop repair facility, pizza restaurant, roofers mart, Mexican food supply store, rent-a-car office, and pet food supply outlet. These uses generate electricity demand from uses such as heating, cooling, and ventilation of buildings; operation of electrical systems; lighting; and use of on-site equipment and appliances. Electricity use data is based on CalEEMod default energy rates for the existing 357,544 square feet of building area.  Under the GPEIR, industrial use of the existing building area on the project site was assumed to consume approximately 2,049,160 kilowatt-hours (kWh) per year in 2023. Existing estimated electricity consumption for the buildings and on-site equipment are shown in Table 5.5-2, *Existing Electricity Consumption*.

**Table 5.5-2 Existing Electricity Consumption**


Land Use	Electricity (kWh/year)
Existing Buildings	2,049,160
Forklifts	447,074
<b>Total</b>	<b>2,496,234</b>

kWh = kilowatt-hour

<sup>1</sup> Includes operation of 17 electric forklifts, which was extrapolated from the electric forklift information provided by project applicant. Modeling also assumes electric forklifts to provide a conservative estimate for comparison to the proposed project.

<sup>2</sup> Electricity use for forklift operation assumes higher range of annual energy use for an electric forklift, based on data from the Electric Power Research Institute (EPRI 2015).

### Gas

SoCalGas provides gas service in the City of Walnut, including to the project site. The service area of SoCalGas spans much of the southern half of California, from Imperial County in the southeast to San Luis Obispo County in the northwest to part of Fresno County in the north, to Riverside County and most of San Bernardino County in the east (CEC 2022b). Total natural gas consumption in SoCalGas's service area was 6,756 million therms for 2021 (CEC 2023). The project evaluated in the GPEIR would generate natural gas demand from uses such as building heating and water heating. Natural gas use data is based on CalEEMod default energy rates for the existing 357,544 square feet of building area.  Under the GPEIR, industrial use of the existing building area on the project site was assumed to consume approximately 6,892,070 kilo-British thermal units (kBtu) in 2023. Estimated natural gas consumption for the existing uses is shown in Table 5.5-3, *Existing Natural Gas Consumption*.

<sup>2</sup> The electricity sources listed reflect changes after the 2013 closure of the San Onofre Nuclear Generating Station, which is owned by SCE.

## 5. Environmental Analysis

### ENERGY

**Table 5.5-3 Existing Natural Gas Consumption**

Land Use	Natural Gas (kBTU/year)
Existing Buildings	6,892,070
kBTU = kilo-British thermal unit	

### Fuel Consumption

California is among the top producers of petroleum in the country, with crude oil pipelines throughout the state connecting to oil refineries in the Los Angeles, San Francisco Bay, and Central Valley regions. California is also one of the top consumers of fuel for transportation. With this sector accounting for approximately 35 percent of California's total energy demand in 2020, transportation fuel demand amounted to approximately 2,355.5 trillion British thermal units and consumed approximately 433 million barrels of petroleum fuels (US EIA 2020a, 2020b). According to the CEC, California's 2022 fuel sales were approximately 13,640 million gallons of gasoline and 2,290 million gallons of diesel (CEC 2023d). In Los Angeles County, 2022 sales were approximately 3,070 million gallons of gasoline and 188 million gallons of diesel (CEC 2023d). The estimated operational fuel usage for industrial use of the existing building area on the project site, as determined in the GPEIR, is shown in Table 5.5-4, *Approved Project Fuel Usage*.



## 5. Environmental Analysis

### ENERGY

**Table 5.5-4 Approved Project Fuel Usage**

	Gasoline		Diesel		CNG		Electricity	
	Annual VMT	Annual Gallons	Annual VMT	Annual Gallons	Annual VMT	Annual Gallons	Annual VMT	Annual kWh
<b>Proposed Project</b>								
Passenger Vehicles <sup>1</sup>	4,235,008	158,210	14,677	500	<1	<1	254,239	93,431
Trucks <sup>2</sup>	1,059,198	74,103	1,981,058	299,841	86,551	13,429	4,348	2,283
Off-Road Equipment <sup>3,4</sup>	NA	NA	NA	8,243	NA	NA	NA	447,074
<b>Total</b>	<b>5,294,206</b>	<b>232,314</b>	<b>1,995,735</b>	<b>308,584</b>	<b>86,551</b>	<b>13,429</b>	<b>258,588</b>	<b>542,789</b>

Notes: VMT = vehicle miles traveled; CNG = compressed natural gas

<sup>1</sup> Based on calendar year 2023 EMFAC2021 v.1.0.2 fuel consumption data, CalEEMod default trip lengths, and trip generation data provided by Iteris (Appendix D-a).

<sup>2</sup> Based on calendar year 2023 EMFAC2021 v.1.0.2 fuel consumption data and trip generation data provided by Iteris (Appendix D-a). Utilizes an average trip length of 39.9 miles per trip, which is derived from the SCAG's Heavy-Duty Truck Regional Travel Demand model and represents the average class 8 truck trip distance within the SoCAB (South Coast AQMD 2021).

<sup>3</sup> Fuel consumption is based on operation of 20 electric-powered forklifts at 8 hours per day and 1 diesel-powered yard trucks at 8 hours per day.

<sup>4</sup> Electric and diesel-powered fuel consumption based on OFFROAD2021 v 1.0.5 fuel consumption data for 25-horsepower electric forklifts and 175-horsepower yard truck).

## 5. Environmental Analysis

### ENERGY

### 5.5.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- E-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- E-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

### 5.5.3 Environmental Impacts

#### 5.5.3.1 2018 GENERAL PLAN UPDATE

The GPEIR did not specifically analyze energy because it was certified prior to the 2019 amendments to the CEQA Guidelines to incorporate subdivision (b) to CEQA Guidelines Section 15162.2. However, as discussed in the global climate change and greenhouse gas emissions section of the GPEIR, implementation of the General Plan Update (GPU) would generate energy demand, including from electricity and natural gas usage and from fuel use for vehicle trips. The GPEIR also determined that implementation of the GPU would result in an irreversible commitment of energy resources, including fuel oil, natural gas, and gasoline or diesel fuel for construction equipment and vehicles.

Because environmental and regulatory settings were not addressed with respect to energy specifically in the GPEIR, and because the environmental and regulatory settings for the proposed project have changed since the certification of the GPEIR, the following discussion is provided to update conditions relative to development of the proposed project.

#### 5.5.3.2 PROPOSED PROJECT

##### Methodology

Based on CEQA Guidelines Appendix F, Energy Conservation, to ensure energy implications are considered in project decisions, EIRs include a discussion of the potential impacts of proposed projects, with particular emphasis on avoiding or reducing wasteful, unnecessary, or inefficient use of energy resources as applicable. Environmental effects may include the proposed project's energy requirements and its energy use efficiencies by amount and fuel type during demolition, construction, and operation; the effects of the proposed project on local and regional energy supplies; the effects of the proposed project on peak and base period demands for electricity and other forms of energy; the degree to which the proposed project complies with existing energy standards; the effects of the proposed project on energy resources; and the proposed project's projected transportation energy use requirements and its overall use of efficient transportation alternatives, if applicable. The provided energy and fuel usage information for the proposed project are based on the following:

- **Building Energy.** Building energy consumption estimates utilize the California Emissions Estimator Model (CalEEMod version 2022.1) default energy (i.e., electricity and natural gas) rates for nonresidential land uses, which are based on the CEC's 2018–2030 Uncalibrated Commercial Sector Forecast (commercial

## 5. Environmental Analysis

### ENERGY

forecast) compiled by the CEC in 2019. Use of the CalEEMod default energy rates results in conservative estimates compared to the recently adopted 2022 Building Energy Efficiency Standards because the commercial forecast is based on the energy demand per square foot of building space, land use subtype, and end use for the year 2019. It is anticipated that new buildings under the 2022 Standards will generally result in lower electricity use. Electricity and natural gas use data are based on CalEEMod default energy rates for the amount of building area associated with the project evaluated in the GPEIR and the proposed project. Because the four new buildings would be all electric based on information provided by the applicant, the CalEEMod default natural gas use associated with these buildings was converted to electricity use.<sup>3</sup>

- **On-Road Vehicle Fuel Usage.** Fuel usage associated with operation-related vehicle trips and construction-related vehicle trips (i.e., worker and vendor trips) is based on fuel usage data obtained from EMFAC2021, version 1.0.2, and on vehicle trip generation data provided by Iteris (see Appendix D-a).
- **Off-Road Equipment Fuel Usage.** Fuel usage for construction-related off-road equipment is based on fuel usage data obtained from OFFROAD2021, version 1.0.4, and on the equipment mix and operations anticipated for the proposed project (see the methodology discussion under Section 5.3.5.2, *Proposed Project*, of Section 5.3, *Air Quality*, for details). Electricity use for forklift operation assumes a higher range of annual energy use for an electric forklift (25,932 kWh per forklift) based on data from the Electric Power Research Institute (EPRI 2015).

#### 5.5.3.3 IMPACT ANALYSIS

The following impact analysis addresses the thresholds of significance in Section 5.5.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.5-1: Implementation of the proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. [Threshold E-1])**

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The GPEIR determined that implementation of the GPU would result in an increase in energy usage from electricity and natural gas usage and from fuel use for vehicle trips. The GPEIR also determined that implementation of the GPU would result in an irreversible commitment of energy resources, including fuel oil, natural gas, and gasoline or diesel fuel for construction equipment and vehicles. Similar to the project evaluated in the GPEIR, the proposed project would introduce warehousing to the project site. However, under the proposed project, the total building area developed would be greater than what was assumed under the GPEIR—approximately 414,778 building square feet across four buildings compared to 357,544 building square feet under the project evaluated in the GPEIR.

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<sup>3</sup> Natural gas conversion to electricity assumes 3,412 BTU per kWh (EIA 2023).

## 5. Environmental Analysis

### ENERGY

#### Short-Term Construction Impacts

Construction of development associated with the proposed project would create temporary increased demands for electricity and vehicle fuels compared to existing conditions and would result in short-term transportation-related energy use.

For electricity use, demand would fluctuate according to the phase of construction. Additionally, it is anticipated that most electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which use minimal electricity during construction activities. Natural gas is not generally required to power construction equipment, and therefore is not anticipated during construction phases.

Transportation energy use during construction of the proposed project would come from delivery vehicles, haul trucks, and construction employee vehicles as well as off-road construction equipment. It is anticipated that the majority of off-road construction equipment, such as what is used during grading, would be gas or diesel powered. The use of energy resources by these vehicles would fluctuate according to the phase of construction. Fuel consumption during construction was calculated based on fuel consumption data for calendar years 2025 and 2026 from the EMFAC2021 (v. 1.0.2) and OFFROAD2021 (v. 1.0.5) databases. The results are shown in Table 5.5-5, *Construction-Related Fuel Usage*.

**Table 5.5-5 Construction-Related Fuel Usage**

Project Component	Gas		Diesel		Electricity	
	VMT	Gallons	VMT	Gallons	VMT	kWh
Construction Worker Commute	998,104	38,716	1,359	40	28,873	10,554
Construction Vendor Trips	25,517	4,884	183,251	25,522	0	0
Construction Off-Road Equipment	0	0	0	212,461	0	0
<b>Total</b>	<b>1,023,664</b>	<b>43,610</b>	<b>286,832</b>	<b>254,663</b>	<b>28,873</b>	<b>10,554</b>

Source: EMFAC2021 v1.0.2; OFFROAD2021 v1.0.5

To limit wasteful and unnecessary energy consumption from transportation, the construction contractors would minimize nonessential idling of construction equipment during construction in accordance with the 13 CCR Article 4.8, Chapter 9, Section 2449, which limits nonessential idling of diesel-powered off-road equipment to five minutes. In addition, the project site is centrally located and is served by numerous regional freeway systems (e.g., State Route 60 [SR-60] and SR-57), which would optimize transportation fuel use by minimizing distances and promoting efficient distribution networks. Moreover, all construction equipment would cease operating upon completion of project construction. Therefore, in consideration of the factors discussed, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of fuel during construction and would not result in new or a substantial increase in magnitude of impacts compared to the project evaluated in the GPEIR.

## 5. Environmental Analysis

### ENERGY

#### Operation

Electrical service for the proposed project would be provided by SCE through connections to existing off-site electrical lines and new on-site infrastructure as needed. The proposed project would result in the development of 414,778 square-feet of industrial space. Operation of the proposed project would result in four new all-electric buildings that would generate demand for electricity. Operational use of electricity would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; use of on-site equipment and appliances; lighting; and charging electric vehicles. The electricity for the proposed project and the net change from the project evaluated in the GPEIR are shown in Table 5.5-6, *Electricity Demand*. As shown in the table, the proposed project would result in an increase in electricity demand compared to the project evaluated in the GPEIR.

**Table 5.5-6 Electricity Demand**

Land Use	Electricity (kWh/year)
<b>Proposed Project</b>	
Unrefrigerated Warehouse-No Rail <sup>1</sup>	1,692,724
Refrigerated Warehouse-No Rail <sup>1</sup>	1,035,927
Parking Lot <sup>1</sup>	217,458
Offroad Equipment <sup>2,3</sup>	518,640
<b>Total</b>	<b>3,464,749</b>
Approved Project	2,496,234
<b>Net Change</b>	<b>968,515</b>

Source: CalEEMod version 2022.1.

Note: kWh = kilowatt per hour

<sup>1</sup> Electricity use data is based on CalEEMod default energy rates for the proposed project land use and its respective area.

<sup>2</sup> Includes operation of 20 electric forklifts, based on information provided by project applicant.

<sup>3</sup> Electricity use for forklift operation assumes higher range of annual energy use for an electric forklift, based on data from the Electric Power Research Institute (EPRI 2015).

While the proposed project would generate energy demand greater than the project evaluated in the GPEIR, it would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements. Compliance with these standards would contribute to reducing building energy demands through energy efficiency and use of renewable energy. In general, compliance with the Building Energy Efficiency Standards would also include installation of a higher efficiency heating, ventilation, and thermal envelope (e.g., insulation materials), which would contribute to reducing natural gas demands and decreasing overall reliance on fossil fuels. In addition, the new buildings to be constructed would be all electric and upon buildout of the proposed project, natural gas usage on-site would be eliminated, resulting in a reduction of 6,892,070 kBTU/year. For these reasons, buildout under the proposed project would be more energy efficient than the existing buildings under the GPU.

Furthermore, SCE is required to comply with the state's renewable portfolios standard (RPS), which mandates utilities to procure a certain proportion of electricity from eligible renewable and carbon-free sources and increasing the proportion through the coming years with an ultimate procurement requirement of 100 percent

## 5. Environmental Analysis

### ENERGY

by 2045. The RPS requirements would support use of electricity by the proposed project that is generated from renewable or carbon-free sources.

Overall, the proposed project would be consistent with the goals outlined in Appendix F of the CEQA Guidelines regarding increasing energy efficiency, decreasing reliance on fossil fuels, and increasing renewable energy sources. Thus, the proposed project would not result in wasteful, inefficient, or unnecessary energy demand as it pertains to building energy and would not result in new or a substantial increase in magnitude of impacts compared to the project evaluated in the GPEIR.

#### *Transportation Fuels*

As previously stated, the GPEIR determined that implementation of the GPU would result in an irreversible commitment of energy resources, including fuel oil, natural gas, and gasoline or diesel fuel for construction equipment and vehicles. The land uses accommodated under the proposed project would consume transportation energy (e.g., gasoline, diesel, compressed natural gas, and electricity) from the use of motor vehicles such as passenger vehicles, trucks, and off-road equipment used in daily business operations. Table 5.5-7, *Annual Operation-Related Fuel Usage*, shows the annual transportation-related fuel usage for the proposed project and the net change compared to the project evaluated in the GPEIR.

As shown in the table, the proposed project would result in an increase in fuel use. However, upon buildout, the proposed project would provide more opportunities for employment for residents of the city and would be within an urbanized area with nearby amenities and public transit options. Furthermore, the proposed project would include roadway and sidewalk/pathway improvements, which would promote alternative modes of transportation such as walking for biking. In addition, in compliance with CALGreen, the proposed project would include bicycle racks and storage for employee use. The proposed project would also include electric vehicle charging infrastructure, which, if implemented, would reduce reliance on fossil fuels. In addition, fuel efficiency of vehicles in the next couple of decades following the buildout year of 2026 would, on average, improve compared to vehicle fuel efficiencies experienced under existing conditions in 2023, resulting in a lower per capita fuel consumption in later and buildout years assuming travel distances, travel modes, and trip rates remain the same. The improvement in fuel efficiency would be attributable to the statewide fuel reduction strategies and regulatory compliances (e.g., CAFE standards) that will make new cars more fuel efficient as well as the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to land use development projects, but to car manufacturers. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing the population in the project region with more fuel-efficient vehicle options.

These features and aspects of the proposed project would contribute to minimizing VMT and transportation-related fuel usage. Overall, it is expected that operation-related fuel usage associated with the proposed project would not be any more inefficient, wasteful, or unnecessary compared to that experienced under the project evaluated in the GPEIR. Therefore, the proposed project would not result in new or a substantial increase in magnitude of impacts compared to the project evaluated in the GPEIR, and impacts would be less than significant with respect to operation-related fuel usage.

## 5. Environmental Analysis

### ENERGY

**Table 5.5-7 Annual Operation-Related Fuel Usage**

	Gasoline		Diesel		CNG		Electricity	
	Annual VMT	Annual Gallons	Annual VMT	Annual Gallons	Annual VMT	Annual Gallons	Annual VMT	Annual kWh
<b>Proposed Project</b>								
Passenger Vehicles <sup>1</sup>	5,505,760	206,819	19,675	674	0	0	320,082	117,564
Trucks <sup>2</sup>	743,729	75,985	2,543,277	335,103	99,587	14,768	50,525	38,296
Off-Road Equipment <sup>3,4</sup>	NA	0	NA	27,663	NA	0	NA	518,640
<b>Total</b>	<b>6,249,489</b>	<b>282,804</b>	<b>2,562,952</b>	<b>363,441</b>	<b>99,587</b>	<b>14,768</b>	<b>370,607</b>	<b>674,500</b>
<b>Net Change</b>								
GPEIR Project	5,294,206	232,314	1,995,735	308,584	86,551	13,429	258,588	542,789
Proposed Project	6,249,489	282,804	2,562,952	352,265	99,587	14,768	370,607	674,500
<b>Net Change</b>	<b>955,283</b>	<b>50,490</b>	<b>567,217</b>	<b>54,857</b>	<b>13,036</b>	<b>1,339</b>	<b>112,019</b>	<b>131,711</b>

Notes: VMT = vehicle miles traveled; CNG = compressed natural gas

<sup>1</sup> Based on calendar year 2026 EMFAC2021 v.1.0.2 fuel consumption data, CalEEMod default trip lengths, and trip generation data provided by Iteris (Appendix D-a).

<sup>2</sup> Based on calendar year 2026 EMFAC2021 v.1.0.2 fuel consumption data and trip generation data provided by Iteris (Appendix D-a). Utilizes an average trip length of 39.9 miles per trip, which is derived from the SCAG's Heavy-Duty Truck Regional Travel Demand model and represents the average class 8 truck trip distance within the SoCAB (South Coast AQMD 2021).

<sup>3</sup> Fuel consumption is based on operation of 20 electric-powered forklifts at 8 hours per day and 1 diesel-powered yard trucks at 8 hours per day. In addition, fuel consumption also considers 15 trucks with TRUs per day and 120 mins of idling per TRU per day and 2 hours per round trip for each truck with a TRU.

<sup>4</sup> Electric and Diesel-powered fuel consumption based on OFFROAD2021 v 1.0.5 fuel consumption data for 25- horsepower electric forklifts, 175-horsepower yard truck, 50-horsepower Instate Trailer transportation refrigeration units (TRUs) for 15 heavy-heavy duty trucks (HHDT).

## 5. Environmental Analysis ENERGY

*Level of Significance Before Mitigation:* Less than significant.

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**Impact 5.5-2: The proposed project would not conflict with or obstruct implementation of plans for renewable energy or energy efficiency. [Threshold E-2])**

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Applicable plans relevant to the proposed project include the California RPS Program.

### Buildout

#### *California Renewables Portfolio Standard Program*

The state's electricity grid is transitioning to renewable energy under California's RPS Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The RPS goals have been updated since adoption of SB 1078 in 2002. In general, California has RPS requirements of 33 percent renewable energy by 2020 (SB X1-2), 44 percent by 2024, 50 percent by 2026, 52 percent by 2027, 60 percent by 2030, 90 percent by 2035, 95 percent by 2040, and 100 percent by 2045.

The statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as SCE, whose compliance with RPS requirements would contribute to the state objective of transitioning to renewable energy. Similar to the project evaluated in the GPEIR, the land uses accommodated by the proposed project would comply with the current and future iterations of the Building Energy Efficiency Standards. In addition, new regulations regarding renewable energy have been adopted since the certification of the GPEIR. These regulations include SB 100, SB 1020, and Executive Order (EO) N-79-20.

Therefore, implementation of the proposed project would not conflict or obstruct implementation of California's RPS Program and would not result in new or a substantial increase in magnitude of impacts compared to the project evaluated in the GPEIR.

*Level of Significance Before Mitigation:* Less than significant.

### 5.5.4 Cumulative Impacts

The area considered for cumulative impacts to electricity and natural gas supplies are the service areas of SCE and SoCalGas, respectively. Other projects in the SCE and SoCalGas service areas would be required to comply with the Building Energy Efficiency Standards and CALGreen, which would contribute to minimizing wasteful energy consumption and promoting renewable energy sources. As discussed under Impact 5.5-1, construction- and operation-related energy impacts resulting from implementation of the proposed project would not be considered inefficient, wasteful, or unnecessary. The proposed project would therefore not contribute to any cumulative energy impacts when considered together with cumulative development projects and would not be cumulatively considerable.



## 5. Environmental Analysis

### ENERGY

#### 5.5.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, these impacts would be less than significant: 5.5-1 and 5.5-2.

#### 5.5.6 Mitigation Measures

##### 5.5.6.1 MITIGATION MEASURES FROM THE GPEIR

The GPEIR did not identify mitigation measures for energy.

##### 5.5.6.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

No additional mitigation measures or conditions of approval are required to reduce impacts to less than significant.

#### 5.5.7 Level of Significance After Mitigation

No significant impacts would occur.

#### 5.5.8 References

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### ENERGY

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## 5. Environmental Analysis

### ENERGY

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## 5. Environmental Analysis

### 5.6 GEOLOGY AND SOILS

This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates the potential for implementation of the Walnut Business Park (proposed project) to impact geological and soil resources, paleontological resources, or unique geologic features in the City of Walnut. Specifically, this SEIR will evaluate the impacts for the project site in comparison to the General Plan EIR (GPEIR). The analysis in this section is based in part on the following technical report(s):

- *Geotechnical Investigation Report for Proposed Walnut Business Park*, Langan Engineering and Environmental Services, Inc., December 15, 2021
- *Paleontological Resources for the IDS Warehouse Project*, Natural History Museum of Los Angeles County, April 16, 2023

Complete copies of studies are included in the technical appendices to this Draft SEIR (Appendices H and I).

#### 5.6.1 Environmental Setting

##### 5.6.1.1 REGULATORY BACKGROUND

Federal, state, and local regulations are listed in Table 5.6-1. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of GPU policies.

**Table 5.6-1 Regulations/Plans for Geology and Soils**

<b>Federal</b>	
Clean Water Act (CWA)	The CWA authorizes the US Environmental Protection Agency to implement water quality regulations.
National Pollution Discharge Elimination System	A permit program was established by the CWA to regulate municipal and industrial discharges to surface waters of the United States, including discharges from municipal separate storm sewer systems (MS4) and management of construction and operational stormwater runoff.
Paleontological Resources Preservation Act	Limits the collection of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers who have obtained a permit from the appropriate state or federal agency.
<b>State</b>	
California Alquist-Priolo Earthquake Fault Zoning Act of 1972	Requires state geologist to delineate earthquake fault zones that are “sufficiently active” and “well-defined” and requires cities and counties to investigate development proposals threatened by potential future faulting. Prohibits structures for human occupancy within 50 feet of an active fault trace.
Seismic Hazard Mapping Act	The California Geologic Survey prepares and provides local governments with seismic hazard zone maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. Section 2697(a) of the Act states that “cities and counties shall require, prior to the approval of

## 5. Environmental Analysis

### GEOLOGY AND SOILS

**Table 5.6-1 Regulations/Plans for Geology and Soils**

	a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard."
Porter-Cologne Water Quality Act Water Code §§ 13000 et seq.	Basic water quality control law for California; gives the State Water Control Resources Board (SWRCB) control over state water rights and water quality policy.
Sustainable Groundwater Management Act	The act established a priority framework for all 515 groundwater basins in California, categorizing them into very low, low, medium, and high priority based on eight components. The act requires local agencies to form groundwater sustainability agencies for the high and medium priority basins.
2022 California Building Code, Code of Regulations, Title 24, Part 2	Provides minimum standards for building design.
Soils Investigation Requirements	Studies must be done as needed to evaluate slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on load-bearing capacity, compressibility, liquefaction, differential settlement, and expansiveness which are included as part of the geotechnical evaluation required by the California Building Code.
California Public Resources Code (PRC)	This statute prohibits the removal, without permission, of any paleontological site or feature from lands under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. As a result, local agencies are required to comply with PRC 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC Section 5097.5 establishes the removal of paleontological resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, and district) lands.
Statewide General Construction Permit	Construction projects of one acre or more are regulated under the General Construction Permit, Order No. 2022-0057-DWQ, issued by the State Water Resources Control Board in 2022. Projects obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan estimating sediment risk from construction activities to receiving waters and specifying best management practices (BMPs) that would be used by the project to minimize pollution of stormwater.
<b>Regional</b>	
Los Angeles County All-Hazard Mitigation Plan	The Disaster Mitigation Act of 2000, Public Law 106-390 (Section 322(a-d)) requires that local governments, as a condition of receiving federal disaster mitigation funds, adopt a mitigation plan that describes the process for identifying hazards, vulnerabilities, and risks; identifies and prioritizes mitigation actions; encourages the development of local mitigation; and provides technical support for those efforts. In
City of Walnut Multi-jurisdictional Hazard Mitigation Plan	The Hazard Mitigation Plan was prepared in response to Disaster Mitigation Act of 2000 (DMA 2000). DMA 2000 (also known as Public Law 106-390) requires state and local governments to prepare mitigation plans to document their mitigation planning process, and identify hazards, potential losses, mitigation needs, goals, and strategies. This document is a federally mandated update to the 2005 City of Walnut, Mt. San Antonio Community College District, Walnut Valley Unified School District Multi-Jurisdictional Hazard Mitigation Plan and ensures continuing

## 5. Environmental Analysis

### GEOLOGY AND SOILS

**Table 5.6-1 Regulations/Plans for Geology and Soils**

	eligibility for Hazard Mitigation Grant Program funding. DMA 2000 was designed to establish a national program for predisaster mitigation, streamline disaster relief at the federal and state levels, and control federal disaster assistance costs.
<b>Local</b>	
City of Walnut Municipal Code	The City of Walnut Municipal Code Titles 5 and 2, Chapters 5.08 and 2.04, are relevant to potential geological impacts of the proposed project. Chapter 5.08 provides minimum requirements to control the discharge of pollutants into the City's municipal storm drain system and to ensure that discharges from the municipal storm drain system comply with the current NPDES permit. Chapter 2.04, Building Code, establishes the adoption of the Los Angeles County Building Code for the City of Walnut with amendments.

#### 5.6.1.2 EXISTING CONDITIONS

##### Geologic Setting

##### *Regional Geology*

The project site is in the Los Angeles Basin, a northwest-trending, alluvium-filled lowland at the north end of the Peninsular Ranges geomorphic province of coastal southern California. This basin, which is the surface expression of a deep structural trough, has been subdivided into four primary structural blocks distinguished from one another by contrasting basement rock types and stratigraphy. These structural blocks are generally separated by zones of faulting along which movement has occurred intermittently since middle Miocene time.

The site is in the central portion of the Northeastern Block of the Los Angeles Basin, a roughly triangular-shaped area bounded on the south by the Elsinore/Whittier fault, on the east by the Chino fault, and on the north by the Sierra Madre/Cucamonga fault.

The city of Walnut is between the San Jose and Puente Hills in an alluviated valley. Bedrock of these hills generally consists of the Puente Formation. Drainage through the area is controlled by San Jose Creek, which flows to the west-southwest.

The site is underlain by middle-Holocene-aged young alluvial-fan deposits. This unit is described as slightly consolidated silt, sand, and coarse-grained sand to boulder alluvial fan deposits having slightly to moderately dissected surfaces. These alluvial fans are noted to consist primarily of boulder alluvial in the headward portions of the fan, grading southward into dominantly sand and gravel. Additionally, several outcrops of the Yorba member of the Puente Formation bedrock are near the site. The Yorba member is described as white to gray, thin-bedded, micaceous and siliceous siltstone and sandy siltstone. The Yorba member is Miocene in age.

## 5. Environmental Analysis

### GEOLOGY AND SOILS

#### *Groundwater*

The project site is in the San Gabriel Valley Groundwater Basin. The measured groundwater levels range from 16 to 24.5 feet in depth. Historically, the highest groundwater level at the project site was 20 feet below ground surface (bgs).

#### **Seismic Setting**

##### *Regional Faulting*

The project site is in a seismically active region adjacent to major geologic structures (active faults) and affected by historic large earthquakes. Because the site is in a seismically active region adjacent to active faults, it is reasonable to assume that it will be subjected to future severe seismic shaking along one or more of these local or regional faults. The State of California defines an “active fault” as one that has had surface displacement within Holocene time (approximately the last 11,000 years). “Potentially Active” faults are defined as faults that show evidence of surface displacement during Quaternary time (within the last 1.6 million years) (CGS 2018).

According to the California Geological Survey (CGS) 2010 Fault Activity Map of California and the United States Geological Survey Quaternary Fault and Fold Database the closest mapped faults to the site are the San Jose fault, approximately 1.8 miles to the northwest; the Walnut Creek fault, approximately 4 miles to the northwest; and the Whittier fault, approximately 5 miles to the southwest. There are no known active or potentially active faults passing through or immediately adjacent to the project site.

Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region, which may affect the project site, include ground lurching and shallow ground rupture, soil liquefaction, and dynamic settlement. These secondary effects of seismic shaking are a possibility throughout the Southern California region and are dependent on the distance between the site and causative fault and the on-site geology.

##### *Fault Rupture*

Alquist-Priolo earthquake fault zones are regulatory zones surrounding the surface traces of active faults in California. Wherever an active fault exists, if it has the potential for surface rupture, a structure for human occupancy cannot be placed over the fault and must be a minimum distance from the fault (generally 50 feet). An active fault, for the purposes of the Alquist-Priolo Act, is one that has ruptured in the last 11,000 years. The project site is not within or immediately adjacent to an Alquist-Priolo Earthquake Fault Zone.

##### *Earthquake Ground Shaking*

Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the size and type of the earthquake, the distance of the site from the earthquake epicenter, and the nature of the earth materials beneath a given site. The Los Angeles Basin region has experienced several large earthquakes throughout recorded history, with the last most sizable event being the magnitude 6.7 Northridge Earthquake in 1994. The earthquake occurred on a blind thrust fault centered in the San Fernando Valley community of

## 5. Environmental Analysis

### GEOLOGY AND SOILS

Northridge. Additionally, the USGS Advanced National Seismic System Comprehensive Earthquake Catalog revealed that 62 earthquakes with magnitudes of 5.0 or greater occurred within a 100-km radius of the project site since 1800.

#### *Liquefaction and Related Ground Failure*

Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based upon three main contributing factors: 1) cohesionless, granular soils having relatively low densities (usually of Holocene age); 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking. Cohesionless and granular soils are sand or gravel, typically with little or no clay content. Soil liquefaction generally occurs in submerged granular soils and non-plastic silts during or after strong ground shaking. Typically, liquefaction occurs in the upper 50 feet bgs. The site is in County- and State-designated liquefaction hazard zones, as shown on Figure 5.6-1.

The historically highest groundwater level is approximately 20 feet bgs, and the geologic deposits below this depth consist of stiff to very stiff clayey soils and/or bedrock. Therefore, the potential for liquefaction at the site is considered very low.

Localized, discontinuous soft clays at the site would be subject to loss of strength during strong ground shaking and might liquify; however, these deposits are not anticipated to contribute appreciably to the overall performance of foundation elements constructed as part of the proposed development.

### **Geologic Hazards**

#### *Landslides*

The site is not in a zone of required investigation for earthquake-induced landslides per the CGS Earthquake Fault Zones and Seismic Hazard Zones, San Dimas Quadrangle map, as shown on Figure 5.6-1. Additionally, no landslides have been mapped near the site on regional geologic maps of the area. No evidence of deep-seated land sliding was observed during field exploration, and no significant sloped boundary conditions exist. Therefore, the probability of earthquake-induced landslides at the site is negligible.

#### *Expansive Soils*

Expansive soils swell and shrink when their moisture content changes as a result of cyclic wet/dry weather cycles, installation of irrigation systems, change in landscape plantings, or changes in grading. Swelling and shrinking soils can result in differential movement of structures, including floor slabs and foundations, and site work such as hardscape, utilities, and sidewalks. Based on the preliminary laboratory test data, the on-site soils have a moderate to high potential for expansion.

#### *Erosion*

Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved; removed from one place; and transported to another. Precipitation, running water,



## 5. Environmental Analysis

### GEOLOGY AND SOILS

and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. Accelerated erosion in a developed area can cause damage by undermining structures; blocking storm drains; and depositing silt, sand, or mud on roads and in tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life.

Erosion can occur when rainfall or other sources result in the placement of a significant amount of water on a sloping, bare-earth surface. Eroded soils can cause damage if they enter a waterway or a storm drain facility that deposits the collected water and entrained sediment into a waterway.

Topsoil is the thin, rich layer of soil where most nutrients for plants are found and where most land-based biological activity takes place. The loss of topsoil through erosion is a major agricultural and water quality problem.

#### *Subsidence*

Land subsidence may be induced from withdrawal of oil, gas, or water from wells. Based on a search of the California Geologic Energy Management Division's (CalGEM)<sup>1</sup> GIS Well Finder online tool, the site is not in an oil field. The nearest well is approximately 0.8 mile west of the site. This well is listed as plugged. According to available information from CalGEM, the likelihood of land subsidence caused by oil or gas withdrawal from oil wells is negligible (see Appendix H). Additionally, there is no subsidence on the project site as a result of groundwater pumping or peat loss (USGS 2023).

The ground surface level at the site is generally flat so that open or unsupported slopes are not present. However, San Jose Creek Diversion Channel is located as close as approximately 300 feet south of the site. This channel has been improved with vertical concrete channel walls and is approximately 20 feet in depth. Based on the very low liquefaction potential of the site and depth to the historically highest groundwater level, the potential for lateral spreading is considered very low.

#### **Paleontological Setting**

Paleontological resources are fossils—that is, organisms or fragments, impressions, or traces of organisms preserved in rock. The project site is within the San Gabriel Valley. It is situated east of Los Angeles in the northern portion of the Peninsular Ranges Geomorphic Province. As noted earlier, the project site is situated on a bolder alluvial plain, and surface deposits consist of artificial fill with a maximum thickness of 7.5 feet bgs.

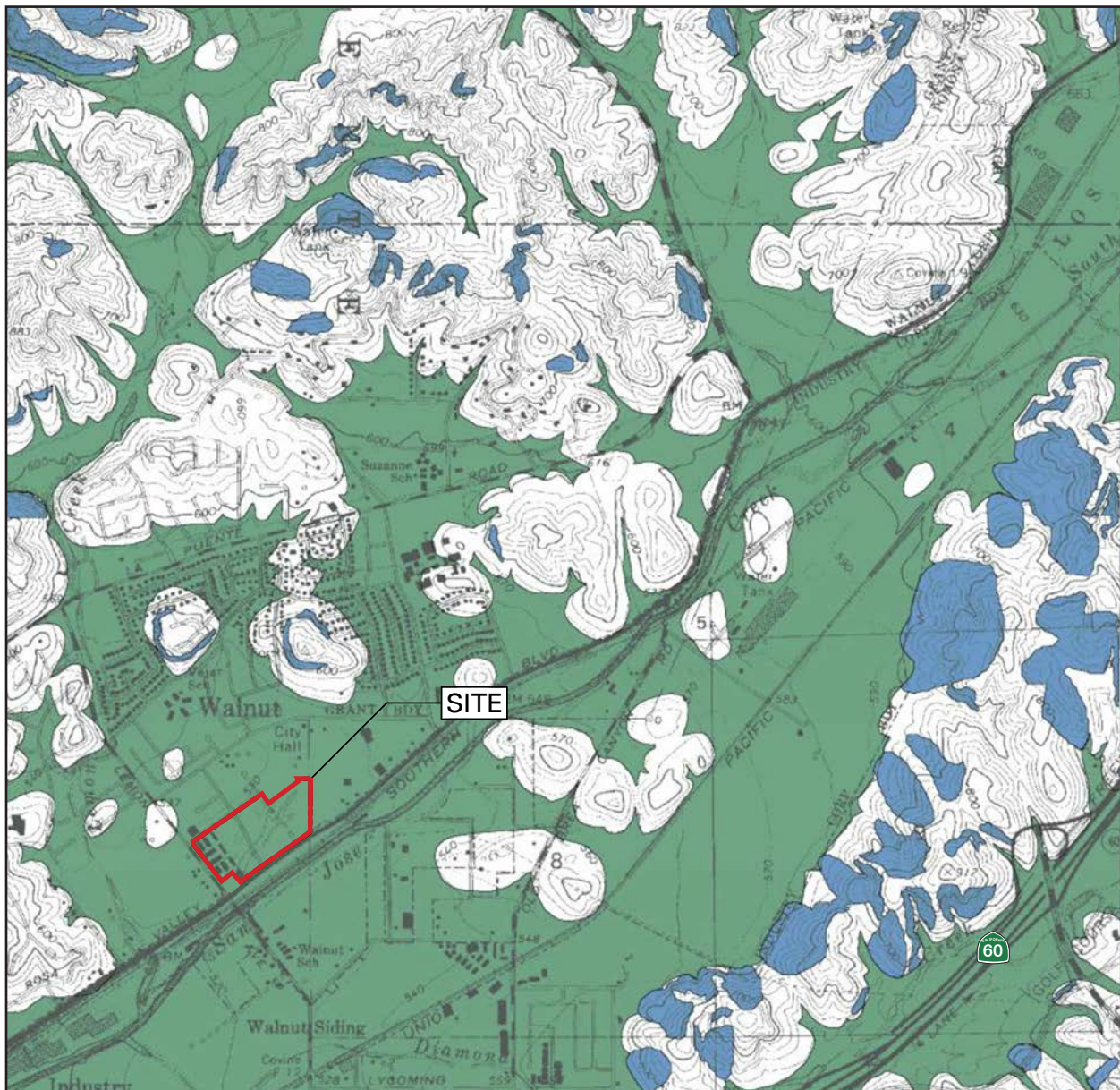
PlaceWorks asked the Natural History Museum of Los Angeles County to search through the paleontological records for locality and specimen data for paleontological resources in the project vicinity. The results concluded that there are no fossil localities in the proposed project area. However, there are fossil localities in the same sedimentary deposits as occur in the proposed project area, either at the surface or at depth (Appendix I).

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<sup>1</sup> Formerly known as Division of Oil, Gas, and Geothermal Resources.

5. Environmental Analysis

Figure 5.6-1 - County and State Designated Liquefaction Hazard Zones



**Liquefaction**



Areas where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicated a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

**Earthquake-Induced Landslides**



Areas where previous occurrence of landslide movement, or local topographic, geological, geotechnical and sub-surface water conditions indicated a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

Reference: CGS Earthquake Zones of Required Investigation for the San Dimas, California 7.5-Minute Quadrangle (1999).

— Project Boundary

0 2,000  
Scale (Feet)



Source: Langan Engineering and Environmental Services, Inc. 2020.

## 5. Environmental Analysis

### GEOLOGY AND SOILS

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## 5. Environmental Analysis GEOLOGY AND SOILS

### 5.6.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- G-1 Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.)
  - ii) Strong seismic ground shaking.
  - iii) Seismic-related ground failure, including liquefaction.
  - iv) Landslides.
- G-2 Result in substantial soil erosion or the loss of topsoil.
- G-3 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.
- G-4 Be located on expansive soil, as defined in Table 18-1B of the Uniform building Code (1994), creating substantial direct or indirect risks to life or property.
- G-5 Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.
- G-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

### 5.6.3 Environmental Impacts

#### 5.6.3.1 2018 GENERAL PLAN UPDATE

The GPEIR concluded that development associated with the GPU built on or near the San Jose Fault Zone could expose people and structures to a fault rupture. Earthquakes on this fault can generate magnitudes ranging from 6.0 to 6.5 on the Richter Magnitude Scale. These strong earthquakes can cause damage to property, result in injury and loss of life, and have secondary impacts such as fire and disruption of utilities and service systems.

Liquefaction is prevalent throughout the eastern portion of the city because of the potential for strong ground shaking; loose, unconsolidated sediments; and relatively shallow depth to groundwater. As a result, new development associated with the GPU buildout will need to take this into consideration as well as the potential for earthquake-induced landslides. Additionally, future development under the GPU could cause impacts

## 5. Environmental Analysis

### GEOLOGY AND SOILS

associated with soil erosion, resulting in increased fugitive dust (which affects air quality) and water quality degradation due to increased sedimentation.

Though no mitigation measures exist in the GPEIR related to impacts to geology and soils, in order to mitigate the potential for liquefaction, landslides, and soil erosion, certain state regulations and GPU policies are in place. For state regulations these include the Alquist-Priolo Earthquake Fault Zoning Act, the State of California Seismic Hazards Mapping Act, and the State of California Building Code. The GPU policies include Policy PS-3.2, Geotechnical Evaluation; Policy PS-3.3, Landslide Hazards; and Policy PS-3.4, Seismic Building Codes. By incorporating applicable state regulations and GPU policies into any new development within the GPEIR study area, the GPEIR concluded that all impacts would be less than significant.

#### 5.6.3.1 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance in Section 5.6.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.6-1: As with development pursuant to the 2018 General Plan Update, project occupants, visitors, and/or patrons would not be subject to potential seismic-related hazards. [Threshold G-1.i through iv])**

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The location and the underlying geology in the project area make it likely that the proposed project would be subject to regional faulting and strong seismic ground shaking. The project is proposing to develop the project site with approximately 392,488 square feet of warehousing and/or manufacturing space and approximately 22,290 square feet of office/retail space for a total of 414,778 building square feet. Currently, the project site is occupied by 357,544 square feet of buildings that consist of commercial and light industrial uses with some office uses. Similar to the current uses, the proposed project would consist of light industrial, commercial, and office uses. However, the majority of the proposed project would consist of warehouse and/or manufacturing uses with some commercial and office uses.

#### Earthquake Faults

The project site is in a seismically active region in Southern California with three faults within approximately 62 miles of the project site. The nearest fault, the San Jose fault, is approximately 1.8 miles northwest of the project site. The Walnut Creek fault is approximately 4 miles northwest, and the Whittier fault is approximately 5 miles southwest of the project site. There are no known active or potentially active faults passing through or immediately adjacent to the project site. In addition, the project site is not in a County of Los Angeles or CGS Alquist-Priolo Earthquake Fault Zone. The proposed project would not result in new or substantially more severe significant impacts when compared to the impacts determined in the GPEIR, and impacts would be less than significant.

#### Strong Seismic Ground Shaking

Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the

## 5. Environmental Analysis

### GEOLOGY AND SOILS

distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region, which may affect the project site, include ground lurching and shallow ground rupture, soil liquefaction, and dynamic settlement. These secondary effects of seismic shaking are a possibility throughout the Southern California region and are dependent on the distance between the site and causative fault and the on-site geology.

The seismic design of the proposed buildings is governed by the requirements of the most recent California Building Code (CBC), which has been accepted as the basic design standard in the city. All structures that would be constructed pursuant to the proposed project would be designed to meet current design standards in the latest CBC. In addition, the requirements of the geotechnical investigation report also address seismic ground shaking. Much like the project evaluated in the GPEIR, the proposed project would be subject to the applicable state regulations and local policies and would remain less than significant after implementation.

#### Seismic-Related Ground Failure

Secondary effects of earthquakes are nontectonic processes such as ground deformation, including fissures, settlement, displacement, and loss of bearing strength, and are the leading causes of damage to structures during a moderate to large earthquake. Secondary effects could lead to ground deformation, including liquefaction, lateral spreading, seismically induced landslides, and ground lurching.

Liquefaction occurs when the cyclic loading to the soil due to strong ground shaking results in a buildup of excessive pore-water pressure in the pore spaces between the soil grains and the grain-to-grain contact of the soils is temporarily interrupted, resulting in settlement as the soil particles reconstitute. Typically, liquefaction occurs within the upper approximately 50 feet bgs. As stated previously, the historically highest groundwater level is 20 feet bgs and the geologic deposits at the project site are very stiff clayey soils and/or bedrock. As a result, the potential for seismic-related ground failure, including liquefaction, is very low. Therefore, when the applicable state regulations and local policies are implemented, impacts would be considered less than significant, similar to what was concluded in the GPEIR.

#### Landslides

The site is not in a zone of required investigation for earthquake-induced landslides per CGS Earthquake Fault Zones and Seismic Hazard Zones, San Dimas Quadrangle map, as shown on Figure 5.6-1. Additionally, no landslides have been mapped near the site on regional geologic maps of the area. No evidence of deep-seated land sliding was observed during field exploration and no significant sloped boundary conditions exist. Therefore, the probability of an earthquake-induced landslide at the site is negligible, and impacts would be considered less than significant, similar to the GPEIR.

#### Summary

Impacts stemming from the proposed project would be considered less than significant, similar to what the GPEIR concluded. Though the proposed project is within a seismically active area of California, potential impacts from earthquake faults, strong seismic ground shaking, seismic-related ground failure, and landslides

## 5. Environmental Analysis

### GEOLOGY AND SOILS

are low. Additionally, the proposed project would be subject to certain state regulations, existing GPU policies, and the requirements of the geotechnical investigation report that would avoid or reduce impacts. The state regulations include the Alquist-Priolo Earthquake Fault Zoning Act, the State of California Seismic Hazards Mapping Act, and the CBC. The applicable GPU policies would include Policy PS-3.2 and Policy PS-3.4. The proposed project would not result in new or substantially more severe significant impacts due to seismic-related hazards when compared to the project evaluated in the GPEIR.

***Level of Significance Before Mitigation:*** Less than significant.

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**Impact 5.6-2: As with the 2018 General Plan Update, unstable geologic unit or soils conditions, including soil erosion, would not result from development of the project. [Thresholds G-2 and G-3]**

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#### Landslides

As stated in Impact 5.6-1, the project site is not located in a zone of required investigation for earthquake-induced landslides. Furthermore, the proposed project would be subject to the applicable state regulations, local policies, and requirements found in the geotechnical report. As a result, impacts from landslides at the project site would be considered less than significant, similar to impacts associated with the project evaluated in the GPEIR.

#### Subsidence

The probability of subsidence at the project site is negligible. As stated previously in Section 5.6.1.2, subsidence is most often caused by removing oil, gas, or water from wells. The nearest oil and gas well to the project site is approximately 0.8 miles west and has been plugged. Though there are no existing oil and gas wells in the project area, the Walnut Valley Water District has one well pumping water from the Spadra Basin and five wells pumping water from the Puente Basin. However, this is not the main source of water and the groundwater from these basins is a supplement to the recycled water supply. As such, the risk of subsidence, despite the relatively shallow depth to groundwater in the eastern portion of the city, would remain low. Additionally, any applicable state regulations, local policies, and requirements from the geotechnical report would reduce the impacts to less than significant, similar to what was concluded in the GPEIR.

#### Liquefaction and Lateral Spreading

Based on the fact that the historically highest groundwater level is approximately 20 feet bgs and the geologic deposits below 20 bgs are stiff to very stiff clayey soils and/or bedrock, the potential for liquefaction on the project site is very low. Lateral spreading—when liquefied surface materials spread on very gentle slopes or flat terrain and can result in slope failure—is unlikely to occur. The main reason for this is the low potential for liquefaction. Unlike the proposed project, the GPEIR concluded that the eastern portion of the city contained three factors for liquefaction: the potential for strong ground shaking and loose, unconsolidated sediments, and relatively shallow depth to groundwater. As a result, any project in the GP planning area, including the proposed project, would be subject to the applicable state regulations, local policies, and the requirements found in the geotechnical report. Therefore, similar to the GPEIR, impacts would be less than significant.



## 5. Environmental Analysis

### GEOLOGY AND SOILS

#### Settlement and Collapse

As a result of the low potential for liquefaction, any resulting settlement and collapse on the project site is also considered low. Additionally, any potential seismic settling or collapse on the project site, which occurs in loose granular soils, is also considered to be low because the project site soils mostly contain medium stiff to stiff fine-grained deposits and/or medium dense granular deposits.

To avoid or reduce any potential impacts as a result of settlement or collapse, the project buildings would be subject to applicable state regulations, such as the CBC, requirements in the geotechnical investigation report, and GPU policies. The combination of the applicable state regulations and GPU policies would reduce impacts to less than significant. Therefore, similar to the GPEIR, impacts would be considered less than significant.

#### Erosion

Erosion has the potential to occur during the grading and construction phases of the project. Storms that bring wind and/or water can accelerate the process of erosion on-site. Substantial soil erosion or the loss of topsoil during construction could undermine structures or minor slopes, which would be a concern during implementation of the proposed project.

The CBC provides regulations for construction to provide proper grading, drainage, and erosion and sediment control. In addition, the City of Walnut Municipal Code, Chapter 2.04, which derives from Appendix J of the Los Angeles County Building Code, gives development standards meant to minimize erosion. Some of these standards include not creating cut or fill slopes exceeding 30 feet in height, planting plants to reduce erosion impacts, building sediment catchment basins and/or other erosion control devices, and much more.

As described in further detail in Chapter 5.8, *Hydrology and Water Quality*, of this Draft SEIR, to minimize potential impacts related to erosion, all construction projects of one acre or more are required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) to obtain coverage under the Statewide Construction General Permit. A project SWPPP estimates sediment risk from construction activities to receiving waters and specifies best management practices that would be used to minimize pollution of stormwater. Typical construction best management practices include silt fences, fiber rolls, catch basin inlet protection, water trucks, street sweeping, and stabilization of truck entrance/exits. As a result of the state and local regulations that will be applied to the proposed project, similar to the GPEIR, impacts would be considered less than significant.

#### Summary

The proposed project would be subject to state and local regulations as well as the policies in the GPU. Implementation of these goals and policies, as well as compliance with state, regional, and local regulations pertaining to structural safety regarding a geologic unit or soils that are unstable and could result in landslides, lateral spreading, subsidence, liquefaction, or collapse, would ensure that the proposed project would not directly or indirectly cause substantial adverse effects. In addition to the state regulations and local policies found in the GPEIR, the proposed project would also be subject to the requirements found in the geotechnical report.



## 5. Environmental Analysis

### GEOLOGY AND SOILS

Therefore, similar to the GPEIR, impacts would be less than significant for the proposed project with the implementation of the state regulations, local policies, and the geotechnical requirements described above.

***Level of Significance Before Mitigation:*** Less than significant.

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**Impact 5.6-3: As with the 2018 General Plan, expansive soil conditions would not result in risks to life or property. [Threshold G-4]**

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As stated previously in Section 5.6.1.2, the proposed project site does carry a moderate to high potential for soil expansion. Soil expansion happens as soils swell and shrink due to a change in moisture content. This can result in the differential movement of structures like floor slabs and foundations, hardscape, utilities, and sidewalks. It is recommended that the foundation, floor slab, and pavement be supported by nonexpansive, properly compacted fill soil.

The GPEIR states that expansive soils are generally structurally related, including cracked walls and foundations. In order to lessen the potential impacts of expansive soil conditions, the applicable state regulations and local policies would be implemented. For the proposed project, these state regulations and local policies would also be implemented in concert with the requirements of the geotechnical investigation. The proposed project would not result in new or substantially more severe significant impacts to expansive soil conditions when compared to the GPEIR

***Level of Significance Before Mitigation:*** Less than significant.

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**Impact 5.6-4: The proposed project would not include the use of septic tanks. [Threshold G-5]**

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As discussed in Chapter 5.14, *Utilities and Service Systems*, of this SEIR, wastewater from the project site would be discharged into the existing public sanitary sewer system serviced by the Consolidated Sewer Maintenance District of Los Angeles County. Therefore, potential future development in the project area is not anticipated to result in the use of septic tanks or alternative wastewater disposal systems.

Thus, the proposed project would not impact existing septic tank or alternative wastewater disposal systems in the city. The proposed project would not result in new or substantially more severe significant impacts to when compared to the impacts determined in the GPEIR, and impacts would be less than significant.

***Level of Significance Before Mitigation:*** Less than significant.

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**Impact 5.6-5: The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. [Threshold G-6]**

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A paleontological resource is a natural resource characterized as faunal or floral fossilized remains but may also include specimens of nonfossil material dating to any period preceding human occupation. These resources are valued for the information they yield about the history of the earth and its past ecological settings. The resources are found in geologic strata conducive to their preservation, typically sedimentary formations. Often

## 5. Environmental Analysis

### GEOLOGY AND SOILS

they appear simply as small outcroppings visible on the surface; other times they are below the ground surface and may be encountered during grading.

To determine the potential for paleontological resources on the project site, the Natural History Museum of Los Angeles County was contacted and conducted a thorough search of its paleontological collection records for locality and specimen data on the project site, and found no records of fossil localities directly within the proposed project area. However, fossil localities in the same sedimentary deposit as the project site have been found nearby, either at the surface or at depth. Though no records have shown any fossil localities, there remains the potential for fossil-bearing units in project area, either at the surface or in the subsurface (Appendix I). Though the potential for fossil localities does remain on the project site, all project activities would be conducted in compliance with the requirements of PRC Division 5, Chapter 1.7, Section 5097.5, and Division 20, Chapter 3, Section 30244. Additionally, the proposed project would not result in new or substantially more severe significant impacts when compared to the impacts determined in the GPEIR, and impacts would be less than significant.

***Level of Significance Before Mitigation:*** Less than significant.

#### 5.6.4 Cumulative Impacts

The impacts for geologic resources are typically site specific. As discussed previously, implementation of the proposed project would not result in significant impacts related to geology and soils. As a result of the proposed project being within a seismically active area, the potential hazards related to strong ground shaking and unstable soil conditions would be prevalent, especially in the eastern portion of the city. As such, the proposed project would be subject to the applicable state regulations and local policies in the GPU as well as the requirements of the geotechnical investigation report.

Since impacts associated with geology and soils are by their nature focused on specific sites or areas, the less-than-significant impacts within the project site to avoid impacts to geologic resources from the proposed project would not contribute to a cumulative increase in hazards in the immediate vicinity of the project site. Similarly, impacts to paleontological resources are considered site specific. The proposed project would be on an existing disturbed site and would not contribute to a larger cumulative impact. The proposed project would not result in new or substantially more severe cumulative significant impacts when compared to the GPEIR.

#### 5.6.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements, GPU policies, and standard conditions of approval Impacts 5.6.1, 5.6.2, 5.6.3, 5.6.4, and 5.6.5 would be less than significant.

No impacts would be considered potentially significant, therefore no mitigation would be required.

#### 5.6.6 Mitigation Measures

##### 5.6.6.1 MITIGATION MEASURES FROM THE GPEIR

The GPEIR did not identify mitigation measures for geology and soils.

## 5. Environmental Analysis

### GEOLOGY AND SOILS

#### 5.6.6.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

No additional mitigation measures or conditions of approval are required to reduce impacts to less than significant.

#### 5.6.7 Level of Significance After Mitigation

Geology and soils impacts for the proposed project would be less than significant without mitigation measures.

#### 5.6.8 References

California Geological Survey. 2018. Earthquake Fault Zones: A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California. Department of Conservation. [https://www.conservation.ca.gov/cgs/documents/publications/special-publications/SP\\_042-a11y.pdf](https://www.conservation.ca.gov/cgs/documents/publications/special-publications/SP_042-a11y.pdf).

United States Geologic Survey. 2023 (accessed). Areas of Land Subsidence in California. [https://ca.water.usgs.gov/land\\_subsidence/california-subsidence-areas.html](https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html).

## 5. Environmental Analysis

### 5.7 GREENHOUSE GAS EMISSIONS

This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates the potential for implementation of the Walnut Business Park (proposed project) to cumulatively contribute to greenhouse gas (GHG) emissions impacts in comparison to the impacts evaluated for the project site in the General Plan EIR (GPEIR). Because no single project is large enough to result in a measurable increase in global concentrations of GHGs, climate change impacts of a project are considered on a cumulative basis. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (South Coast AQMD) Working Group and the California Air Resources Board (CARB). GHG emissions modeling was conducted using the California Emissions Estimator Model (CalEEMod), version 2022.1, and model outputs are in Appendix D-a of this Draft SEIR. Cumulative impacts related to GHG emissions are evaluated statewide.

There were several comment letters received from CREED LA and City residents in response to the Notice of Preparation (NOP) related to GHG emissions. The relevant issues raised in these comment letters are addressed throughout this section.

#### Terminology

The following are definitions for terms used throughout this section.

- **Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP).** Metric used to describe how much heat a molecule of a GHG absorbs relative to a molecule of carbon dioxide (CO<sub>2</sub>) over a given period of time (20, 100, and 500 years). CO<sub>2</sub> has a GWP of 1.
- **Carbon dioxide-equivalent (CO<sub>2</sub>e).** The standard unit to measure the amount of GHGs in terms of the amount of CO<sub>2</sub> that would cause the same amount of warming. CO<sub>2</sub>e is based on the GWP ratios between the various GHGs relative to CO<sub>2</sub>.
- **MTCO<sub>2</sub>e.** Metric ton of CO<sub>2</sub>e.
- **MMTCO<sub>2</sub>e.** Million metric tons of CO<sub>2</sub>e.

#### 5.7.1 Environmental Setting

##### 5.7.1.1 GREENHOUSE GASES AND CLIMATE CHANGE

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and ozone (O<sub>3</sub>)—that are the likely cause of an increase in global average temperatures observed in the twentieth and twenty-first centuries. Other GHGs identified by the IPCC that contributes to global warming to a lesser extent are nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

(SF<sub>6</sub>), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).<sup>1,2</sup> The major GHGs applicable to the proposed project are briefly described.

- **Carbon dioxide (CO<sub>2</sub>)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane (CH<sub>4</sub>)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in landfills and water treatment facilities.
- **Nitrous oxide (N<sub>2</sub>O)** is emitted during agricultural and industrial activities as well as during the combustion of fossil fuels and solid waste.

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have stronger greenhouse effects than others. These are referred to as high GWP gases. The GWP of GHG emissions are shown in Table 5.7-1, *GHG Emissions and Their Relative Global Warming Potential Compared to CO<sub>2</sub>*. The GWP is used to convert GHGs to CO<sub>2</sub>-equivalence (CO<sub>2</sub>e) to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. For example, under the IPCC Fourth Assessment Report (AR4), GWP values for CH<sub>4</sub>, 10 metric tons (MT) of CH<sub>4</sub> would be equivalent to 250 MT of CO<sub>2</sub>.

**Table 5.7-1 GHG Emissions and Their Relative Global Warming Potential Compared to CO<sub>2</sub>**

GHGs	Fourth Assessment Report Global Warming Potential Relative to CO <sub>2</sub> <sup>1</sup>	Fifth Assessment Report Global Warming Potential Relative to CO <sub>2</sub> <sup>1</sup>	Sixth Assessment Report Global Warming Potential Relative to CO <sub>2</sub> <sup>1</sup>
Carbon Dioxide (CO <sub>2</sub> )	1	1	1
Methane (CH <sub>4</sub> ) <sup>2</sup>	25	28	30
Nitrous Oxide (N <sub>2</sub> O)	298	265	273

Source: IPCC 2007, 2013, and 2022.

Notes: The IPCC published updated GWP values in its Sixth Assessment Report (AR6) that reflect new information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of CO<sub>2</sub>. However, GWP values identified in AR4 are used in CalEEMod. Therefore, this analysis uses AR4 GWP values.

<sup>1</sup> Based on 100-year time horizon of the GWP of the air pollutant compared to CO<sub>2</sub>.

<sup>2</sup> The methane GWP includes direct effects and indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO<sub>2</sub> is not included.

<sup>1</sup> Water vapor (H<sub>2</sub>O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals); however, water vapor is not considered a pollutant because it is considered part of the feedback loop rather than a primary cause of change.

<sup>2</sup> Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. The share of black carbon emissions from transportation is dropping rapidly and is expected to continue to do so between now and 2030 as a result of California's air quality programs. The remaining black carbon emissions will come largely from woodstoves/fireplaces, off-road applications, and industrial/commercial combustion (CARB 2022b). However, state and national GHG inventories do not include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

## 5. Environmental Analysis GREENHOUSE GAS EMISSIONS

### Human Influence on Climate Change

For approximately 1,000 years before the Industrial Revolution, the amount of GHGs in the atmosphere remained relatively constant. During the twentieth century, scientists observed a rapid change in the climate and the quantity of climate change pollutants in the Earth's atmosphere that is attributable to human activities.

The recent Sixth Assessment Report (AR6) of the IPCC summarizes the latest scientific consensus on climate change. It finds that atmospheric concentrations of CO<sub>2</sub> have increased by 50 percent since the Industrial Revolution and continue to increase at a rate of two parts per million each year. By the 2030s, and no later than 2040, the world will exceed 1.5 degrees Celsius (°C) warming (CARB 2022b). These recent changes in the quantity and concentration of climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants (CAT 2006). In the past, gradual changes in the earth's temperature changed the distribution of species, availability of water, etc. Human activities are accelerating this process so that environmental impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime (IPCC 2007).

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are hard to predict. Projections of climate change depend heavily on future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in emissions and on observations of the climate record that assess the human influence of the trend and projections for extreme weather events. Climate-change scenarios are affected by varying degrees of uncertainty. For example, there are varying degrees of certainty on the magnitude of the trends for:

- Warmer and fewer cold days and nights over most land areas.
- Warmer and more frequent hot days and nights over most land areas.
- An increase in the frequency of warm spells and heat waves over most land areas.
- An increase in frequency of heavy precipitation events (or proportion of total rainfall from heavy falls) over most areas.
- Larger areas affected by drought.
- Intense tropical cyclone activity increases.
- Increased incidence of extreme high sea level (excluding tsunamis).

### Potential Climate Change Impacts for California

There is at least a greater than 50 percent likelihood that global warming will reach or exceed 1.5°C in the near-term, even for the very low GHG emissions scenario (IPCC 2022). Climate change is already impacting California and will continue to affect it for the foreseeable future. For example, the average temperature in most

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

areas of California is already 1°F higher than historical levels, and some areas have seen average increases in excess of 2°F (CalOES 2020). The California Fourth Climate Change Assessment identifies the following climate change impacts under a business-as-usual scenario:

- Annual average daily high temperatures in California are expected to rise by 2.7 degrees Fahrenheit (°F) by 2040, 5.8°F by 2070, and 8.8°F by 2100 compared to observed and modeled historical conditions. These changes are statewide averages. Heat waves are projected to become longer, more intense, and more frequent.
- Warming temperatures are expected to increase soil moisture loss and lead to drier seasonal conditions. Summer dryness may become prolonged, with soil drying beginning earlier in the spring and lasting longer into the fall and winter rainy season.
- High heat increases the risk of death from cardiovascular, respiratory, cerebrovascular, and other diseases.
- Droughts are likely to become more frequent and persistent through 2100.<sup>3</sup>
- Climate change is projected to increase the strength of the most intense precipitation and storm events affecting California.
- Mountain ranges in California are already seeing a reduction in the percentage of precipitation falling as snow. Snowpack levels are projected to decline significantly by 2100 due to reduced snowfall and faster snowmelt. California's water storage system is designed with the expectation that snow will stay frozen for many months, and that as it melts, it will be stored in a series of reservoirs and dams, many of which are used to generate electricity. Changing waterfall patterns therefore impact both water supply and electricity supply.
- Marine layer clouds are projected to decrease, though more research is needed to better understand their sensitivity to climate change.
- Extreme wildfires (i.e., fires larger than 10,000 hectares or 24,710 acres) would occur 50 percent more frequently. The maximum area burned statewide may increase 178 percent by the end of the century. Drought and reduced water supplies can increase wildfire risk.
- Exposure to wildfire smoke is linked to increased incidence of respiratory illness.
- Sea level rise is expected to continue to increase erosion of beaches, cliffs, and bluffs (CalOES 2020).

Global climate change risks to California are shown in Table 5.7-2, *Summary of GHG Emissions Risks to California*, and include impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy.

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<sup>3</sup> Overall, California has become drier over time, with five of the eight years of severe to extreme drought occurring between 2007 and 2016, and with unprecedented dry years in 2014 and 2015 (OEHHHA 2018). Statewide precipitation has become increasingly variable from year to year, with the driest consecutive four years occurring from 2012 to 2015 (OEHHHA 2018).

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

**Table 5.7-2 Summary of GHG Emissions Risks to California**

Impact Category	Potential Risk
Public Health Impacts	Heat waves will be more frequent, hotter, and longer Fewer extremely cold nights Poor air quality made worse Higher temperatures increase ground-level ozone levels Deaths due to extreme heat
Water Resources Impacts	Decreasing Sierra Nevada snowpack Challenges in securing adequate water supply Potential reduction in hydropower Loss of winter recreation
Agricultural Impacts	Increasing temperature Increasing threats from pests and pathogens Expanded ranges of agricultural weeds Declining productivity Irregular blooms and harvests
Coastal Sea Level Impacts	Accelerated sea-level rise Increasing coastal floods Shrinking beaches Worsened impacts on infrastructure
Forest and Biological Resource Impacts	Increased risk and severity of wildfires Lengthening of the wildfire season Movement of forest areas Conversion of forest to grassland Declining forest productivity Increasing threats from pests and pathogens Shifting vegetation and species distribution Altered timing of migration and mating habits Loss of sensitive or slow-moving species
Energy Demand Impacts	Potential reduction in hydropower Increased energy demand

Sources: CEC 2006, 2009; CCCC 2012; CNRA 2014; CalOES 2020.

#### 5.7.1.2 REGULATORY BACKGROUND

Federal, State, regional, and local regulations are listed in Table 5.7-3, *Regulations/Plans for Greenhouse Gas Emissions*. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals Policies*, for the full list of General Plan Update (GPU) policies.



## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

**Table 5.7-3 Regulations/Plans for Greenhouse Gas Emissions**

<b>Federal</b>	
US Mandatory Report Rule for GHGs	In 2009, the United States Environmental Protection Agency (EPA) issued this rule that requires substantial emitters of GHG emissions (large stationary sources, etc.) to report GHG emissions data. Facilities that emit 25,000 MT or more of CO <sub>2</sub> e per year are required to submit an annual report.
Corporate Average Fuel Economy (CAFE) standards	Overall, the new CAFE standards require a fleet average of 49 miles per gallon (mpg) for passenger vehicles and light trucks for model year 2026, which would be a 10 mpg increase over model year 2021 (NHTSA 2022).
<b>State</b>	
Executive Order S-03-05	EO S-03-05 was signed June 1, 2005, and set the following GHG reduction targets for the state: 2000 levels by 2010, 1990 levels by 2020, 80 percent below 1990 levels by 2050.
Assembly Bill 32, the Global Warming Solutions Act (2006)	AB 32 follows the 2020 tier of emissions reduction targets established in EO S-03-05. CARB prepared the 2008 Scoping Plan to outline a plan to achieve the GHG emissions reduction targets of AB 32.
Executive Order B-30-15	EO B-30-15, signed April 29, 2015, set a goal of reducing GHG emissions in the state to 40 percent of 1990 levels by year 2030.
Senate Bill 32 and Assembly Bill 197	In September 2016, Governor Brown signed SB 32 and AB 197 into law, making the executive order goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires the CARB to prioritize direct emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.
Executive Order B-55-18	Executive Order B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." Executive Order B-55-18 directs CARB to work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.
Assembly Bill 1279	AB 1279, signed by Governor Newsom in September 2022, codifies the carbon neutrality targets of EO B-55-18 for year 2045 and sets a new legislative target for year 2045 of 85 percent below 1990 levels for anthropogenic GHG emissions. CARB will be required to update the scoping plan to identify and recommend measures to achieve the net-zero and GHG emissions-reduction goals.
2022 Climate Change Scoping Plan	The 2022 Scoping Plan was adopted on December 15, 2022. The plan lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the state's anthropogenic (human-caused) GHG emissions. The Scoping Plan was updated to address the carbon neutrality goals of EO B-55-18 and the ambitious GHG reduction target of AB 1279.
Senate Bill 375	SB 375, the Sustainable Communities and Climate Protection Act, was adopted in 2008 to connect the GHG emissions reduction targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled and vehicle trips.
Update to the SB 375 Targets	CARB adopted revised SB 375 targets for the Metropolitan Planning Organizations (MPOs) in March 2018 and the updated targets became effective in October 2018. All Sustainable Communities Strategies (SCSs) adopted after October 1, 2018, are subject to these new targets.

## 5. Environmental Analysis GREENHOUSE GAS EMISSIONS

**Table 5.7-3 Regulations/Plans for Greenhouse Gas Emissions**

<i>Transportation Sector Specific Regulations</i>	
Advanced Clean Fleets and Advanced Clean Trucks	CARB adopted the Advanced Clean Fleets (ACF) regulation in 2023 to accelerate the transition to zero-emission medium- and heavy-duty vehicles (ZEVs). In conjunction with the Advanced Clean Trucks (ACT) regulation, the ACF regulations help ensure that medium- and heavy-duty ZEVs are brought to market by requiring certain fleets to purchase them.
Assembly Bill 1493	California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and is anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 light-duty vehicles.
Executive Order S-01-07	In 2017, EO S-01-07 set a declining standard for GHG emissions measured in CO <sub>2</sub> e gram per unit of fuel energy sold in California. The low-carbon fuel standard required a reduction of 2.5% in the carbon intensity of California's transportation fuels by 2015 and a reduction of at least 10% by 2020.
Executive Order B-16-2012	CARB, the California Energy Commission (CEC), the Public Utilities Commission, and other relevant agencies worked with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate ZEVs in major metropolitan areas, including infrastructure to support them (e.g., electric vehicle charging stations). EO B-16-2012 also directed the number of ZEVs in California's state vehicle fleet to increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are ZE by 2015 and at least 25 percent by 2020. The EO also established a target for the transportation sector of reducing GHG emissions to 80 percent below 1990 levels.
Executive Order N-79-20	The goal of EO N-79-20 is that 100 percent of in-state sales of new passenger cars and trucks will be ZE by 2035. Additionally, the fleet goals for trucks are that 100 percent of drayage trucks are ZE by 2035, and 100 percent of medium- and heavy-duty vehicles in the state are ZE by 2045, where feasible. The EO's goal for the state is to transition to 100 percent ZE off-road vehicles and equipment by 2035, where feasible.
<i>Renewables Portfolio: Carbon Neutrality Regulations</i>	
Senate Bills 1078, 107, and X1-2 and Executive Order S-14-08	Senate Bills 1078 (Sher) and 107 (Simitian) established a Renewables Portfolio Standard (RPS) for renewable sources of electricity, like wind, hydropower, geothermal, biomass, and biogas. Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent to reach at least 20 percent by December 30, 2010. EO S-14-08, signed in November 2008, expanded the state's renewable energy standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2).
Senate Bill 350	SB 350 (de Leon) establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030 and set a new goal to double the energy-efficiency savings in electricity and natural gas through energy-efficiency and conservation measures.
Senate Bill 100	Under SB 100, the RPS for public-owned facilities and retail sellers consists of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030 and established a new requirement of 50 percent renewables by 2026. Furthermore, the bill establishes an overall State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

**Table 5.7-3 Regulations/Plans for Greenhouse Gas Emissions**

	of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.
Senate Bill 1020	SB 1020 provides interim RPS targets (90 percent renewable energy by 2035 and 95 percent renewable energy by 2040) and requires renewable energy and zero-carbon resources to reach 100 percent clean electricity by 2045.
<b>Energy-Efficiency Regulations</b>	
California Building Code: Building Energy-Efficiency Standards	Title 24 of the California Code of Regulations, adopted by the California Energy Commission (CEC) requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for the consideration and possible incorporation of new energy-efficiency technologies and methods. The most recent 2022 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and require mixed-fuel single-family homes to be electric-ready to accommodate replacement of gas appliances with electric appliances.
California Building Code: CALGreen	CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.
2006 Appliance Efficiency Regulations	These regulations include standards for both federally and non-federally regulated appliances. Though these regulations are now often viewed as "business as usual," they exceed the standards imposed by all other states and reduce GHG emissions by reducing energy demand.
<b>Solid Waste Diversion Regulations</b>	
AB 939: Integrated Waste Management Act of 1989	California's Integrated Waste Management Act (AB 939) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the Act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.
AB 341	AB 341 increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multifamily residential land uses. Section 5.408 of CALGreen also requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.
AB 1327	The California Solid Waste Reuse and Recycling Access Act (AB 1327) requires areas to be set aside for collecting and loading recyclable materials in development projects. The act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.
AB 1826	AB 1826 requires businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses and multifamily residential dwellings with five or more units.

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

**Table 5.7-3 Regulations/Plans for Greenhouse Gas Emissions**

<i>Water-Efficiency Regulations</i>	
SBX7-7	SBX7-7 mandates urban water conservation and authorizes the Department of Water Resources (DWR) to prepare a plan implementing urban water conservation requirements (20x2020 Water Conservation Plan). In addition, it requires agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 requires urban water providers to adopt a water conservation target of a 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.
AB 1881	AB 1881 requires local agencies to adopt the updated DWR model ordinance or an equivalent. AB 1881 also requires the CEC to consult with the DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves, to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.
<i>Short-Lived Climate Pollutant Reduction Strategy</i>	
SB 1383	The Short-Lived Climate Pollutant Reduction Strategy identifies the state's approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants. Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (charbroiling), and industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s, despite the tripling of diesel fuel use.
<b>Regional</b>	
2020-2045 Regional Transportation Plan (RTP) and Sustainable Conservation Strategy (SCS)	The RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled (VMT) from automobiles and light-duty trucks and thereby reduces GHG emissions from these sources.
2024-2050 RTP/SCS	SCAG is in the process of updating the RTP/SCS. The draft 2024-2050 RTP/SCS, <i>Connect SoCal 2024</i> , is anticipated to be adopted in 2024. Connect SoCal 2024 includes a comprehensive regional transportation planning integrated with the SCS. SCAG's first RTP/SCS in 2012 included strategies like Complete Streets, Transportation Demand Management, and Sustainable Development.

#### 5.7.1.3 EXISTING CONDITIONS

##### California's GHG Sources and Relative Contribution

In 2022, the statewide GHG emissions inventory was updated for 2000 to 2020 emissions using the GWPs in IPCC's AR4, and California produced 369.2 MMTCO<sub>2</sub>e GHG emissions—35.3 MMTCO<sub>2</sub>e lower than 2019 levels and 61.8 MMTCO<sub>2</sub>e below the 2020 GHG limit of 431 MMTCO<sub>2</sub>e (CARB 2022a). The 2019 to 2020 decrease in emissions is likely due in large part to the impacts of the COVID-19 pandemic. Since the peak level in 2004, California's GHG emissions have generally followed a decreasing trend. In 2014, statewide GHG emissions dropped below the 2020 GHG limit and have remained below the limit since that time. Per-capita GHG emissions in California have dropped from a 2001 peak of 13.8 metric tons per person to 9.3 metric tons per person in 2020, a 33 percent decrease (CARB 2022a).

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

California's transportation sector remains the largest generator of GHG emissions, producing 37 percent of the state's total emissions in 2020. Industrial sector emissions made up 20 percent and electric power generation made up 16 percent of the state's emissions inventory. Other major sectors of GHG emissions include commercial and residential (4 percent), agriculture and forestry (8.6 percent), high-GWP gases (5.8 percent), and recycling and waste (2 percent) (CARB 2022a).

Transportation emissions continued to decline for the past three consecutive years with the rise of fuel efficiency for passenger vehicle fleet and increases in battery electric vehicles. The deployment of renewable/less carbon-intensive resources and higher energy efficiency standards have facilitated the continuing decline in fossil fuel electricity generation. The industrial sector trend has been relatively flat in recent years but saw a decrease of 7.1 MMTCO<sub>2</sub>e in 2020. Commercial and residential emissions saw a decrease of 1.7 MMTCO<sub>2</sub>e. Emissions from high-GWP gases have continued to increase as they replace ozone-depleting substances that are being phased out under the 1987 Montreal Protocol. Emissions from other sectors have remained generally constant in recent years. Overall trends in the inventory also continue to demonstrate that the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross domestic product [GDP]) is declining. From 2000 to 2020, the carbon intensity of California's economy decreased by 49 percent while the GDP increased by 56 percent (CARB 2022a).

### Existing Emissions

The existing industrial developments on-site reflects the assumed land use buildout for the project site in the GPEIR. Therefore, for this SEIR, emissions from the existing development on the project site serves as the environmental baseline. The existing development includes 357,544 square feet of building area consisting of an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, a car body shop repair facility, pizza restaurant, roofers mart, Mexican food supply store, rent-a-car office, and pet food supply outlet. These uses currently generate GHG emissions from transportation (employee and vendor vehicle trips), area sources (consumer products and cleaning supplies), energy use, water use and wastewater generation, and solid waste disposal. Table 5.7-4, *Existing (Approved Project) GHG Emissions*, shows the existing emissions from on-site uses.

**Table 5.7-4 Existing (Approved Project) GHG Emissions**

Source	GHG Emissions <sup>1</sup>
	MTCO <sub>2</sub> e Per Year
Mobile (Truck)	4,031
Mobile (Passenger)	1,490
Area	7
Energy	693
Water	142
Solid Waste	105
Refrigerants	0
TRUs <sup>1</sup>	0
Off-Road Equipment	84

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

**Table 5.7-4 Existing (Approved Project) GHG Emissions**

Source	GHG Emissions <sup>1</sup>
	MTCO <sub>2</sub> e Per Year
<b>Total Emissions</b>	<b>6,552</b>

Source: CalEEMod, Version 2022.1.0.

Notes: MT = metric tons; MTCO<sub>2</sub>e = metric ton of carbon dioxide equivalent

<sup>1</sup> Modeling conservatively assumes that industrial operations on-site do not involve cold storage.

### 5.7.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project would normally have a significant effect on the environment if the project would:

- GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- GHG-2 Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

#### 5.7.2.1 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

South Coast AQMD adopted a significance threshold of 10,000 MTCO<sub>2</sub>e per year for permitted (stationary) sources of GHG emissions for which South Coast AQMD is the designated lead agency. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, South Coast AQMD convened a GHG CEQA Significance Threshold Working Group. Based on the last Working Group meeting in September 2010 (Meeting No. 15), the South Coast AQMD Working Group identified a tiered approach for evaluating GHG emissions for development projects where South Coast AQMD is not the lead agency (South Coast AQMD 2010a). The following tiered approach has not been formally adopted by South Coast AQMD.

- **Tier 1.** If a project is exempt from CEQA, project-level and contribution to significant cumulative GHG emissions are less than significant.
- **Tier 2.** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (e.g., city or county), project-level and contribution to significant cumulative GHG emissions are less than significant.
- **Tier 3.** If GHG emissions are less than the screening-level criterion, project-level and contribution to significant cumulative GHG emissions are less than significant.

For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, South Coast AQMD Working Group requires an assessment of GHG emissions. Project-related GHG emissions include on-road transportation, energy use, water use, wastewater generation, solid waste disposal, area sources, off-road emissions, and construction activities. The South Coast AQMD Working Group decided that because construction activities would result in a "one-time" net increase in GHG emissions,

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

construction activities should be amortized into the operational phase GHG emissions inventory based on the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame, since this is a typical interval before a new building requires the first major renovation. South Coast AQMD Working Group identified a screening-level threshold of 3,000 MTCO<sub>2</sub>e annually for all land use types (bright-line screening level). The bright-line screening-level criteria are based on a review of the Governor's Office of Planning and Research database of CEQA projects. Based on review of 711 CEQA projects, 90 percent of these projects would exceed the bright-line thresholds. Therefore, projects that do not exceed the bright-line threshold would have a nominal and less than cumulatively considerable impact on GHG emissions. South Coast AQMD Working Group recommends use of the 3,000 MTCO<sub>2</sub>e interim bright-line screening-level criterion for all project types (South Coast AQMD 2010b).

- **Tier 4.** If emissions exceed the screening threshold, a more detailed review of the project's GHG emissions is warranted.

The South Coast AQMD Working Group's bright-line screening-level criterion of 3,000 MTCO<sub>2</sub>e per year is used as the significance threshold for the proposed project. If the project's operation-phase emissions exceed this criterion, GHG emissions would be considered potentially significant without mitigation measures incorporated.

#### 5.7.2.2 MASS EMISSIONS AND HEALTH EFFECTS

On December 24, 2018, in *Sierra Club et al. v. County of Fresno et al.* (Friant Ranch), the California Supreme Court determined that the EIR for the proposed Friant Ranch project failed to adequately analyze the project's air quality impacts on human health. The EIR prepared for the project, which involved a master planned retirement community in Fresno County, showed that project-related mass emissions would exceed the San Joaquin Valley Air Pollution Control District's regional significance thresholds. In its findings, the California Supreme Court affirmed the holding of the Court of Appeal that EIRs for projects must not only identify impacts to human health, but also provide an "analysis of the correlation between the project's emissions and human health impacts" related to each criterion air pollutant that exceeds the regional significance thresholds or explain why it could not make such a connection. In general, the ruling focuses on the correlation of emissions of toxic air contaminants and criteria air pollutants and their impact to human health.

In 2009, the United States Environmental Protection Agency (EPA) issued an endangerment finding for six GHGs (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>) to regulate GHG emissions from passenger vehicles. The endangerment finding is based on evidence that shows an increase in mortality and morbidity associated with increases in average temperatures, which increase the likelihood of heatwaves and ozone levels. The effects of climate change are identified in Table 5.7-2. Though identified effects such as sea level rise and increased extreme weather can indirectly impact human health, neither the EPA nor CARB has established ambient air quality standards for GHG emissions. The State's GHG reduction strategy outlines a path to avoid the most catastrophic effects of climate change. The State's GHG reduction goals and strategies are based on their path toward reducing statewide cumulative GHGs as outlined in AB 32, SB 32, and EO S-03-05.

The two significance thresholds that the City uses to analyze GHG impacts are based on achieving the statewide GHG reduction goals based on a no net increase in GHG emissions (GHG-1) and consistency with policies

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

or plans adopted to reduce GHG emissions (GHG-2). Further, because no single project is large enough to result in a measurable increase in global concentration of GHG emissions, climate change impacts of a project are considered on a cumulative basis. Without federal ambient air quality standards for GHG emissions, and given the cumulative nature of GHG emissions and the City's significance thresholds, which are tied to reducing the state's cumulative GHG emissions, it is not feasible at this time to connect the project's specific GHG emissions to the potential health impacts of climate change.

### 5.7.3 Environmental Impacts

#### 5.7.3.1 2018 GENERAL PLAN UPDATE

The GPEIR identified that while GHG emissions under buildout of the GPU would be partially offset by implementation of the existing regulations and new policies and through changes to land use designations and zoning, impacts would be significant and unavoidable, as feasible mitigation for future projects cannot be determined at this time. The GPU would be consistent with the measures outlined in the 2008 CARB Scoping Plan. However, as the South Coast AQMD plan level efficiency target of 2.6 MTCO<sub>2</sub>e/year/service population (SP) has been exceeded under existing conditions and buildout under the GPU would result in a population 8 percent greater than the 2016 RTP/SCS projections, the GPU would not be consistent with the 2016 RTP/SCS and impacts would be significant and unavoidable.

#### 5.7.3.2 PROPOSED PROJECT

##### Methodology

This GHG evaluation was prepared in accordance with the requirements of CEQA to determine if significant GHG impacts are likely in conjunction with the proposed project compared to those associated with the GPU. South Coast AQMD has published guidelines for analyzing and mitigating environmental impacts, and they were used in this analysis. The analysis in this section is modeled using CalEEMod, version 2022.1.

Since future businesses and/or tenants are unknown at this time, and could include warehousing, manufacturing, and retail/office uses, all building space was conservatively modeled as unrefrigerated and refrigerated warehouse uses.

##### Construction

Construction would entail building and asphalt demolition, site preparation, rough grading and soil haul, fine grading and soil haul, utilities trenching, building construction, paving, architectural coating, and finishing and landscaping as well as off-site improvements. The proposed project construction would occur over 16 months between August 2025 and December 2026. Per South Coast AQMD recommended guidance, total annual construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the proposed project (South Coast AQMD 2009).



## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

#### *Operational Phase*

- **Transportation.** The number of trips generated is based on the trip generation provided by Iteris without passenger car equivalents<sup>4</sup> (see Appendix D-a). The proposed project would generate up to 236 truck trips and 793 passenger trips for a total of 1,029 non-passenger equivalent trips per day upon buildout. The existing development on the project site would generate up to 215 truck trips and 611 passenger trips for a total of 826 non-passenger equivalent trips per day<sup>5</sup>. Modeling of truck trip lengths are based on an average trip length of 39.9 miles per trip, which is derived from the SCAG's Heavy-Duty Truck Regional Travel Demand model and represents the average Class 8 truck trip distance within the South Coast Air Basin (South Coast AQMD 2021). For non-truck vehicles (e.g., passenger vehicles), the default CalEEMod trip length of 20.20 miles per trip was used.
- **Area Sources.** Area sources generated from use of consumer products and cleaning supplies are based on CalEEMod default emission rates and on the assumed building and land use square footages.
- **Off-Road Equipment.** Modeling included 20 electric-powered forklifts and 1 diesel-powered yard trucks, based on information provided by the applicant. The yard trucks would consist of diesel-powered units that would operate for 10 hours per day and 365 days per year. Electric-powered forklift and yard truck emissions are based on calendar year 2026 OFFROAD2021, Version 1.0.5, emission factors for a 25-horsepower electric forklift and 175-horsepower industrial yard truck, respectively. For baseline conditions, diesel-powered forklift and yard truck emissions are based on calendar year 2023 OFFROAD2021, Version 1.0.5, emission factors for a 75-horsepower diesel forklift and 175-horsepower industrial yard truck, respectively.
- **Transport Refrigeration Units.** Emissions from transport refrigeration units (TRUs) are based on the operation of 15 trucks with TRUs per day, 30 minutes of idling per unit, and calendar year 2026 aggregated Instate Trailer TRU emission rates obtained from OFFROAD2021, Version 1.0.5. As information regarding cold storage was not available, modeling assumes that industrial operations on-site under the approved project would not involve cold storage.
- **Energy.** The CalEEMod Version 2022.1 default energy (i.e., electricity and natural gas) rates for nonresidential land uses are based on the CEC's 2018-2030 Uncalibrated Commercial Sector Forecast (commercial forecast), which was compiled by the CEC in 2019. Use of the CalEEMod default energy rates results in conservative estimates compared to the recently adopted 2022 Building Energy Efficiency Standards because the commercial forecast is based on the energy demand per square foot of building space, land use subtype, and end use for the year 2019. It is anticipated new buildings under the 2022 Standards would generally result in lower electricity use. Furthermore, the carbon intensity factor is based

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<sup>4</sup> Passenger car equivalent is used to represent the impact of a large vehicle on a road by expressing it as the number of equivalent passenger vehicles.

<sup>5</sup> The number of trips generated is based on the trip generation provided by Iteris without passenger car equivalents (see Appendix D-a). Trips are based on 392,488 sf of warehousing and 22,290 sf of office space. This results in a more conservative analysis since warehouses result in more truck trips than manufacturing use.

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

on the forecasted CalEEMod default CO<sub>2</sub>e intensity factor 346.20 pounds per megawatt hour (lbs/MWh) for buildout year 2026 and 348.64 lbs/MWh for baseline year 2023.

- **Solid Waste Disposal.** Indirect emissions from waste generation are based on the CalEEMod default solid waste generation of 0.94 pounds per thousand square feet per day for both baseline conditions and operational conditions.
- **Water/Wastewater.** Water use and wastewater generation is based on the CalEEMod default water/wastewater generation rates.
- **Refrigerants.** GHG emissions from operation of building air conditioning and refrigeration equipment are based on CalEEMod default values based on land use type.

Life cycle emissions are not included in the GHG analysis, consistent with California Resources Agency directives.<sup>6</sup> Black carbon emissions are not included in the GHG analysis because CARB does not include this short-lived climate pollutant in the state's SB 32/AB 1279 inventory but treats it separately.<sup>7</sup> Additionally, though not anticipated, industrial sources of emissions that require a permit from South Coast AQMD (permitted sources) are not included in the proposed project community inventory since they have separate emission reduction requirements. GHG modeling is included in Appendix D-a of this Draft SEIR.

### Impact Analysis

The following impact analysis addresses the thresholds of significance in Section 5.7.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.7-1: The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. [Threshold GHG-1]**

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The GPEIR identified that under buildout of the GPU, impacts would be significant and unavoidable. As future projects would be required to analyze project-specific and cumulative impacts, feasible mitigation for GHG emissions could not be determined for the GPU.

Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate

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<sup>6</sup> Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses were not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

<sup>7</sup> Particulate matter emissions, which include black carbon, are analyzed in Section 5.2, *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017).

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

enough GHG emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Implementation of the proposed project would generate GHG emissions from vehicle trips, TRUs, off-road equipment, water demand, wastewater and solid waste generation, area sources (e.g., consumer cleaning products), and energy usage (i.e., electricity). The proposed project would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen. The proposed project would also include development of all-electric buildings and would include electric vehicle (EV) charging stations. These features would all help to reduce GHG emissions.

The proposed project emissions are shown in Table 5.7-5, *Project-Related GHG Emissions*. Compared to the existing development, the proposed project would increase the total building area from 357,544 square feet to 414,778 square feet, a difference of 57,234 square feet. As compared to the 826 total daily trips under the existing development, operation of the proposed project would generate up to 1,029 trips per day (non-passenger equivalent) consisting of 793 passenger vehicle trips and 112 heavy-heavy duty truck trips, 58 medium-heavy duty truck trips, and 66 light-heavy duty truck trips. Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of development accommodated by the proposed project. The proposed construction- and operation-related emissions of development accommodated by the proposed project are quantified and shown in Table 5.7-5. As shown in the table, the net GHG emissions from the proposed project would not exceed the South Coast AQMD bright-line threshold of 3,000 MTCO<sub>2e</sub>/year. Therefore, the proposed project would not result in new significant impacts or a substantial increase in significant impacts when compared to impacts identified in the GPEIR.

**Table 5.7-5 Project-Related GHG Emissions**

Source	GHG Emissions <sup>1</sup>
	MTCO <sub>2e</sub> Per Year
Mobile (Truck)	4,191
Mobile (Passenger)	1,809
Area	8
Energy <sup>1</sup>	465
Water	163
Solid Waste	122
Refrigerants	236
Amortized Construction Emissions <sup>2</sup>	102
<b>Total Emissions</b>	<b>7,265</b>
<b>Approved Project Buildout GHG Emissions</b>	<b>6,552</b>
<b>Net Change in Emissions</b>	<b>819</b>
South Coast AQMD Bright-Line Threshold	3,000 MTCO <sub>2e</sub> /Yr.

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

**Table 5.7-5 Project-Related GHG Emissions**

Source	GHG Emissions <sup>1</sup>
	MTCO <sub>2</sub> e Per Year
Exceeds Bright-Line Threshold?	No

Source: CalEEMod, Version 2022.1.0.  
Notes: MT = metric tons; MTCO<sub>2</sub>e = metric ton of carbon dioxide equivalent  
<sup>1</sup> Energy use assumes that all new buildings would be all-electric buildings, based on information provided by the applicant.  
<sup>2</sup> Total construction emissions for all three phases of construction are amortized over 30 years per South Coast AQMD methodology (South Coast AQMD 2009).

**Level of Significance Before Mitigation:** Less than significant.

**Impact 5.7-2: The proposed project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. [Threshold GHG-2]**

As determined by the GPEIR, the GPU would be consistent with the measures outlined in the 2008 CARB Scoping Plan. However, as the South Coast AQMD efficiency target of 2.6 MTCO<sub>2</sub>e/year/SP have been exceeded under existing conditions and buildout under the GPU would result in a population 8 percent greater than the 2016 RTP/SCS projections, the GPU would not be consistent with the 2016 RTP/SCS and impacts would be significant and unavoidable. Since the GPEIR was certified, CARB and SCAG have adopted updated GHG reduction plans. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's 2022 Scoping Plan and SCAG's RTP/SCS. A consistency analysis with these plans is presented below.

#### *CARB Scoping Plan*

CARB's latest Climate Change Scoping Plan (2022) outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279 (CARB 2022b). The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Statewide strategies to reduce GHG emissions in the 2022 Climate Change Scoping Plan include implementing SB 100, which expands the RPS to 60 percent by 2030; expanding the Low Carbon Fuel Standards to 18 percent by 2030; implementing the Mobile Source Strategy to deploy zero-electric vehicle buses and trucks; implementing the Sustainable Freight Action Plan to provide targets and guidance for California's future freight transport system; implementing the Short-Lived Climate Pollutant Reduction Strategy, which reduces methane and hydrofluorocarbons to 40 percent below 2013 levels by 2030 and black carbon emissions to 50 percent below 2013 levels by 2030; continuing to implement SB 375; creating a post-2020 Cap-and-Trade Program; and developing an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency Regulations, California Renewable Energy Portfolio Standard, changes in the CAFE standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen. The proposed project would comply with these GHG emissions reduction measures since they are statewide strategies. The proposed project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32, SB 32, and AB 1279 were adopted.

Furthermore, while statewide efforts could provide downstream reductions at the local level, the 2022 Scoping Plan identifies three priority areas for local actions that would support and amplify the overall State efforts to reduce GHG emissions and achieve the long-term climate goals: (1) transportation electrification, (2) vehicle miles traveled (VMT) reduction, and (3) building decarbonization. The proposed project would develop all-electric buildings, which would support CARB's goals for 100 percent renewable energy use. In addition, as noted in Chapter 5.13, *Transportation*, the proposed project would have a Home-based Work VMT per worker of 20.5 miles, which would not exceed the City baseline rate of 20.97 miles per worker. However, while the proposed project would also include EV capable stalls and charging stations, the proposed project does not include provisions that would require EV parking that are comparable to the CALGreen residential and nonresidential voluntary Tier 2 EV parking standards. Thus, although the proposed project would adhere either directly or indirectly to statewide strategies, it would not meet one of the three local action priority areas (i.e., EV charging stalls that meet CALGreen Tier 2), it is considered inconsistent with the Scoping Plan. Therefore, the proposed project would potentially result in new significant impacts or a substantial increase in significant impacts compared to impacts identified in the GPEIR. Impacts related to consistency with the 2022 Scoping Plan would be potentially significant.

***Level of Significance Before Mitigation:*** Potentially significant.

#### ***SCAG's Regional Transportation Plan / Sustainable Communities Strategy***

SCAG adopted the 2020-2045 RTP/SCS (*Connect SoCal*) in September 2020. *Connect SoCal* finds that land use strategies that focus on new housing and job growth in areas rich with destinations and mobility options would be consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in *Connect SoCal* is to plan for the southern California region to grow in more compact communities in transit priority areas and priority growth areas; provide neighborhoods with efficient and plentiful public transit; establish abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands and farmlands (SCAG 2020). *Connect SoCal*'s transportation projects help more efficiently distribute population, housing, and employment growth, and forecast development is generally consistent with regional-level general plan data to promote active transportation and reduce GHG emissions. The projected regional development, when integrated with the proposed regional transportation network in *Connect SoCal*, would reduce per-capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region.

*Connect SoCal* does not require that local general plans, proposed projects, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. It is anticipated that long-term and short-term (i.e., construction) jobs would be absorbed by the local and regional labor force. Jobs absorbed by the local and regional labor force would contribute to minimizing passenger vehicle VMT. Moreover, VMT

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

associated with heavy-duty trucks involved in goods movement is outside the realm of the RTP/SCS, which primarily focuses on VMT associated with passenger vehicles. Under *Connect SoCal*, the focus remains on improving freight mobility in the region and transitioning to near-zero and zero-emissions technology. The following is the list of *Connect SoCal* goods-movement strategies that are applicable to the proposed project that could provide benefits from a regional and macro-level scale:

- **Clean Freight Corridor System/East-West Freight Corridor.** Establishing a freight corridor system to connect the San Pedro Ports and industrial cluster areas in Los Angeles and the Inland Empire.
- **Truck Bottleneck Relief Strategy.** Working to relieve the top 57 truck bottlenecks. Examples of bottleneck relief strategies include ramp metering, extension of merging lanes, ramp and interchange improvements, capacity improvements, and auxiliary lane additions.
- **Truck Climbing Lanes.** Installing dedicated truck climbing lanes along key corridors, such as Interstate 5 (I-5), I-10, I-15, State Route 57 (SR-57) and SR-60, to enable other vehicles to move at a faster pace, thereby reducing congestion.
- **Goods Movement Environmental Strategy and Technology Advancement Plan.** Reducing environmental impacts by supporting the deployment of commercially available low-emission trucks and advancing technologies to implement a zero- and near zero-emission freight system.

The uses proposed under the project would be consistent with the overall *Connect SoCal* Goods Movement strategy, which identifies the large demand for warehouse space in the SCAG region. Furthermore, the proposed project would include clean air parking spaces as well as EV charging stations, which would promote use of alternative fuels to reduce GHG emissions. Therefore, the proposed project would not result in new impacts or a substantial increase in magnitude of impacts compared to the GPEIR. Impacts related to consistency with SCAG's *Connect SoCal* would be less than significant.

***Level of Significance Before Mitigation:*** Less than significant.

#### 5.7.4 Cumulative Impacts

Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide. Therefore, impacts identified under Impact 5.7-1 and Impact 5.7-2 are not project-specific impacts to global warming, but the proposed project's contribution to this cumulative impact. As discussed previously, the proposed project would not generate a substantial increase in GHG emissions from existing conditions that would exceed the South Coast AQMD bright-line threshold. Consequently, the proposed project's cumulative contribution to global climate change impacts would not be cumulatively considerable. As such, the proposed project would not result in a new impact or substantial increase in magnitude of impacts compared to that of the GPEIR.

## 5. Environmental Analysis

### GREENHOUSE GAS EMISSIONS

#### 5.7.5 Level of Significance Before Mitigation

After implementation of regulatory requirements and standard conditions of approval, Impact 5.7-1 would be less than significant.

Without mitigation, these impacts would be **potentially significant**:

- **Impact 5.7-2** Development of the proposed project could potentially conflict with the State's goals for carbon neutrality identified in the 2022 Scoping Plan.

#### 5.7.6 Mitigation Measures

##### 5.7.6.1 MITIGATION MEASURES FROM THE GPEIR

The GPEIR did not identify mitigation measures for GHG emissions.

##### 5.7.6.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

#### Mitigation Measures

##### *Impact 5.7-2*

GHG-1 Prior to the issuance of a building permit, the site plan shall include automobile electric vehicle (EV) charging stations equal to the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code (CALGreen).

#### Conditions of Approval

No additional conditions of approval are required to reduce impacts to less than significant.

#### 5.7.7 Level of Significance After Mitigation

##### **Impact 5.7-2**

The proposed project would be potentially inconsistent with CARB's 2022 Scoping Plan unless it achieves the three priority areas for ensuring carbon neutrality. Implementation of Mitigation Measure GHG-1 would ensure that development projects accommodated under the proposed project comply with the CALGreen voluntary Tier 2 EV parking standards in addition to buildings designed to be all electric. Thus, with mitigation, the proposed project would be consistent with the transportation electrification and building decarbonization priority areas of the Scoping Plan. Therefore, Impact 5.7-2 would be reduced to less than significant.

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## 5. Environmental Analysis

### 5.8 HAZARDS AND HAZARDOUS MATERIALS

This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates the potential impacts of the Walnut Business Park (proposed project) on human health and the environment due to exposure to hazardous materials or conditions associated with the project site, project construction, and project operations in comparison to the impacts evaluated for the project site in the General Plan EIR (GPEIR). Potential project impacts and appropriate mitigation measures or standard conditions are included as necessary. The analysis in this section is based, in part, upon the following source(s):

- *Phase I Environmental Site Assessment, Walnut Business Park Phase 1 and 2 South Lemon Ave. at Valley Blvd. Walnut, CA 91789*, AES Due Diligence, Inc., October 13, 2021.
- *Phase I Environmental Site Assessment, Walnut Business Park Phase 3 Paseo Sonrisa at Valley Boulevard Walnut, CA 91789*, AES Due Diligence, Inc., October 13, 2021.
- *Phase I Environmental Site Assessment, Walnut Business Park Phase 4 and 5 Paseo Sonrisa at Valley Boulevard Walnut CA, 91789*, AES Due Diligence, Inc., October 13, 2021.
- *Phase I Environmental Site Assessment, Walnut Business Park Phase 6 Paseo Tesoro at Valley Boulevard Walnut CA, 91789*, AES Due Diligence, Inc., October 13, 2021.

Complete copies of these studies are included in the Technical Appendices to this Draft SEIR (Appendices J-a, J-b, J-c, and J-d).

#### 5.8.1 Environmental Setting

##### 5.8.1.1 REGULATORY BACKGROUND

Federal, state, and local are listed in Table 5.8-1. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of General Plan update (GPU) policies.

**Table 5.8-1 Regulations/Plans for Hazards and Hazardous Materials**

<b>Federal</b>	
Resource Conservation and Recovery Act	The Resource Conservation and Recovery Act of 1976 (42 US Code sec. 6901 et seq.) is the principal federal law regulating waste generation, management, and transportation. Hazardous waste management includes storage creating, storing, or disposal of hazardous waste.
Comprehensive Environmental Response, Compensation and Liability Act	The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 protects water, air, and soil resources from the risks created by past chemical disposal practices. This law is also called the Superfund Act and regulates sites on the National Priority List, which are called Superfund sites.

## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

**Table 5.8-1 Regulations/Plans for Hazards and Hazardous Materials**

Emergency Planning and Community Right-to-Know Act	Title III of the Superfund Amendments and Reauthorization Act authorized the Emergency Planning and Community Right-to-Know Act (42 US Code sec. 11001 et seq.) to inform communities and citizens of chemical hazards in their areas. It requires businesses to report to state and local agencies the locations and quantities of chemicals stored on-site; releases to the environment of more than 600 designated toxic chemicals; off-site transfers of waste; pollution prevention measures and activities; and participation in chemical recycling.
Toxic Substances Control Act	The Toxic Substances Control Act of 1976 gives the US Environmental Protection Agency (EPA) the authority to require reporting, record-keeping, testing requirements, and restrictions related to chemical substances and/or mixtures. The act addresses the production, importation, use, and disposal of specific chemicals, including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.
Hazardous Materials Transportation Act	The United States Department of Transportation regulates hazardous materials transportation to reduce risks to life and property from hazards associated with the transport of hazardous materials under Title 49 of the Code of Federal Regulations.
<b>State</b>	
California Health and Safety Code and Code of Regulations	California Health and Safety Code, Chapter 6.95, and California Code of Regulations, Title 19, Section 2729, set out the minimum requirements for business emergency plans and chemical inventory reporting. A business that uses hazardous materials or a mixture containing hazardous materials must establish and implement a business plan if the hazardous material is handled in certain quantities. These regulations require businesses to provide emergency response plans and procedures, training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled on-site.
California Code of Regulations, Title 22, Division 4.5	Title 22, Division 4.5, of the California Code of Regulations (CCR) sets forth the requirements for hazardous waste generators; transporters; and owners or operators of treatment, storage, or disposal facilities. These regulations include the requirements for packaging, storage, labeling, reporting, and general management of hazardous waste prior to shipment.
Asbestos-Containing Materials Regulations	In conjunction with the EPA and California Occupational Safety and Health Administration (Cal/OSHA), state-level agencies regulate removal, abatement, and transport procedures for asbestos-containing materials. These regulations prohibit asbestos releases from industrial, demolition, or construction activities; medical evaluation and monitoring are required for employees performing activities that could expose them to asbestos.
Lead Regulations	Cal/OSHA's "Lead in Construction Standard" (8 CCR Section 1532.1) applies to all construction work where an employee may be exposed to lead. The regulations address permissible exposure limits; exposure assessment; compliance methods; respiratory protection; protective clothing and equipment; housekeeping; medical surveillance; medical removal protection; employee information, training, and certification; signage; record keeping; monitoring; and agency notification.

## 5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

**Table 5.8-1 Regulations/Plans for Hazards and Hazardous Materials**

Hazardous Materials Disclosure Programs	The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) administered by the State of California consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for environmental and emergency management programs, which include hazardous materials release response plans and inventories (business plans), the California Accidental Release Prevention Program, and the Underground Storage Tank (UST) Program. The Unified Program is implemented at the local government level by certified Unified Program agencies, or CUPAs.
Underground Storage Tank Program	The purpose of the UST Program is to protect people and the environment from releases of petroleum and other hazardous substances from tanks. The statutes governing the UST Program are in the Solid Waste Disposal Act (1965). Because of the localized nature of USTs, the EPA shifts enforcement and oversight authority to local governments. California laws and regulations authorize the State Water Board to implement the UST program. The State Water Board then delegates the field implementation to CUPAs.
California Fire Code	The California Fire Code (24 CCR Part 9) is updated every three years and includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, fire hydrant locations and distribution, and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.
Porter-Cologne Water Quality Control Act	Authorizes the Regional Water Quality Control Boards to require groundwater investigations when the quality of groundwater or surface waters of the state is threatened, and to require remediation actions, if necessary.
<b>Regional</b>	
South Coast Air Quality Management District	South Coast Air Quality Management District's Rule 1403 governs the demolition of buildings containing asbestos. Rule 1403 specifies work practices to minimize asbestos emissions during building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.
Los Angeles County All-Hazards Mitigation Plan	The Disaster Mitigation Act of 2000 (Public Law 106-390, Section 322a-d) requires that local governments, as a condition of receiving federal disaster mitigation funds, adopt a mitigation plan that describes the process for identifying hazards, vulnerabilities, and risks; identifies and prioritizes mitigation actions; encourages the development of local mitigation; and provides technical support for those efforts.
Los Angeles County Operational Area Emergency Response Plan	The Los Angeles County Operational Area Emergency Response Plan establishes the County's coordinated emergency management system, which includes prevention, protection, response, recovery, and mitigation in the operational area.
<b>Local</b>	
Walnut Municipal Code	The City of Walnut Municipal Code addresses hazards and hazardous materials in Titles 3 and 5: <ul style="list-style-type: none"> <li>Chapter 3.16 Fire Prevention</li> <li>Chapter 3.24 Health and Sanitation</li> </ul>

## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

**Table 5.8-1 Regulations/Plans for Hazards and Hazardous Materials**

	<ul style="list-style-type: none"> <li>• Chapter 3.28 Collection and Disposal of Refuse</li> <li>• Chapter 5.04 Sewers and Sewage Disposal</li> <li>• Chapter 5.08 Stormwater and Urban Runoff Pollution Control</li> </ul>
City of Walnut Emergency Plan	<p>The City of Walnut's Emergency Operation Center (EOC) administers the State-required Walnut Emergency Plan and ensures the City's efficient and effective response to disaster and emergency situations. In the event of an emergency, the City's Walnut Emergency Plan has developed three levels of activation. Level three, which is the minimum activation level, calls for minimal staffing for emergency operations and is meant for situations such as weather alerts, low-risk planned events, wind or rainstorms, etc. The designated EOC facilities may or may not be needed during this level. Level two involves more emergency staff but is not a full activation of that staff. This level is mainly used for major scheduled events, major wind or rainstorms, moderate earthquakes, and large-scale hazardous materials incidences or large scale evacuations. The physical EOC facility will need to be opened and staffed. Level one will require to full activation of all emergency staff. This level is activated during a major county/city or regional emergency, a major earthquake, or a terrorism threat or incident. The physical EOC facility will need to be opened and fully staffed (City of Walnut, 2021a).</p>
Airports	<p>Airport authorities and other agencies regulate aircraft activity. The State Aeronautics Act of the California Public Utilities Code establishes statewide requirements for airport land use compatibility planning. It requires nearly every county to create an airport land use commission or an alternative. Los Angeles County opted for an airport land use commission.</p>

#### 5.8.1.2 EXISTING CONDITIONS

##### Current Use of the Project Site

The approximately 23-acre project site is between Valley Boulevard to the south, S. Lemon Avenue to the west, Paseo Del Prado to the north, and an existing industrial development to the east. Beyond Valley Boulevard is the Southern Pacific Railroad line and San Jose Creek (see *Figure 3-3, Aerial Photograph*). The City of Industry, which is characterized by industrial land uses, lies south of these features. The existing development on the project site includes 357,544 square feet of building area consisting of an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, a car body shop repair facility, pizza restaurant, Mexican food supply store, rent-a-car office, and pet food supply outlet.

##### Historical Uses of the Property

Based on research of historical records, interviews, and historical maps of the project site, the project site was used in a variety of ways. The project site consists of 34 buildings that accommodate the current commercial and industrial uses. Across the entire site, the land remained undeveloped until 1928, when it was used for agricultural uses. The first buildings were built on the project site in 1976 and 1977. Specifically, this consisted

## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

of the 10 single-story buildings in Phase 1 and 2 (see Table 5.8-2). By 1978, the next set of buildings were built in Phase 3, which consisted of seven single-story buildings, and in Phase 6, which consisted of the single-story building at 20601 Valley Boulevard.

The next cluster of buildings was built sometime between 1981 and 1983 in Phase 4 and 5 and consisted of 10 single-story buildings. The remaining buildings were built in 1985—specifically, the two-story building in Phases 1 and 2 at 20401 Valley Boulevard and the 5 single-story buildings in Phase 6 at 310–360 Paseo Tesoro (see Appendices J-a, J-b, J-c, and J-d).

#### Phase I Environmental Site Assessment Findings

The Phase I Environmental Site Assessments (ESA) were completed by AES Due Diligence on October 13, 2021, in substantial conformance with the scope and limitations of the ASTM E 1527-13 Standard. The Phase I ESAs covered the entire site, with four separate reports that are defined in Table 5.8-2, *Phase I Environmental Site Assessments*. The boundaries of the areas studied in the four separate Phase 1 ESAs are shown in Figure 5.8-1, *Phase I ESA Study Areas*.

**Table 5.8-2 Phase I Environmental Site Assessments**

Phase	Building Addresses	Year Built
Walnut Business Park Phase 1 & 2	<ul style="list-style-type: none"> <li>• 300–310 S. Lemon Ave.</li> <li>• 312–328 S. Lemon Ave.</li> <li>• 330–342 S. Lemon Ave.</li> <li>• 344–346 S. Lemon Ave.</li> <li>• 348–358 S. Lemon Ave.</li> <li>• 360–372 S. Lemon Ave.</li> <li>• 378–382 S. Lemon Ave.</li> <li>• 384–390 S. Lemon Ave.</li> <li>• 394–396 S. Lemon Ave.</li> <li>• 20425 and 20427 Valley Blvd</li> <li>• 20401 Valley Blvd</li> </ul>	<ul style="list-style-type: none"> <li>• Between 1976 and 1977</li> <li>• Between 1976 and 1977</li> <li>• Between 1976 and 1977</li> <li>• Between 1976 and 1977</li> <li>• Between 1976 and 1977</li> <li>• Between 1976 and 1977</li> <li>• Between 1976 and 1977</li> <li>• Between 1976 and 1977</li> <li>• Between 1976 and 1977</li> <li>• Between 1976 and 1977</li> <li>• Between 1976 and 1977</li> <li>• 1985</li> </ul>
Walnut Business Park Phase 3	<ul style="list-style-type: none"> <li>• 307–351 Paseo Sonrisa</li> <li>• 20258–20268 Paseo del Prado</li> <li>• 20475 Valley Blvd.</li> </ul>	<ul style="list-style-type: none"> <li>• 1978</li> <li>• 1978</li> <li>• 1978</li> </ul>
Walnut Business Park Phase 4 & 5	<ul style="list-style-type: none"> <li>• 301–370 Paseo Sonrisa</li> <li>• 20505–20525 Valley Blvd.</li> </ul>	<ul style="list-style-type: none"> <li>• Between 1981 and 1983</li> <li>• Between 1981 and 1983</li> </ul>
Walnut Business Park Phase 6	<ul style="list-style-type: none"> <li>• 310–360 Paseo Tesoro</li> <li>• 20601 Valley Blvd.</li> </ul>	<ul style="list-style-type: none"> <li>• Between 1985</li> <li>• Between 1978</li> </ul>

Based on site observations, interviews, review of available documents, and the database records search, no historical recognized environmental conditions (REC) were identified on the project site. A historical REC is a past release that has been remediated to below “residential” standards and given regulatory closure with no use restrictions. Also, no current RECs—the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property—were identified on any parcel. Finally, no controlled REC was identified—that is, a recognized environmental condition affecting the subject property that has been addressed to the

## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

satisfaction of the applicable regulatory authority or authorities, with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls. However, three Business Environmental Risks were identified on the project site at Phase 1 and 2, Phase 3, and Phase 6. Based on the construction dates in Table 5.8-2 as well as observation, the buildings are suspect for materials containing asbestos. The suspected materials are nonfriable and in good condition and can be maintained in place under an existing asbestos operations and maintenance plan. Additionally, three *de minimis* environmental conditions—a condition related to a release that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies—were identified at Phase 1 and 2, Phase 3, and Phase 6. The early buildings in Phase 1 and 2 are suspected of containing lead-based paint; the buildings are used for nonresidential purposes (Appendix J-a).

#### *Regulatory Agency Environmental Database Listings*

The Phase I ESAs included review of the computer-generated environmental database records search provided by Environmental Data Resources (EDR). This search has been summarized in Table 5.8-3, *Environmental Database Listings for the Project Site*, to show sites that have a hazardous condition that is on or may impact the project site. For a full listing of the EDR database, see Appendices J-a through J-d.

**Table 5.8-3 Environmental Database Listings for the Project Site**

Database Name	Name of Listing/Address	Type of Listing	Distance	Status
Superfund Enterprise Management System	None	None	N/A	N/A
Federal Comprehensive Environmental Response, Compensation and Liability Information System-No Further Remedial Action Planned List	None	None	N/A	N/A
National Priority List	None	None	N/A	N/A
Resource Conservation and Recovery Act Generators	T & M Strip Shop/320 South Lemon	Small Quantity Generator	Project Site	Former
	Flyer Graphics/345 Paseo Sonrisa, Walnut, CA 91789	Small Quantity Generator	Project Site	Former
	The Copy Masters/20425 E Valley Blvd, Walnut CA 91789	Small Quantity Generator	0.042 miles	Former
RCRA Treatment, Storage, Disposal Facilities	None	None	N/A	N/A
Emergency Response Notification System	None	None	N/A	N/A

## 5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

**Table 5.8-3 Environmental Database Listings for the Project Site**

Database Name	Name of Listing/Address	Type of Listing	Distance	Status
Underground Storage Tanks	Union Service Station/20373 Valley Blvd. #1, Walnut, CA 91789	N/A	0.033 miles	Active
	Vogel Properties Inc./300 Paseo Tesoro, Walnut, CA 91789	N/A	0.160 miles	Active
Leaking Underground Storage Tanks	Unocal #5525/20373 Valley Blvd, Walnut, CA 91789	Former	0.33 miles	Completed – Case Closed
Solid Waste Facilities/Landfills	None	None	N/A	N/A
EnviroStor	None	None	N/A	N/A
DEED (Institutional Controls)	None	None	N/A	N/A
California Hazardous Material Incident Reporting System	None	None	N/A	N/A
Hazardous Waste and Substances Sites List (CORTESE)	None	None	N/A	N/A
VCP (Voluntary Cleanup Program)	None	None	N/A	N/A
Hazardous Waste Information System (HAZNET)	Printing Dynamics, Inc./325 Paseo Sonrisa, Walnut, CA 91789	Former Sites	Project Site	Not Active
	Flyer Graphics, Inc./345 Paseo Sonrisa, Walnut, CA 91789	Former Sites	Project Site	Not Active
	VCT, Inc./345 Paseo Tesoro, Walnut, CA 91785	Current Site	Project Site	Active
Historic USTs	Vogel Properties, Inc./300 Paseo Tesoro, Walnut, CA 91789	N/A	0.016 miles	N/A
	Station 5525/20373 Valley Blvd., Walnut, CA 91785	N/A	0.153 miles	N/A
	Union Oil Service Station/20373 Valley Blvd. #1, Walnut, CA 91785	N/A	0.153 miles	N/A
	Pacific Fence Co./20522 Carrey Rd. E., Walnut, CA 91785	N/A	0.177 miles	N/A
EDR Historical Auto Service Stations	None	None	N/A	N/A
Dry Cleaners and EDR Historical Dry Cleaners	None	None	N/A	N/A
Waste Management Unit Database System (WMUDS/SWAT)	None	None	N/A	N/A



## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

**Table 5.8-3 Environmental Database Listings for the Project Site**

Database Name	Name of Listing/Address	Type of Listing	Distance	Status
Manufactured Gas Plants	None	None	N/A	N/A
US Brownfields	None	None	N/A	N/A
Federal Superfund Lien Searches	None	None	N/A	N/A

Three former Resource Conservation and Recovery Act (RCRA) generators were found on the project site and in adjoining properties. Two of these are on the project site and the other is on one of the adjoining properties. These sites are listed as former waste generators and would not have an effect on the project site.

Two underground storage tanks were found on the project site and on adjoining properties. The USTs at 300 Paseo Tesoro and 20373 Valley Boulevard are both outside the project site boundary, and both are known to be active. However, the USTs were evaluated based on the following criteria: violator status, area geology, gradient relationship, and separation distance. Based on this evaluation and due to their regulated nature, it is believed that this does not represent an environmental concern to the subject site.

The Hazardous Waste Information System (HAZNET) database also revealed three sites for hazardous waste generators and hazardous waste treatment, storage, and disposal facilities on the project site. Two of these sites are not active and one is still active. The one active site was evaluated based on the following criteria: violator status, area geology, gradient relationship, and separation distance. Based on this evaluation, and due to its regulated nature, it is believed that this site does not represent an environmental concern to the project.

The Historic USTs database also revealed four sites on adjoining properties. Two of the four sites cross-reference with the UST database, and two are known to be active: Union Service Station/20373 Valley Boulevard and 300 Paseo Tesoro. The rest of the sites are historic USTs, and the status of each is unknown. However, each site was evaluated based on the following criteria: violator status, area geology, gradient relationship and separation distance. Based on this evaluation, and due to their regulated nature, it is believed that these sites do not represent an environmental concern to the subject site.

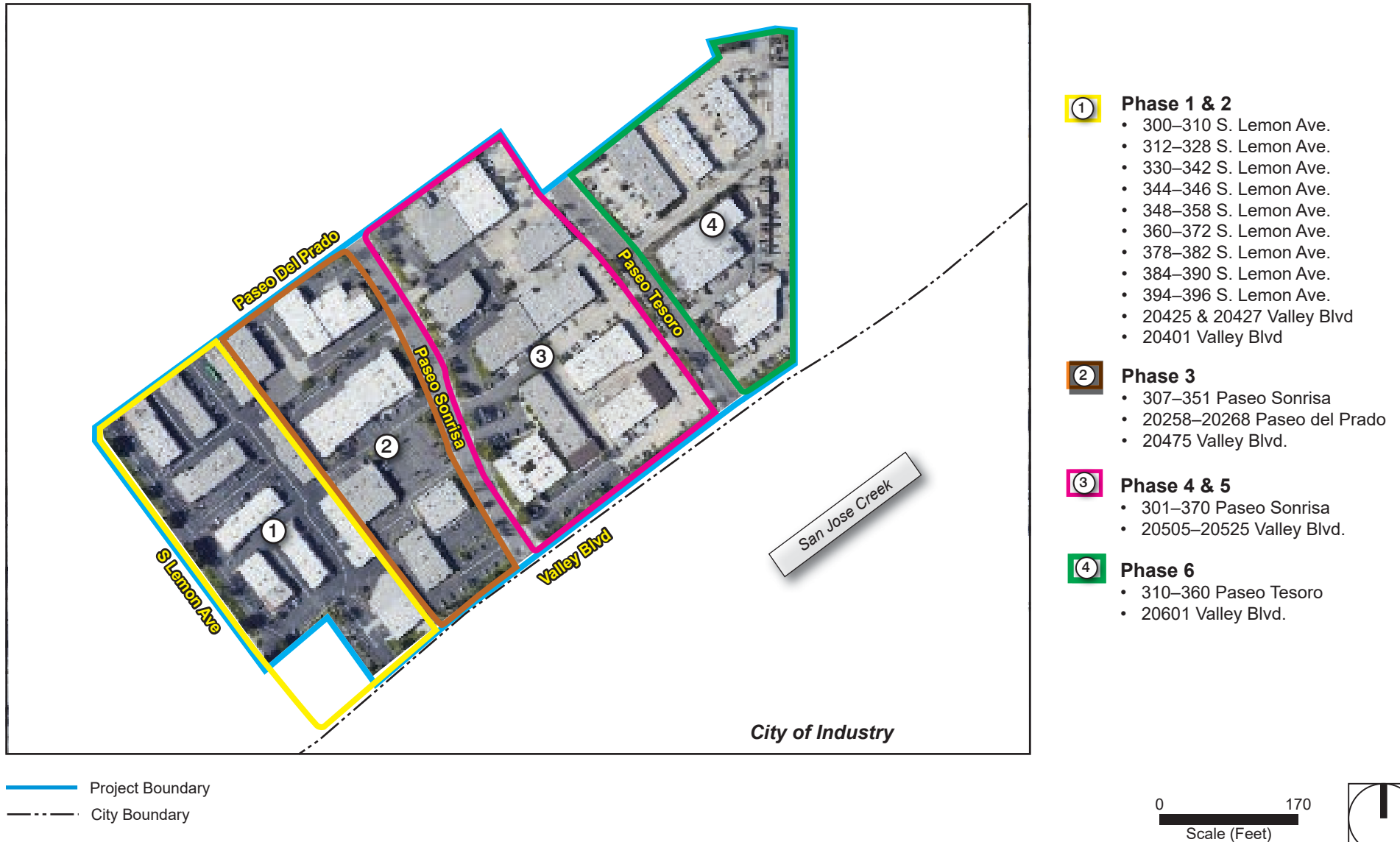
A site was listed on the Leaking Underground Storage Tanks (LUST) database at 20373 Valley Boulevard. However, this site is a former site for a LUST, and its case has been closed, so it would not impact the project site (Appendices J-a through J-d).

#### *Asbestos-Containing Materials and Lead-Based Paint*

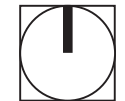
State and federal agencies regulate removal, abatement, and transport procedures for asbestos-containing materials (ACM). These regulations prohibit releases of asbestos from industrial, demolition, or construction activities without a permit, and medical evaluation and monitoring are required for employees performing actions that could expose them to asbestos. Additionally, the rules include warnings and practices that must be followed to reduce the risk of asbestos emissions and exposure. Finally, federal, state, and local agencies must be notified before the onset of demolition or construction activities with the potential to release asbestos.

5. Environmental Analysis

Figure 5.8-1 - Phase I ESA Study Areas



Source: AES Due Diligence, Inc. 2021



## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

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## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

ACMs were commonly used in a wide variety of building products before 1980, such as roofing shingles, composite siding, linoleum flooring, acoustic ceiling tiles, furnace, and water heater exhaust piping and insulation, glues and mastics, stucco, joint compounds, and composite wallboards. ACMs can be divided into friable materials (easily crumbled or reduced to powder) and nonfriable. Friable ACMs are regulated as hazardous materials because of the elevated long-term risk of developing lung cancer from respiratory exposure. ACMs must be properly removed before the renovation or demolition of a structure that uses them. All buildings on the project site potentially have ACMs. The Phase I ESAs for all Phases recommend limited testing before any renovation, remodeling, or demolition of areas considered to be suspect for ACMs to determine if asbestos is on-site.

Lead-based paints were commonly used until 1978, when they were phased out. The single-story buildings on the project site were built between 1976 and 1977. Based on the construction and observation during the Phase I ESA, buildings in Phase 1 and 2, Phase 3, and Phase 6 (see Table 5.8-2) are suspected of containing both asbestos and lead-based paints (Appendices J-a, J-b, and J-d).

#### *Polychlorinated Biphenyls*

Before the 1970s, PCBs were used in fluids for insulation and cooling. PCBs are considered toxic environmental contaminants, and the EPA banned their manufacture in 1979. PCBs have been demonstrated to cause cancer and other adverse effects on the immune system, reproductive system, nervous system, and endocrine system. According to the Phase I ESA, no PCBs were found on the project site (Appendices J-a through J-d).

#### *Radon*

The Indoor Radon Abatement Act of 1988 directs the EPA to identify and lists areas of the United States with the potential for elevated indoor radon levels. Radon is a colorless, odorless, tasteless, and radioactive gas produced by the natural decay of uranium. Because of its radioactivity, studies have shown that people living in a building with high radon concentrations may have an increased risk of contracting lung cancer. The Phase I ESA states that Los Angeles County, including the site, is in Zone 2, and radon gas accumulation is not a significant environmental concern at the project site (Appendices J-a through J-d).

### **Hazardous Materials**

#### *On-Site Chemical and Petroleum Product Storage*

The project site was surveyed for stored chemicals, hazardous substances, petroleum-based fuels and lubricants, and janitorial and cleaning supplies. No chemicals or hazardous substances were observed on the subject site other than shelf quantities of commonly available janitorial and cleaning supplies.

#### *Waste Disposal Practices*

According to a project site survey, general and recycled wastes are properly disposed of, and areas of waste storage appear to be well kept and free of debris. Additionally, general wastes are collected, placed in a dumpster, removed from the site as needed, and disposed of by Valley Vista Services. For Phase 1 and 2, the restaurant tenants recycle cooking grease, and some medical wastes are disposed of by tenant-contracted haulers. All X-

## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

ray equipment is digital. Phase 3 produces medical waste and disposes of it according to required methods. Phase 4 and 5 and Phase 6 only produce general waste.

#### Underground Storage Tanks

The project site was reviewed and a total of 14 LUST sites within a half mile of the subject site were discovered. There are no facilities on the subject site, but there is one former facility on adjoining properties at 20373 Valley Boulevard, across from Phase 1 and 2. The facility is a closed case (June 3, 2021). Based on this evaluation and due to their regulated nature, it is believed that this does not represent an environmental concern to the subject site (Appendix J-a).

### 5.8.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- H-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- H-2 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.
- H-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school.
- H-4 Be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.
- H-5 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 result in a safety hazard or excessive noise for people residing or working in the project area.
- H-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- H-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

### 5.8.3 Environmental Impacts

#### 5.8.3.1 2018 GENERAL PLAN UPDATE

Regarding impacts from hazards and hazardous materials, the GPEIR concluded that development would involve the temporary use and transport of fuels, lubricating fluids, solvents, and other hazardous materials that have the potential to be spilled. However, these would generally be materials that, when used correctly, would

## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

not result in a significant hazard to residents. Industrial-grade chemicals would also be transported, used, and disposed of consistent with industrial operations in the city. Existing regulations with respect to hazardous materials transportation, management, and disposal are designed to be protective of human health.

The GPEIR found that with the implementation of the applicable federal, State, regional, and local policies would help impacts remain less than significant. At the federal level, this would include policies from the EPA and OSHA. At the state level, policies would come from the California Environmental Protection Agency/Office of Emergency Services, California Department of Toxic Substances Control, and the California Highway Patrol. Regionally, policies would also come from the Los Angeles County Fire Department (LACFD) and the CUPA, LACFD's Health Hazardous Materials Division. Locally, eight policies from the General Plan would be implemented: Policy CFI-8.7, Hazardous Waste; Policy PS-4.2, Hazard Mitigation Plan; Policy PS-4.11, Consultation with OEM; Policy PS-5.1, Hazardous Materials Handling; Policy PS-5.2, Coordination; Policy PS-5.3, Proper Storage and Disposal; Policy PS-5.4, Household Hazardous Waste Collection; and Policy PS-5.5, Monitoring.

Additionally, increased development adjacent to open space would also potentially increase the risk of wildfire and could affect emergency response. However, the GPEIR concluded that impacts related to fire hazards would be less than significant due to adherence to codes, regulations, and a general plan policies designed to reduce wildfire risk in the city.

#### 5.8.3.2 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for which the Notice of Preparation disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

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**IMPACT 5.8.1: As with the 2018 General Plan, project construction and operations would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or through reasonably foreseeable upset and accidental release of hazardous materials; or emit hazardous emissions or handle hazardous or acutely hazardous materials within a quarter mile of an existing or proposed school. [Thresholds H-1, H-2, and H-3]**

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In comparison to the GPEIR, the proposed project would introduce more overall square footage of development, but fewer buildings. Additionally, the proposed project would not introduce new hazardous materials not already accounted for in the GPEIR. The project is proposing to develop four buildings totaling approximately 414,778 square feet that would consist of a mix of light industrial, warehousing, retail, and office uses. Currently, the project site has 34 buildings with a mix of commercial and light industrial and approximately 357,544 feet of building area. When compared to the existing use of the site, the proposed project would introduce an additional 57,234 square feet of industrial, office, and warehousing building space.

## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

#### Construction

##### *Demolition*

The project is proposing to reduce the number of buildings from 34 to 4. This will involve the demolition of buildings on the project site that are suspected of containing asbestos and lead-based paint. To minimize impacts from asbestos, before any renovation, remodeling, or demolition in areas considered suspect for ACM, limited testing would be performed to determine if asbestos is present on-site. Any disturbance of ACM is governed by local, state, and/or federal regulations and would not be attempted without contacting the appropriate agency. Additionally, if ACM is to be removed, a qualified, licensed asbestos abatement contractor would be consulted.

Because of the age of the buildings on-site, lead-based paint is a possibility. In general, a site survey of all buildings revealed that the painted surfaces appeared to be in good condition. However, only buildings in Phases 1 and 2, Phase 3, and Phase 6 are suspected of containing lead-based paints. Phases 1 and 2 buildings might contain lead-based paints given the construction date of 1976 to 1977. Phase 3 might contain lead-based paints because of the construction date of 1978, and the building at 20601 Valley Boulevard in Phase 6 has a construction date of 1978. Though some of the buildings on the project site are suspected of containing lead-based paint, the buildings are used for nonresidential purposes; therefore, no additional investigation is recommended at this time.

##### *Construction*

During the construction phase, the proposed project would involve grading, excavation, and construction of new buildings. Potentially hazardous materials used during construction include paints, sealants, solvents, adhesives, cleaners, and diesel fuel. Temporary bulk aboveground storage tanks (e.g., 55-gallon drums) may also be used for fueling and maintenance purposes. There is potential for hazardous materials to spill or to create hazardous conditions. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature.

To prevent spills or hazardous conditions, existing local, state, and federal laws must be enforced at the construction sites, such as those under Section 5.7.1.1, *Regulatory Background*. Compliance with existing regulations would ensure that construction workers and the general public are not exposed to risks related to hazardous materials during construction activities. Cal/OSHA is the primary State agency responsible for worker safety in the handling and using of chemicals in the workplace. The project developer must monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR Sections 337–340). Regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. For example, any spills or leakage of petroleum products during construction activities must be immediately contained, the dangerous material identified, and the material according to state and local regulations for the cleanup and disposal of that contaminant. Any contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, strict adherence to all emergency response requirements set forth by LACFD would be required throughout project construction.

## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

Additionally, any project-related hazardous materials and hazardous wastes would be transported to and/or from the project site in compliance with any applicable state and federal requirements, including the U.S. Department of Transportation regulations (Code Fed. Regs. Title 49, Hazardous Materials Transportation Act), California Department of Transportation standards, and Cal/OSHA standards.

Any project-related hazardous waste generation, transportation, treatment, storage, and disposal would be conducted in compliance with Subtitle C of the RCRA (Code Fed. Regs. Title 40, Part 263), including the management of nonhazardous solid wastes. The proposed project would be designed and constructed by the specifications and regulations of the LACFD, which is the designated CUPA and implements state and federal regulations for the following programs: (1) Hazardous Waste Generator, (2) Hazardous Materials Release Response Plans and Inventory Program, (3) California Accidental Release Prevention Program, (4) Aboveground Storage Tank Program, and (5) Underground Storage Tank Program.

Additionally, the use, transport, and disposal of construction-related hazardous materials would conform to existing laws and regulations, ensuring that all potentially hazardous materials are used and handled appropriately and minimizing the potential for accidental releases.

Furthermore, strict adherence to all emergency response plan requirements by LACFD would be required throughout the construction of each development project. Overall, the proposed project would not result in new or substantially more severe significant impacts to hazards to the public or the environment arising from the routine transport, use or disposal of hazardous materials, or from reasonably foreseeable upset and accident conditions, or emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste when compared to the GPEIR.

### Operation

Operation of the proposed project would involve the use of small amounts of hazardous materials, such as cleansers, greases, and oils for cleaning and maintenance purposes. Additionally, all four of the proposed buildings are industrial, intended for manufacturing and/or warehousing uses with some office and commercial uses. Project operation would involve transport, use, and disposal of hazardous materials; the specific substances and quantities of such materials are presently unknown.

The operation of the proposed land uses under the proposed project would involve the use, storage, transport, and disposal of hazardous materials. These activities would be governed by existing regulations of several agencies. Uses that transport, use, or dispose of hazardous materials are subject to the RCRA, which provides “cradle to grave” regulation of hazardous wastes; the Hazardous Materials Transportation Act, which governs hazardous materials transportation on U.S. roadways; International Fire Code (IFC), which creates procedures and mechanisms to ensure the safe handling and storage of hazardous materials; CCR Title 22, which regulates the generation, transportation, treatment, storage, and disposal of hazardous waste; and CCR Title 27, which governs the treatment, storage, and disposal of solid wastes. No final certificate of occupancy or its substantial equivalent will be issued unless there is verification that the owner or authorized agent has met or is meeting the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Sections 25500 through 25520. These regulations require businesses to provide emergency response plans and procedures,



## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled on-site.

LACFD is the CUPA for the City and is responsible for enforcing Hazardous Materials Release Response Plans and Inventory (Chapter 6.95 of the Health and Safety Code). The CUPA is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The hazardous materials business plans are required to contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of on development sites. They also contain an emergency response plan that describes the procedures for mitigating a hazardous release, procedures and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the CUPA and other emergency response personnel, such as the local fire agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the CUPA must conduct ongoing routine inspections to ensure compliance with existing laws and regulations, identify safety hazards that could cause or contribute to an accidental spill or release, and suggest preventive measures to minimize the risk of a spill or release of hazardous substances.

Compliance with applicable laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials associated with future development proposed by the project are used and handled appropriately and would minimize the potential for safety impacts. Compliance with these laws and regulations is ensured through the City's building plan check process and any discretionary entitlement review.

There are no schools within one-quarter mile of the project site. Therefore, there would be no impact.

With the implementation of the applicable federal, State, regional, and local policies, impacts from the routine transport, use, or disposal of hazardous materials; from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; and to schools within a quarter mile of the project site, impacts would be considered less than significant.

***Level of Significance Before Mitigation:*** Less than significant.

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**IMPACT 5.8-2: Because the project site is not on a list of hazardous materials sites, it would not alter impacts related to these sites in comparison to the GPEIR. [Threshold H-4]**

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The Phase I ESAs revealed that one site adjacent to the project site was identified as having hazardous materials from a leaking underground storage tank. However, this listing at 20373 Valley Boulevard was closed on June 3, 2021. The HAZNET database revealed that a current tenant (VCT Inc.) at 345 Paseo Tesoro is listed as a hazardous waste producer whose hazardous waste is disposed of off-site. The site at 345 Paseo Tesoro was evaluated based on the following criteria: violator status, area geology, gradient relationship and separation distance. Based on this evaluation, and due to its regulated nature, it is believed that this does not represent an environmental concern to the subject site.

## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

As stated in Section 5.8.1.2, *Existing Conditions*, the database search found listed sites on the project site and within a 0.5-mile radius. Two former RCRA Generators were found in the database. One is on the project site the other is on an adjoining property. These sites are listed as former waste generators and would not have an effect on the project site.

Additionally, two USTs were found in this database. The USTs at 300 Paseo Tesoro and 20373 Valley Boulevard #1 are both outside the project site boundary. Only one is known to be active (20373 Valley Boulevard #1), and the status of the UST at 300 Paseo Tesoro is unknown. However, the USTs were evaluated based on: violator status, area geology, gradient relationship, and separation distance. Based on this evaluation, and due to their regulated nature, it is believed that they do not represent an environmental concern to the subject site.

There are no other current or former listings of hazardous materials on the proposed project site. Therefore, the proposed project would not result in new or substantially more severe significant impacts in this regard when compared to the GPEIR.

***Level of Significance Before Mitigation:*** Less than significant.

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**Impact 5.8-3: The project site is not in the vicinity of an airport or within the jurisdiction of an airport land use plan. [Threshold H-5]**

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The closest airport to the project site is the Brackett Field Airport, which is approximately 10.3 miles northeast of the project area. The project site does not lie within two miles of a public airport or public use airport, or within an airport land use plan. Additionally, the proposed project would not construct new development that would interfere with airport operations. There has been no change in conditions since the approved GPEIR. Therefore, the proposed project would not result in new or substantially more severe significant impacts related to airports when compared to the GPEIR.

***Level of Significance Before Mitigation:*** Less than significant.

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**Impact 5.8-4: Project development would not impair or physically interfere with the implementation of an emergency response or evacuation plan. [Threshold H-6]**

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Major emergencies and disasters can occur anytime and could significantly impact day-to-day activities for some or all residents. The City of Walnut's Emergency Operation Center administers the State-required Walnut Emergency Plan and ensures the City's efficient and effective response to disaster and emergency situations. Additionally, the City contracts with LACFD for fire prevention, fire suppression, and emergency medical services (City of Walnut 2018b).

When the EOC facilities are needed and open, they serve as the epicenter for operations during an emergency. It is here that the City will work in coordination with numerous governmental, nongovernmental, and private organizations to help mitigate hazards, meet basic human needs, address needs of people with access and functional needs, restore essential services, and support community and economic recovery. The main facility is at 21001 La Puente Road, and the alternate facility is at 21701 Valley Boulevard—both within the city limits.

## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

The proposed project is approximately 2.1 miles southwest of the main EOC facility, while the alternate facility is approximately 2.2 miles northeast of the project site. Multiple streets are available to access the main facility on La Puente Road and the alternate site on Valley Boulevard. In the event of an emergency, it is unlikely that the proposed project would interfere with the implementation of the City's emergency response plan (City of Walnut 2021a, 2021b).

Development of the plan area would include construction that may temporarily impact traffic in the area. Temporary traffic diversion, truck haul routes, and impacts to the roadway would be coordinated with the City and applicable emergency response agencies to ensure adequate access during any construction activities. The City, along with the LACFD and Los Angeles County Sheriff's Department, would review building plans during plan check to ensure that adequate site access is maintained and that roadway improvements and project driveways would not interfere with circulation on adjacent streets or any emergency plan or evacuations routes. Additionally, the GPEIR found that impacts would be less than significant and that the implementation of the City of Walnut Comprehensive Emergency Management Plan help impacts remain less than significant. Therefore, impacts would not impair or physically interfere with the implementation of an emergency response or evacuation plan when compared to the GPEIR.

***Level of Significance Before Mitigation:*** Less than significant.

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<b>Impact 5.8-5:</b>	<b>Development of the project as proposed would increase the number of structures exposed to fire danger compared to the 2018 General Plan Update. [Threshold H-7]</b>
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The proposed project site is not in a Fire Hazard Severity Zone (FHSZ) and is in a local responsibility area (CAL FIRE 2023). Additionally, the project is not proposing to increase the number of structures in the project area compared to the 2018 GPEIR. The proposed project would consist of four buildings that would hold approximately 392,488 square feet of mixed warehouse and light-industrial use and approximately 22,290 square feet of office and retail space.

Currently, the project site consists of 34 buildings and approximately 357,544 feet of building area (see Figure 3-3, *Aerial Photograph*). This industrial business park accommodates multiple uses, primarily commercial and light industrial. The proposed project would reduce the number of structures by 30 buildings but the overall square footage would increase by approximately 57,234. Under the current land use designation, Industrial, the maximum lot coverage is 60 percent and allows for a maximum height of two stories. The proposed project would cover a maximum of 40.3 percent of the site, and the buildings would be up to two stories in height. Additionally, the proposed development would be subject to state and local regulations, such as the California Building Code, that are in place to mitigate damage as a result of fires. Because the proposed development would decrease the number of structures potentially exposed to fire danger compared to the GPEIR, the buildings would comply with the development standards of the land use designation, and the proposed project site is not in an FHSZ, impacts would be considered less than significant.

***Level of Significance Before Mitigation:*** Less than significant.

## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

#### 5.8.4 Cumulative Impacts

The assessment of potential cumulative impacts regarding hazards and hazardous materials refers to the potential for on-site and off-site hazardous materials to have a cumulative effect on the public or the environment. No project-related significant impacts were identified regarding hazards and hazardous materials.

The project site is not within a quarter mile of a school; therefore, the proposed project would not contribute to a cumulative impact associated with schools.

The project site is not in an airport land use plan or within two miles of a private airstrip and would not contribute to a cumulative impact associated with a public or private airport.

The proposed project site is not in a very high FHSZ and would be required to comply with the provisions of local and state regulations for fire safety.

The project and cumulative projects would be required to comply with any applicable regulations prior to being issued permits, which would address potential impacts related to hazards and hazardous materials. Therefore, the project would not contribute to the effects of the cumulative impact regarding hazards and hazardous materials, and impacts would be less than significant.

#### 5.8.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements, General Plan policies, and standard conditions of approval, these impacts would be less than significant: Impacts 5.8-1, 5.8-2, 5.8-3, 5.8-4, and 5.8-5.

#### 5.8.6 Mitigation Measures

##### 5.8.6.1 MITIGATION MEASURES FROM THE GPEIR

The GPEIR did not identify mitigation measures for hazards and hazardous materials.

##### 5.8.6.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

No additional mitigation measures or conditions of approval are required to reduce impacts to less than significant.

#### 5.8.7 Level of Significance After Mitigation

Impacts would be less than significant.

## 5. Environmental Analysis

### HAZARDS AND HAZARDOUS MATERIALS

#### 5.8.8 References

- California Department of Forestry and Fire Protection (CAL FIRE). 2023, November (accessed). Fire Hazard Severity Zones in State Responsibility Area. <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>.
- Department of Toxic Substances Control (DTSC). 2023, October (accessed). EnviroStor. <https://www.envirostor.dtsc.ca.gov/public/>.
- State Water Resources Control Board (SWRCB). 2023, October (accessed). GeoTracker. <https://geotracker.waterboards.ca.gov/>.
- US Environmental Protection Agency (USEPA). 2023, October (accessed). Superfund National Priorities (NPL) Where You Live Map. <https://www.epa.gov/superfund/search-superfund-sites-where-you-live>.
- Walnut, City of. February 2018a. Draft Environmental Impact Report Volume I of II. <https://www.cityofwalnut.org/home/showpublisheddocument/20510/638290932284470000>.
- . 2018b, May 9. City of Walnut General Plan. <https://www.cityofwalnut.org/home/showpublisheddocument/12022/636705242381770000>.
- . 2021a, September 31. *Base Plan*. Part 1 of *City of Walnut Emergency Operations Plan*. <https://www.cityofwalnut.org/home/showpublisheddocument/17552/637684967562270000>.
- . 2021b, September 31. EOC Management and Implementation. Part 2 of *City of Walnut Emergency Operations Plan*. <https://www.cityofwalnut.org/home/showpublisheddocument/17554/637684967571170000>.

## 5. Environmental Analysis

### 5.9 HYDROLOGY AND WATER QUALITY

This section of the Draft SEIR evaluates the potential for implementation of the proposed project to impact hydrology and water quality conditions in comparison to the impacts evaluated for the project site in the GPEIR. Also reviewed are potential changes to circumstances since the GPEIR that could result in new significant or substantially more severe environmental impacts for the project. Cumulative impacts related to hydrology and water quality are also considered.

Hydrology deals with the distribution and circulation of water, both on land and underground. Water quality deals with the quality of surface- and groundwater. Surface water includes lakes, rivers, streams, and creeks; groundwater is under the earth's surface.

The analysis in this section is based in part on the following technical studies:

- *Geotechnical Investigation Report for Proposed Walnut Business Park*, Langan, December 2015
- *Low Impact Development Plan (LID Plan) - Walnut Business Park – Lot 1 South Lemon Avenue and Paseo Del Prado*, Atlas Civil Design, June 2023
- *Low Impact Development Plan (LID Plan) - Walnut Business Park – Lot 2 Paseo Del Prado and Paseo Sonrisa*, Atlas Civil Design, June 2023
- *Low Impact Development Plan (LID Plan) - Walnut Business Park – Lot 3 Valley Boulevard and Paseo Tesoro*, Atlas Civil Design, June 2023
- *Low Impact Development Plan (LID Plan) - Walnut Business Park – Lot 4 Valley Boulevard and Paseo Tesoro*, Atlas Civil Design, June 2023
- *Preliminary Hydrology and Hydraulic Report for Walnut Business Park – Lot 1 South Lemon Avenue and Paseo Del Prado*, Atlas Civil Design, June 2023
- *Preliminary Hydrology and Hydraulic Report for Walnut Business Park – Lot 2 Paseo Del Prado and Paseo Sonrisa*, Atlas Civil Design, June 2023
- *Preliminary Hydrology and Hydraulic Report for Walnut Business Park – Lot 3 Valley Boulevard and Paseo Tesoro*, Atlas Civil Design, June 2023
- *Preliminary Hydrology and Hydraulic Report for Walnut Business Park – Lot 4 Valley Boulevard and Paseo Tesoro*, Atlas Civil Design, June 2023

A complete copy of these studies are included in the Technical Appendices to this Draft SEIR (Appendices H, K-a through K-d, and L-a through L-d).

## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

#### 5.9.1 Environmental Setting

##### 5.9.1.1 REGULATORY BACKGROUND

Federal, State, regional, and local regulations are listed in Table 5.9-1. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of GPU policies.

**Table 5.9-1 Regulations for Hydrology and Water Quality**

<b>Federal</b>	
Clean Water Act 33 US Code Sections 1251 to 1376	States must adopt water quality standards for all surface waters of the United States by: <ul style="list-style-type: none"> <li>Designating beneficial uses</li> <li>Setting criteria that protect designated uses</li> </ul> Section 303(d): Impaired water bodies Section 402: NPDES permits
National Pollutant Discharge Elimination System (NPDES)	Regulates municipal and industrial discharges to surface waters of the US.
National Flood Insurance Program	Provides insurance to help reduce the socioeconomic impact of floods. Municipalities that participate are required by the Federal Emergency Management Agency to adopt standards for construction and development in 100-year floodplains.
<b>State</b>	
Porter-Cologne Water Quality Act Water Code §§ 13000 et seq.	Basic water quality control law for California; gives the State Water Control Resources Board (SWRCB) control over state water rights and water quality policy.
Sustainable Groundwater Management Act (SGMA)	Framework for the sustainable management of groundwater supplies by local authorities; requires local groundwater sustainability agencies (GSA) to assess water basin conditions and adopt groundwater sustainability plans (GSP).
SWRCB Construction General Permit Order 2022-0057-DWQ	Construction activities that disturb one or more acres of land must file a notice of intent, risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement.
SWRCB Trash Amendments <ul style="list-style-type: none"> <li>Amendment to the Water Quality Control Plan for Ocean Waters of California</li> <li>Amendment to the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California, Part 1</li> </ul>	Applies to all surface waters of California and include a land-use-based compliance approach to focus trash controls in areas with high trash-generation rates.
<b>Regional</b>	
Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties	The Los Angeles Regional Water Quality Control Board's (RWQCB) Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters.
Los Angeles RWQCB Regional Municipal Stormwater (MS4) Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004)	The MS4 Permit contains waste discharge requirements for municipal separate stormwater systems for both storm and non-stormwater discharges. The intent of the permit is to protect general water quality and that of receiving water bodies from pollutants and to mitigate for existing pollutants.

## 5. Environmental Analysis HYDROLOGY AND WATER QUALITY

**Table 5.9-1 Regulations for Hydrology and Water Quality**

County of Los Angeles Department of Public Works Low Impact Development (LID) Standards Manual	The LID Standards Manual includes land development requirements pertaining to hydromodification LID for new developments and significant redevelopment projects.
Los Angeles County Department of Public Works Hydrology Manual	Establishes hydrologic design procedures and contains the data necessary to conduct a hydrologic study within the County of Los Angeles
<b>Local</b>	
City of Walnut General Plan (see Appendix C)	Conservation, Open Space, and Recreation Element policies Land Use and Community Design Element policies Community Facilities and Infrastructure Element policies
City of Walnut Watershed Management Plan (WMP)	The intention of the WMP is to provide a viable plan for implementing water quality improving infrastructure, policies, and programs within the City of Walnut.
City of Walnut Municipal Code	Chapter 5.08 Stormwater and Urban Runoff Pollution Control Chapter 2.04.040 Appendix Chapter J of Los Angeles County Building Code supplemented by development grading standards

### 5.9.1.2 EXISTING CONDITIONS

#### Regional Drainage

The Los Angeles RWQCB encompasses all coastal watersheds and drainages flowing to the Pacific Ocean between Rincon Point (on the coast of western Ventura County) and the eastern Los Angeles County line. In addition, the Los Angeles RWQCB includes all coastal waters within three miles of the continental and island coastlines.

#### Local Drainage

The project site lies within the San Gabriel River Watershed. The watershed receives drainage from 689 square miles of eastern Los Angeles County; its headwaters originate in the San Gabriel Mountains. The watershed consists of extensive areas of undisturbed riparian and woodland habitats in its upper reaches. Much of the watershed of the West Fork and East Fork of the river is set aside as a wilderness area; other areas in the upper watershed are subject to heavy recreational use. The upper watershed also contains a series of flood control dams. Further downstream, toward the middle of the watershed, are large spreading grounds utilized for groundwater recharge. The watershed is hydraulically connected to the Los Angeles River through the Whittier Narrows Reservoir. The lower part of the river flows through a concrete-lined channel in a heavily urbanized portion of the county before becoming a soft bottom channel once again near the ocean in the city of Long Beach. A majority of the 58 National Pollutant Discharge Elimination System (NPDES) permittees in the watershed discharge directly to the San Gabriel River, and the others discharge to Coyote and San Jose Creeks (Los Angeles RWQCB 2023).



## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

#### Site Hydrology

The existing site is an industrial manufacturing park with associated landscaping, paving, and parking lots. For the lot proposed for Building 1 (see Figure 5.9-1a, *Existing Hydrology Map – Lot 1*), under existing conditions stormwater generated on the northwest half of the site drains to the southeast and sheet flows to multiple ribbon gutters, which direct runoff to an existing on-site catch basin near the south corner of the site. The existing catch basin is directly connected to an existing 90-inch storm drain maintained by the Los Angeles County Flood Control District. This storm drain bisects the site from the northwest to the southeast. The northeast half of the site drains to the southeast and sheet flows to multiple ribbon gutters, which direct runoff over the driveways and into Paseo Sonrisa. Runoff then flows north in the curb and gutter until it is captured by existing curb inlets that are connected to the existing 90-inch storm drain.

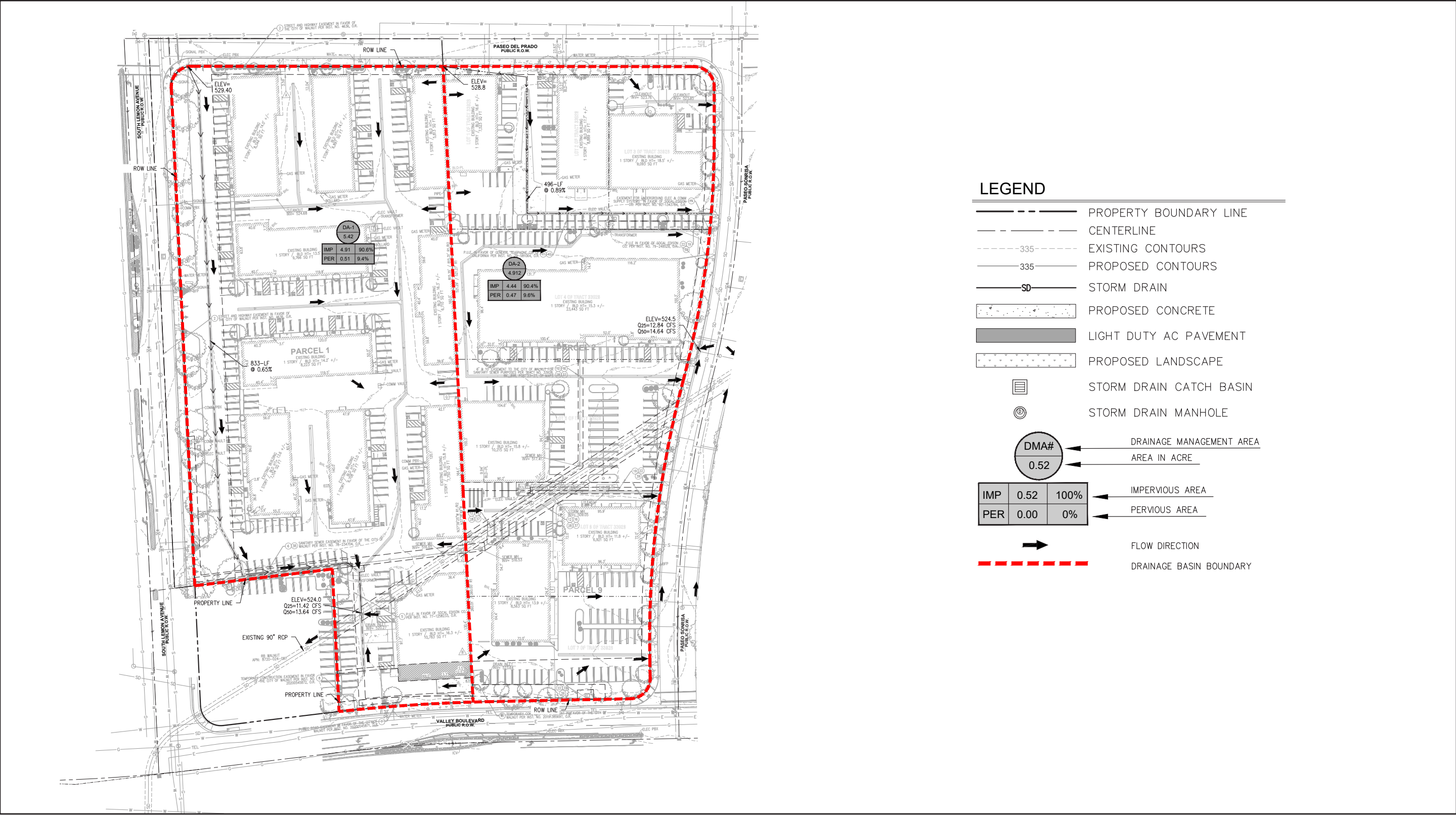
For the lot proposed for Building 2 (see Figure 5.9-1b, *Existing Hydrology Map – Lot 2*), under existing conditions stormwater generated on the northwest half of the site drains to the southwest and sheet flows to the two existing driveways at the southwest corner of the site and into Paseo Sonrisa. Runoff flows south in the curb and gutter and is captured in a curb inlet, which connects to the existing 90-inch storm drain.

For the lot proposed for Building 3 (see Figure 5.9-1c, *Existing Hydrology Map – Lot 3*), under existing conditions the site drains to the southwest and sheet flows to the two existing driveways along the southwest corner of the site and into Paseo Sonrisa. Runoff flows north in the curb and gutter and is captured in a curb inlet that connects to the existing 90-inch storm drain.

For the lot proposed for Building 4 (see Figure 5.9-1d, *Existing Hydrology Map – Lot 4*), under existing conditions, the site drains to the southwest and sheet flows to the existing driveways along the western property line and into Paseo Tesoro. Runoff then flows north in the curb and gutter and is captured in a curb inlet that connects to an existing 90-inch storm drain.

The existing 90-inch storm drain that bisects the site flows across the site to the intersection of South Lemon Avenue and Valley Boulevard. The storm drain becomes a 96-inch drain that flows southeast into the San Jose Creek. San Jose Creek flows west until it merges with the San Gabriel River, which flows south until it reaches the Pacific Ocean near Seal Beach.

Figure 5.9-1a - Existing Hydrology Map – Lot 1



Source: Atlas Civil Design 2023.

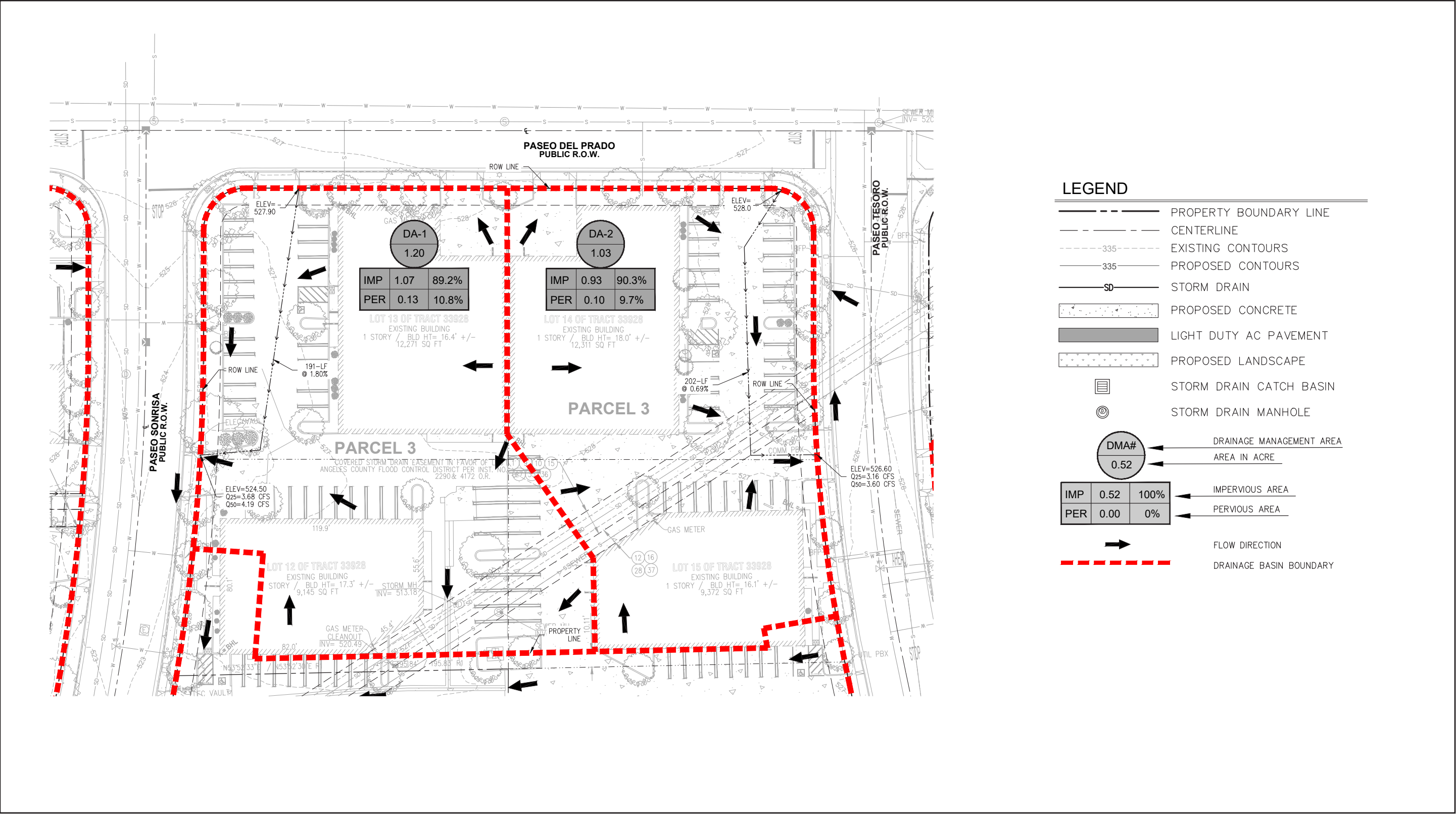


## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

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Figure 5.9-1b - Existing Hydrology Map – Lot 2



Source: Atlas Civil Design 2023.



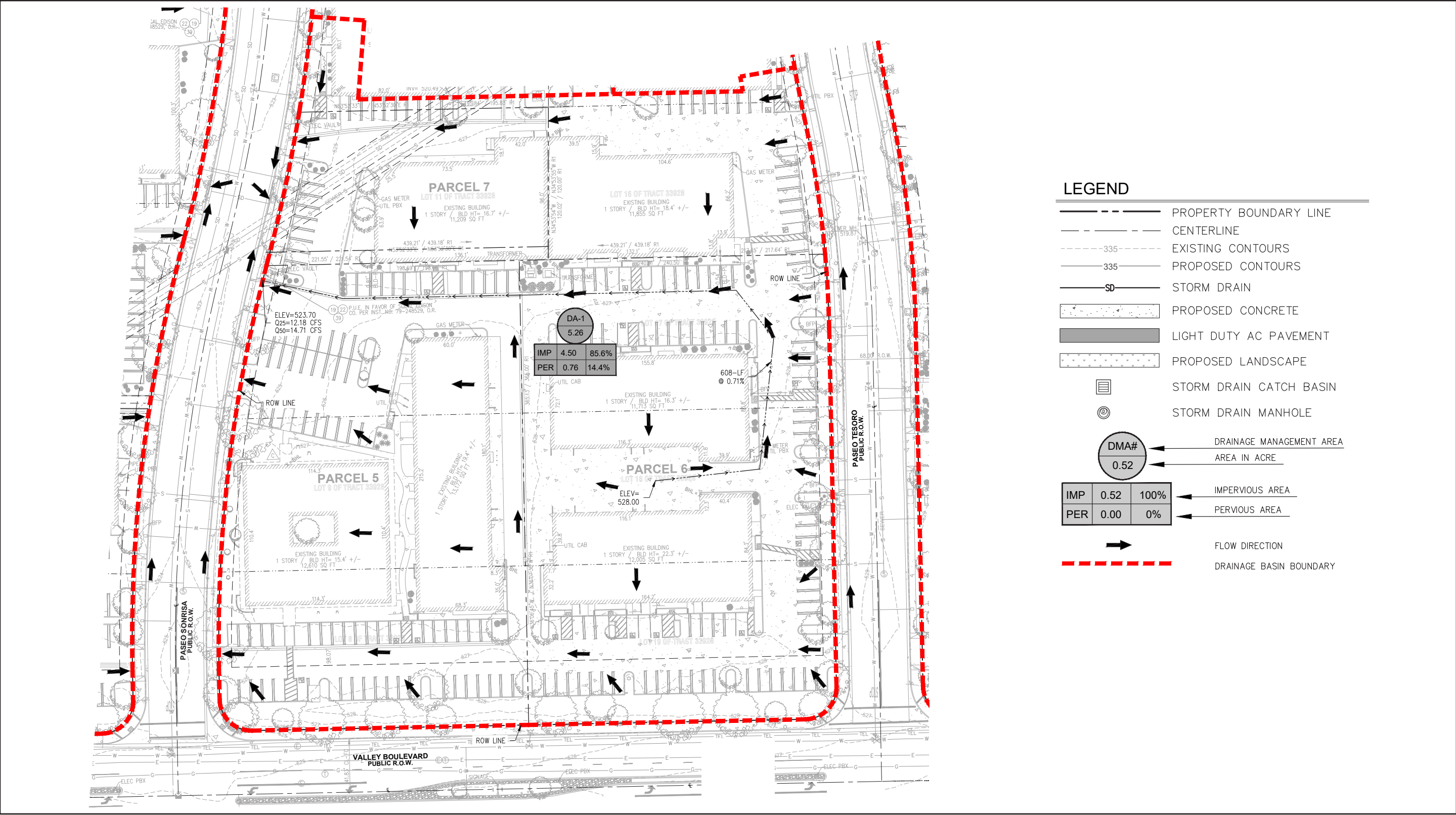
## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

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Figure 5.9-1c - Existing Hydrology Map – Lot 3



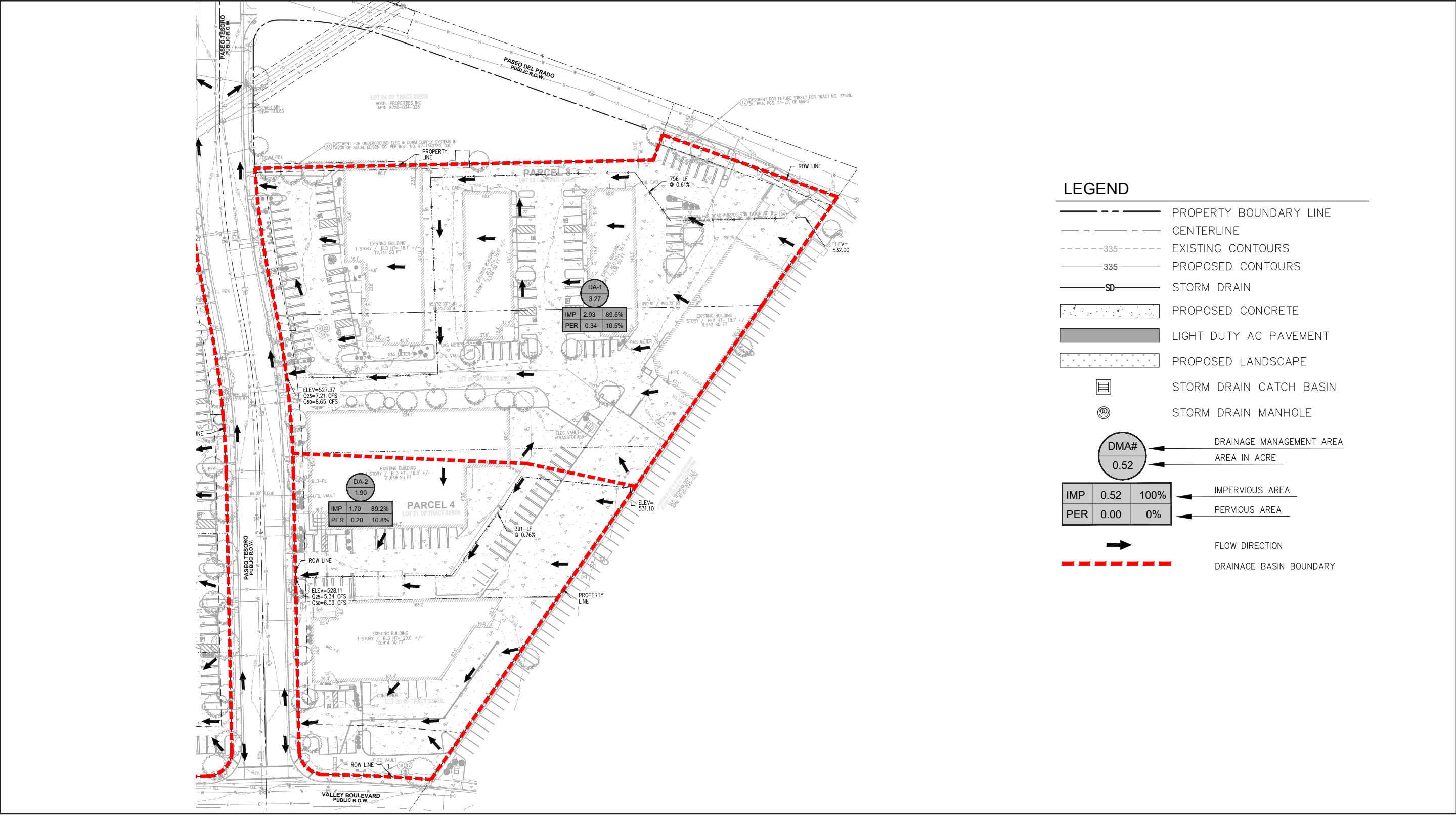
Source: Atlas Civil Design 2023.

## 5. Environmental Analysis

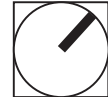
### HYDROLOGY AND WATER QUALITY

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Figure 5.9-1d - Existing Hydrology Map – Lot 4



Source: Atlas Civil Design 2023.





## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

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## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

#### Surface Water Quality

Section 303(d) of the 1972 Clean Water Act requires states to identify water bodies that do not meet water quality objectives and do not support their beneficial uses. Every two years each state must submit to the EPA an updated list, called the 303(d) list. In addition to identifying the water bodies that are not supporting beneficial uses, the list identifies the pollutant or stressor causing impairment and establishes a priority for developing a control plan to address the impairment. The list identifies water bodies where 1) a total maximum daily load has been approved by the EPA and implementation is available, but water quality standards are not yet met, and 2) water bodies where the water quality problem is being addressed by an action other than a total maximum daily load and water quality standards are not yet met.

San Jose Creek is listed on the 303(d) list due to the presence of coliform bacteria. The San Gabriel River is listed due to coliform bacteria, metals, pH, cyanide, pathogens, and nutrients.

#### Groundwater

The City of Walnut is in the San Gabriel Valley Groundwater Basin, which is an adjudicated basin.<sup>1</sup> The San Gabriel Valley Groundwater Basin is in eastern Los Angeles County and includes the water-bearing sediments underlying most of the San Gabriel Valley as well as a portion of the upper Santa Ana Valley that lies in Los Angeles County. The Basin is bounded on the north by the Raymond fault and the contact between Quaternary sediments and consolidated basement rocks of the San Gabriel Mountains (DWR 2004). The Basin has been identified by the California Department of Water Resources as a groundwater basin not subject to critical conditions of overdraft and is categorized as a very low priority basin (DWR 2023).

The project site is in Walnut Valley Water District (WVWD) water service area. WVWD relies on local groundwater and imported surface water sources to meet water demand in its service area. Local groundwater sources are the Main San Gabriel Basin, Puente Basin, and Spadra Basin. Groundwater use by WVWD is limited due to adjudication, and WVWD is primarily dependent on surface water sources (WVWD 2021).

During the geologic investigations at the project site, groundwater was encountered between depths of 16 and 24.5 feet below ground surface (bgs). The historic high groundwater level is approximately 20 feet bgs.

#### Flood Hazards

##### *Designated Flood Zones*

According to the most recent flood insurance rate map (FIRM) that covers the project area (FIRM No. 06037C172F, September 26, 2008), the project site is not within a 100-year or 500-year floodplain (FEMA 2008).

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<sup>1</sup> When water users within a groundwater basin are in dispute over legal rights to the water, a court can issue a ruling known as an adjudication. The court decree will define the area of adjudication. The court typically appoints a watermaster to administer the court's decree. In basins or areas where a lawsuit is brought to adjudicate, the groundwater rights of all the overlies and appropriators are determined by the court.

## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

#### *Seismically Induced Dam Inundation*

The City of Walnut does not lie within a dam inundation area according to the Los Angeles County All-Hazard Mitigation Plan. Puddingstone Reservoir is several miles to the north, but the reservoir's inundation area would not affect the city due to the intervening topography (Walnut 2018).

#### *Seiches*

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. No surface water bodies pose a flood hazard to the project area due to a seiche.

#### *Tsunamis*

A tsunami is an ocean wave caused by a sudden displacement of the ocean floor, most often due to earthquakes. The project site is not at risk of flooding from tsunami because it is about 24 miles from the ocean (DOC 2015).

### 5.9.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- HYD-1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.
- HYD-2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- HYD-3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
  - i) Result in a substantial erosion or siltation on- or off-site.
  - ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.
  - iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
  - iv) Impede or redirect flood flows.
- HYD-4 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
- HYD-5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

### 5.9.3 Environmental Impacts

#### 5.9.3.1 2018 GENERAL PLAN UPDATE

The GPEIR found that violations of water quality standards due to runoff from construction projects under the GPU can be prevented through the continued implementation of existing regional water quality regulations and through successful implementation of the City's local water quality control standards imposed on applicable development projects.

NPDES regulations applicable to the City are designed to reduce pollutant loads through implementation of best management practices (BMP) and other control measures that minimize or eliminate pollutants from urban runoff, thereby protecting downstream water resources. The City implements NPDES provisions through the requirements of its MS4 permit, which is applicable to all portions of the city. BMPs include structural and nonstructural measures to reduce pollutant sources and loads and reduce the rate of runoff. These measures include educational programs. Commercial and industrial development are also subject to annual inspections to ensure implementation of BMPs and educational programs.

With implementation of these measures, water quality impacts due to point and nonpoint sources of pollutants were found to be less than significant. With the implementation of existing regulations and the City's policies and development standards related to protection of the city's water supply, impacts on groundwater would also be less than significant. Finally, the City's floodplain management ordinance and policies would minimize the risk of impacts to safety and property from flooding. Therefore, the GPEIR found that impacts due to flooding would also be less than significant.

#### 5.9.3.2 IMPACT ANALYSIS

The following impact analysis addresses the thresholds of significance in Section 5.9.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.9-1: As with development pursuant to the GPU, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. [Threshold HYD-1]**

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#### Construction Phase

The proposed project includes the demolition of the existing buildings on the project site, which is not an activity that was accounted for in the GPEIR. The construction of the proposed project would involve grading and construction equipment that could result in pollution of stormwater with oil and greases, fuels, and metals. Disturbance of soil during grading and construction could leave soil vulnerable to erosion. Project construction could also generate water pollution from paving and grinding operations, concrete work, and use of paints and other coatings.

All construction projects of one acre or more are required to prepare and implement a SWPPP to obtain coverage under the Statewide Construction General Permit (CGP). A SWPPP estimates sediment risk from

## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

construction activities to receiving waters and specifies BMPs that would be used to minimize pollution of stormwater.

Categories of BMPs that are included in SWPPPs include:

- **Erosion controls and wind erosion controls.** Cover and/or bind soil surface to prevent soil particles from being detached and transported by water or wind. Erosion control BMPs include mulch, soil binders, and mats.
- **Sediment controls.** Filter out soil particles that have been detached and transported in water. Sediment control BMPs include barriers and cleaning measures such as street sweeping.
- **Tracking controls.** Tracking control BMPs minimize the tracking of soil off-site by vehicles—for instance, by stabilizing construction roadways and entrances/exits.
- **Nonstorm water management.** Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance, and fueling of vehicles and equipment. Nonstorm water management BMPs also prescribe conducting various construction operations, including paving, grinding, and concrete curing and finishing, in ways that minimize nonstorm water discharges and contamination of any such discharges.
- **Waste and materials management.** Management of materials and wastes to avoid contamination of stormwater. Waste and materials management BMPs include spill prevention and control, stockpile management, and management of solid wastes and hazardous wastes.

With implementation of the requirements of the CGP and Chapters 2.0.040 and 5.08 of the Walnut Municipal Code, impacts during the construction phase would be less than significant. Therefore, similar to the buildout for the project site analyzed in the GPEIR, impacts to water quality standards, waste discharge requirements, or surface or groundwater quality during the operational phase would be less than significant.

### Operational Phase

The City is subject to the Phase I MS4 NPDES Permit, Order No. R4-2021-0105, issued by the Los Angeles RWQCB. New development applications must include a LID Plan specifying operation and maintenance requirements for all structural or treatment control BMPs required to reduce pollutants in postdevelopment runoff to the maximum extent practicable.

Urban runoff from the proposed project, similar to the buildout for the site analyzed in the GPEIR, could include a variety of contaminants that could impact water quality. Runoff from buildings, streets, driveways, and parking areas typically contain oils, grease, fuel, and antifreeze; byproducts of combustion, such as lead, cadmium, nickel, and other metals; and fertilizers, herbicides, and pesticides; and other pollutants. Precipitation at the beginning of the rainy season may result in an initial stormwater runoff (first flush) with high pollutant concentrations.

## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

The proposed project is considered a “Designated Project” per the MS4 Permit since it is a redevelopment of an industrial park of 5,000 square feet or more. As such, the proposed project is required to treat the Stormwater Quality Design volume (SWQDv) on-site.<sup>2</sup> Based on preliminary soil infiltration testing on-site, soils are not conducive to infiltration. Therefore, the proposed project would employ the use of Modular Wetland systems sized to treat 150 percent of the SWQDv.

For all the proposed buildings, roof drainage would be routed through downspouts to the sidewalk around the warehouses. Stormwater runoff from the sidewalks and parking lots would drain to multiple 36-inch-wide ribbon gutters that direct runoff to 24-inch catch basins. Runoff would be captured in underground detention systems and routed to the Modular Wetland systems for treatment. Table 5.9-2 shows the SWQDv for the lots that would accommodate the four proposed buildings. The table also shows the design capacity of the proposed detention and Modular Wetland systems.

**Table 5.9-2 Stormwater Quality Design Volumes and BMP Capacities**

SWQDv (cubic feet)	150 percent of SWQDv (cubic feet)	Modular Wetland System Capacity (cubic feet)	Detention Basin Capacity (cubic feet)
<b>Lot 1</b>			
30,465	45,698	49,853	46,218
<b>Lot 2</b>			
6,679	10,019	12,442	10,569
<b>Lot 3</b>			
15,482	23,223	29,894	23,627
<b>Lot 4</b>			
15,169	22,754	29,894	23,435
Source: Atlas Civil Design 2023e – 2023h.			

For the lot proposed for Building 1 (see Figure 3-10a, *Preliminary LID Plan Lot 1*), runoff would drain to the southeast to catch basins along the southeast property line that are connected to the detention and Modular Wetland systems. Treated runoff would flow to a sump pump and be pumped to the existing on-site catch basin that is connected to the existing 90-inch storm drain. Larger storm events would be directed around the Modular Wetland and detention systems through an overflow bypass pipe and connected to the existing catch basin.

For the lot proposed for Building 2 (see Figure 3-10b, *Preliminary LID Plan Lot 2*), the site would drain to catch basins along the southeast property line that are connected to the underground detention system and the Modular Wetland System. After treatment the runoff would flow to a sump pump and be pumped to the curb and gutter in Paseo Tesoro. Runoff would then flow north to the existing curb inlet that is connected to the existing 90-inch storm drain.

<sup>2</sup> The MS4 Permit requires designated projects to retain, on-site, the Stormwater Quality Design Volume from a design storm event. The design storm event is determined using the 0.75-inch 24-hour rain event or the 85th percentile 24-hour rain event, whichever is greater.

## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

For the lot proposed for Building 3 (see Figure 3-10c, *Preliminary LID Plan Lot 3*), runoff would drain to catch basins near the south property corner. After treatment the runoff would flow to a sump pump and would be pumped to the curb and gutter in Paseo Sonrisa. Runoff would flow north to the existing curb inlet that is connected to the existing 90-inch storm drain.

For the lot proposed for Building 4 (see Figure 3-10d, *Preliminary LID Plan Lot 4*), the site would drain to catch basins near the south property corner. After treatment the runoff would flow to a sump pump and be pumped to the curb and gutter in Paseo Tesoro. Runoff would then flow north to the existing curb inlet that is connected to the existing 90-inch storm drain.

The proposed project would also include nonstructural source control BMPs and structural source control BMPs across all lots (see Sections 2.2.6 and 2.2.7 of the Preliminary LID Plans in Appendices K-a through K-d). To meet the zero-trash discharge requirement of the Trash Amendments (see Table 5.9-1), all proposed catch basins would be equipped with full-capture catch basin inserts/inlet screens to remove trash/litter, debris, and sediment from runoff entering the City's storm drain system.

The proposed project is exempt from the hydromodification requirements of the MS4 Permit because the proposed project would discharge through a fully improved storm drain system to San Jose Creek and the San Gabriel River, neither of which is susceptible to hydromodification impacts.

Implementation of site-specific BMPs would improve the water quality of runoff when compared to existing conditions since runoff currently flows untreated into the existing 90-inch storm drain. Therefore, similar to the buildout for the project site analyzed in the GPEIR, impacts to water quality standards, waste discharge requirements, or surface or groundwater quality during the operational phase would be less than significant.

***Level of Significance Before Mitigation:*** Less than significant.

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**Impact 5.9-2:** As with site land uses designated under the GPU, the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed project could impede sustainable groundwater management of the basin. [Threshold HYD-2]

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WVWD relies on local groundwater from the Main San Gabriel Basin, Puente Basin, and Spadra Basin as well as imported surface water sources to meet water demand in its service area.

The Main San Gabriel Basin has been adjudicated, and management of the local water resources in the Main Basin is based on the adjudication. The Puente Basin is a subbasin of the San Gabriel Valley Groundwater Basin, which is also an adjudicated basin. Pursuant to the SGMA, the Main San Gabriel Basin and Puente Basin are exempt from the requirement of developing a GSP. The adjudications of the San Gabriel Valley Groundwater Basin and the Main San Gabriel Basin define overlying and appropriated pumping rights and ensure sustainable management of the basins.

The Spadra Basin is an unadjudicated subbasin of the San Gabriel Valley Groundwater Basin. Local water agencies, including WVWD and the City of Pomona, collectively formed a GSA for the Spadra Basin in February 2017. The GSA plans to prepare and adopt a GSP to maximize the beneficial use of the Spadra Basin

## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

while ensuring long-term sustainability. Groundwater from the Spadra Basin is used by WVWD in a limited capacity for nonpotable purposes, including irrigation, as part of the WVWD's recycled water distribution system.

Additionally, groundwater at the project site was encountered at depths of 16 and 24.5 feet bgs, and project construction would not require dewatering. The operation of the proposed project would not involve direct withdrawals from the groundwater basin and would not be in areas that are actively used for groundwater recharge. Therefore, the proposed project, similar to development pursuant to the GPU, would not substantially decrease groundwater supplies or interfere with groundwater recharge, and impacts would be less than significant.

**Level of Significance Before Mitigation:** Less than significant.

**Impact 5.9-3:** As with the GPU, the proposed project would not 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 a substantial erosion or siltation on- or off-site, result in flooding on- or off-site, or create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. [Threshold HYD-3(i), (ii), and (iii)]

The proposed project would not involve the alteration of any natural drainages or watercourses. As described for Impact 5.9-1, the SWQDv from the proposed project would be conveyed to the on-site detention and Modular Wetland systems, and overflow would be diverted to the 90-inch county storm drain that bisects the site. The on-site BMPs would be designed to accommodate 150 percent of the SWQDv, as shown in Table 5.9-2. The proposed development would change the impervious areas on the four lots, as shown in Table 5.9-3. The pervious area on the project site would decrease from 11.0 percent to 10.2 percent with the development of the proposed project.

**Table 5.9-3 Existing and Proposed Pervious and Impervious Areas**

Lot No.	Pervious Area (square feet)	Pervious Area Percentage	Impervious Area (square feet)	Impervious Area Percentage
<b>Existing Conditions</b>				
Lot 1	43,715	9.6	406,807	90.4
Lot 2	10,150	10.5	86,851	89.5
Lot 3	33,325	14.5	196,020	85.5
Lot 4	23,285	10.3	201,901	89.7
<b>Total</b>	<b>110,475</b>	<b>11.0</b>	<b>891,579</b>	<b>89.0</b>
<b>Proposed Conditions</b>				
Lot 1	45,738	10.1	404,237	89.9
Lot 2	8,430	8.7	88,571	91.3
Lot 3	23,433	10.2	205,798	89.8
Lot 4	24,293	10.8	200,892	89.2
<b>Total</b>	<b>101,894</b>	<b>10.2</b>	<b>899,498</b>	<b>89.8</b>
Source: Atlas Civil Design 2023e-h				



## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

Per the requirements of the Los Angeles County Department of Public Works (LACDPW), as detailed in the Los Angeles County Hydrology Manual and the Los Angeles County Hydraulic Design Manual, the proposed project is required to provide site-specific hydrology and hydraulic studies to determine the capacity of the existing storm drain systems and project impacts on such systems prior to approval by the LACDPW. The analysis in the Preliminary Hydrology Report (see Appendices La–Ld), pursuant to the requirements of LACDPW, represents the hydrology and hydraulic analyses for the four lots on the project site.

The 25-year and 50-year storm event peak flow rates were calculated under existing and proposed conditions for the four lots in the project site, taking into account the capacity of the proposed on-site BMPs described above in Impact 5.9-1. These calculations are shown in Table 5.9-4, *Existing and Proposed Peak Flow Rates*. The City requires that post-development flows do not exceed existing flows for both the 25-year and 50-year storm events. As shown in Table 5.9-4, flows for the proposed conditions under both the 25-year and 50-year storm events would exceed the flows of the existing conditions for Lot 4 and the flow of the proposed conditions for Lot 3 would also exceed the existing for the 50-year event. While the flows calculated in the preliminary hydrology report would exceed the City’s standard, the proposed project would be required to redesign the proposed BMPs to ensure that the post-development flows do not exceed the existing. A final Hydrology Report would be required prior to commencement of grading activities for review and approval by the City.

**Table 5.9-4 Existing and Proposed Peak Flow Rates**

Lot No.	Existing (cfs)	Proposed (cfs)	Difference (cfs)
<b>25-Year Storm Event</b>			
Lot 1	24.26	17.00	-7.26
Lot 2	6.84	6.83	-0.01
Lot 3	12.18	11.31	-0.87
Lot 4	12.44	13.91	+1.36
<b>50-year Storm Event</b>			
Lot 1	28.04	24.83	-3.45
Lot 2	7.79	7.78	-0.01
Lot 3	14.71	15.67	+0.96
Lot 4	14.74	18.04	+3.30

Source: Atlas Civil Design 2023a-d  
cfs = cubic feet per second

The preliminary hydrology report also evaluated the capacity of the existing drainage system to convey stormwater from the project site under the 25-year storm event and determined that the stormwater runoff volume for the 25-year storm under post-development conditions can be accommodated by the public storm drain system. Additionally, construction activities would require compliance with the CGP Water Quality Order 2022-0057-DWQ, which requires the preparation and implementation of a SWPPP. A SWPPP requires the incorporation of BMPs to control sediment and erosion during the construction phase. Therefore, impacts on existing drainage patterns that would cause increased siltation and flooding on- or off-site, create or contribute to the exceedance of the existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows were determined to be less than significant.

**Level of Significance Before Mitigation:** Less than significant.

## 5. Environmental Analysis HYDROLOGY AND WATER QUALITY

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**Impact 5.8-4:** As with site development pursuant to the GPU, the proposed project would not 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 impede or redirect flood flows, and would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. [Threshold HYD-3 (iv) and HYD-4]

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The project site is not in an area that the Federal Emergency Management Administration designates a 100-year flood hazard zone; is not in the inundation zone of any dams; and no surface water bodies pose a flood hazard to the project area due to a seiche. The project area is also not at risk of flooding from tsunami. Therefore, similar to development pursuant to the GPU, the proposed project would not impede or redirect flood flows or risk the release of pollutants due to project inundation, and impacts would be less than significant.

*Level of Significance Before Mitigation:* Less than significant.

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**Impact 5.9-5:** As with the GPU, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. [Threshold HYD-5].

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The proposed project would adhere to the state CGP, implement SWPPPs, and adhere to the City's requirements, as described in detail in Impact 5.9-1. This would ensure that surface and groundwater quality are not adversely impacted during construction. In addition, the proposed project would comply with the MS4 requirements, and the requirements of Chapter 5.08 and Chapter 2.04.040 of the City's municipal code. As a result, the proposed project would not obstruct or conflict with the implementation of the Basin Plan.

The project site would be connected to WVWD's public water supply, which include groundwater withdrawals from Main San Gabriel Basin, Puente Basin, and Spadra Basin. As noted in Impact 5.9-2, the Main San Gabriel Basin and Puente Basin are exempt from the requirement of developing a GSP and the Spadra Basin is used by WVWD in a limited capacity for nonpotable purposes. Therefore, impacts would be less than significant.

*Level of Significance Before Mitigation:* Less than significant.

### 5.9.4 Cumulative Impacts

The area considered for cumulative impacts is the San Gabriel River Watershed. The proposed project would be similar to development pursuant to the GPU and would implement all local, State, and federal requirements related to water quality and hydrology. Therefore, the proposed project would not incrementally increase GPEIR impacts. As with the GPU, implementation of the proposed project would not have the potential to result in cumulatively considerable impacts.

### 5.9.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, Impacts 5.9-1 through 5.9-5 would be less than significant.

## 5. Environmental Analysis

### HYDROLOGY AND WATER QUALITY

#### 5.9.6 Mitigation Measures

##### 5.9.6.1 MITIGATION MEASURES FROM THE GPEIR

The GPEIR did not identify mitigation measures for water quality and hydrology.

##### 5.9.6.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

No additional mitigation measures or conditions of approval are required to reduce impacts to less than significant.

#### 5.9.7 Level of Significance After Mitigation

Impacts 5.9-1 through 5.9-5 would be less than significant.

#### 5.9.8 References

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## 5. Environmental Analysis

### 5.10 LAND USE AND PLANNING

This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates the potential impacts of the Walnut Business Park (proposed project) to impact land use and planning conditions in comparison to the impacts evaluated for the project site in the General Plan Environmental Impact Report (GPEIR).

Land use impacts can be either direct or indirect. Direct impacts are those that result in land use incompatibilities, division of neighborhoods or communities, or interference with other land use plans, including habitat for wildlife conservation plans. This section focuses on direct land use impacts. Indirect impacts are secondary effects resulting from land use policy implementation, such as an increase in demand for public utilities or services, or increased traffic on roadways. Indirect impacts are addressed in other sections of this Draft SEIR.

One comment letter was received in response to the Notice of Preparation (NOP) regarding land use and planning issues. The relevant concerns raised in this letter are addressed throughout this section. For a summary of the comment letter, refer to Chapter 2, Table 2-1, *NOP and Scoping Meeting Comments Summary*, or see the full letter in Appendix A.

#### 5.10.1 Environmental Setting

##### 5.10.1.1 REGULATORY BACKGROUND

Federal, State, regional, and local regulations are listed in Table 5.10-1, *Regulations/Plans for Land Use*. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of General Plan Update (GPU) policies.

**Table 5.10-1 Regulations/Plans for Land Use**

Regional	
Southern California Association of Governments (SCAG), 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS): Connect SoCal	SCAG is a regional planning agency and a forum for addressing regional issues of transportation, the economy, community development, and the environment. SCAG's RTP/SCS, known as Connect SoCal, has 3 principles for the region's future: mobility, economy, and sustainability. It builds on and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The most recent Connect SoCal was adopted in 2020 and SCAG's Draft Connect SoCal 2024 is currently under public review.
Local	
City of Walnut General Plan	The 2018 General Plan provides the direction for growth and change in Walnut, with goals, policies, and implementation actions that address important community needs.
City of Walnut Municipal Code (WMC)	WMC includes Chapter 25 (Zoning). These zoning designations establish how properties can be used, developed, and subdivided, and they set forth permitting processes for project review.

## 5. Environmental Analysis

### LAND USE AND PLANNING

#### 5.10.1.2 EXISTING CONDITIONS

##### City of Walnut

The City of Walnut encompasses 8.9 square miles in southwestern Los Angeles County, approximately 25 miles east of downtown Los Angeles. The Walnut General Plan Update (GPU) Planning Area covers the entire city and two small spheres of influence along Valley Boulevard primarily within the street right-of-way. The city is adjacent to the cities of Diamond Bar, Industry, West Covina, San Dimas, and Pomona, and it is next to California State Polytechnic University (Cal Poly), Pomona. No freeways traverse the city limits, as Walnut is south of Interstate (I-) 10, north of State Route (SR-) 60, and west of SR-57.

##### Project Site

The approximately 23-acre project site is between Valley Boulevard to the south, S. Lemon Avenue to the west, Paseo Del Prado to the north, and an existing industrial development to the east. Beyond Valley Boulevard is the Southern Pacific Railroad line and San Jose Creek. The City of Industry, which is characterized by industrial land uses, lies south of these features. The site is approximately 0.8 mile north of SR-60 and 1.5 miles northwest of SR-57.

The project site consists of 20 parcels with the following Assessor's Parcel Numbers (APNs):

8720-024-058	8720-034-005	8720-034-019	8720-034-033
8720-034-001	8720-034-035	8720-034-020	8720-034-034
8720-034-002	8720-034-016	8720-034-030	8720-034-024
8720-034-003	8720-034-017	8720-034-031	8720-034-025
8720-034-004	8720-034-018	8720-034-032	8720-034-026

The property immediately northeast of the intersection of S. Lemon Avenue and Valley Boulevard is not a part of the project site. The property immediately southeast of the intersection of Paseo Del Prado and Paseo Tesoro is also not a part of the project site.

The existing development on the project site includes 357,544 square feet of building area consisting of an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, a car body shop repair facility, pizza restaurant, roofers' mart, Mexican food supply store, rent-a-car office, and pet food supply outlet.

##### Surrounding Land Uses

Surrounding land uses directly adjacent to the project site include commercial and industrial business parks to the north, west, and east of the project site. These include the Walnut Tech Business Park to the west and the Walnut Valley Business Park to the east. South of the project site is the Southern Pacific Railroad line and San Jose Creek in addition to warehousing and other industrial uses in the City of Industry.

## 5. Environmental Analysis

### LAND USE AND PLANNING

Further north of the project site is a residential area that includes Vejar Elementary School. Residential uses also surround the site further to the west and east. Further south of the project site are additional manufacturing and warehousing uses in the City of Industry.

#### *General Plan and Zoning*

##### ***General Plan Land Use Designation***

The City of Walnut adopted a GPU in May 2018, and the City of Walnut General Plan Update and West Valley Specific Plan Environmental Impact Report (State Clearinghouse #2017101010) was certified by the Walnut City Council in May 2018 (GPEIR). The City of Walnut's General Plan land use designation for the project site is "Industrial". The City adopted Ordinance No. 24-06 on January 8, 2025, which included amendments to Chapter 2, *Land Used and Community Design*, of the General Plan. As amended, the "Industrial" land use designation allows for, as either a permitted or conditional use, light manufacturing, certain commercial storage (including general warehouses and storage warehouses), craftsman and artisan assembly and production, and limited vehicle service repair. Limited commercial retail and office uses are allowed as well. Logistics facilities and storage warehouses more than 50,000 square feet in gross floor area are allowed subject to a conditional use permit (CUP). This designation allows a maximum lot coverage of 60 percent and a maximum building height of two stories.

##### ***Zoning Designation***

The project site is zoned Light Manufacturing (M-1). The City adopted Ordinance No. 24-06 on January 8, 2025, which included amendments to Sections 6.48.020 and 6.48.020 of the City's Zoning Ordinance (Title 6 of the Walnut Municipal Code). As amended, the M-1 Zone permits a variety of industrial, manufacturing, warehousing, and retail uses in addition to office and business uses. Logistic facilities are allowed subject to a CUP. Storage warehouses where 50,000 square feet or more of the building's gross square footage is used for warehouse purposes are also subject to a CUP. The height limit in this zone is two stories or 35 feet, whichever is less. The maximum lot coverage is 60 percent of the lot area.

### **5.10.2 Thresholds of Significance**

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project would normally have a significant effect on the environment if the project would:

- LU-1      Physically divide an established community.
- LU-2      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.

### **5.10.3 Environmental Impacts**

#### **5.10.3.1 2018 GENERAL PLAN UPDATE**

The GPEIR noted that existing land use designations in the city would change under the GPU to better align with the City's Zoning Map. The GPEIR determined that these proposed land use changes would not divide

## 5. Environmental Analysis

### LAND USE AND PLANNING

an established community because they would not trigger any new infrastructure or large-scale development that would result in these impacts. The GPU and WVSP were found to be consistent with other land use regulations that would mitigate an environmental impact, including the land use provisions of the City's zoning code. Land use impacts under the GPU and WVSP were determined to be less than significant.

#### 5.10.3.2 IMPACT ANALYSIS

The following impact analysis addresses the thresholds of significance in Section 5.10.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.10-1: The proposed project would not physically divide an established community. [Threshold LU-1]**

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The project site is currently developed and consists of an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, a car body shop repair facility, pizza restaurant, roofers' mart, Mexican food supply store, rent-a-car office, and pet food supply outlet.

The proposed project would involve demolition of the existing buildings on-site, which total 357,544 square feet of building area. Development of the proposed project would include four concrete tilt-up buildings that would encompass a total of 414,778 square feet of building space. The proposed project would include 392,488 square feet of mixed warehousing and light-industrial space and 22,290 square feet of office/retail space.

The closest established residential communities to the project site are single-family homes north of Paseo Del Prado, approximately 0.15 mile from the project site; and west of Lemon Avenue, approximately 0.23 mile from the project site (see Figure 3-3, *Aerial Photograph*). These neighborhoods are physically separated from the plan area by these streets and additional industrial development sites. Thus, the project improvements would not physically divide a community. Therefore, impacts would be less than significant. Additionally, the proposed project would not result in any new or more substantial impacts when compared to the impacts evaluated in the GPEIR.

***Level of Significance Before Mitigation:*** Less than significant.

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**Impact 5.10-2: The proposed project would not conflict with applicable plans adopted for the purpose of avoiding or mitigating environmental effects. [Threshold LU-2]**

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#### City of Walnut Municipal Code

New development in the City of Walnut is governed by the City's zoning ordinance, which includes development standards and design policies. The M-1 zoning designation for the project site allows for the proposed land uses as either a permitted or conditional use. Logistics facilities and storage warehouses larger than 50,000 square feet in gross floor area are allowed subject to a CUP.

## 5. Environmental Analysis LAND USE AND PLANNING

The new proposed buildings would have a maximum height of 35 feet, in compliance with Section 6.48.050 of the WMC, which states that no lot or parcel of land shall have a building or structure in excess of two stories or 35 feet in height, whichever is less.

Parking under the proposed project would be required to comply with Chapter 6.68, Off-Street Parking, in the WMC. Offices, businesses, and other professional uses in the city are required to provide one parking space for each 250 square feet of floor area. Industrial uses (e.g. Logistic Facilities) are required to provide one parking space for each two employees on the largest shift or for each 400 square feet of floor area, whichever is greater, and one parking space for each vehicle operated or kept in connection with the use. Under the WMC requirements, the proposed project would be required to provide 1,070 parking spaces.<sup>1</sup> The proposed project would provide 1,097 parking stalls on the project site, which exceeds the minimum parking requirements in the WMC. Therefore, the proposed project is consistent with the WMC and would not result in any new or more substantial impacts when compared to the GPEIR.

### City of Walnut General Plan

The proposed project would be subject to consistency with the City's General Plan goals and policies. The "Industrial" land use designation for the project site allows for the proposed land uses as either a permitted or conditional use. Logistics facilities and storage warehouses larger than 50,000 square feet in gross floor area are allowed subject to a CUP. Table 5.10-2, *General Plan Consistency Analysis*, has been provided to demonstrate overall consistency with the applicable policies from the City of Walnut General Plan that have been adopted for the purposes of avoiding or mitigating environmental impacts.

**Table 5.10-2 General Plan Consistency Analysis**

General Plan Policies	Relevance/Consistency
<b>Land Use and Community Design Elements</b>	
<b>Goal LCD-1:</b> A balanced community with a mix of land uses that supports thriving businesses, all modes of transportation, complete neighborhoods, and healthy lifestyles	
<b>Policy LCD-1.5: Sustainability.</b> Promote land use and development projects that demonstrably reduce greenhouse gas emissions, water usage, and electricity and natural gas demand.	<b>Consistent.</b> The proposed project would be designed using green building practices, including those of the most current Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6) and California Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11).
<b>Policy LCD-1.12: Gathering Spaces.</b> Encourage public gathering spaces with flexible areas that allow for passive social gatherings and spaces for public events throughout the City. Consider encouraging in commercial and mixed-use developments a central town square with additional plazas and greens for community gathering spaces, public art, and community events.	<b>Consistent.</b> The proposed project would include buildings that would be positioned to create a cohesive campus atmosphere with multiple areas to gather, including outdoor amenity areas scattered throughout the site. These areas would feature high-quality furnishings and landscaping with a rustic and natural aesthetic.
<b>GOAL LCD-3:</b> Successful commercial and industrial businesses that provide opportunities for local employment and contribute to a strong local economy.	
<b>Policy LCD-3.6: Façade Upgrades.</b> Target design upgrades and other façade enhancements that maintain the City's standards for high-quality and prevailing desired design	<b>Consistent.</b> The proposed project would include building designs that would be characterized by contemporary industrial design, and the

<sup>1</sup> The proposed project would include 22,290 square feet of office/retail space, which requires 89 parking spaces. The remaining 393,488 square feet of industrial building space would require an additional 981 parking spaces.



## 5. Environmental Analysis

### LAND USE AND PLANNING

**Table 5.10-2 General Plan Consistency Analysis**

General Plan Policies	Relevance/Consistency
aesthetics. Help landowners and landlords recognize that quality, maintained, and up-to-date places promote occupancy of tenant spaces that have been vacant for long periods of time.	buildings would be positioned to create a cohesive campus atmosphere with multiple areas to gather.
<b>GOAL LCD-5:</b> Land use and development patterns that promote a healthy community	
<b>Policy LCD-5.7: Reduce Vehicular Trips and Miles Traveled.</b> Coordinate land use patterns with the Circulation Element to improve and protect air quality, reduce vehicular trips, and promote walkability.	<b>Consistent.</b> As discussed in Section 5.13, <i>Transportation</i> , the vehicle miles traveled (VMT) generated by the proposed project is expected to be below the baseline (average) VMT of the city, resulting in less than significant impacts with respect to VMT. Furthermore, the proposed project would comply with the improvements listed in the City's Circulation Element and would not otherwise conflict with City efforts to reduce vehicular trips.
<b>GOAL LCD-7:</b> Community character that reflects Walnut's distinctive small-town identity and character	
<b>Policy LCD-7.4:</b> Preserve the value of the community's night sky and avoid unnecessary light and spill-over of glare from signage, buildings, and landscape illumination and other sources of outdoor lighting.	<b>Consistent.</b> The proposed project would comply with the provisions in the City Municipal Code Section 6.48.100, Nuisance activity prohibited, that prohibit lighting nuisances from development in the M-1 Light Manufacturing Zone. Therefore, the proposed project would not create unnecessary light and glare.
<b>Policy LCD-7.5:</b> Maintain a pedestrian scale for new development. Require that non-residential development provide amenities that promote pedestrian activity and community gathering.	<b>Consistent.</b> As shown in Figures 3-8a and 3-8b, <i>Conceptual Building Renders</i> , the proposed project would be designed to include outdoor amenity areas across the site to allow gathering. Additionally, the proposed project would preserve existing sidewalks that front project streets, allowing for pedestrians to access and move within the site.
<b>GOAL LCD-8:</b> High-quality and traditional design for all new development	
<b>Policy LCD-8.1: Enhanced Design.</b> Require architectural design treatments that encourage Walnut's small-town, rural character and that can incorporate a mix of traditional and/or newer design themes, styles, and high-quality materials.	<b>Consistent.</b> The proposed project would include building designs that would be characterized by contemporary industrial design and the buildings would be positioned to create a cohesive campus atmosphere with multiple areas to gather. Outdoor amenity areas would be scattered throughout the site. These areas would feature high-quality furnishings and landscaping with a rustic and natural aesthetic.
<b>Policy LCD-8.2: High-quality Materials.</b> Insist that all new development incorporate high-quality building materials, textures, and finishes that embody durability and permanence.	<b>Consistent.</b> The buildings would be designed as single-story, tilt-up industrial buildings up to 35 feet with metal canopies, corrugated metal panels or similar appearing finished concrete panels, aluminum faux wood, and painted mural exteriors.
<b>Policy LCD-8.3: Consistent Building Themes.</b> Encourage non-residential development to utilize a unified or consistent design theme, particularly when involving multiple structures as part of one project. Thematic and stylistic diversity may be allowed when the overall project design achieves a harmonious effect.	<b>Consistent.</b> The proposed buildings have been designed to reflect the visual character and appearance of the surrounding area in materials and color and to respect and maintain the architectural design of the project site and its vicinity.
<b>Policy LCD 8.4: Landscape Design:</b> Develop specialized landscape and design treatments for entryways, intersections, parks, districts and neighborhoods, and public areas.	<b>Consistent.</b> A landscaping plan was prepared for the proposed project (see Figure 3-9, <i>Conceptual Landscaping Plan</i> ). The plan details the proposed landscape design treatments for green spaces throughout the project site, which include drought-tolerant planting design and the preservation of on-site trees.
<b>Policy LCD-8.5: Outdoor Spaces.</b> Require new development to provide engaging, well landscaped outdoor spaces that invite and support outdoor activities for residents, especially areas viewed or accessible by the public.	<b>Consistent.</b> The proposed project would include outdoor amenities and gathering spaces scattered throughout the project site.

## 5. Environmental Analysis LAND USE AND PLANNING

**Table 5.10-2 General Plan Consistency Analysis**

General Plan Policies	Relevance/Consistency
<b>Goal LCD-9.</b> A built environment with development approaches that apply sustainability principles	
<b>Policy LCD-9.1: Conservation.</b> Encourage the use of building design and materials that conserve energy and material resources.	<b>Consistent.</b> The proposed project would be designed using green building practices, including those of the most current Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6) and California Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11).
<b>Policy LCD-9.3: Sustainable Building Features.</b> Require that development incorporate sustainability, including features that minimize energy and water use, limit carbon emissions, provide opportunities for local power generation and food production, and provide areas for recreation.	
<b>Policy LCD-9.4: Building Design.</b> Support building designs that assist with the management of stormwater runoff, preserve and enhance soil permeability, and reduce other negative effects of urban development.	<b>Consistent.</b> As discussed in Section 5.9, <i>Hydrology and Water Quality</i> , implementation of site-specific Best Management Practices (BMPs) would improve the water quality of runoff when compared to existing conditions since runoff currently flows untreated into the existing 90-inch storm drain.
<b>Policy LCD-9.6: Vehicle Charging Station.</b> Encourage the implementation of programs that support electric vehicle charging readiness Citywide. Permit the installation of electric vehicle charging stations on private property.	<b>Consistent.</b> The proposed project would include electric vehicle charging infrastructure that would reduce reliance on fossil fuels.
<b>Circulation Element</b>	
<b>GOAL C-1:</b> Streets that are designed and managed to enable safe access for all users, including pedestrians, equestrians, bicyclists, motorists, and transit riders of all ages and abilities	
<b>Policy C-1.1: Complete Streets.</b> Pursue and implement Complete Streets strategies to accommodate all users of different ages and abilities.	<b>Consistent.</b> The proposed project would not conflict with the proposed improvements listed in the City's Circulation Element that encourage complete streets. The project site would continue to be accessible via sidewalks and existing transit amenities in proximity to the site would provide alternatives for visitor and employee transportation to and from the site.
<b>Policy C-1.5: Universal Access.</b> Identify and evaluate the system for potential improvements to accommodate seniors and disabled persons and to comply with ADA requirements.	<b>Consistent.</b> The proposed project would comply with Americans with Disability Act (ADA) requirements.
<b>Policy C-1.7: Multimodal.</b> Use available public rights-of-ways to provide wider sidewalks, bicycle lanes, trail facilities, and transit amenities.	<b>Consistent.</b> The proposed project would not impact existing pedestrian, bicycle, or transit amenities where available in the vicinity of the project site.
<b>Policy C-1.8: Levels of Service.</b> Use the Level of Service (LOS) metric to measure congestion performance. Complement this approach with sustainable transportation and land use strategies that can effectively reduce vehicle miles traveled. Use vehicle daily trips as the benchmark demand for determining potential levels of parking and vehicular congestion, and equate mitigation and compliance with the sufficiency to provide supply on the facilities to meet that demand.	<b>Consistent.</b> As discussed in Appendix O, the proposed project would not exceed the City's LOS thresholds for any studied intersections under project opening or cumulative plus project scenarios. The proposed project would also comply with the City's Transportation Demand Management Ordinance (see Section 5.13) and includes additional project design features that would reduce VMT, parking, and congestion.
<b>Policy C-1.9: Emergency Coordination.</b> Consult with regional and local emergency service providers in ensuring that the roadways allow efficient access to recovery sites and are easily accessible by emergency vehicles.	<b>Consistent.</b> Temporary traffic diversion, truck haul routes, and impacts to the roadway would be coordinated with the City and applicable emergency response agencies to ensure adequate access during any construction activities. The City, along with the Los Angeles County Fire Department (LACFD) and Los Angeles Sheriff's Department, would review building plans during plan check to ensure that adequate site access is maintained and that roadway improvements and project driveways would not interfere with circulation on adjacent streets and any emergency plan or evacuation routes.

## 5. Environmental Analysis

### LAND USE AND PLANNING

**Table 5.10-2 General Plan Consistency Analysis**

General Plan Policies	Relevance/Consistency
<b>Policy C 1.10: Beautiful Complete Streets.</b> Promote an enhanced aesthetic image through streetscaping, median improvements, and careful implementation of non-essential signage when revising infrastructure for complete streets.	<b>Consistent.</b> The improvements under the proposed project would not conflict with City efforts to enhance the aesthetic image of city streetscapes. As detailed in the conceptual landscape plan (see Figure 3-9), the site would feature drought-tolerant landscaping to complement the design for the outdoor gathering areas adjacent to the site buildings. These features would create a cohesive aesthetic for the site.
<b>GOAL C-2:</b> Quiet streets with limited congestion	
<b>Policy C-2.5: Protect Ambience.</b> Preserve and maintain the most aesthetic part of the streetscapes, including the natural vegetated mountain, street landscaping, and hillside edges.	<b>Consistent.</b> The improvements under the proposed project would not conflict with City efforts to preserve and maintain streetscapes. As shown in the conceptual landscape plan, all improvements would be limited to areas within the project site. These include entry treatments visible from adjacent roadways.
<b>GOAL C-4:</b> Connected pedestrian and bicycle network	
<b>Policy C-4.6: Parking Lot Pathways.</b> Require that parking lots include clearly defined paths for pedestrians and bicyclists to provide a safe access to building entrances and to surrounding public sidewalks.	<b>Consistent.</b> The proposed project would include pedestrian walkways within the parking lots of the project site to accommodate pedestrian access. The proposed project would also comply with the California Code of Regulations, Title 24, Part 6, Green Building Standards to include a level of bicycle parking equivalent to a minimum of 5% of vehicle parking spaces.
<b>GOAL C-6:</b> Reduction in total vehicle miles traveled to help improve local air quality and reduce greenhouse gas emissions	
<b>Policy C-6.1:</b> Implement development and transportation improvements that help reduce greenhouse gas emissions by reducing per capita Vehicle Miles Traveled (VMT), reducing impacts on the City's transportation network, and maintaining the desired levels of service for all modes of transportation.	<b>Consistent.</b> The proposed project would be required to comply with Green Building Standards that implement VMT-reducing and/or GHG-reducing project design features, including visitor bicycle parking racks provided within 200 feet of building entrances for a minimum of 5% of new vehicular parking, "Clean Air" parking spaces for carpools and fuel-efficient vehicles, 20% EV capable parking spaces with 25% of those spaces including charging stations. The proposed project is also required to comply with additional measures in accordance with the City's Transportation Demand Management (TDM) Ordinance, including employee education for trip-reduction.
<b>GOAL C-7:</b> Provision of parking that meets evolving demands and vehicle usage.	
<b>Policy C-7.1: Parking Standards.</b> Ensure that required loading and parking spaces continue to be responsive to existing and forecasted demand. Revise standards accordingly to maintain equilibrium between parking supply and demand. Discourage reducing parking requirements unless a parking study indicates that the supply requested is supported by demand.	<b>Consistent.</b> As discussed previously, the proposed project would comply with Section 6.68.040, Schedule of minimum requirements, in the City's Municipal Code, which outlines the parking requirements for development in the city.
<b>Policy C 7.2: Parking Screening.</b> Minimize the appearance of parking lots and structures as viewed from public rights-of-ways and gateways.	<b>Consistent.</b> As shown in Figure 3-9, <i>Conceptual Site Plan</i> , parking lots on the project site would be screened from view from roadways through landscaping buffers. This includes cover from existing trees and new trees to be planted at the site. Ornamental shrubs and hedges proposed along parking lot boundaries would also screen these portions of the site from view of the public streets.
<b>GOAL C-10:</b> Ability to respond and adapt to technological advances in the field of transportation and mobility	
<b>Policy C-10.3: Ride Sourcing and Ridesharing.</b> Require new non-residential developments to provide access and facilities that enable safe pick-up/drop-off locations of passengers of ride sourcing and ridesharing services. Encourage ride sourcing and ridesharing services to complement services provided for seniors, disabled persons, those who have impaired mobility, and those who live in isolated residences.	<b>Consistent.</b> In compliance with the City's TDM Ordinance, the proposed project is required to provide drop-off zones for carpool and vanpool vehicles in safe and convenient locations. This requirement would satisfy the needs of ridesharing services as well.

## 5. Environmental Analysis LAND USE AND PLANNING

**Table 5.10-2 General Plan Consistency Analysis**

General Plan Policies	Relevance/Consistency
<b>Conservation, Open Space, and Recreation Element</b>	
<b>Goal COR-4: A healthy and vibrant community forest</b>	
<b>Policy COR-4.2: Planting Program.</b> Prioritize the planting of street trees in new development projects, and ensure that any dying or diseased tree within a public right-of-way is quickly replaced with healthy and appropriate specimens.	<b>Consistent.</b> The proposed project would remove 66 trees on the project site that would be affected by the activities under the proposed project. The proposed project would replace these trees with 66 new trees (see Appendix E).
<b>Policy COR-4.3: Private Tree Preservation.</b> Implement effective programs that provide protection for mature trees on private properties.	<b>Consistent.</b> The project site could include trees protected by the City's Oak/Walnut Tree Preservation Ordinance (incorporated as Chapter 6.52, Article V, Oak/Walnut Tree Preservation in the WMC). The proposed project would adhere to the provisions of the WMC, including obtaining a tree permit from the City for any oak/walnut tree removal.
<b>Goal COR-5: Municipal practices and private actions that promote environmental sustainability</b>	
<b>Policy COR-5.3: Efficient Design</b> Encourage energy-efficient design of all new projects (public and private), including appropriate structure orientation and the use of shade trees to maximize cooling and reduce fossil fuel consumption for heating and cooling.	<b>Consistent.</b> Compliance with the Building Energy Efficiency Standards would also include installation of a higher-efficiency heating, ventilation, and thermal envelope (e.g., insulation materials), which would contribute to reducing natural gas demands and decreasing overall reliance on fossil fuels.
<b>Policy COR-5.4: Recycling.</b> Work to reduce landfill waste and increase recycling.	<b>Consistent.</b> As discussed in Section 5.15, <i>Utilities and Service Systems</i> , the proposed project would comply with the applicable federal, State, and local policies concerning the diversion of waste, including WMC provisions for mandatory organic waste reduction in Chapter 3.29, <i>Mandatory Organic Waste Disposal Reduction</i> .
<b>Policy COR-5.6: Water Conservation</b> Support the efforts of all water agencies serving Walnut to reduce water consumption at all times, not just during times of drought.	<b>Consistent.</b> Compliance with CALGreen establishes planning and design standards for sustainable site development, including water conservation.
<b>Policy COR-5.7: Water Supply.</b> Allow new development only when it can be demonstrated that sufficient water is available over the long term to supply that development.	<b>Consistent.</b> As shown in Section 5.15, the increase in water demand under the proposed project would represent a small fraction of the Walnut Valley Water District's (WVWD's) current water demand. Furthermore, WVWD has demonstrated that it has the available supply to meet the demand of the proposed project.
<b>GOAL COR-7 Protected and healthy groundwater basins</b>	
<b>Policy COR-7.1: Green Infrastructure.</b> Require low-impact designs such as vegetated treatment systems (bioswales, drainage swale, vegetative buffers, constructed wetlands) and other green infrastructure improvements for storm water discharge pollution removal.	<b>Consistent.</b> As discussed in Section 5.9, a low-impact development (LID) plan was developed for the proposed project to ensure that on-site runoff would be adequately collected and treated by an underground detention system and modular wetlands.
<b>GOAL COR-8: Expansive public art and cultural programs that strengthen Walnut's community identity</b>	
<b>Policy COR-8.1: Promote Public Art</b> Encourage and promote opportunities for permanent and temporary public art installations.	<b>Consistent.</b> The proposed project would include buildings that would showcase colorful murals in key locations to create artistic focal points.
<b>GOAL COR-9: The recognition and prioritization of cultural and historical preservation</b>	
<b>Policy COR-9.2: Archaeological Resources.</b> Assure that all development properly addresses the potential for subsurface archeological deposits.	<b>Consistent.</b> As discussed in Section 5.4, <i>Cultural Resources</i> , the proposed project would incorporate Mitigation Measure CR-3, which provides protections for potential archaeological resources on the project site consistent with impacts and mitigation included in the GPEIR.
<b>Policy COR-9.3: Cultural Resources.</b> Review all development and re-development proposals in the City for the possibility of cultural resources. This may include the need for individual cultural resource studies, including subsurface investigations.	<b>Consistent.</b> The proposed project would incorporate Mitigation Measure CR-1 to require a cultural resources evaluation of the existing buildings on the project site to ensure that potential resources are documented and protected.

## 5. Environmental Analysis

### LAND USE AND PLANNING

**Table 5.10-2 General Plan Consistency Analysis**

General Plan Policies	Relevance/Consistency
<b>Goal COR-10: Clean local air quality and reduced greenhouse gas emissions</b>	
<b>Policy COR-10.6: Minimize Air Quality Impacts.</b> Minimize air quality impacts of new development projects on established uses.	<b>Consistent.</b> As discussed in Section 5.2, <i>Air Quality</i> , the proposed project would be required to implement Mitigation Measure AQ-1, which requires the use of construction equipment that meets the United States Environmental Protection Agency Tier 4 Final emissions standards. This would ensure that any project-related air quality impacts are mitigated to less than significant. Additionally, as discussed, the proposed project includes several project design features that aim to reduce VMT impacts under the proposed project.
<b>Policy COR-10.7: Air Quality Goals.</b> Ensure that land use and transportation plans support air quality goals, with new development projects reducing vehicle miles traveled and vehicle trips.	<b>Consistent.</b> As discussed previously, the proposed project would result in a level of VMT below the city's baseline VMT level. Additionally, project design features, such as vanpool/carpool parking spaces, bike parking, and EV charging spaces would further promote the reduction of VMT/GHG emissions.
<b>Policy COR-10.10: Alternative Fuels.</b> Prioritize alternative fuel vehicles for City use. Incorporate alternative fuel charging stations into public and private development projects.	<b>Consistent.</b> Consistent with CALGreen standards, the proposed project would be required to construct 20% of parking spaces as EV capable, with 25% of those spaces including charging stations.
<b>Community Facilities and Infrastructure Element</b>	
<b>GOAL CFI-1: Quality community facilities that meet the needs of the community in a fiscally responsible manner</b>	
<b>Policy CFI-1.2: New Development Impacts.</b> Require that development projects fully address impacts to public facilities and services. Ensure new development pays proportional fair share costs of public facilities through applicable fees and assessments. Ensure that existing residents and businesses are not burdened with the cost of financing facilities and services aimed at supporting new development or the intensification of existing development.	<b>Consistent.</b> As discussed in Section 5.12, <i>Public Services</i> , the proposed project would be required to pay development impact fees as applicable, which would fully address impacts to public facilities and public services, including fire, police, school, and library services.
<b>Policy CFI-1.3: Adequate Services and Facilities.</b> Continue to allow new development and the intensification of existing development only where and when adequate public services and facilities can be provided.	<b>Consistent.</b> The proposed project would have less-than-significant impacts with respect to public services and existing services would be able to accommodate the increased demand under the proposed project.
<b>GOAL CFI-2: Infrastructure that preserves and enhances the City's character and rural aesthetic</b>	
<b>Policy CFI-2.1: Infrastructure Aesthetics.</b> Limit negative aesthetic impacts of new public and private infrastructure.	<b>Consistent.</b> The proposed project involves minor improvements to existing utilities and infrastructure to accommodate the reconfiguration of the buildings on-site under the proposed project. Valley Boulevard would also be widened to include a right-turn lane. This would involve temporary construction within the right-of-way. However, these improvements would largely be out of sight of the public right-of-way and would not impact the aesthetic quality of the area.
<b>Policy CFI-2.3: Overhead Utilities.</b> Reduce the visual impact of above ground and overhead utilities, including electric lines, by continuing to require the placement of utilities underground within new development and wherever possible, the realignment of existing utilities and equipment underground.	<b>Consistent.</b> As discussed in Section 5.15, the proposed project would tie into existing underground and overhead utilities but would not require the expansion of or new construction related to these utilities.
<b>GOAL CFI-5: Wastewater system that meets current and future needs</b>	
<b>Policy CFI-5.2: Development.</b> Require developers to pay their fair share of costs for localized wastewater infrastructure upgrades to ensure that service levels are met.	<b>Consistent.</b> The proposed project would pay its fair share of costs for wastewater infrastructure as required by Chapter 5.04, <i>Sewers and Sewage Disposal</i> , in the WMC.
<b>GOAL CFI-6: Storm water infrastructure that minimizes flood risks and achieves water quality goals</b>	

## 5. Environmental Analysis LAND USE AND PLANNING

**Table 5.10-2 General Plan Consistency Analysis**

General Plan Policies	Relevance/Consistency
<b>Policy CFI-6.1: Storm Water and Drainage System</b> Implement best practices in storm water management to reduce demand on the drainage system and to maintain low pollution impacts to the surface waters and Walnut's local creeks.	<b>Consistent.</b> The proposed project is exempt from the hydromodification requirements of the MS4 Permit, as the proposed project would discharge through a fully improved storm drain system that discharges to San Jose Creek and the San Gabriel River that are both not susceptible to hydromodification impacts. Additionally, LID Plans have been prepared for the proposed project that specifies the operation and maintenance requirements for all structural or treatment control BMPs required to reduce pollutants in post development runoff to the maximum extent practicable. Final hydrology reports for the proposed project would also ensure that the water runoff from the site does not exceed the Los Angeles County Department of Public Works (LACDPW) standards.
<b>Policy CFI-6.3: Storm Water Runoff</b> Minimize the impact of development on the City's drainage system by reducing the amount of impervious surface associated with new development and encouraging low impact design features or landscaping that capture runoff.	<b>Consistent.</b> Implementation of site-specific BMPs would improve the water quality of runoff when compared to existing conditions since runoff currently flows untreated into the existing 90-inch storm drain. The sizing of the proposed BMPs would be addressed during submittal of the final hydrology report for the proposed project, which would be reviewed by the City for compliance with LACDPW standards.
<b>Policy CFI-6.4: National Pollutant Discharge Elimination System (NPDES).</b> Encourage on-site retention of storm water and compliance with requirements of the NPDES.	<b>Consistent.</b> As described in Section 5.9, to comply with the County Phase I MS4 NPDES Permit, the proposed project is required to collect and treat a certain amount of stormwater on-site with the use of Modular Wetland systems. Further documentation of the project's compliance with the NPDES is provided in Appendices Ka through d.
<b>GOAL CFI-8: Efficient and economical solid waste management</b>	
<b>Policy CFI-8.3: Collection and Recycling.</b> Ensure that all development provide on-site collection facilities to meet the waste diversion requirements.	<b>Consistent.</b> Solid waste generated by the proposed project would be collected and hauled away by Valley Vista Services. Enclosures with a roof and double swing gates would accommodate trash bins for solid waste and recyclable materials.
<b>Public Safety Element</b>	
<b>Goal PS-1: Effective and comprehensive crime prevention/protection and fire services that respond to the community's safety needs</b>	
<b>Policy PS-1.1: Law Enforcement and Fire Services.</b> Maintain law enforcement and fire prevention and protection services that maximize protection of life and property.	<b>Consistent.</b> As discussed in Section 5.12, impacts to fire protection and police services would be less than significant and would not hinder the ability of these agencies to maintain service in their service areas.
<b>Policy PS-1.3: Development Review</b> Engage the Los Angeles County Sheriffs' Department in the review of development applications for security and public safety measures.	<b>Consistent.</b> The City, along with the LACFD and Los Angeles County Sheriff's Department (LACSD), would review building plans during plan check to ensure that adequate site access is maintained and that roadway improvements and project driveways would not interfere with circulation on adjacent streets and any emergency plan or evacuation routes.
<b>Policy PS-1.8: Environmental Design.</b> Look at design approaches that deter crime and vandalism for both public and private projects when reviewing development proposals and the design of public spaces. Consult methods found in Crime Prevention through Environmental and Design resources.	<b>Consistent.</b> The proposed project would include lighting for parking and loading dock areas in addition to security lighting throughout the site and on buildings. Furthermore, during the building permit plan check process, an LACSD police captain or police lieutenant would review the building plans before the City issues a building permit to determine the needs for crime prevention, such as installation of lighting systems, emergency notification systems, and/or crime prevention through environmental design.
<b>Goal PS-2: Minimized risks associated with wildland fires</b>	
<b>Policy PS-2.2: Development Review</b> Involve the Fire Department in the early design stage of all projects requiring public review to ensure Fire Department input and appropriate	<b>Consistent.</b> As described in Section 5.12, the proposed project has been preliminarily reviewed by LACFD for CEQA purposes. The

## 5. Environmental Analysis

### LAND USE AND PLANNING

**Table 5.10-2 General Plan Consistency Analysis**

General Plan Policies	Relevance/Consistency
modifications and fire safe design is incorporated in future development.	proposed project will also be reviewed at a later date by LACFD to ensure that it incorporates department recommendations for fire safety.
<b>Policy PS-2.11: Water System Adequacy.</b> Maintain adequate water pressure, fire flow, and water storage capabilities to meet required fire-flow pressures. Consult with water agencies to maintain long-term integrity of water supplies and related infrastructure systems.	<b>Consistent.</b> The proposed project's required fire flow has been provided by LACFD in their response to a service provider questionnaire for the proposed project (see Appendix N). This requirement will be maintained under the proposed project. As described in Section 5.15, the proposed project's water demand is met with adequate supply from Walnut Valley Water District.
<b>Goal PS-3:</b> Minimized risks associated with seismic and geologic hazards	
<b>Policy PS-3.2: Geotechnical Evaluation</b> As appropriate, require geotechnical evaluation and recommendations prior to new development. Such geotechnical evaluation shall analyze the potential hazards from landslides, liquefaction, expansive soils, and mud and debris flow. Recommendations will include mitigation to avoid or minimize the identified hazards.	<b>Consistent.</b> As described in Section 5.8, <i>Geology and Soils</i> , a geotechnical evaluation has been conducted for the proposed project and the recommendations of the evaluation will be incorporated during the construction and design of the proposed project.
<b>Policy PS-3.4: Seismic Building Codes.</b> Require that all new development comply with the most recent State of California seismic building codes and the Seismic Hazards Mapping Act. As appropriate, require mitigation of potentially adverse impacts of geologic and seismic hazards.	<b>Consistent.</b> The proposed project is not in a zone of required investigation for Earthquake-Induced Landslides per California Geological Survey (CGS) Earthquake Fault Zones and Seismic Hazard Zones. The proposed project would comply with the applicable provisions of the Alquist-Priolo Earthquake Fault Zoning Act, the State of California Seismic Hazards Mapping Act, and the State of California Building Code, to ensure that seismic and geologic hazards are minimized.
<b>Goal PS-5:</b> A high degree of community awareness and participation in the proper storage and disposal of hazardous waste materials	
<b>Policy PS-5.1: Hazardous Materials Handling.</b> Ensure the safe handling, storage, and transportation of hazardous materials citywide.	<b>Consistent.</b> The proposed project would comply with the applicable hazardous waste handling, storage, and transportation requirements described in Section 5.8, <i>Hazards and Hazardous Materials</i> .
<b>Policy PS-5.3: Proper Storage and Disposal.</b> Require the proper storage and disposal of hazardous materials to prevent leakage, potential explosions, fire, or the release of harmful fumes. Maintain information channels to the residential and business communities about the illegality and danger of dumping hazardous material and waste into the storm drain system and creeks.	<b>Consistent.</b> The proposed project would comply with the applicable hazardous waste disposal requirements described in Section 5.8, <i>Hazards and Hazardous Materials</i> .
<b>Noise Element</b>	
<b>Goals N-1:</b> Coordinate the City's land use policies promoting a small-town ambience with the appropriate measures to control, and to measure noise impacts.	
<b>Policy N 1.3: Minimize Noise Impacts.</b> Minimize noise impacts in the community to ensure that noise does not detract from Walnut's quality of life.	<b>Consistent.</b> As described in Section 5.11, <i>Noise</i> , the proposed project would not result in an increase in noise exceeding the City's Noise Element threshold.
<b>Policy N 1.5: Commercial Delivery Areas.</b> Locate delivery areas for new commercial and industrial development away from existing or planned homes.	<b>Consistent.</b> Truck access for delivery and transport would be along Lemon Avenue, Paseo Sonrisa, Paseo Tesoro, and Paseo Del Prado. The nearest receptor to the proposed project is 515 feet north of the project site. Analysis of the noise levels expected from the proposed project found that the distance between project delivery areas and the nearest receptor would ensure that project noise levels do not exceed the City's threshold for this receptor.

## 5. Environmental Analysis

### LAND USE AND PLANNING

**Table 5.10-2 General Plan Consistency Analysis**

General Plan Policies	Relevance/Consistency
<b>Policy N 1.6: Stationary Noise Sources.</b> Minimize stationary noise impacts on sensitive receptors, and require control of noise from construction activities, private developments/residences, landscaping activities, and special events.	<b>Consistent.</b> The proposed project would comply with Section 3.40.050, Exterior Noise Standards, in the WMC. Additionally, the proposed project was found to not exceed the City's noise threshold in the analysis presented in Section 5.11.
<b>Policy N 1.7: Noise Mitigation.</b> Require development projects to implement mitigation measures, where necessary, to reduce noise levels to meet adopted standards and criteria. Such measures may include, but are not limited to, berms, walls, and sound-attenuating architectural design and construction methods.	<b>Consistent.</b> Due to the conditions of the project site, including its proximity to nearby receptors, it was determined that the proposed project would not require mitigation to reduce noise impacts to less than significant.
<b>Policy N 1.9: Industrial Uses and Equipment.</b> Require analysis and implementation of techniques to control the effects of noise from industrial sources, utilities, and mechanical equipment.	<b>Consistent.</b> Noise from the proposed uses of the project site would not exceed the City's noise thresholds applicable to the proposed project. The proposed project would implement noise control for on-site machinery where necessary.

Source: City of Walnut 2018.

### SCAG 2020-2045 RTP/SCS Consistency

Table 5.10-3, *SCAG 2020-2045 RTP/SCS Goals Consistency Analysis*, provides an assessment of the proposed project's consistency with the applicable SCAG 2020-2045 RTP/SCS goals.

**Table 5.10-3 SCAG 2020-2045 RTP/SCS Goals Consistency Analysis**

Goals	Consistency Analysis
<b>Goal 1.</b> Encourage regional economic prosperity and global competitiveness.	<b>Consistent.</b> The proposed project would redevelop the project site with new modern commercial and industrial buildings and would increase the square footage of building space. This would provide new economic opportunities for businesses in the city and region, specifically by providing space to accommodate the growing logistics industry.
<b>Goal 2.</b> Improve mobility, accessibility, reliability, and travel safety for people and goods.	<b>Consistent.</b> The project site would be accessible via major arterial roads in the city, Lemon Avenue and Valley Boulevard. The proposed project would provide sufficient parking to meet the needs of the proposed project. The proposed project would also widen Valley Boulevard to ensure adequate site access. These features would provide safe and reliable accessibility and mobility for people and goods to and within the project site.
<b>Goal 3.</b> Enhance the preservation, security, and resilience of the regional transportation system.	<b>Not Applicable.</b> The proposed project is not a transportation project and would not have a direct impact on the preservation and sustainability of the regional transportation system. Proposed roadway improvements within the project site and on Valley Boulevard would be consistent with the General Plan's Circulation Element.
<b>Goal 4.</b> Increase person and goods movement and travel choices within the transportation system.	<b>Consistent.</b> See response to Goal 3.
<b>Goal 5.</b> Reduce greenhouse gas emissions and improve air quality.	<b>Consistent:</b> As discussed in Section 5.2, <i>Air Quality</i> , the proposed project would result in less-than-significant impacts related to air pollutant emissions after incorporation of Tier 4 Final construction equipment. Additionally, as discussed in Section 5.7, <i>Greenhouse Gas Emissions</i> , the proposed project would result in less-than-



## 5. Environmental Analysis

### LAND USE AND PLANNING

**Table 5.10-3 SCAG 2020-2045 RTP/SCS Goals Consistency Analysis**

Goals	Consistency Analysis
	significant impacts with respect to greenhouse gas emissions after compliance with CALGreen Tier 2 Nonresidential Voluntary Measures for EV charging infrastructure.
<b>Goal 6.</b> Support healthy and equitable communities.	<b>Consistent.</b> See response to Goal 5.
<b>Goal 7.</b> Adapt to a changing climate and support an integrated regional development pattern and transportation network.	<b>Consistent.</b> The proposed project would be required to comply with CALGreen, as adopted and amended by the City of Walnut, and with California Building Energy Efficiency Standards. The proposed project is also required to implement CALGreen Tier 2 Nonresidential Voluntary Measures for EV charging infrastructure, which exceeds the standards required in the code. Compliance with these standards and mitigation measures would ensure that the proposed project provides an energy-efficient development. Also, the proposed project's compliance with the City's TDM Ordinance would implement additional measures to reduce VMT and greenhouse gas emissions associated with the project.
<b>Goal 8.</b> Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	<b>Not Applicable.</b> This is not a project-specific goal and is therefore not applicable.
<b>Goal 9.</b> Encourage development of diverse housing types in areas that are supported by multiple transportation options.	<b>Not Applicable.</b> The proposed project is surrounded by commercial and industrial uses and does not propose new housing development.
<b>Goal 10.</b> Promote conservation of natural and agricultural lands and restoration of habitats.	<b>Not Applicable.</b> The project site is within an urban area concentrated with light industrial and commercial uses. The proposed project would not affect natural and agricultural lands or habitats. Also see Chapter 8, <i>Impacts Found not to be Significant</i> .
Source: SCAG 2020	

Based on the consistency analysis provided, the proposed project would be consistent with the City of Walnut's GPU, Municipal Code, and SCAG's RTP/SCS. Assuming approval of all requests, permits, and other mitigation measures in this SEIR, impacts related to the City's land use plans, regulations, and policies would be less than significant. Additionally, the proposed project would not result in any new or more substantial impacts when compared to the impacts evaluated in the GPEIR.

***Level of Significance Before Mitigation:*** Less than Significant.

#### 5.10.4 Cumulative Impacts

A cumulative impact would be considered significant if the project, taken together with past, present, and reasonably foreseeable projects in the identified area, would conflict with applicable land use plans, policies, or regulations. The proposed project includes the demolition of the existing buildings on-site, and development of four office/retail buildings. As discussed, the project site improvements would not physically divide an existing community. Further, the proposed project would be consistent with existing land uses and zoning and would not change any land use designation or zoning. The proposed project does not conflict with any adopted land use plan, policies, or regulations. Therefore, the proposed project would not contribute to a cumulative land use and planning impact, and the impact would be less than significant.

## 5. Environmental Analysis LAND USE AND PLANNING

### 5.10.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, Impacts 5.10-1 through 5.10-2 would be less than significant.

### 5.10.6 Mitigation Measures

#### 5.10.6.1 MITIGATION MEASURES FROM THE GPEIR

There are no land use and planning mitigation measures in the GPEIR.

#### 5.10.6.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

No additional project-specific mitigation measures are required.

### 5.10.7 Level of Significance After Mitigation

Impacts 5.10-1 through 5.10-2 would be less than significant.

### 5.10.8 References

Southern California Association of Governments (SCAG). 2020, September 3. *Connect SoCal Plan: The 2020–2045 Regional Transportation Plan / Sustainable Communities Strategy of the Southern California Association of Governments*. <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>.

Walnut, City of. 2018. *The City of Walnut General Plan*. <https://www.cityofwalnut.org/for-residents/departments/community-development/planning-division/walnut-general-plan-and-zoning>.

———. 2023, October. Walnut, CA Municipal Code. [https://library.qcode.us/lib/walnut\\_ca/pub/municipal\\_code/item/title\\_3-chapter\\_3\\_40?view=all](https://library.qcode.us/lib/walnut_ca/pub/municipal_code/item/title_3-chapter_3_40?view=all).

## 5. Environmental Analysis

### LAND USE AND PLANNING

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## 5. Environmental Analysis

### 5.11 NOISE

This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates the potential for implementation of the proposed project to impact existing noise conditions in comparison to the impacts evaluated for the project site in the GPEIR. Also reviewed are potential changes to circumstances since the GPEIR that could result in new significant or substantially more severe environmental impacts for the project. Cumulative impacts related to noise are considered. This section discusses the fundamentals of sound; examines state and local noise guidelines, policies, and standards; characterizes existing noise levels in the project area; and evaluates potential noise and vibration impacts associated with the proposed project. Noise modeling worksheets are in Appendix M of this SEIR.

Three comment letters were received during the NOP public review period, and three comments were received during scoping meetings regarding impacts to surrounding residences from the potential traffic noise increase. The relevant issues are addressed throughout this section, mostly in Section 5.11.3.2. For a summary of the response letters, refer to Chapter 2, Table 2-1, *NOP and Scoping Meeting Comments Summary*, or Appendix A.

#### 5.11.1 Environmental Setting

##### 5.11.1.1 NOISE AND VIBRATION FUNDAMENTALS

Noise is defined as unwanted sound and, if overexposed, is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” The following are brief definitions of terminology used in this section:

##### Technical Terminology

- **Sound.** A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.
- **Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- **Decibel (dB).** A unitless measure of sound on a logarithmic scale.
- **A-Weighted Decibel (dBA).** An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Equivalent Continuous Noise Level (Leq); also called the Energy-Equivalent Noise Level.** The value of an equivalent, steady sound level which, in a stated time period (often over an hour) and at a stated location, has the same A-weighted sound energy as the time-varying sound. Thus, the Leq metric is a single numerical value that represents the equivalent amount of variable sound energy received by a receptor over the specified duration.

## 5. Environmental Analysis

### NOISE

- **Statistical Sound Level ( $L_n$ ).** The sound level that is exceeded “n” percent of time during a given sample period. For example, the  $L_{50}$  level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period); that is, half of the sampling time, the changing noise levels are above this value and half of the time they are below it. This is called the “median sound level.” The  $L_{10}$  level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum) and this is often known as the “intrusive sound level.” The  $L_{90}$  is the sound level exceeded 90 percent of the time and is often considered the “effective background level” or “residual noise level.”
- **$L_{\min}$  and  $L_{\max}$ .** The lowest and highest measured noise levels, in terms of root-mean-square noise levels.
- **Day-Night Sound Level ( $L_{dn}$  or DNL).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the sound levels occurring during the period from 10:00 pm to 7:00 am.
- **Community Noise Equivalent Level (CNEL).** The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dBA added from 7:00 pm to 10:00 pm and 10 dBA from 10:00 pm to 7:00 am. For general community/environmental noise, CNEL and  $L_{dn}$  values rarely differ by more than 1 dBA (with the CNEL being only slightly more restrictive, that is, higher than the  $L_{dn}$  value). As a matter of practice,  $L_{dn}$  and CNEL values are interchangeable and are treated as equivalent in this assessment.
- **Sensitive Receptor.** Noise- and vibration-sensitive receptors include land uses where quiet environments are necessary for enjoyment and public health and safety. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, and nursing homes are examples.
- **Peak Particle Velocity (PPV).** The peak rate of speed at which soil particles move (e.g., inches per second) due to ground vibration.
- **Vibration Decibels (VdB).** Vibration is expressed in vibration decibels (VdB). The level of vibration represents how much the ground is moving.

### Sound Fundamentals

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in Hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the decibel. Changes of 1 to 3 dBA are detectable under quiet, controlled conditions, and changes of less than 1 dBA are usually indiscernible. A 3 dBA change in noise levels is considered the minimum change that is detectable with human hearing in outside environments. A change of 5 dBA is readily discernable to most people in outside environments, and a 10 dBA change is perceived as a doubling (or halving) of the sound.

The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are “felt” more as a vibration. Similarly, while people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about

## 5. Environmental Analysis

### NOISE

10,000 Hz and below about 200 Hz. Since the human ear is not equally sensitive to sound at all frequencies, a special frequency dependent rating scale is usually used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

### Sound Measurement

Sound pressure is measured through the A-weighted measure to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies similar to the human ear's response to those frequencies.

Unlike linear units such as inches or pounds, decibels are measured on a logarithmic scale, as points on a sharply rising curve. On a logarithmic scale, an increase of 10 dBA is 10 times more intense than 1 dBA, 20 dBA is 100 times more intense than 1 dBA, and 30 dBA is 1,000 times more intense than 1 dBA. A sound as soft as human breathing is about 10 times greater than 0 dBA. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud).

A sound's decibel level decreases as the distance increases from the source of the sound. Sound dissipates exponentially with distance from its source, and this phenomenon is known as "spreading loss." For a single point source, sound levels decrease by approximately 6 dBA for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by on-site operations from stationary equipment or activity at a project site. If noise is produced by a line source, such as highway traffic, the sound decreases by 3 dBA for each doubling of distance in a hardscape environment, such as buildings, pavement, and other hard surfaces. Line source noise in a relatively flat environment with absorptive soft surfaces, such as vegetation, decreases by 4.5 dBA for each doubling of distance.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time period (called  $L_{eq}$ ), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example,  $L_{50}$  represents the noise level that is exceeded 50 percent of the time; that is, the noise level exceeds the  $L_{50}$  half the time, and is less than the  $L_{50}$  half the time, or,  $L_{50}$  is exceeded 30 minutes in an hour. Similarly, the  $L_2$ ,  $L_8$ , and  $L_{25}$  values represent the noise levels that are exceeded two, eight, and 25 percent of the time or one, five, and 15 minutes per hour. These "L" values are typically used to demonstrate compliance with a city's noise ordinance, as discussed below. Other noise descriptors typically noted during a noise survey are the  $L_{min}$  and  $L_{max}$ , the lowest and highest sound levels during the measurement period (in terms of root-mean-square noise levels).

Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, an artificial dB increment is added to these "quiet time" noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL) or Day-Night Noise Level ( $L_{dn}$ ). The CNEL descriptor adds an artificial increment of 5 dBA to the actual noise level for the hours from 7:00 pm to 10:00 pm and 10 dBA for the hours from 10:00 pm to 7:00 am. The  $L_{dn}$  descriptor uses the same methodology except that it only adds 10 dBA from 10:00 pm to 7:00 am. Both descriptors give roughly the same 24-hour level, with the CNEL being only slightly more restrictive (i.e., higher).

## 5. Environmental Analysis

### NOISE

#### Psychological and Physiological Effects of Noise

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, affecting blood pressure, functions of the heart, and the nervous system. Extended periods of noise exposure above 90 dBA can result in permanent hearing damage. When the noise level reaches 120 dBA, it causes a tickling sensation the human ear called the “threshold of feeling.” As the sound reaches 140 dBA, the tickling sensation is replaced by pain, called the “threshold of pain.” Table 5.11-1, *Typical Noise Levels* shows typical noise levels from familiar noise sources.

**Table 5.11-1 Typical Noise Levels**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Onset of physical discomfort	120+	
	110	Rock Band (near amplification system)
Jet Flyover at 1,000 feet		
	100	
Gas Lawn Mower at three feet		
	90	
Diesel Truck at 50 feet, at 50 mph		Food Blender at 3 feet
	80	Garbage Disposal at 3 feet
Noisy Urban Area, Daytime		
	70	Vacuum Cleaner at 10 feet
Commercial Area		Normal speech at 3 feet
Heavy Traffic at 300 feet	60	
		Large Business Office
Quiet Urban Daytime	50	Dishwasher Next Room
Quiet Urban Nighttime	40	Theater, Large Conference Room (background)
Quiet Suburban Nighttime		
	30	Library
Quiet Rural Nighttime		Bedroom at Night, Concert Hall (background)
	20	
		Broadcast/Recording Studio
	10	
Lowest Threshold of Human Hearing	0	Lowest Threshold of Human Hearing

Source: Caltrans 2013.

## 5. Environmental Analysis

### NOISE

#### 5.11.1.2 REGULATORY BACKGROUND

Federal, State, regional, and local regulations are listed in Table 5.11-2. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals Policies*, for the full list of GPU policies.

**Table 5.11-2 Regulations/Plans for Cultural Resources**

State	
California Green Building Standards Code (CALGreen)	Requires a lead agency to ensure that new or remodeled buildings that are of nonsensitive land uses have an interior noise level of 50 dBA $L_{eq}$ or have the required transmission loss ratings for wall, window, and roof assemblies.
California General Plan Guidelines	Establishes the States requirements for how existing ambient noise levels influences future and existing developments and defines the allowed land use to be developed.
Local	
City of Walnut General Plan	Goals and policies relevant to noise are listed in the Noise Element. Establishes the City's procedures and guidelines for future and existing land uses based on ambient noise levels. Should noise levels for an existing sensitive land use be in a normally or clearly unacceptable noise level, an interior noise analysis should be conducted to ensure a 45 dBA $L_{eq}$ threshold can be met.
City of Walnut Municipal Code Section 3.40.050.	Sets the exterior noise threshold at various land uses for stationary or operational equipment (e.g. HVAC).

#### 5.11.1.3 EXISTING CONDITIONS

##### Existing Noise Environment

The project site is in a predominantly commercial/industrial area of the City of Walnut that is characterized by traffic noise along Valley Boulevard, South Lemon Avenue, and other local roadways. Intermittent noise from nearby commercial/industrial land uses also contributes to the overall noise environment in the project vicinity. Existing traffic noise levels were calculated using the FHWA Highway Noise Prediction Model (FHWA-RD-77-108) with traffic counts provided by Iteris (Iteris 2024). Modeled traffic volumes were derived from traffic turning movements at study intersections within the traffic report. The traffic noise model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by Caltrans. The 60, 65, and 70 dB(A) CNEL traffic noise contours for the project area roadways are shown in Table 5.11-3, *Existing Traffic Noise Levels*.



## 5. Environmental Analysis

### NOISE

**Table 5.11-3 Existing Traffic Noise Levels**

Roadway	Segment		dB(A) L <sub>dn</sub> at 100 feet	Distance to Noise Contour (feet)		
	From	To		70 dB(A) L <sub>dn</sub>	65 dB(A) L <sub>dn</sub>	60 dB(A) L <sub>dn</sub>
Valley Blvd	from the West	Camino De Teodoro/Fairway Dr	70	109	234	504
	Camino De Teodoro/Fairway Dr	Lemon Ave	70	109	234	504
	Lemon Ave	Paseo Sonrisa	71	132	283	610
	Paseo Sonrisa	Paseo Tesoro	70	101	217	467
	Paseo Tesoro	Pierre Rd	70	103	221	477
	Pierre Rd	S Brea Canyon Rd	70	114	245	527
	S Brea Canyon Rd	to the East	72	137	296	637
Lemon Ave	from the North	Paseo Del Prado	65	51	109	235
	Paseo Del Prado	Valley Blvd	65	50	108	232
	Valley Blvd	to the South	68	82	178	383
Paseo Del Prado	Lemon Ave	Paseo Sonrisa	54	9	20	43
	Paseo Sonrisa	Paseo Tesoro	49	4	9	19
Paseo Sonrisa	Valley Blvd	Paseo Del Prado	49	4	9	19
Paseo Tesoro	Valley Blvd	Paseo Del Prado	49	4	9	20
Fairway Dr	Valley Blvd	to the South	66	57	122	263

Source: Calculated using the Federal Highway Administration RD-77-108 model based on traffic data provided by Iteris. For traffic noise calculations (see Appendix M,

### Sensitive Receptors

Certain land uses, such as residences, schools, and hospitals, are particularly sensitive to noise and vibration. Sensitive receptors include residences, senior housing, schools, places of worship, and recreational areas. These uses are regarded as sensitive because they are where people most frequently engage in activities that are likely to be disturbed by noise, such as reading, studying, sleeping, resting, or quiet or passive recreation. Commercial and industrial uses are not particularly sensitive to noise but are still evaluated in terms of vibration damage.

The nearest off-site sensitive receptors to the project site boundary are the residences to the north at 20332 Carrey Road, approximately 515 feet from the nearest project site boundary.

### 5.11.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would result in:

## 5. Environmental Analysis NOISE

- N-1 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.
- N-2 Generation of excessive groundborne vibration or groundborne noise levels.
- N-3 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, if the project would expose people residing or working in the project area to excessive noise levels.

### 5.11.2.1 TRANSPORTATION NOISE THRESHOLDS

A project would have a significant effect on the environment related to noise if it substantially increases the ambient noise levels at noise sensitive receptors. As discussed in section 5.11.1.1 under “Sound Fundamentals,” most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an outdoor environment. Thresholds of significance that are based on this and similar to those recommended by the Federal Aviation Administration are used to assess traffic noise impacts at sensitive receptor locations. Noise levels above 70 dBA CNEL are normally unacceptable at sensitive receptor locations such as residences, and noise environments in these areas would be considered degraded. Therefore, a significant impact would result from the following traffic noise increases:

- If project-related traffic noise increases the ambient noise levels at the property line of sensitive land uses by 3 dBA CNEL to or within the “normally unacceptable” or “clearly unacceptable” noise-level categories (as shown in Table N-4 of Appendix M); and an interior noise level of 45 dBA CNEL cannot be met at the sensitive land uses; or
- If the project causes the ambient noise levels measured at the property line of sensitive land uses to increase by 5 dBA CNEL or more in areas that lie within the “clearly acceptable” or “normally acceptable” noise levels (see Table N-4 of Appendix M).

### 5.11.2.2 CONSTRUCTION NOISE THRESHOLDS

The City of Walnut does not have a quantified construction noise threshold. Therefore, the Federal Transit Administration’s (FTA) temporary construction noise criteria of 80 dBA  $L_{eq}$  is used to determine impact significance at off-site noise sensitive receptors.

### 5.11.2.3 STATIONARY NOISE THRESHOLDS

As discussed in Section 5.11.1.2, *Regulatory Background*, the City of Walnut Municipal Code, Section 3.40.050, establishes exterior residential noise standards that are used to determine impact significance for stationary noise sources (noise sources that are considered stationary sources can include speech from conversations, use of patios, decks, balconies, loading docks, and permanent mechanical equipment like air conditioning units, cooling towers, generators, etc.). Therefore, a significant stationary noise impact would result if project-related stationary noise would increase the ambient or presumed ambient noise environment for residential land uses

## 5. Environmental Analysis

### NOISE

above 50 dBA  $L_{eq}$  during the daytime hours of 7:00 am to 10:00 pm or 45 dBA  $L_{eq}$  during the nighttime hours of 10:00 pm to 7:00 am (see Table N-1 of Appendix M).

#### 5.11.2.4 VIBRATION THRESHOLDS

The City of Walnut does not have quantified vibration damage standards. The FTA criteria for vibration damage for various types of buildings are summarized in Table 5.11-4, *Groundborne Vibration Damage Criteria*, and used to determine impact significance.

**Table 5.11-4 Groundborne Vibration Damage Criteria**

Building Category		PPV (in/sec)
I.	Reinforced concrete, steel, or timber (no plaster)	0.5
II.	Engineered concrete and masonry (no plaster)	0.3
III.	Non-engineered timber and masonry buildings	0.2
IV.	Buildings extremely susceptible to vibration damage	0.12

Source: FTA 2018.  
PPV = peak particle velocity

### 5.11.3 Environmental Impacts

#### 5.11.3.1 2018 GENERAL PLAN UPDATE

##### Long-Term Noise Impacts

The GPEIR identified impacts to sensitive receptors in Walnut in terms of long-term operational noise impacts. The GPEIR found that major local roadways and the active railroad tracks along Valley Boulevard are in excess of 65 dBA CNEL at the nearest off-site sensitive receptors north of Valley Boulevard. The GPEIR notes that future development in Walnut would exacerbate this problem by increasing noise levels, though only by 1 dBA overall. Future projects would be required to provide an acoustical study to ensure that new development is compatible with the Land Use Compatibility Criteria and ensure that interior noise levels of sensitive structures preserve the State of California interior noise level requirements of 45 dBA CNEL. Nevertheless, impacts to long-term noise would remain **significant and unavoidable**.

##### Short-Term Noise Impacts

The GPEIR also identified potential impacts from short-term noise in Walnut, such as from construction activity. The GPEIR incorporated Mitigation Measure N-1 to outline proper procedures in the event of construction noise exceeding the ambient noise level or local standards. This mitigation would ensure that construction equipment is well maintained and uses the proper muffler or that quieter equipment alternatives are used to reduce noise levels from the proposed project site(s). Furthermore, equipment would be as far as possible from nearby off-site sensitive receptors to ensure noise levels are reduced. Temporary noise barriers and noise disturbance coordinator would also be used to reduce noise levels and respond to neighborhood

## 5. Environmental Analysis

### NOISE

complaints. The GPEIR could not determine if implementation of this mitigation measure would reduce noise levels to less than significant; therefore, impacts were found to be **significant and unavoidable**.

#### Vibration Impacts

The GPEIR noted the potential for construction and operational vibration impacts during future development activities. In the event of vibration impacts, Mitigation Measures N-2 and N-3 would help reduce vibration impacts. The GPEIR concluded that if construction or operational vibration exceed vibration thresholds, Mitigation Measures N-2 and N-3 would require a vibration study, which would ensure that impacts of human annoyance and structural damage are less than significant.

#### Airport Noise Impacts

The GPEIR found that the nearest airport is over eight miles from Walnut. Noise contours from the nearest airports are outside of the City's sphere of influence; therefore, impacts from airport noise to the City of Walnut are less than significant.

#### 5.11.3.2 METHODOLOGY

This section analyzes impacts related to short-term construction noise and vibration, as well as operational noise and vibration associated with operational buildout of the proposed project. Construction is anticipated to start in January of 2025 and be completed by May of 2026. Methodologies to assess noise are described below.

#### Construction Noise and Vibration

Construction noise includes two main sources: construction-related traffic (worker, vendor, and haul truck trips) and construction equipment (associated with actual construction activities on-site). Construction noise modeling used the FHWA Roadway Construction Noise Model with construction equipment mix based on CalEEMod defaults (the air quality modeling tool) and assumed no pile driving but did include rock crushing equipment. Project vibration impacts are addressed using reference vibration levels for construction equipment published by FTA (FTA 2018).

#### Operational Noise and Vibration

Assessment of operational noise resulting from full buildout of the project site considers three main noise components: noise associated with increased traffic generated by the project, noise associated with stationary equipment that would be developed on the project site, and noise associated with an overall increase in activity on-site because of the new development.

Traffic noise increases are calculated using a version of the FHWA RD-77-108 Traffic Noise Prediction Model. The traffic noise prediction model takes into account the following inputs: average daily traffic (ADT) volumes; vehicle mix; speeds; number of lanes; and day, evening, and night traffic splits. Model inputs associated with transportation noise were provided by Iteris (see Appendix M).

## 5. Environmental Analysis

### NOISE

Model inputs for noise associated with stationary equipment was based on a conservative assumption of where stationary equipment could be located. Upon review of the conceptual site plan, Building 2 was assumed to be the closest to nearby off-site sensitive receptors. Calculations for loading dock operations were calculated from the edge of the loading docks closest to the off-site sensitive receptors. Noise associated with an overall increase in project activity on the site is discussed qualitatively and considered in conjunction with the modeled noise components.

#### 5.11.3.3 IMPACT ANALYSIS

The following impact analysis addresses the thresholds of significance in Section 5.11.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.11-1: Construction activities would result in temporary noise increases in the vicinity of the proposed project that would not exceed local standards. [Threshold N-1]**

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#### Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along main access roadways, including but not limited to South Lemon Avenue, Valley Boulevard, Paseo Del Prado, Paseo Tesoro, and Paseo Sonrisa. Individual construction vehicle pass-bys and haul trucks may create momentary noise levels of up to 85 dBA ( $L_{max}$ ) at 50 feet from the vehicle, but these occurrences would be temporary and generally short lived as trucks pass by.

Based on CalEEMod outputs, the proposed project would generate up to 242 daily worker and vendor trips during building construction phases and up to 88 daily haul truck trips during fine grading soil haul (see Appendix D-a, *Air Quality and Greenhouse Gas Emissions Data*). The addition of temporary worker and vendor trips and haul truck trips would result in a noise increase of less than 1 dBA CNEL along access roadways. Therefore, temporary construction vehicles would not generate an increase in ambient noise levels in the vicinity of the project in excess of established standards. Impacts would be **less than significant**.

#### Construction Equipment

Noise generated during construction on the project site is based on the type of equipment used, the location of the equipment relative to off-site sensitive receptors, and the timing and duration of the noise-generating activities. Each activity phase of construction involves the use of different construction equipment and therefore each activity phase has its own distinct noise characteristics. Noise levels from construction activities are dominated by the loudest piece of construction equipment. The dominant noise source is typically the engine, although work piece noise (such as dropping of materials) can also be noticeable.

Construction activities associated with the proposed project would require rock crushing, which generate moderately high noise levels compared to other construction activities. Demolition and paving also generates high noise levels—second to pile driving and rock crushing—because it requires large equipment. Construction noise levels can often vary at any given sensitive receptor based on factors such as noise attenuation due to distance between the noise source and receptor, the number and types of equipment in use at a given time, and

## 5. Environmental Analysis

### NOISE

the load and power requirements to accomplish tasks for each construction activity. Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of 85 dBA at 50 feet. Since noise from construction equipment is intermittent and diminishes at a rate of 6 dBA per doubling distance,<sup>1</sup> the average noise levels at noise-sensitive receptors (the closest of which is the single-family residence at 20332 Carrey Road approximately 515 feet to the north) would be lower because mobile construction equipment would move around the site with different loads, power requirements, and distances from source to receptor.

Noise levels from project-related construction activities were calculated by combining the simultaneous use of the three loudest pieces of construction equipment during overlapping and non-overlapping construction components at spatially averaged distances (i.e., from the acoustical center of each disturbance area per phase such as grading, site preparation, and demolition) to the nearest receptors, with the exception of paving, building construction, rock crushing, architectural coating, finishing/landscape, and utility trenching. Although construction may occur across the entire construction area, the area around the center of most phases (e.g., grading, site prep, demolition) best represents the potential average construction-related noise levels at the various sensitive receptors. Noise levels generated from building construction, rock crushing, and architectural coatings at sensitive receptors are determined by measuring the distance from the edge of the nearest proposed building, as shown in the conceptual site plan, to the nearest off-site sensitive receptor. Finishing/landscaping and utility trenching are measured from the project site boundary to the nearest off-site sensitive receptor. As seen in Table 5.11-5, *Project-Related Construction Noise*, construction noise would not exceed the 80 dBA  $L_{eq}$  at the nearest off-site noise-sensitive receptors to the north (20332 Carrey Road). Therefore, impacts related to temporary noise increases in the vicinity of the proposed project in excess of established standards would be **less than significant**. Incorporation of Mitigation Measure N-1 from the GPEIR would not be necessary because noise levels would be below the FTA thresholds for construction noise at sensitive receptors. The proposed project would not result in new or substantially more severe significant impacts to short-term noise when compared to the GPEIR.

**Table 5.11-5 Project-Related Construction Noise**

Activity Phase	dBA Leq				
	RCNM Reference Noise Level	Single-Family Residence to the North at 20600 Fuero Drive	Animal Hospital of Walnut to the East at 20670 E, Carrey Road	School Building to the Southeast at 476 S Lemon Avenue	Single-Family Residence to the North at 20332 Carrey Road
<i>Distance in feet</i>	50	1,575	1,580	1,370	920
Demolition	84	54	54	55	59
Site Prep	83	53	53	54	58
Grading	83	53	53	54	58
<i>Distance in feet</i>	50	960	870	990	545
Building Construction	82	56	57	56	61
Architectural Coating	74	48	49	48	53
Rock Crushing	83	57	58	57	62
<i>Distance in feet</i>	50	900	815	900	600
Paving	84	59	60	59	62

<sup>1</sup> The sound attenuation rate of 6 dBA is generally conservative and does not consider additional attenuation provided by existing buildings, structures, and natural landscapes around the project site.

## 5. Environmental Analysis

### NOISE

**Table 5.11-5 Project-Related Construction Noise**

Activity Phase	dBA Leq				
	RCNM Reference Noise Level	Single-Family Residence to the North at 20600 Fuero Drive	Animal Hospital of Walnut to the East at 20670 E, Carrey Road	School Building to the Southeast at 476 S Lemon Avenue	Single-Family Residence to the North at 20332 Carrey Road
<i>Distance in feet</i>	50	840	720	780	515
Finish/Landscaping	83	58	60	59	63
Utility Trenching	83	58	60	59	63
<b>Maximum dBA Leq</b>		59	60	59	63
<b>Exceeds 80 dBA Leq Threshold?</b>		No	No	No	No

Sources: Roadway Construction Noise Model 2.0 (RCNM) and CalEEMod defaults in addition to assumed rock crushing equipment.

**Level of Significance Before Mitigation:** Less than significant.

#### **Impact 5.11-2 Project implementation would result in long-term operation-related noise that would not exceed local standards. [Threshold N-1]**

The proposed project would result in the generation of operational noise related to the increase in traffic; stationary noise such as mechanical equipment, loading activity, and overall increase in activity on-site because of the new development.

#### **Operational Traffic Noise**

ADT values provided by Iteris (see Appendix O) are used to determine any significant increase in traffic noise from the Opening Year 2026 and Buildout Year 2040 without and with project traffic scenarios due to the proposed project. Traffic noise increases were calculated by comparing the with- to the without-project traffic noise levels for Opening Year 2026 and Buildout Year 2040 traffic scenarios for roadway segments in the project site area. The year 2040 ADT segment volumes involve the trips from the proposed project as well as any foreseeable future projects in the city. As mentioned in Section 5.11.2, *Thresholds of Significance*, a significant traffic noise impact would occur if:

- If project-related traffic noise increases the ambient noise levels at the property line of sensitive land uses by 3 dBA CNEL to or within the “normally unacceptable” or “clearly unacceptable” noise-level categories (as shown in Table N-1 of Appendix M); and an interior noise level of 45 dBA CNEL cannot be met at the sensitive land uses; or
- If the project causes the ambient noise levels measured at the property line of sensitive land uses to increase by 5 dBA CNEL or more in areas that lie within the “clearly acceptable” or “normally acceptable” noise levels (see Table N-1 of Appendix M).

As shown in Table 5.11-6, *Project Traffic Noise Related Increases*, the project would result in a maximum 2 dBA increase over Opening Year 2026 and Buildout Year 2040 conditions and would not exceed the threshold of

## 5. Environmental Analysis

### NOISE

3 dBA CNEL. Therefore, impacts are considered **less than significant**. The proposed project would not result in new or substantially more severe significant impacts to long-term traffic noise when compared to the GPEIR.

**Table 5.11-6 Project Traffic Related Noise Increases**

Roadway	From	To	dBA, CNEL at 100 feet from Centerline				Traffic Noise Increase (dBA CNEL)	
			Opening Year (2026) No Project	Opening Year (2026) With Project	Buildout Year (2040) No Project	Buildout Year (2040) With Project	Opening Year 2026	Buildout Year 2040
Valley Blvd	from the West	Camino De Teodoro /Fairway Dr	71	71	71	71	<1	<1
	Camino De Teodoro /Fairway Dr	Lemon Ave	70	71	71	71	<1	1
	Lemon Ave	Paseo Sonrisa	70	70	71	71	<1	<1
	Paseo Sonrisa	Paseo Tesoro	70	70	70	70	<1	<1
	Paseo Tesoro	Pierre Rd	70	70	70	70	<1	<1
	Pierre Rd	S Brea Canyon Rd	71	71	71	71	<1	<1
	S Brea Canyon Rd	to the East	72	72	72	73	<1	<1
Lemon Ave	from the North	Paseo Del Prado	66	66	66	66	<1	<1
	Paseo Del Prado	Valley Blvd	66	66	66	66	<1	<1
	Valley Blvd	to the South	67	67	67	67	<1	<1
Paseo Del Prado	Lemon Ave	Paseo Sonrisa	54	55	54	55	<1	<1
	Paseo Sonrisa	Paseo Tesoro	49	50	49	50	1	1
Paseo Sonrisa	Valley Blvd	Paseo Del Prado	49	51	49	51	2	2
Paseo Tesoro	Valley Blvd	Paseo Del Prado	49	51	49	51	2	2
Fairway Dr	Valley Blvd	to the South	66	66	66	67	<1	<1
Maximum CNEL Increase							1	2
Potentially Significant?							No	No

Source: Iteris. 2024.

### Mechanical Equipment and Loading Activities

The project proposes to construct commercial buildings, which are anticipated to have heating, ventilation, and air conditioning (HVAC) units. For a conservative analysis, it is assumed that HVAC equipment could be installed at the edge of the proposed buildings facing Paseo Del Prado. Typical HVAC noise levels are 72 dBA at a distance of 3 feet. The nearest off-site sensitive receptor to the nearest proposed buildings is the single-family residence at 20332 Carrey Road at approximately 515 feet north of the project site. At 515 feet, noise levels would attenuate to 27 dBA or less. This would not exceed the presumed exterior nighttime and daytime ambient noise levels of 45 and 50 dBA, respectively. Therefore, the proposed project's noise from stationary mechanical equipment would not result in a permanent increase in ambient noise levels in the vicinity of the project in excess of established standards, and noise impacts from the proposed project's stationary mechanical equipment would be **less than significant**.



## 5. Environmental Analysis

### NOISE

The proposed project would include commercial uses that could include loading and unloading activities from delivery trucks. It is also assumed that delivery trucks could be equipped with transport refrigeration units, which are noise generators. Conservatively, it is currently assumed that loading activities can occur at any time of the day.

PlaceWorks measured noise levels for loading and unloading activities from delivery trucks with attached transport refrigeration units in 2019 for analysis of the Westminster Mall Specific Plan (see Appendix M), indicating that noise levels are typically 66 dBA  $L_{eq}$  at a distance of 20 feet for one truck. To be conservative, it is assumed that two adjacent delivery trucks could be unloading at the same time. Table 5.11-7, *Delivery Truck Loading Activity Noise*, shows the attenuated noise levels at the nearest off-site residences approximately 680 feet to the north of Building 2's loading dock. At this distance, noise levels would attenuate to 38 dBA  $L_{eq}$  or less, which would not exceed the City's daytime and nighttime thresholds of 50 and 45 dBA  $L_{eq}$ , respectively, and would not cause a substantial increase over existing noise levels. Therefore, the proposed project's loading activities would not result in a permanent increase in ambient noise levels in the vicinity of the project and would not exceed established standards, and impacts from the proposed project's loading activities would be **less than significant**. The proposed project would not result in new or substantially more severe significant impacts due to operational noise when compared to the GPEIR.

**Table 5.11-7 Delivery Truck Loading Activity Noise**

Noise Source	dBA $L_{eq}$	
	Reference Measured Noise Levels	Noise Level at Off-Site Residence approximately 680 feet north of Building 2 at 20332 Carrey Road
Adjusted Reference Level for 2 Trucks at 20 feet	69	38
Exceeds Daytime or Nighttime Municipal Code Standard of 50 or 45 dBA, respectively		No

**Level of Significance Before Mitigation:** Less than significant.

**Impact 5.11-3: The project would not create excessive short/long term groundborne vibration and groundborne noise. [Threshold N-2]**

### Vibration Annoyance

Groundborne vibration is rarely annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers. For annoyance, vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames. Since construction activities are typically distributed throughout the project site, vibration annoyance impacts are typically based on average vibration levels (levels that would be experienced by sensitive receptors most of the time). Therefore, to represent the worst-case scenario, Table 5.11-8 calculates vibration levels at the nearest off-site sensitive receptor buildings from different construction equipment. Distances were measured from the edge of the project site boundary to the façade of the nearest off-site sensitive receptors. For vibration annoyance, the FTA vibration level limit of 72 VdB will apply to the surrounding residential receptors. The GPEIR found the GPU did not address vibration annoyance impacts

## 5. Environmental Analysis

### NOISE

and created Mitigation Measure N-2, which requires a vibration impact assessment if construction equipment is within 200 feet of an existing structure or off-site sensitive receptor.

Table 5.11-8 shows the vibration levels from typical earth-moving construction equipment at the nearest off-site sensitive receptors. As shown in the table, construction-generated vibration levels would not exceed 72 VdB at nearby off-site sensitive receptors. Therefore, impacts related to construction vibration annoyance would be **less than significant**, and Mitigation Measure N-2 has been completed for the proposed project. The proposed project would not result in new or substantially more severe significant impacts due to vibration annoyance when compared to the GPEIR.

**Table 5.11-8 Worst-Case Annoyance Vibration Levels from Construction Equipment**

Equipment	Vibration Levels (VdB)				
	Reference Levels at 25 feet	Single-Family Residence to the North at 20600 Fuero Drive (840 feet)	Animal Hospital of Walnut to the East at 20670 E, Carrey Road (720 feet)	School Building to the Southeast at 476 S Lemon Avenue (780 feet)	Single-Family Residence to the North at 20332 Carrey Road (515 feet)
Vibratory Roller	94.0	48.2	50.2	49.2	54.6
Clam Shovel	94.0	48.2	50.2	49.2	54.6
Hoe Ram	87.0	41.2	43.2	42.2	47.6
Large Bulldozer	87.0	41.2	43.2	42.2	47.6
Caisson Drilling	87.0	41.2	43.2	42.2	47.6
Loaded Trucks	86.0	40.2	42.2	41.2	46.6
Jackhammer	79.0	33.2	35.2	34.2	39.6
Small Bulldozer	58.0	12.2	14.2	13.2	18.6
FTA Threshold	-	72	72	72	72
Exceeds Threshold?	-	No	No	No	No

Source: FTA 2018.  
Note: Distances are the nearest distance from where these equipment pieces may be used to the nearest receptor building.

### Vibration Damage

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight architectural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

For reference, a vibration level of 0.2 in/sec PPV is used as the limit for non-engineered timber and masonry buildings (which would apply to the surrounding residential structures) (FTA 2018). When analyzing vibration damage, unlike vibration annoyance, non-sensitive structures are analyzed to determine if a significant impact would occur. The GPEIR found the GPU did not address vibration damage impacts and implemented Mitigation Measure N-2, which would require a vibration impact assessment should construction equipment

## 5. Environmental Analysis

### NOISE

be present within 200 feet of an existing structure or sensitive receptor. A vibration impact assessment was conducted for the proposed project because structures are within 200 feet of the project site.

Table 5.11-9 summarizes vibration levels for typical construction equipment at a reference distance of 25 feet and at the nearest buildings surrounding the project site. The nearest structure to proposed construction activities is the commercial building approximately 60 feet or less to the east of the project site. Table 5.11-9 shows that vibration levels would not exceed 0.2 in/sec PPV at off-site receptors from the proposed project, resulting in a **less than significant** impact, and Mitigation Measure N-2 has been completed for the proposed project. The proposed project would not result in new or substantially more severe significant impacts due to vibration damage when compared to the GPEIR.

**Table 5.11-9 Vibration Damage Levels for Typical Construction Equipment**

Equipment	PPV (in/sec)				
	FTA Reference at 25 feet	Commercial Building to the North at 20301 Paseo Del Prado (80 feet)	Commercial Building to the East at 20513 Valley Boulevard (60 feet)	Commercial Building to the South at 20401 Valley Boulevard (75 feet)	Commercial Building to the West at 353 South Lemon Avenue (190 feet)
Vibratory Roller	0.21	0.037	0.056	0.040	0.010
Clam shovel	0.202	0.035	0.054	0.039	0.010
Hoe Ram	0.089	0.016	0.024	0.017	0.004
Large Bulldozer	0.089	0.016	0.024	0.017	0.004
Caisson Drilling	0.089	0.016	0.024	0.017	0.004
Loaded Trucks	0.076	0.013	0.020	0.015	0.004
Jackhammer	0.035	0.006	0.009	0.007	0.002
Small Bulldozer	0.003	0.001	0.001	0.001	0.000

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

NA= Not Applicable

**Bold** = Threshold exceedance

### Operational Vibration

Sources of operational vibration typically include above- or underground rail systems such as a subway or railroad tracks. Since the proposed project includes the operation of commercial uses and does not include a rail system, subway, or rail tracks, it would not have any significant source of vibration. The GPEIR found that operational (rail) was not addressed under the policies of the GPU. Therefore, Mitigation Measure N-3 of the GPEIR required a groundborne vibration/noise analysis for future commercial and residential projects within 200 feet of rail tracks to minimize vibration disturbances. Since the proposed project is not within 200 feet from any existing rail tracks (closest project site boundary is approximately 210 feet north of the railroad), impacts would be less than significant, and Mitigation Measure N-3 is not required. The proposed project would not result in new or substantially more severe significant impacts due to operational vibration when compared to the GPEIR.

**Level of Significance Before Mitigation:** Less than significant.

## 5. Environmental Analysis

### NOISE

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**Impact 5.11-4: The proximity of the project site to an airport or airstrip would not result in exposure of future resident/workers to airport-related noise. [Threshold N-3]**

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The project site is not within an airport land use plan nor within two miles of a public airport or public use airport. The nearest airport is Brackett Field Airport in La Verne, approximately 6.6 miles northeast of the project site (AirNav 2023). The GPEIR found that the Brackett Field Airport was approximately 8 miles from Walnut, and the lowest airport noise contour (60 dBA CNEL) was over 2 miles from the city. Therefore, the proposed project would not result in new or substantially more severe significant impacts to airport noise when compared to the approved project.

*Level of Significance Before Mitigation:* Less than significant.

### 5.11.4 Cumulative Impacts

Projects that may be in development alongside the proposed project would include the Terraces at Walnut, approximately 1.72 miles northeast of the project site. Another development in the vicinity of the proposed project is the Brookside project, approximately 0.66 mile northwest of the project site. Given these distances, the proposed project's contribution to cumulative construction noise and vibration impacts would be less than significant. Typically, cumulative impacts from multiple projects for construction noise affect sensitive receptors within 500 feet of two or more projects. Cumulative vibration impacts occur at even shorter distances, typically 100 to 200 feet.

For operational noise, the Brookside project and the Terraces at Walnut are both predominantly residential developments; therefore, stationary impacts would be typically affect sensitive receptors adjacent to those projects but would not add to stationary noise at the proposed project's nearby sensitive receptors. Traffic noise would result in an increase, but as explained in the GPEIR, many roadways already exceed the normally or conditionally acceptable noise levels of the City of Walnut's land use compatibility guidelines. Therefore, any future residential projects or other sensitive receptor projects would need to provide an acoustical study to ensure the best mitigation practices are applied to the exterior of the residence and that an interior of 45 dBA CNEL can be met. Therefore, the noise produced from the proposed project would not be considered cumulatively significant.

### 5.11.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements, General Plan policies, and standard conditions of approval, Impacts 5.11-1, 5.11-2, 5.11-3, and 5.11-4 would be less than significant.

### 5.11.6 Mitigation Measures

#### 5.11.6.1 MITIGATION MEASURES FROM THE GPEIR

The mitigation measures from the GPEIR for potential noise and vibration impacts have been satisfied or do not apply to the proposed project as follows:

## 5. Environmental Analysis

### NOISE

- Mitigation Measure N-1 is not needed for the proposed project because construction noise will not exceed local noise standards.
- Mitigation Measure N-2 was completed during the preparation of this SEIR.
- Mitigation Measure N-3 does not apply to the proposed project because the project is not located within 200 feet of an existing railroad line.

#### 5.11.6.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

No additional mitigation measures or conditions of approval are required to reduce impacts to less than significant.

#### 5.11.7 Level of Significance After Mitigation

All impacts would be less than significant.

#### 5.11.8 References

AirNav, LLC. 2023. Airport Information. Accessed August 2, 2023. <http://www.airnav.com/airports>.

California Department of Transportation (Caltrans). 2013, September. Technical Noise Supplement (“TeNS”).

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## 5. Environmental Analysis

### 5.12 PUBLIC SERVICES

This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates the potential for implementation of the proposed project to impact public services, including fire protection and emergency services, police protection services, school services, and library services in comparison to the impacts evaluated for the General Plan Environmental Impact Report (GPEIR). Potential changes to circumstances since publication of the GPEIR that could result in new significant or substantially more severe environmental impacts for the proposed project are reviewed and cumulative impacts are also considered. Park services are addressed in Chapter 8, *Impacts Found Not to be Significant*. Public and private utilities and service systems, including water, wastewater, and solid waste services and systems, are addressed in Section 5.15, *Utilities and Service Systems*.

#### 5.12.1 Fire Protection and Emergency Services

The information in this section is based partly on a written service questionnaire response by the Los Angeles County Fire District (LACFD), dated October 5, 2023. A copy of this response is included in Appendix N of this Draft SEIR.

##### 5.12.1.1 ENVIRONMENTAL SETTING

##### Regulatory Background

Federal, State, regional, and local regulations are listed in Table 5.12-1, *Regulations/Plans for Fire Protection Services*. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of General Plan Update (GPU) policies.

**Table 5.12-1 Regulations/Plans for Fire Protection Services**

<b>Federal</b>	
International Fire Code	Regulates the minimum fire-safety requirements for new and existing buildings, facilities, storage, and processes and includes specialized, technical, fire- and life-safety regulations, with topics addressing fire-department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, use and storage of hazardous materials, protection of emergency responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings.
<b>State</b>	
California Fire Code (Title 24 California Code of Regulations, Part 9)	Based on the 2021 International Fire Code and includes amendments from the State of California, including fire access road requirements and water supply requirements for fire flow.
California Health and Safety Code Sections 13000 et seq.	Includes regulations for building standards (also in the California Building Code), fire-protection and notification systems; fire-protection devices, such as extinguishers and smoke alarms; high-rise building and childcare facility standards; and fire-suppression training.
<b>Regional</b>	
Los Angeles County Fire District (LACFD) Facilities Master Plan	Identifies existing and future LACFD fire station development needs.

## 5. Environmental Analysis

### PUBLIC SERVICES

**Table 5.12-1 Regulations/Plans for Fire Protection Services**

County of Los Angeles Fire Code	Adopts and incorporates the 2022 edition of the California Fire Code, with certain amendments, by the County of Los Angeles in the Fire Code, or Title 32, of the County's Municipal Code.
<b>Local</b>	
City of Walnut Municipal Code	Adopts the Los Angeles County Fire Code by reference as provided in Section 3.16.010, County Fire Code, of the City of Walnut Municipal Code.
City of Walnut General Plan	Goals and policies applicable to fire protection and emergency services are included in the Community Facilities and Infrastructure Element.

### Existing Conditions

Fire protection and medical aid services are provided to the project site and surrounding areas by the (LACFD. LACFD is a full-service fire department that provides fire suppression, urban search and rescue, paramedic ambulance service, fire prevention inspections/permits, public fire education programs, emergency preparedness planning, fire cause and origin investigation, fire patrols, and other services based on community needs. LACFD calls for service in the City of Walnut are dispatched from Station No. 61 at 20011 La Puente Road. Station No. 61 is also the closest fire station to the project site and is approximately 0.8 miles away. According to LACFD, the estimated response time to the project site from Station No. 61 is three minutes. Fire Station No. 61 is staffed with a three-person engine and a two-person paramedic squad. Other fire stations that would respond to the project site are Fire Station No. 146, which would be the second responding station; Fire Station No. 120, which would be the third responding station; and Fire Station No. 119, which would be the fourth responding station (see Table 5.12-2, *Fire Stations and Equipment Serving the Project Site*). LACFD has indicated that there are adequate fire protection services for existing development at the project and its vicinity (LACFD 2023).

**Table 5.12-2 Fire Stations and Equipment Serving the Project Site**

Station	Address	Equipment
<b>Los Angeles County Fire District</b>		
Los Angeles County Fire Station 61	20011 La Puente Road, Walnut, CA 91789	3-Person Engine 2-Person Paramedic Squad
Los Angeles County Fire Station 146	20604 E. Loyaltan Dr, Walnut, CA 91789	3-Person Engine
Los Angeles County Fire Station 120	1051 5. Grand Ave, Diamond Bar, CA 91765	4-Person Assessment Engine
Los Angeles County Fire Station 119	20480 Pathfinder Rd, Walnut, CA 91789	3-Person Engine 2-Person Paramedic Squad
Source: LACFD 2023		

#### 5.12.1.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project would normally have a significant effect on the environment if the project would:

## 5. Environmental Analysis PUBLIC SERVICES

FP-1 Result in a substantial adverse physical impact associated with the provisions 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 fire protection services.

### 5.12.1.3 ENVIRONMENTAL IMPACTS

#### 2018 General Plan Update

The GPEIR noted that LACFD provides fire protection and emergency services to Walnut and operates two stations, Station 61, which has a paramedic and a fire engine unit that responds to all emergencies, including accidents, fires, swift water rescues, and hazardous material spills, and Station 146, which has one fire engine and provides mutual aid to surrounding cities. According to Figure 18-1, *Fire Station Boundaries*, of the GPEIR, the project site is within the service boundary of Station 61.

The GPEIR notes that the anticipated population increase of Walnut would likely increase demand on fire services from LACFD. The GPEIR also notes that should the expansion or construction of fire facilities be necessary to meet the demands of buildout under the GPU, such actions would undergo a development review process and be subject to environmental review. When such development is proposed, impacts would be identified, along with measures to mitigate any significant impacts, as part of the CEQA compliance process for future project-specific planning actions. Furthermore, the goals, policies, or implementation measures of the GPU were expected to reduce potential environmental impacts. Therefore, impacts to fire protection and emergency services were found to be less than significant.

#### Impact Analysis

The following impact analysis addresses the thresholds of significance detailed in Section 5.12.1.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.12-1: The proposed project would introduce new structures and workers into the LACFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel. [Threshold FP-1]**

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The proposed project would result in a net increase of 57,234 square feet of building space on the project site when compared to baseline/existing conditions. The number of employees per square foot for the proposed project would be similar to the uses at the existing business park and those anticipated for the project site under the GPU. However, this increase in building square footage is expected to generate approximately 31 additional employees under the proposed project when compared to baseline.<sup>1</sup> This increase in on-site employees has the potential to increase the frequency of fire protection and emergency

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<sup>1</sup> Chapter 3, *Project Description*, describes the employee generation assumptions used to estimate the number of employees generated under the proposed project (one employee per 1,800 square feet of floor area). This assumption has been used to estimate the number of employees under the existing site uses (357,544 square feet of building space divided by 1,800 square feet per employee), which is 199 employees. The number of employees under the proposed project is estimated to be 230. However, the number of employees will ultimately depend on the business(es) and tenant(s) that operate out of the building.



## 5. Environmental Analysis

### PUBLIC SERVICES

medical calls to the project site. LACFD Fire Station No. 61 (20011 La Puente Road in the City of Walnut) is the nearest fire station to the project site, located approximately 0.8 miles north of the project site. LACFD has indicated that while each additional development generally creates greater demands on existing resources, the proposed project would not have a significant impact on the service demands of Station No. 61 (LACFD 2023). Therefore, current staffing and facilities at Station No. 61 would provide adequate fire protection and emergency services without the need for construction of additional facilities or expansion of existing facilities.

The proposed buildings that would be developed on the project site would be required by law to be constructed in accordance with the California Building Standards Code and Los Angeles County Fire Code. In addition, proposed building and fire plans would be reviewed by LACFD to ensure compliance with LACFD fire and life safety requirements, including adequate access for emergency vehicles and adequate fire hydrant placement and fire flows. For example, LACFD indicated that the proposed project would have an approximate fire flow requirement of 8,000 gallons per 4 hours at 20 pounds per square inch and would be required to comply with the fire flow requirements for buildings listed in County of Los Angeles Fire Code Appendix 8, Table 8105.1 (LACFD 2023).

As stated previously, the LACFD has indicated that the proposed project would have a less-than-significant impact on fire protection services and would not necessitate new or expanded off-site fire protection facilities. Additionally, based on the project site's proximity to LACFD Fire Station No. 61 and the requirement for project buildings to install appropriate fire suppression systems and comply with preventative fire measures from the California Building Standards Code and the Los Angeles County Fire Code, implementation of the proposed project would not result in nor require new or expanded off-site fire protection facilities. In addition, no fire stations are presently located on-site or are planned to be located on the project site. Therefore, there is no potential for the proposed project to have a direct physical impact related to fire protection facilities. The proposed project would not result in any new or substantially more severe impacts to fire protection facilities when compared to the impacts determined in the GPEIR.

***Level of Significance Before Mitigation:*** Impact 5.12-1 would be less than significant.

#### 5.12.1.4 CUMULATIVE IMPACTS

The area considered for cumulative impacts is the City of Walnut, in the service areas of LACFD fire station No. 61. The LACFD has indicated that the proposed project, in combination with all other projects currently planned in the area as of August 16, 2023 (the Notice of Preparation [NOP] release date), would have a negligible impact on LACFD's ability to provide fire protection services in the city.

Additionally, the population of Walnut is forecast to increase by approximately 4,853 residents under full buildout of the GPU and employment in the city is forecast to increase by approximately 9,321 jobs (City of Walnut 2018). The proposed project's net increase of 31 new jobs would therefore not exceed the City's employment projections. Other projects in the service area would add residents, workers, visitors, and structures to LACFD's service area, increasing demands for fire services and thus requiring additional LACFD staff, stations, and equipment. LACFD's Facilities Master Plan identifies existing and future LACFD fire station development needs based on the Southern California Association of Governments population

## 5. Environmental Analysis

### PUBLIC SERVICES

growth projections (LACFD 2020). Future projects would pay sales taxes, property taxes, and development impact fees; parts of each would be allocated for fire operations and facilities, to implement improvements identified in the Facilities Master Plan. Therefore, cumulative impacts would be less than significant after payments of such taxes and fees, and project impacts would not be cumulatively considerable.

#### 5.12.1.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, Impact 5.12-1 would be less than significant.

#### 5.12.1.6 MITIGATION MEASURES

##### Mitigation Measures from the GPEIR

There are no fire and emergency protection services mitigation measures in the GPEIR.

##### New Mitigation Measures/Conditions of Approval

No additional mitigation measures or conditions of approval are required to reduce impacts to less than significant.

#### 5.12.1.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

### 5.12.2 Police Protection

#### 5.12.2.1 ENVIRONMENTAL SETTING

##### Regulatory Background

The Public Services Element of the GPU contains goals and policies relevant to police protection services. See Appendix C, *General Plan Goals and Policies*, for the full list of GPU policies. There are no additional regulations that apply to police protection services.

##### Existing Conditions

Law enforcement in the City of Walnut is provided through contract with the Los Angeles County Sheriff's Department (LACSD), which uses a response time of 10 minutes, 20 minutes, and 60 minutes for emergency, priority, and routine calls for service, respectively (LACSD 2022). The Walnut/Diamond Bar Sheriff's Station serves the cities of Walnut and Diamond Bar, and unincorporated areas of Los Angeles County, such as Rowland Heights and Covina Hills. The station provides several programs and services, including bike patrol, volunteers on patrol, neighborhood watch, and substance abuse and narcotics education (LACSD 2023). The Walnut Sheriff's Station is at 21695 East Valley Boulevard, approximately 2.1 miles east of the project site.

## 5. Environmental Analysis

### PUBLIC SERVICES

#### 5.12.2.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- PP-1 Result in a substantial adverse physical impact associated with the provisions 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 police protection services.

#### 5.12.2.3 ENVIRONMENTAL IMPACTS

##### 2018 General Plan Update

The GPEIR states that the East Patrol Division of the LACSD serves the city through the Walnut/Diamond Bar Sheriff's Station on 21695 East Valley Boulevard in Walnut. The GPEIR also notes that between November 2016 to November 2017, the station's average response time was 4.2 minutes. Under buildout of the General Plan and West Valley Area Plan, population within the Sheriff Department's service area would increase. However, the GPEIR concludes that any site-specific conditions and physical changes to the environment that could result from construction or expansion of a new station would be subject to environmental review. Therefore, impacts are considered less than significant.

##### Impact Analysis

The following impact analysis addresses the thresholds of significance detailed in Section 5.12.2.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.12-2: The proposed project would introduce new structures and workers into the LACSD Walnut/Diamond Bar Station service boundaries, thereby increasing the requirement for police protection facilities and personnel. [Threshold PP-1]**

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The project site would be served by the Walnut/Diamond Bar Sheriff's Station on 21695 East Valley Boulevard in the City of Walnut. The proposed project would result in a net increase in building square footage and employees when compared to existing/baseline conditions. The proposed project's net increase of 31 employees at the project site would potentially increase the frequency of police calls to the project site.

The proposed project would include lighting for parking and loading dock areas in addition to security lighting throughout the site and on buildings. During the building permit plan check process, an LACSD police captain or police lieutenant would review the building plans before the City issues a building permit to determine the needs for crime prevention, such as installation of lighting systems, emergency notification systems, and/or crime prevention through environmental design. This preconstruction review process is intended to prevent or deter crime and the demand for police protection services to new developments.

## 5. Environmental Analysis

### PUBLIC SERVICES

The demand for police services from the Walnut/Diamond Bar Sheriff's Station may increase slightly under the proposed project but this increase is not expected to result in or require new or expanded police protection facilities. In addition, no police stations are presently located or are planned to be located on the project site; thus, there is no potential for the proposed project to have a direct physical impact on police protection facilities. Therefore, the proposed project would result in a less-than-significant impact on police protection facilities. Furthermore, the proposed project would not result in any new or substantially more severe impacts to police protection facilities when compared to the impacts determined in the GPEIR.

***Level of Significance Before Mitigation:*** Impact 5.12-2 would be less than significant.

#### 5.12.2.4 CUMULATIVE IMPACTS

The area considered for cumulative impacts is the service area of the LACSD Walnut/Diamond Bar Station. Population growth in the station's service area would require additional personnel, equipment, and facilities. Cumulative projects that the Walnut/Diamond Bar Sheriff Station serves have the possibility of combining with the proposed project to increase demand for LACSD services and facilities. Like the proposed project, the construction site for each cumulative project served by the station is expected to be fenced and secured to limit access to authorized personnel, which would deter criminal activity during construction. Before construction, each cumulative project would be reviewed by the City of Walnut and LACSD, ensuring that construction activities, such as road closures (if needed), would not interfere with LACSD operations.

Like the proposed project, each development project is expected to integrate design concepts to reduce the potential of unwanted activity on their respective sites and comply with applicable regulatory requirements related to security and safety during construction and operation. Individual development projects would be reviewed on a project-by-project basis to determine potential impacts to law enforcement services as a result of the proposed development. The City would also continue to coordinate with the LACSD through their contractual agreement to ensure that adequate personnel and facilities are available to serve the City of Walnut and require payment of a fee to offset any contribution to cumulative impacts. Future expansion of sheriff's stations would also require environmental review to determine its environmental impacts. Therefore, the cumulative impacts of the proposed project would be less than significant.

#### 5.12.2.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, Impact 5.12-2 would be less than significant.

#### 5.12.2.6 MITIGATION MEASURES

##### **Mitigation Measures from the GPEIR**

There are no police protection services mitigation measures in the GPEIR.

## 5. Environmental Analysis

### PUBLIC SERVICES

#### New Mitigation Measures/Conditions of Approval

No additional mitigation measures or conditions of approval are required to reduce impacts to less than significant.

#### 5.12.2.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

### 5.12.3 School Services

#### 5.12.3.1 ENVIRONMENTAL SETTING

##### Regulatory Background

Federal, State, regional, and local regulations are listed in Table 5.12-3, *Regulations/Plans for School Services*. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of GPU policies.

**Table 5.12-3 Regulations/Plans for School Services**

State	
Senate Bill (SB) 50	Established the base amount of allowable developer fees, commonly called "Level 1 fees." Provides for a 50/50 State and local school facilities funding match. SB 50 also provides for three levels of statutory impact fees.
Mitigation Fee Act	Requires a local agency establishing, increasing, or imposing an impact fee as a condition of development to identify the purpose of the fee and the use to which the fee is to be put.
Local	
City of Walnut General Plan	The Community Facilities and Infrastructure Element of the General Plan contains goals and policies relevant to school services.

#### Existing Conditions

Public school students in Walnut are served by two school districts, the Walnut Valley Unified School District (WVUSD) and Rowland Unified School District (RUSD). The nearest schools are Vejar Elementary School, approximately 0.24 mile north of the project site; Del Paso High School, approximately 0.17 mile south of the project site; and Montessori of Walnut, approximately 0.26 mile northwest of the project site.

#### 5.12.3.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- SS-1 Result in a substantial adverse physical impact associated with the provisions 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

## 5. Environmental Analysis PUBLIC SERVICES

maintain acceptable service ratios, response times, or other performance objectives for school services.

### 5.12.3.3 ENVIRONMENTAL IMPACTS

#### 2018 General Plan Update

The GPEIR states that buildout of the General Plan and Walnut Valley Specific Plan would result in an increase in school-aged children and therefore increased demand on school services. The GPEIR notes that the collection of fees by school districts is sufficient in mitigating any potential impacts to school facilities resulting from long-term growth in the community and that any new or expanded school facilities would be subject to environmental review under CEQA. Impacts to school service were considered less than significant under the GPU.

#### Impact Analysis

The following impact analysis addresses the thresholds of significance detailed in Section 5.12.3.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.12-3: The proposed project would not generate new students and therefore would not impact the school enrollment capacities of area schools. [Threshold SS-1]**

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The proposed project is a business park that would consist of industrial, office, and retail uses. There are no proposed residences on-site; thus, the proposed project would not introduce any new permanent residents that may attend schools serving the project site. In addition, no schools are located on the project site, nor are any schools planned to be located on the project site; thus, there is no potential for the proposed project to have a direct physical impact on any school.

Although the proposed project would not directly create a demand for additional public school services, the project applicant would be required to contribute fees to WVUSD and RUSD, in compliance with SB 50, for the purpose of funding the construction or reconstruction of school facilities necessitated by the development (Ed. Code, Section 17620(a)(1)). On February 23, 2022, the State Allocation Board adjusted the maximum level-one industrial fee to be \$0.78 per square foot. Development fees authorized by Senate Bill (SB) 50 are deemed by Section 65996 of the California Government Code to be “full and complete school facilities mitigation.” Therefore, the proposed project would not result in any new or substantially more severe impacts to school services when compared to the impacts determined in the GPEIR.

***Level of Significance Before Mitigation:*** Impact 5.12-3 would be no impact.

### 5.12.3.4 CUMULATIVE IMPACTS

The proposed project would not introduce new students into the attendance areas of WVUSD and RUSD and therefore would have less-than-significant cumulative impacts.

## 5. Environmental Analysis

### PUBLIC SERVICES

#### 5.12.3.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

There would be no impact on school services.

#### 5.12.3.6 MITIGATION MEASURES

##### Mitigation Measures from the GPEIR

There are no school services mitigation measures in the GPEIR.

##### New Mitigation Measures/Conditions of Approval

No additional mitigation measures or conditions of approval are required to reduce impacts to less than significant.

#### 5.12.3.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

There would be no impact on school services.

### 5.12.4 Library Services

#### 5.12.4.1 ENVIRONMENTAL SETTING

##### Regulatory Background

The City of Walnut General Plan Community Facilities and Infrastructure Element contains goals and policies relevant to library services. See Appendix C, *General Plan Goals and Policies*, for the full list of GPU policies. There are no additional regulations applicable to library services.

##### Existing Conditions

Public library services are provided by the Walnut Library, which is owned by the County of Los Angeles Public Library. Walnut Library is 10,00 square feet and approximately 1.17 miles northeast of the project site (Los Angeles County Library 2023).

#### 5.12.4.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- LS-1 Result in a substantial adverse physical impact associated with the provisions 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 library services.

## 5. Environmental Analysis PUBLIC SERVICES

### 5.12.4.3 ENVIRONMENTAL IMPACTS

#### 2018 General Plan Update

Impacts to library services are not explicitly addressed in the GPEIR. The GPEIR notes that buildout of the GPU may have impacts on all public services, including library services. The GPEIR states that environmental review would identify site-specific conditions and physical changes resulting from expansion or construction of new public service facilities. The GPEIR also states that new developments would result in increased property taxes that would assist in paying for the incremental increases in demand for public services. Additionally, the City and other public service providers require development impact fees to maintain service levels. Impacts to public services, including libraries, were considered less than significant under the GPU.

#### Impact Analysis

The following impact analysis addresses the thresholds of significance detailed in Section 5.12.4.2. The applicable thresholds are identified in brackets after the impact statement.

---

**Impact 5.12-4: The proposed project would not result in a substantial adverse physical impact associated with the provisions of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for library services. [Threshold LS-1]**

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Demand placed on libraries is based on the generation of a resident population in the service area of the library. The proposed project would not introduce any new permanent residences that may become patrons of the Walnut Library. Therefore, implementation of the proposed project would not directly create a demand for public library facilities and would not directly result in the need to modify existing or construct new library facilities. Thus, the proposed project would not result in any new or substantially more severe impacts when compared to the impacts determined in the GPEIR with regard to library services and facilities.

*Level of Significance Before Mitigation:* Impact 5.12-4 would result in no impact.

### 5.12.4.4 CUMULATIVE IMPACTS

The proposed project would not introduce new residents into the service area of the Walnut Library; therefore, cumulative impacts are considered less than significant.

### 5.12.4.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

There would be no impact on library services.



## 5. Environmental Analysis

### PUBLIC SERVICES

#### 5.12.4.6 MITIGATION MEASURES

##### Mitigation Measures from the GPEIR

There are no library service mitigation measures in the GPEIR.

##### New Mitigation Measures/Conditions of Approval

No additional mitigation measures or conditions of approval are required to reduce impacts to less than significant.

#### 5.12.4.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

There would be no impact on library services.

### 5.12.5 References

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## 5. Environmental Analysis

### 5.13 TRANSPORTATION

This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates the potential for implementation of the Walnut Business Park (proposed project) to result in transportation impacts in the City of Walnut in comparison to the impacts evaluated for the project site in the General Plan Environmental Impact Report (GPEIR). The analysis in this section is based in part on the following technical report:

- *Walnut Business Park Traffic Impact Analysis*, Iteris, July 8, 2024.

A complete copy of this study is in the technical appendices to this Draft SEIR (Appendix O).

A comment letter was received during the Notice of Preparation (NOP) comment period for the Draft SEIR from the California Department of Transportation (Caltrans). Issues and comments raised in this letter are addressed throughout this section. Several other comment letters and comments made during the scoping meeting on August 15, 2023, refer to traffic impacts of the proposed project, which are analyzed within the Traffic Impact Analysis (see Appendix O).

#### 5.13.1 Environmental Setting

##### 5.13.1.1 REGULATORY BACKGROUND

Federal, State, and local regulations are listed in Table 5.13-1, *Regulations/Plans for Transportation*. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of General Plan Update (GPU) policies.

**Table 5.13-1 Regulations/Plans for Transportation**

State	
Senate Bill (SB) 743: Vehicle Miles Traveled (VMT)	Revises the way transportation impacts are analyzed by local agencies under the California Environmental Quality Act (CEQA). SB 743 requires the amount of driving and length of trips – as measured by “vehicle miles traveled” (VMT) – be used to assess transportation impacts on the environment for CEQA review instead of road congestion and delay or level of service (LOS). SB 743 also revised the way aesthetic and parking impacts are evaluated under CEQA by allowing projects that meet certain requirements related to their location and transit accessibility to be exempt from review regarding these impacts.
Assembly Bill (AB) 1358: The California Complete Streets Act	Requires circulation elements to address the transportation system from a multimodal perspective by planning for all modes of transportation where appropriate, including walking, biking, car travel, and transit.
SB 375: Sustainable Communities and Climate Protection Act	Provides incentives for cities and developers to bring housing and jobs closer together and to improve public transit. Requires each Metropolitan Planning Organization (MPO) to add a broader vision for growth, called a “sustainable communities strategy” (SCS), to its transportation plan. The SCS must lay out a plan to meet the region’s transportation, housing, economic, and environmental needs in a way that enables the area to lower greenhouse gas emissions.
Regional	
Southern California Association of Governments (SCAG)	SCAG is the MPO that represents Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy,

## 5. Environmental Analysis

### TRANSPORTATION

**Table 5.13-1 Regulations/Plans for Transportation**

	community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and State law.
SCAG: Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)	SCAG's RTP/SCS, known as Connect SoCal, provides an RTP for six counties in its jurisdiction. The primary goal of the RTP/SCS is to increase mobility for the region. The most recent Connect SoCal plan was adopted in 2020 and SCAG's Draft Connect SoCal 2024 is currently under public review.
San Gabriel Valley Council of Governments (SGVCOG)	SGVCOG is a joint powers authority that acts as the subregional COG for the San Gabriel Valley geographic area, which includes the City of Walnut. The COG provides a number of transportation planning resources for its member agencies, including the Regional Vehicle Miles Travelled Analysis Tool and the Regional Vehicle Miles Travelled Mitigation Program. The COG also funds and manages housing and transportation planning projects within its region.
<b>Local</b>	
City of Walnut Trip Reduction and Transportation Demand Management (TDM) Ordinance	Ensures implementation of trip reduction measures for nonresidential projects commensurate with their size and number of employees consistent with the Congestion Management Program (CMP) of Los Angeles County.
City of Walnut Municipal Code Article II, Transportation and Air Quality Control Measures	Adopts and implements a trip reduction and travel demand management ordinance.
City of Walnut General Plan	Goals and policies applicable to transportation are listed in the Land Use and Community Design and Circulation Elements.
Resolution No. 20-39 Vehicle Miles Traveled (VMT) Threshold of Significance	City Council resolution to adopt VMT Thresholds of Significance for the purposes of analyzing transportation impacts under the California Environmental Quality Act.

#### 5.13.1.2 EXISTING CONDITIONS

##### Roadways in the Project Vicinity

The project site is between Valley Boulevard to the south and S. Lemon Avenue to the west, Paseo Del Prado to the north, and an existing industrial development to the east, in the City of Walnut, as shown on Figure 3-3, *Aerial Photograph*, in Chapter 3, *Project Description*. The project site is currently occupied by an industrial business park accommodating multiple uses, primarily commercial and light industrial. Regional access to the project area is provided by Interstate (I-) 10 and State Route (SR-) 60. Access to the project site is currently provided via 2 driveways on Lemon Avenue, 2 driveways on Paseo Del Prado, 11 driveways on Paseo Sonrisa, 5 driveways on Paseo Tesoro, and 1 driveway on Valley Boulevard, as shown in Figure 5.13-1, *Existing Site Access Points*. The following is a description of the local roadways providing access to the project area, including Valley Boulevard, S. Lemon Avenue, La Puente Road, Carrey Road, and Pierre Road.

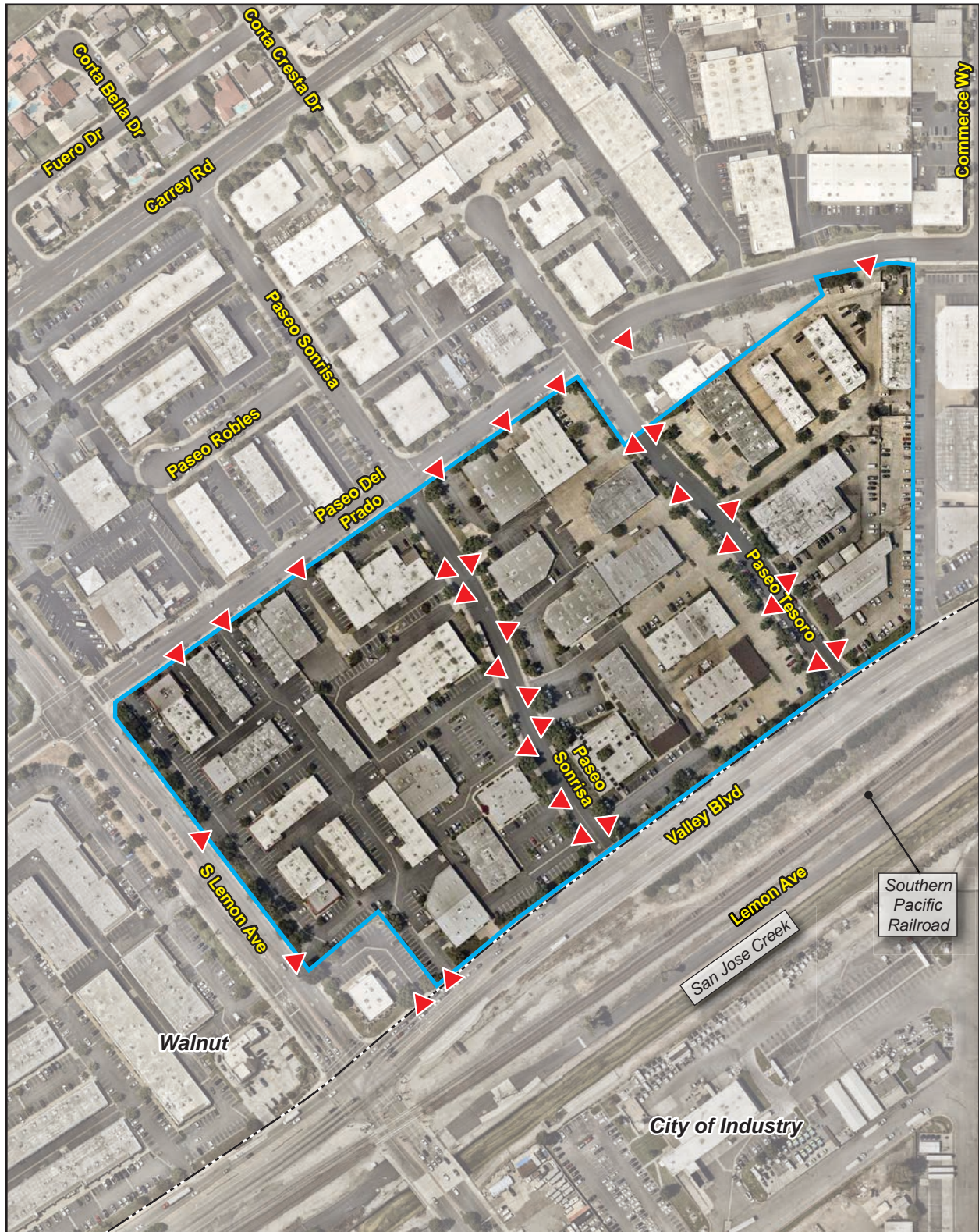
##### *Valley Boulevard*

Valley Boulevard is a five-lane divided major arterial with a raised median trending in an east-west direction, providing access to commercial, residential, and industrial land uses within the study area. The posted speed limit on Valley Boulevard is 50 miles per hour. On-street parking is generally prohibited on both sides of the roadway. Valley Boulevard is a designated truck route.



5. Environmental Analysis

Figure 5.13-1 - Existing Site Access Points



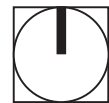
Project Site Boundary

Existing Site Access Points

City Boundary

0 300  
Scale (Feet)

Source: Nearmap 2024.



PlaceWorks

## 5. Environmental Analysis

### TRANSPORTATION

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## 5. Environmental Analysis TRANSPORTATION

### *S. Lemon Avenue*

S. Lemon Avenue is a four-lane divided minor arterial with a raised median trending in a north-south direction, providing access to SR-60. The posted speed limit on S. Lemon Avenue, within the project vicinity, is 40 miles per hour. On-street parking is generally prohibited on both sides of the roadway.

### *La Puente Road*

La Puente Road is a four-lane divided minor arterial trending in an east-west direction. The posted speed limit on La Puente Road, within the project vicinity, is 40 miles per hour. On-street parking is generally prohibited on both sides of the roadway.

### *Carrey Road*

Carrey Road is a four- to two-lane local street in the vicinity of the project site, generally oriented in an east-west direction. On-street parking is generally prohibited on both sides of the roadway.

### *Pierre Road*

Pierre Road is a two-lane undivided “important local street” within the study area, generally oriented in a north-south direction, providing access to residential land uses and Walnut High School. This roadway is in conjunction with Valley Boulevard. The posted speed limit is 30 miles per hour north of Vejar Road and 35 miles per hour south of Vejar Road. On-street parking is prohibited on the east side of the roadway; however, one-hour parking is available on the west side from 9 a.m. to 3 p.m. on school days.

## **Alternative Modes of Travel**

### *Bicycle and Pedestrian Systems*

Sidewalks bound the adjacent streets to the proposed project on Lemon Avenue, Valley Boulevard, Paseo Del Prado, Paseo Sonrisa, and Paseo Tesoro. There is no specific bicycle-related infrastructure in the project area. The Los Angeles County Schabarum Trail is west of Lemon Avenue along Lemon Creek approximately 1,000 feet west of the project site.

### *Public Transit*

The project site is served by Foothill Transit Line 194 (Pomona-Industry-La Puente-El Monte Station via Valley Boulevard). There are eastbound and westbound bus stops at the intersection of Valley Boulevard and Lemon Avenue. Service frequency during weekdays is every 20 minutes in the morning peak hours and every 30 minutes in the afternoon peak hours.

Metrolink operates a commuter rail station in the City of Industry approximately 0.67 mile from the project site and offers connection to downtown Los Angeles as well as a variety of locations in the Inland Empire.

## 5. Environmental Analysis

### TRANSPORTATION

#### 5.13.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project would normally have a significant effect on the environment if the project would:

- T-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- T-2 Conflict with or be inconsistent with CEQA Guidelines Section 15064.3 (b).
- T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- T-4 Result in inadequate emergency access.

#### 5.13.3 Environmental Impacts

##### 5.13.3.1 2018 GENERAL PLAN UPDATE

The GPEIR analyzed transportation impacts based on the level of service (LOS) methodology and determined that several intersections and roadway segments in the city would have LOS deficiencies under implementation of the GPU. The GPEIR incorporated Mitigation Measures T-1 through T-12, which involve a variety of roadway improvements to reduce impacts to affected study segments. However, the GPEIR determined that LOS impacts would be significant and unavoidable despite the implementation of these mitigation measures.

The GPEIR addresses the GPU's impacts with regard to the other transportation thresholds in Table 19-6, *Regulations and Proposed General Plan Policies to Avoid or Reduce Impacts on Transportation and Circulation*, of the GPEIR. This table lists the policies in the GPU that reduce impacts associated with roadway hazards; consistency with bicycle, pedestrian, and transit plans; congestion management, and emergency access. The GPEIR concluded that these impacts are less than significant.

Vehicle miles traveled (VMT) impacts under the GPU were not analyzed.

##### 5.13.3.2 PROPOSED PROJECT

###### Methodology

The City of Walnut adopted VMT significance thresholds under Resolution No. 20-39 in June 2020. VMT analysis consists of a screening analysis that determines if a project needs project-level assessment and a full VMT assessment for non-screened projects.



## 5. Environmental Analysis

### TRANSPORTATION

The proposed project does not meet any of the City's screening criteria outlined in the City Resolution No. 20-39 staff report and therefore does not screen out of VMT analysis. These criteria include (City of Walnut 2020):

- Retail projects up to 50,000 square feet in floor area
- Projects generating less than 110 daily trips
- Residential and office projects in low VMT areas
- Affordable housing developments or affordable housing units within mixed-use developments
- Daycare(s)/childcare/pre-K facilities
- Student housing
- Community institutions

Therefore, the proposed project is required to complete a project-level VMT analysis consistent with the City's guidance on analyzing VMT impacts. The City directs projects to compare their measured VMT level to the baseline VMT of the city. The baseline VMT is defined as the average VMT for the area, as measured by VMT per capita, VMT per employee, or VMT per service population (City of Walnut 2020). The City's thresholds, consistent with CEQA Guidelines Section 15064.3 (b) for Land Use Projects, are as follows:

- **Project Impact:** A significant impact would occur if the VMT rate for the project exceeded the applicable baseline VMT (City's VMT) rate.
- **Cumulative Project Impact:** A significant impact would occur if the project increased total regional VMT compared to cumulative no project conditions.

The SGVCOG worked with member agencies (including the City of Walnut) to analyze existing traffic conditions in the region to develop a baseline standard that determines significant CEQA thresholds for future land use projects. SGVCOG then developed a Web-based VMT Evaluation Tool based on VMT data from SCAG's Travel Demand Model. The VMT assessment for the proposed project was conducted using the SGVCOG VMT Evaluation Tool (SGVCOG 2023).

#### 5.13.3.3 IMPACT ANALYSIS

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.13-1: The proposed project would not result in a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. [Threshold T-1]**

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As shown in Figure 3-6, *Conceptual Site Plan*, access to Building 1 would be provided by two driveways along Paseo Del Prado, two driveways along South Lemon Avenue, and one driveway along Paseo Sonrisa. Truck access would be through the driveway along Paseo Sonrisa, the southerly driveway on Lemon Avenue, and the eastern Paseo Del Prado driveway. Access to Buildings 2 and 3 would be provided by two driveways along Paseo Del Prado, two driveways along Paseo Sonrisa, and two driveways along Paseo Tesoro. Truck access would be via the driveways on Paseo Sonrisa and the northern driveway on Paseo Tesoro. Access to Building 4 would be provided by three driveways along Paseo Tesoro and one on Paseo Del Prado. Truck access would be via the



## 5. Environmental Analysis

### TRANSPORTATION

northerly two Paseo Tesoro driveways. The proposed project would include 1,097 parking stalls, 54 dock-high doors, and 7 grade-level doors. Off-site improvements include the widening of Valley Boulevard at the northeast corner of the intersection with S. Lemon Street to include an additional right-turn lane from Valley Boulevard to S. Lemon Street. The ingress and egress for trucks at the project driveways is shown in Figure 3-10a, *Circulation Plan (Ingress)*, and Figure 3-10b, *Circulation Plan (Egress)*.

As part of the proposed project:

- “Clean Air” parking spaces would be provided on-site for carpools and fuel-efficient vehicles, for a minimum number of spaces proportional to the required vehicle parking per CalGreen.
- At least 20 percent of parking spaces would be electric vehicle (EV) capable, with 25 percent of those spaces including charging stations per CalGreen.
- Visitor bicycle parking racks would be provided within 200 feet of building entrances for a minimum of 5 percent of new vehicular parking: 5 percent of 1,097 vehicular parking spaces is 55 bicycle parking spaces.

### General Plan

The City’s General Plan Circulation Element promotes the continued development and enhancement of existing streets and intersections in the city. This element’s policies strive to ensure that new development projects implement a fair share of infrastructure improvements to offset potential adverse impacts associated with additional traffic. The goal of these policies is to improve safe and efficient circulation in the city. Pursuant to Senate Bill (SB) 743, roadway LOS is no longer under the purview of CEQA, and as such, is not addressed in this section of the SEIR. Although not required by CEQA, the City of Walnut implements LOS standards under its local regulatory land use and public works authority. A full Traffic Impact Assessment (TIA) included as Appendix O to this Draft SEIR provides this analysis. The proposed project’s roadway widening at Valley Boulevard and South Lemon Street would also comply with the City’s roadway and intersections design and engineering standards.

Furthermore, the proposed project would implement the applicable strategies from the City’s Transportation Demand Management (TDM) Ordinance, which would reduce impacts to roadways in addition to incentivizing the use of alternative modes of transportation. The proposed project would be subject to the development standards outlined in the Walnut Municipal Code Chapter 6.52.110, *Transportation Demand and Trip Reduction Measures*, Section B (3). These measures include the posting of trip-reduction resources for employees of the future businesses, the designation of preferred parking spaces for carpool/vanpool vehicles in the proposed parking lots, dedicated drop-off zones for carpool/vanpools, the implementation of adequate accessibility improvements to accommodate vanpool vehicles, sidewalks within the project site that connect between project buildings and the external sidewalk system, bicycle parking, bicycle access paths between on-site parking and the external circulation system, and bus stop improvements if deemed necessary by the City (see Appendix B for a full description of the Municipal Code provisions).

## 5. Environmental Analysis

### TRANSPORTATION

Like all development under the GPU, the proposed project would comply with the applicable roadway-related programs, plans, policies, and ordinances governing roadways. Therefore, the proposed project would not introduce any new or more substantial impacts associated with roadways.

#### SCAG Connect SoCal Consistency

The proposed project's consistency with the 2020 SCAG RTP/SCS, Connect SoCal, is detailed in Table 5.10-3, *SCAG 2020-2045 RTP/SCS Goals Consistency Analysis*, of Section 5.10, *Land Use and Planning*. The goals of Connect SoCal are related to housing, transportation technologies, equity, and resilience. The proposed project would not conflict with the SCAG RTP/SCS, and a less-than-significant impact would occur. Additionally, the proposed project would not introduce any new or more substantial impacts with regard to consistency with Connect SoCal when compared to the GPEIR.

#### Impacts to Alternate Modes of Transportation Facilities

As discussed in Section 5.13.1.2, *Existing Conditions*, the project site is bounded by sidewalks on the adjacent roadways, including Lemon Avenue, Valley Boulevard, Paseo Del Prado, Paseo Sonrisa, and Paseo Tesoro. There is no specific bicycle-related infrastructure in the project vicinity. The proposed project does not propose alterations to existing or proposed bicycle and pedestrian conditions. The Walnut General Plan Circulation Element provides guidance for the city's active transportation network. There are no bikeway or pedestrian improvements noted in the Circulation Element that are within proximity to the project site. As noted previously, the proposed project would implement the City's TDM ordinance, which requires the proposed project to accommodate parking for four bicycles. The bicycle parking that would be provided under the proposed project is equivalent to 5 percent of the number of vehicle parking spaces under the proposed project. The proposed project would therefore provide 55 bicycle parking spaces,<sup>1</sup> exceeding the requirements of the TDM ordinance.

Furthermore, the proposed project is not expected to impact transit service from transit agencies that operate in the project vicinity. The closest bus stop to the project site on South Lemon Avenue and Valley Boulevard is served by Foothill Transit Line 194. The project site is also approximately 0.67-mile north of a MetroLink station in the City of Industry. The proposed project would result in an increase in the number of employees at the project site when compared to the existing on-site development. Foothill Transit and Metrolink continually monitor ridership and would update their services as necessary to meet increased demand. As such, the proposed project would not significantly impact transit facilities.

The proposed project would be required to comply with all applicable policies and plans for alternative modes of transportation, similar to all other development under the GPU. Therefore, the proposed project would not result in any new or more substantial impacts when compared to the impacts determined in the GPEIR.

***Level of Significance Before Mitigation:*** Less than significant.

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<sup>1</sup> The proposed project would provide 1,097 vehicular parking spaces. (1,097 \* 0.05 = 55)

## 5. Environmental Analysis

### TRANSPORTATION

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#### **Impact 5.13-2: The proposed project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3(b). [Threshold T-2]**

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The City's VMT thresholds consistent with CEQA Guidelines Section 15064.3, subdivision (b) for Land Use Projects, are as follows:

- **Project Impact:** A significant impact would occur if the VMT rate for the project exceeded the applicable baseline VMT (City's VMT) rate.
- **Cumulative Project Impact:** A significant impact would occur if the project increased total regional VMT compared to cumulative no project conditions.

The City's Resolution No. 20-39 staff report directs the analysis of VMT impacts using the SGVCOG VMT Analysis Model. According to SGVCOG's VMT Evaluation Tool, the citywide average Home-based Work VMT per Worker is 20.97. The proposed project is estimated to have a Home-based Work VMT per Worker of 20.5 when the City's required TDM Ordinance measure for employee trip-reduction education is incorporated by the proposed project (see Appendix O). Therefore, the proposed project does not exceed the Project Impact threshold noted above.

Furthermore, the proposed project would abide by the requirements of Section 6.52.110 of the City's Municipal Code and would include the following project design features that would further reduce the project's VMT:

- "Clean Air" parking spaces would be provided on-site for carpools and fuel-efficient vehicles, for a minimum number of spaces proportional to the required vehicle parking per CalGreen.
- At least 20 percent of parking spaces would be EV capable with 25 percent of those spaces including charging stations per CalGreen.
- Visitor bicycle parking racks would be provided within 200 feet of building entrances for a minimum of 5 percent of new vehicular parking. This equates to 55 bicycle parking spaces.

The Cumulative Project Impact determines a cumulative significant impact if the proposed project increases total regional VMT compared to cumulative No Project conditions. The cumulative analysis was conducted using SCAG's travel demand model which distributes trips across the southern California region among traffic analysis zones on a network of roadways representing roadways classified as collectors, arterials, or freeways. The traffic analysis zones contain socioeconomic conditions of housing units, jobs, and population which represent the travel demand placed on the transportation system. Under existing conditions, the socioeconomic data represents the residents and employees under existing conditions. The forecasted future-year conditions include forecasted population and employment levels that represent cumulative conditions.

The analysis of cumulative VMT determines the level of cumulative No Project conditions as compared to cumulative With Project conditions. In this analysis, all travel except for the project site is held as the same cumulative background level of traffic and the only change is from the project site. The link-level travel demand model analysis sums the daily travel on each modeled roadway link in the city by the length of the roadway links

## 5. Environmental Analysis

### TRANSPORTATION

to obtain a daily VMT value. The daily trip generation of the project site under No Project and With Project conditions was segmented from the overall level of traffic to calculate the difference for the cumulative VMT assessment.

Under cumulative No Project conditions, the average daily VMT on city roadways is forecast to be 491,579 , while under cumulative With Project conditions, citywide VMT is forecast to be 491,619 (see Appendix O). The proposed project increases the total citywide VMT compared to cumulative No Project conditions by 0.008 percent. Therefore, impacts would be **potentially significant**, since the proposed project would result in a new significant impact compared to impacts identified in the GPEIR.

***Level of Significance Before Mitigation:*** Impact 5.13-2 would be potentially significant.

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**Impact 5.13-3: The proposed project would not increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). [Threshold T-3]**

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The proposed project would change the existing vehicular access and circulation on the project site to accommodate the site plan under the proposed project. Vehicular access to the proposed project would be provided via South Lemon Avenue, Paseo Del Prado, and Paseo Sonrisa for Building 1; Paseo Del Prado, Paseo Sonrisa, and Paseo Tesoro for Buildings 2 and 3; and Paseo Del Prado and Paseo Tesoro for Building 4. Overall, this includes four driveways on Paseo Del Prado, two driveways on Lemon Avenue, three driveways on Paseo Sonrisa, and five driveways on Paseo Tesoro. Additionally, Valley Boulevard would be widened to include an additional right-turn lane at its westbound intersection with South Lemon Avenue.

The City and Los Angeles County Fire District (LACFD) have adopted design standards that preclude the construction of any unsafe roadway, circulation, or access design features. Design and construction of the proposed access and circulation improvements would be required to adhere to the City's engineering standards and LACFD's design standards, which are imposed on development projects during the City's development review and building plan check process. Compliance with the established design standards would ensure that hazards due to design features would not occur and that the placement of the vehicular access and circulation improvements would not create a conflict for motorists, pedestrians, or bicyclists traveling within or around the project site.

Furthermore, the proposed project would provide a network of low-speed internal drive aisles that would be safe and walkable for pedestrians while maintaining an efficient circulation system for trucks and vehicles. The proposed project would not include incompatible uses such as farm equipment on area roadways.

The proposed project's compliance with the City's engineering and design standards for project roadway and circulation improvements would ensure that impacts resulting from hazards due to design features or incompatible uses are less than significant. Moreover, the proposed project would not result in any new or more substantial impacts when compared to the GPU.

***Level of Significance Before Mitigation:*** Impact 5.13-3 would be less than significant.

## 5. Environmental Analysis

### TRANSPORTATION

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#### **Impact 5.13-4: The proposed project would not result in inadequate emergency access. [Threshold T-4]**

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The proposed project would result in a new configuration of site access and circulation, as discussed previously. To address emergency and fire access needs, the improvements would be designed and constructed in accordance with all applicable City and LACFD design standards for emergency access (e.g., minimum street width and turning radius). For example, the proposed fire lanes would be designed to meet the minimum width requirements of LACFD to allow for the adequate circulation of emergency vehicles. Fire lanes would be 26 feet wide for buildings up to 35 feet tall and 28 feet for buildings taller than 35 feet.

Development accommodated by the proposed project would be required to incorporate all applicable design and safety requirements as set forth in the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and LACFD. Compliance with these standards is ensured through the City's and LACFD's development review and building plan check process.

During the development review and building plan check process, the City would coordinate with LACFD to ensure that the necessary fire prevention and emergency response features are incorporated into the proposed project and that adequate circulation and access (e.g., adequate turning radii for fire trucks) are provided within the traffic and circulation components. All site and building improvements would be subject to review and approval by the City and LACFD.

Off-site improvements would be required on Valley Boulevard, which would require temporary partial closure of the street. However, any minor road closure would be temporary and would only be necessary during the construction activities associated with these improvements. All proposed road closures would also be subject to review and approval by the City. Upon completion of the improvements, all road conditions would be restored to normal. Based on the preceding, impacts to emergency access would be less than significant. Furthermore, the proposed project would not result in any new or more substantial impacts when compared to the GPU.

***Level of Significance Before Mitigation:*** Impact 5.13-4 would be less than significant.

#### **5.13.4 Cumulative Impacts**

As demonstrated, the proposed project would be consistent with adopted policies, plans, and programs regarding circulation, including roadway and pedestrian and bicycle facilities. Construction and operation of the proposed project would comply and/or be consistent with the City's Circulation Element of the General Plan, the City's TDM ordinance, and Public Works standards for roadway improvements and encroachments. However, the proposed project would result in a cumulative impact related to regional VMT.

All development projects in the city that require discretionary review would be subject to the transportation impact requirements and CEQA review. For example, as with the proposed project, other development projects would be required to analyze the potential transportation impacts that would result from the projects and would be required to demonstrate their consistency with applicable transportation goals and policies of the City's General Plan. As with the proposed project, other development projects would similarly be required to comply with all applicable existing regulations, procedures, and policies that are intended to reduce transportation

## 5. Environmental Analysis TRANSPORTATION

impacts. Additionally, site access to the project site would be designed per City standards and would not combine with other area traffic impacts to result in a significant cumulative impact on circulation or create hazardous conditions.

### 5.13.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.13-1, 5.13-3, and 5.13-4.

Without mitigation, this impact would be potentially significant:

- **Impact 5.13-2:** The proposed project would increase the total regional VMT compared to the cumulative No Project conditions.

### 5.13.6 Mitigation Measures

#### 5.13.6.1 MITIGATION MEASURES FROM THE GPEIR

Mitigation Measures T1 through T12 from the GPU DEIR do not apply to the proposed project. A TIA was conducted to assess project-specific traffic impacts under the proposed project. As noted in Appendix O, traffic from the proposed project would not exceed the City's LOS standards for any of the studied roadways and intersections. No additional improvements to city roadways or intersections are needed to reduce traffic impacts from the proposed project.

#### 5.13.6.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

##### Mitigation Measures

##### *Impact 5.13-2*

T-1 Prior to issuance of construction permits for the proposed project, the project applicant shall coordinate with the City to select one or more of the following mitigation measures:

- **First-Mile/Last-Mile Space:** The proposed project shall dedicate space in a central location for first-mile/last-mile solutions, such as bike share, scooter share, or a future mode of transportation.
- **Improved Pedestrian Network:** The proposed project shall develop additional pedestrian connectivity within the project site such as across Paseo Tesoro and Paseo Sonrisa or for connections outside the project site to Valley Boulevard, Lemon Avenue, and Paseo Del Prado.
- **Car Sharing Program:** The proposed project shall provide on-site parking spaces for car sharing services such as ZipCar or GetAround.

T-2 The applicant shall develop a mitigation implementation and monitoring program. If mitigation measures are physical features such as bicycle or pedestrian infrastructure

## 5. Environmental Analysis

### TRANSPORTATION

improvements, their implementation prior to occupancy would satisfy the monitoring requirements. Programmatic mitigations such as the employee cash-out for parking or transit passes would require ongoing monitoring for implementation and designation of a staff member of the property management's team as a mitigation monitoring coordinator. The mitigation monitoring coordinator would oversee implementation and produce annual monitoring reports of the mitigation program for submittal to the City. Fees paid by tenants, as part of common area maintenance and management, could be used to fund the mitigation monitoring program.

### 5.13.7 Level of Significance After Mitigation

#### Impact 5.15-2

The proposed project increases the total citywide VMT compared to cumulative No Project conditions by 0.008 percent. The effectiveness of mitigation measures is expressed in a percentage reduction of daily VMT. The source of the reduction effectiveness is the California Air Pollution Control Officers Association's (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. The handbook provides a process for calculating the cumulative effects of a series of mitigation measures.

Providing first-mile/last-mile space on the project site would support trips to connect to transit hubs, such as the City of Industry Metrolink Station, located approximately one mile from the project site via Lemon Avenue and Courier Road. The VMT reduction effectiveness is up to 0.8 percent VMT removed from parallel roadways per the CAPCOA Handbook.

Improving the pedestrian network could reduce VMT by up to 6.4 percent in urban areas. However, given the limited destinations in the surrounding vicinity of the project site, this mitigation measure should only be assumed to reduce VMT by less than 1 percent.

The Car Sharing Program allows employees and visitors of the proposed project and potentially neighboring residents to forego car ownership but still have a vehicle available for certain types of trips where walking, bicycling, carpooling, or transit are not convenient options. Based on the CAPCOA Handbook, this feature could reduce area VMT by up to 0.15 percent.

Based on the relatively small amount of VMT needed to reduce the potential cumulative significant impact to less than significant, implementation of any of the potential feasible mitigation measures would mitigate the potential cumulative impact to less than significant.

### 5.13.8 References

Iteris. 2023, November 14. *Walnut Business Park Traffic Impact Analysis* (Appendix O to this Draft SEIR).

San Gabriel Valley Council of Governments (SGVCOG). 2023, November 22. "Regional Vehicle Miles Travelled Analysis Tool." <https://www.sgvkog.org/vmt-analysis-tool>.

## 5. Environmental Analysis TRANSPORTATION

Walnut, City of. 2020, June 11. *Staff Report for the Walnut Planning Commission- VMT Analysis Model: Recommend Adoption of the Vehicle Miles Traveled (VMT) Significance Thresholds.*  
<https://www.cityofwalnut.org/home/showpublisheddocument/15399>.



## 5. Environmental Analysis

### TRANSPORTATION

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## 5. Environmental Analysis

### 5.14 TRIBAL CULTURAL RESOURCES

Tribal cultural resources (TCR) include landscapes, sacred places, or objects with cultural value to a California Native American tribe. This section of the Draft Supplemental Environmental Impact Report (SEIR) evaluates the potential for implementation of the proposed project to impact tribal cultural resource in comparison to the impacts evaluated for the project site in the General Plan EIR (GPEIR). Other potential impacts to cultural resources (i.e., prehistoric, historic, and disturbance of human remains) are evaluated in Section 5.3, *Cultural Resources*.

The analysis in this section is based on the results of the Native American consultation conducted by the City in compliance with Assembly Bill (AB) 52, a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, and a search of the California Historical Resources Information System.

There was one comment letter received from the Native American Heritage Commission in response to the notice of preparation and related to cultural resources and tribal consultation as required by AB 52. The relevant issues raised in that comment letter are addressed throughout this section and in Section 5.3, *Cultural Resources*.

The analysis in this section is based in part on the information compiled in Appendix P of this Draft SEIR.

#### 5.14.1 Environmental Setting

##### 5.14.1.1 REGULATORY BACKGROUND

Federal, State, regional, and local regulations are listed in Table 5.14-1. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of GPU policies.

**Table 5.14-1 Regulations/Plans for Tribal Cultural Resources**

<b>Federal</b>	
Archaeological Resources Protection Act	Regulates the protection of archaeological resources and sites on federal and Indian lands.
American Indian Religious Freedom Act and Native American Graves Protection and Repatriation Act	Establishes as national policy that Native American traditional practices and beliefs, sites (including right of access), and the use of sacred objects shall be protected and preserved. Also mandates that museums and federal agencies return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants or culturally affiliated Indian tribes.
<b>State</b>	
California Code of Regulations Section 15064.5(e) (CEQA), PRC Section 5097.98, and the California Health and Safety Code Section 7050.5	Protects Native American burials, skeletal remains, and associated grave goods regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Includes provisions to ensure that the NAHC is contacted in the event that human remains of Native American origins are discovered at a project site.
California State Assembly Bill 52	Requires the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project. Includes definitions of TCRs and establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.”

## 5. Environmental Analysis

### TRIBAL CULTURAL RESOURCES

#### 5.14.1.2 EXISTING CONDITIONS

Refer to Section 5.3, *Cultural Resources*, of this Draft SEIR for further discussion of the environmental setting for tribal cultural resources.

#### Native American Assembly Bill 52 Consultation

##### *Sacred Lands File Search Results*

PlaceWorks submitted a request to the NAHC for an SLF to determine whether sensitive or sacred Native American resources are in the vicinity of the project site and could be affected by the proposed project. The NAHC responded on April 21, 2023, indicating the project site has potential for the presence of Native American sacred land. NAHC requested that the project contact the Gabrieleño Band of Mission Indians–Kizh Nation for more information. The NAHC also provided a consultation list of tribes with traditional lands or cultural places within the boundaries of the city. The tribes listed by the NAHC also include the Gabrieleño/Tongva San Gabriel Band of Mission Indians, Gabrielino/Tongva Nation, Gabrielino Tongva Indians of California, Gabrielino-Tongva Tribe, Santa Rosa Band of Cahuilla Indians, and Soboba Band of Luiseno Indians.

##### *Tribal Consultation*

In accordance with Public Resources Code Section 21080.3.1(d), a lead agency is required to provide formal notification of intended development projects to Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief description of the proposed project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation regarding potential impacts to TCRs.

The City of Walnut sent letters to the seven Native American contacts on June 1, 2023, requesting any information related to cultural resources or heritage sites within or adjacent to the project site (Appendix P). The Gabrieleño Tongva Indians of California responded to the request on June 13, 2023, noting that the tribe had no further comment on the proposed project or wish to proceed with consultation. The Gabrieleño Band of Mission Indians–Kizh Nation provided comments on the proposed project in written form on August 10, 2023, in lieu of in-person consultation. The written correspondence included confidential archival information that identifies a high cultural sensitivity for the project location. The tribe included documents from historical books and screenshots of historical maps. The Gabrieleño Band of Mission Indians–Kizh Nation stated that since the site is of high importance to the tribe, tribal participation is recommended during all ground-disturbing activities.

#### 5.14.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- TCR-1 Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically

## 5. Environmental Analysis

### TRIBAL CULTURAL RESOURCES

defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

### 5.14.3 Environmental Impacts

#### 5.14.3.1 2018 GENERAL PLAN UPDATE

The GPEIR noted that the future development under the GPU could impact TCRs where excavation and other ground-disturbing activities are required. As a result, Mitigation Measure CR-3 was adopted to ensure that newly discovered TCRs and related artifact(s) found in project sites would be avoided and preserved. Additionally, Mitigation Measure CR-2 was adopted to ensure that projects under the GPU would coordinate with Native American tribal governments pursuant to AB 52 and Senate Bill 18, as applicable. After implementation of these mitigation measures, impacts were considered less than significant.

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**Impact 5.14-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is:**

**i) listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). [Threshold TCR-1.i]**

**ii) determined by the lead agency to be significant pursuant to criteria in Public Resources Code section 5024.1(c). [Threshold TCR-1.ii]**

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The California Historical Resources Information System records search for the project site determined that there are no TCRs on the project site or within a 0.5-mile radius that are listed or eligible for listing in the California Register of Historical Resources, as defined in Public Resources Code section 5020.1(k). However, as noted in Section 5.14.1.2, *Existing Conditions*, the SLF search indicated the presence of sensitive or sacred Native American resources at or in the vicinity of the project site. In correspondence with the lead agency regarding the proposed project, the Gabrieleño Band of Mission Indians–Kizh Nation indicated that the project area is of high importance to the tribe and that there is potential for unknown and/or buried TCRs to be encountered during construction activities. Should such resources be determined by the lead agency to be significant, the proposed project could result in potentially significant impacts related to the substantial adverse change in the significance of TCRs.

## 5. Environmental Analysis

### TRIBAL CULTURAL RESOURCES

The City sent letters to the seven Native American contacts on June 5, 2023, requesting any information related to cultural resources or heritage sites within or adjacent to the project site pursuant to AB 52. The Gabriolino Tongva Indians responded on June 13, 2023, and notified the City that the tribe had no comment on the proposed project. The City also received a response from the Gabrieleño Band of Mission Indians–Kizh Nation, who provided comments on the proposed project in written form on August 10, 2023, in lieu of in-person consultation. The Gabrieleño Band of Mission Indians–Kizh Nation stated that the site is of high importance to the tribe and provided Mitigation Measures TCR-1 through TCR-3 to require the presence of a Gabrieleño Band of Mission Indians–Kizh Nation tribal monitor on-site during ground-disturbing activities. They also provided instructions for proper protocol and handling of discovered TCR resources and human remains. As noted in Section 5.3, *Cultural Resources*, the proposed project also incorporates the GPEIR Mitigation Measure CR-3 as a condition of approval. However, Mitigation Measure CR-3 would not be required to mitigate impacts to TCR resources since the Mitigation Measures TCR-1 and TCR-3 would reduce impacts to less than significant. Furthermore, Mitigation Measure CR-2 from the GPEIR requiring tribal consultation for subsequent projects has been completed during the preparation of this Draft SEIR. Therefore, the proposed project would not result in any new or substantially more severe impacts when compared to the impacts determined in the GPEIR.

***Level of Significance Before Mitigation:*** Impact 5.14-1 would be **potentially significant**.

#### 5.14.4 Cumulative Impacts

Cumulative impacts to TCRs would occur if the impacts of the proposed project, in conjunction with other cumulative projects in the city, result in multiple and/or cumulative impacts to TCRs in the area. The presence of TCRs is site specific. However, implementation of the proposed project in conjunction with other planned projects in other areas of the city could unearth unknown significant cultural resources, including TCRs. As with the proposed project, other planned development projects in the city would involve ground disturbance and could impact TCRs that are buried in those project sites.

However, other development projects in the city would be required to undergo discretionary review and would be subject to the same resource protection requirements and CEQA review as the proposed project. For example, other development projects could require the preparation of site-specific cultural resource assessments, which would include some degree of surface-level surveying. As a part of the assessments, a cultural resources records search at the South Central Coastal Information Center and an SLF search would also be required. Additionally, as with the proposed project, other development projects would be required to comply with all applicable existing regulations, procedures, and policies, including consultation under AB 52, that address accidental discoveries of archaeological sites and resources, including TCR's.

Furthermore, as demonstrated above, impacts on TCRs as a result of implementation of the proposed project would be less than significant with mitigation measures. In consideration of the preceding, the proposed project's contribution to cumulative TCR impacts would be rendered less than significant, and therefore, the proposed project's impacts would not be cumulatively considerable.

## 5. Environmental Analysis TRIBAL CULTURAL RESOURCES

### 5.14.5 Level of Significance Before Mitigation

Without mitigation, the following impacts would be **potentially significant**:

- **Impact 5.14-1:** Ground disturbing activities could encounter unknown and/or buried tribal cultural resources associated with the Gabrieleño Band of Mission Indians–Kizh Nation.

### 5.14.6 Mitigation Measures

#### 5.14.6.1 MITIGATION MEASURES FROM THE GPEIR

Mitigation Measure CR-2 does not apply to the proposed project as it was completed during the preparation of this SEIR. Additionally, Mitigation Measure CR-3 has been incorporated into the proposed project as a new Condition of Approval as opposed to a mitigation measure.

#### 5.14.6.2 NEW MITIGATION MEASURES/CONDITIONS OF APPROVAL

##### Mitigation Measures

##### *Impact 5.14-1*

TCR-1 The project applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians–Kizh Nation. The monitor shall be retained prior to the commencement of any ground-disturbing activity for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). Ground-disturbing activity shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity or the issuance of any permit necessary to commence a ground-disturbing activity, whichever is earlier.

The monitor shall complete daily monitoring logs that shall provide descriptions of the relevant ground-disturbing activities; the type of construction activities performed; locations of ground-disturbing activities; soil types; cultural-related materials; and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc. (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the lead agency monthly, until the monitoring is deemed complete; copies of the monitor logs can be provided to the project applicant upon written request to the Tribe.

## 5. Environmental Analysis

### TRIBAL CULTURAL RESOURCES

On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete (a copy of the written confirmation shall be provided to the lead agency); or (2) a determination and written notification by the Kizh to the project applicant and lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

TCR-2      Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery (i.e., not less than the surrounding 50 feet) shall cease and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh shall recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural, and/or historic purposes.

TCR-3      Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

### Conditions of Approval

No new conditions of approval are required to reduce impacts to less than significant.

### 5.14.7 Level of Significance After Mitigation

The mitigation measures identified above would reduce Impact 5.14-1 to a level that is less than significant. Therefore, no significant unavoidable adverse impacts relating to tribal cultural resources remain.

### 5.14.8 References

Walnut, City of. 2023. "AB 52 Correspondences with Tribes." Appendix P.

## 5. Environmental Analysis

### 5.15 UTILITIES AND SERVICE SYSTEMS

This section of the Draft SEIR evaluates the potential for implementation of the proposed project to impact utilities and services systems in comparison to the impacts evaluated for the GPEIR. Potential changes to circumstances since the GPEIR that could result in new significant or substantially more severe environmental impacts for the proposed project are also reviewed, and cumulative impacts are considered.

Utilities and services systems include wastewater (sewage) treatment and collection systems, water supply and distribution systems, storm drainage, solid waste collection and disposal, and other public utilities. Potential impacts to hydrology (e.g., flooding) and water quality are provided in Section 5.10, *Hydrology and Water Quality*. Storm drainage, though discussed below, is also addressed in Section 5.10, *Hydrology and Water Quality*.

Comment letters were received concerning on-site flooding hazard and storm drainage capacity. Relevant topics from this comment letter are addressed in Section 5.15.3, *Storm Drainage*, of this section as well as within Section 5.10. Los Angeles County Flood Control District and Los Angeles County Sanitation Districts also submitted comment letters with project-relevant information that is incorporated in this section. Additional comments on the proposed project were provided by Los Angeles County Public Works District regarding on-site utilities which are also addressed in this section.

#### 5.15.1 Wastewater Treatment and Collection

##### 5.15.1.1 ENVIRONMENTAL SETTING

##### Regulatory Background

Federal, State, regional, and local regulations are listed in Table 5.15-1. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of GPU policies.

**Table 5.15-1 Regulations/Plans for Wastewater Treatment and Collection**

<b>Federal</b>	
Clean Water Act (CWA) US Code, Title 33, Sections 1251 et seq.	Controls the discharge of pollutants into the waters of the United States and regulates water quality standards for surface waters; requires treatment of all effluent before it is discharged to surface waters. The US Environmental Protection Agency (EPA) is authorized to set wastewater standards and runs the National Pollutant Discharge Elimination System permit program.
National Pollution Elimination Discharge System (NPDES)	Permits required for all new developments that discharge directly into waters of the United States.
<b>State</b>	
State Water Resources Control Board (SWRCB): Statewide General Waste Discharge Requirements for Sanitary Sewer Systems	Requires a sewer master plan that evaluates existing sewer collection systems and provides a framework for undertaking the construction of new and replacement facilities to maintain proper levels of service.
General Pretreatment Regulations for Existing and New Sources of Pollution	Establish the responsibilities of federal, state, and local governments; industry; and the public to implement National Pretreatment Standards to control pollutants that pass through publicly owned treatment works or may contaminate sewage sludge. Pretreatment standards are pollutant discharge limits that apply to industrial users.



## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

**Table 5.15-1 Regulations/Plans for Wastewater Treatment and Collection**

<b>Regional</b>	
San Jose Creek Water Reclamation Plant NPDES Permit NPDES No. CA0053911, Order No. R4-2015-0070 Carson Joint Water Pollution Control Plant NPDES Permit NPDES No. CA0053813, Order No. R4-2017-0180	The NPDES permits include wastewater discharge requirements for the treatment plants, including minimum applicable federal technology-based requirements and more stringent requirements where necessary to achieve the required water quality standards.
Consolidated Sewer Maintenance District of Los Angeles County Sewer System Management Plan	The Sewer System Management Plan ensures that the sanitary sewer collection systems are well managed, operated, and maintained to prevent or significantly minimize the occurrence of sanitary sewer overflow.
<b>Local</b>	
City of Walnut General Plan	Conservation, Open Space, and Recreation Element policies Land Use and Community Design Element policies Community Facilities and Infrastructure Element policies
City of Walnut Municipal Code	Chapter 5.04, Sewers and Sewage Disposal

### Existing Conditions

The City is a member of the Consolidated Sewer Maintenance District of Los Angeles County (CSMD) administered and managed by the Los Angeles County Department of Public Works (LAC-DPW). The LAC-DPW is responsible for developing a comprehensive Sewer System Management Plan for the CSMD. The collection system within Walnut consists of about 97 miles of sewer lines that discharge into the Los Angeles County Sanitation Districts' (LACSD) facilities for treatment and disposal. The LACSD constructs, operates, and maintains facilities to collect, treat, recycle, and dispose of sewage and industrial wastes. The district serves 78 cities and unincorporated areas; the system currently treats 510 million gallons per day (mgd) with 165 mgd available for reuse (LACSD 2023a, 2023b). According to LACSD, the project site is served by an 18-inch-diameter trunk sewer in South Lemon Avenue and Valley Boulevard. The trunk sewer has a capacity of 7.6 mgd and conveyed a peak flow of 0.6 mgd when last measured in 2014 (LACSD 2023c).

Treatment of wastewater from Walnut occurs at the LACSD's San Jose Creek Water Reclamation Plant (WRP) near the City of Industry; biosolids and waste flows that exceed the capacity of the San Jose Creek WRP are diverted to the LACSD's facility in Carson. The San Jose Creek Water Reclamation Plant is designed for primary, secondary, and tertiary treatment for up to 100 mgd of wastewater and serves a population of approximately one million people (LACSD 2023c). The WRP processes an average recycled flow of 62.7 mgd. The Joint Water Pollution Control Plant in Carson treats 260 mgd and has a permitted capacity of 400 mgd (LACSD 2023d).

The city is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). Projects that disturb surface water through their activities and discharges are required to apply for a Water Discharge Requirements permit from the Los Angeles RWQCB. The most recent such permits were effective as of April 17, 2015, for the San Jose Creek Water Reclamation Plant (R4-2015-0070), and a revised permit was issued on September 7, 2017, for the Joint Water Pollution Control Plant (R4-2017-0180).

## 5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

### 5.15.1.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project:

- U-1        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.
- U-3        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.

### 5.15.1.3 ENVIRONMENTAL IMPACTS

#### 2018 General Plan Update

The GPEIR noted that wastewater generated by the city was being treated primarily at the San Jose Creek WRP, and wastewater that exceeded the capacity of the plant was diverted to the Joint Water Pollution Control Plant in Carson. The San Jose Creek WRP treated an average of 64.6 mgd and was permitted to treat up to 100 mgd. The Joint Water Pollution Control Plant had substantial capacity to accommodate growth because it had a residual capacity of 140 mgd.

The anticipated population increase of Walnut would likely increase the amount of wastewater delivered to the treatment facilities. An estimate of 72 per capita gallons per day was developed using LACSD statistics. Given a projected population of 36,495 under the GPU and West Valley Specific Plan (WVSP) buildout, this would result in a generation of 2.62 mgd of wastewater (an increase of about 0.45 mgd). This increase represented less than 1.5 percent of the remaining capacity at the San Jose WRP and did not consider the available capacity at the Joint Water Pollution Control Plant. Therefore, no immediate changes to the sewer system were needed to meet the demands of growth consistent with the GPU and WVSP and impacts were less than significant.

The GPEIR found that future development could require expanded sewer facilities to meet the demand from anticipated population growth, including mainline or backbone elements and local connections. The expansion of utility systems serving Walnut would be contingent, in part, upon the rate of growth and deterioration of aging facilities. Thus, the GPEIR did not identify the specific location of and timing for any potential new facilities since it would be speculative. Any future expansion of existing facilities or construction of new facilities would be required to undergo environmental review pursuant to CEQA. The review will either be conducted by project applicants for individual projects or by the City for projects of broader application. Such impacts would be identified, along with measures to mitigate any significant impacts, as part of the CEQA compliance process for future project-specific planning actions. Furthermore, the goals, policies, or implementation measures of the GPU were expected to reduce potential environmental impacts. Therefore, impacts were found to be less than significant.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

#### Impact Analysis

The following impact analysis addresses the thresholds of significance detailed in Section 5.15.1.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.15-1: As with development pursuant to the GPU, the proposed project would not result in the relocation or construction of new or expanded wastewater facilities and, as with development pursuant to the GPU, would not cause significant environmental effects due to such activities. [Threshold U-1]**

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#### Construction Phase

Sewer infrastructure in the City is managed by LACDPW through the CSMD. Wastewater from these sewer lines discharges into LACSD's facilities and is treated at LACSD's San Jose Creek WRP. There are existing sewer lines in Paseo Del Prado, South Lemon Avenue, Paseo Sonrisa, and Paseo Tesoro which convey wastewater from the project site to an 18-inch trunk sewer located in South Lemon Avenue and Valley Boulevard. As a part of the proposed project, new on-site sewer lines for Building 1 would connect to the existing sewer main in South Lemon Avenue. On-site sewer lines for Building 2 would connect to the existing sewer main in Paseo Del Prado. On-site sewer lines for Buildings 3 and 4 would connect to the existing sewer main in Paseo Del Tesoro. No off-site sewer line construction or upsizing would be required to accommodate the proposed project. However, the public right-of-way of South Lemon Avenue, Paseo Del Prado, and Paseo Del Tesoro would require some construction to make the necessary infrastructure connections to the existing sewer main. Prior to ground disturbance, project contractors would coordinate with the City and LAC-DPW to identify the locations and depth of all sewer lines and the proposed sewer system improvements would be designed and constructed in accordance with City and LAC-DPW requirements and would require City and LAC-DPW approval.

Construction impacts associated with the connection to sewer lines on-site would primarily involve trenching to configure the connections to the sewer main. The construction-related environmental impacts associated with these improvements are analyzed throughout this Draft SEIR since it is a component of the proposed project. The analysis herein focuses on off-site construction and whether LAC-DPW or LACSD would need to expand their sewer system to handle the demand generated by development accommodated by the proposed project.

Additionally, wastewater generation would not occur during the construction phase of the proposed project from associated construction workers on-site. Construction workers would utilize portable restrooms, which would dispose of wastewater off-site and would not contribute to wastewater flows to the City's wastewater system. Thus, construction of the development accommodated by the proposed project would not require new or expanded wastewater infrastructure, the construction or relocation of which could cause significant environmental effects. Impacts would be similar to those analyzed in the GPEIR, and no new or more severe impacts would occur. Therefore, impacts would be less than significant.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

#### Operation Phase

The proposed project consists of four buildings that would accommodate warehousing, light industrial, and office/retail uses. The total warehousing/manufacturing square footage for the proposed project would be 392,488 square feet, and the office/retail square footage would be 22,290 square feet, for a total of 414,778 square feet of building space.

It was conservatively assumed that all the 392,488 square feet would be used for light industrial uses, which generates more sewage than warehousing uses. Therefore, LACSD's industrial generation factor of 200 gallons per day per 1,000 square feet and office generation factor of 200 gallons per day per 1,000 square feet were used (LACSD 2023f). The industrial uses under the proposed project would therefore generate an estimated 78,497 gallons per day (gpd), and the office/retail uses would generate an estimated 4,458 gpd, resulting in a total of 82,955 gpd of wastewater generated.

The baseline condition for analysis in this Draft SEIR is the buildout of the project site under the GPU. The project site is currently developed with 357,544 square feet of building area and includes multiple commercial and light industrial uses. For a comparison of the baseline conditions to the proposed project, LACSD's wastewater generation factor for industrial uses was chosen to estimate the wastewater generation of the baseline condition. Therefore, the estimated wastewater generated under the existing project site uses is 71,509 gpd. Table 5.15-2, *Sewer Demand Comparison*, shows a comparison between the wastewater generated under the proposed project and the existing site conditions.

**Table 5.15-2 Sewer Demand Comparison**

Land Use	Building Space SF	Wastewater Flow (gpd per 1,000 SF)	Wastewater Generation (gpd)
<b>Existing Site Conditions</b>			
Industrial	357,544	200	71,509
<b>Proposed Project</b>			
Industrial	392,488	200	78,497
Office Building	22,290	200	4,458
<b>Total</b>	414,778		<b>82,955</b>
<b>Net Generation</b>			<b>+11,446</b>

Source: LACSD 2023f.  
Notes: SF = square feet; gpd = gallons per day

The net wastewater generation under the proposed project when compared to baseline conditions is 11,446 gpd. As described above, wastewater flow originating from the project site would discharge to an on-site sewer system to be appropriately sized for the proposed project for conveyance to the LAC-DPW sewer system and ultimately to LACSD's Lemon Avenue Trunk Sewer. LACSD's 18-inch-diameter trunk sewer has a capacity of 7.6 mgd and conveyed a peak flow of 0.6 mgd when last measured in 2014 (LACSD 2023e). Therefore, the trunk main has a residual capacity of 7 mgd. Since the net sewer generation associated with

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

the proposed project is approximately 0.0114 mgd, it would be well within the available LACSD sewer infrastructure capacity and would not require the construction of new or expansion of the sewer trunk.

Furthermore, any development accommodated by the proposed project would comply with Chapter 5.04, Sewers and Sewage Disposal, of the Walnut Municipal Code and LACSD's connection fee requirements to provide financing for the ongoing maintenance and operation of the sanitary sewer systems, including capital replacement costs.

Based on the preceding, the proposed project would not require the relocation or construction of new or expanded wastewater conveyance infrastructure and would not result in new or more severe impacts when compared to those identified in the GPEIR. Therefore, impacts regarding wastewater disposal would be less than significant.

#### *Wastewater Treatment*

The proposed project would generate an estimated 82,955 gpd (or 0.083 mgd) of wastewater. However, when compared to baseline conditions, the net increase of wastewater generated under the proposed project is 0.0114 mgd. This wastewater would be treated at the San Jose Creek WRP adjacent to the City of Industry. The San Jose Creek WRP which has a residual capacity of 37.3 mgd.<sup>1</sup> Therefore, the proposed project would be served by WRP's residual capacity, and thus no new or expanded water reclamation plant facilities would be needed.

Additionally, the San Jose Creek WRP is required by federal and State law to meet applicable standards of treatment plant discharge requirements subject to NPDES No. CA0053911. The permit includes the conditions needed to meet minimum applicable technology-based requirements. The NPDES permit regulates the amount and type of pollutants that the system can discharge into receiving waters. The San Jose Creek WRP is operating in compliance with and would continue to operate subject to State waste discharge requirements and federal NPDES permit requirements, as set forth in the NPDES permit and order.

Furthermore, the proposed project would be required to comply with the LACSD's Wastewater Ordinance and Connection Fee Ordinance, which include the payment of a connection fee, the approval of plans for sewer construction by LACSD, and the prohibition of certain discharges to sewer lines. Future development would also need to abide by the requirements of Chapter 5.04, Sewers and Sewage Disposal, of the City's municipal code. This chapter regulates the discharge, deposit and disposal of all waste, including any material which may cause pollution of underground or surface waters.

As described above, the additional wastewater (quantity and type) that would be generated by the proposed project and treated by the San Jose Creek WRP would not impede the treatment plant's ability to continue to meet its wastewater treatment requirements and no new or expanded treatment facilities would be required. Furthermore, the proposed project would not result in any new or substantially more severe impacts when compared to those identified in the GPEIR. Therefore, impacts on wastewater treatment would be less than significant.

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<sup>1</sup> The WRP has a treatment capacity of up to 100 mgd and processes an average of 62.7 mgd. The residual capacity is 37.3 mgd (100 mgd – 62.7 mgd).

## 5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

*Level of Significance Before Mitigation:* Impact 5.15-1 would be less than significant.

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**Impact 5.15-2: As with development pursuant to the GPU, wastewater generated by the proposed project would be adequately treated by the wastewater service provider. [Threshold U-3]**

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Wastewater from the proposed uses that would be accommodated by the proposed project would not contain types of substances and/or amounts prohibited by LACSD. Thus, project-generated wastewater would not adversely affect LACSD's compliance with NPDES No. CA0053911. Development accommodated by the proposed project would also be designed, constructed, and operated in accordance with LACSD's Wastewater Ordinance. Furthermore, the discharge of oil or petroleum products to the sewer system is prohibited. As noted above, the San Jose Creek WRP has a residual capacity of 37.3 mgd and can accommodate the net increase of 11,446 gpd of wastewater that would be generated by the proposed project compared to the wastewater generation of the existing site uses. Therefore, LACSD has adequate capacity to serve the proposed project's projected demand in addition to the provider's existing commitments. The proposed project would not result in any new or more substantial impacts when compared to those identified in the GPEIR. Therefore, impacts would be less than significant.

*Level of Significance Before Mitigation:* Impact 5.15-2 would be less than significant.

### 5.15.1.4 CUMULATIVE IMPACTS

The area considered for cumulative impacts to wastewater treatment and collection in the GPEIR was CSMD's sewer service area. The proposed project would result in an estimated 11,446 gpd net increase in wastewater generation when compared the existing use of the site. However, the increase in sewer generation due to the proposed project can be accommodated by CSMD's system and would not substantially increase GPEIR impacts. Therefore, as with the GPU, the proposed project would not have the potential to result in cumulatively considerable impacts.

### 5.15.1.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.15-1 and 5.15-2.

### 5.15.1.6 MITIGATION MEASURES

#### Mitigation Measures from the GPEIR

There are no wastewater treatment and collection mitigation measures in the GPEIR.

#### New Mitigation Measures/Conditions of Approval

No additional project specific mitigation measures are required.

### 5.15.1.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

All impacts with regard to wastewater treatment and collection would be less than significant.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

## 5.15.2 Water Supply and Distribution

### 5.15.2.1 ENVIRONMENTAL SETTING

#### Regulatory Background

Federal, State, regional, and local regulations are listed in Table 5.15-3. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of GPU policies.

**Table 5.15-3 Regulations/Plans for Water Supply and Distribution**

<b>Federal</b>	
Safe Drinking Water Act	Authorizes the EPA to set national standards for safe drinking water; to set enforceable maximum contaminant levels in drinking water and require all water providers in the US to treat water to remove contaminants.
<b>State</b>	
Urban Water Management Planning Act	Requires the preparation of Urban Water Management Plans (UWMP) by water supplier that provide water to 3,000 or more customers, or that provide over 3,000 acre-feet annually.
Statewide Water Conservation Act of 2009 (Senate Bill X7-7)	Requires a 20 percent reduction in per capita urban water use by 2020, with an interim 10 percent target in 2015.
20x2020 Water Conservation Plan	Establishes a benchmark of current usage per capita of 2005 baseline data; an intermediate goal for all water providers to meet by 2015; a 20 percent reduction by 2020 of water usage.
Assembly Bill 1668 and Senate Bill 606	Calls for the creation of new urban efficiency standards for indoor use, outdoor use, and water lost to leaks as well as any appropriate variances for unique local conditions. The indoor residential water use standard was established at 55 gallons per person per day until January 2025.
Senate Bill 1157	From January 1, 2025, to January 1, 2030, the standard for indoor residential water use must be 47 gallons per capita daily, and beginning January 1, 2030, the standard must be 42 gallons per capita daily.
Mandatory Water Conservation Resolution No. 2014-0038	Conservation regulations that prohibit wasteful water use practices and require urban water suppliers to submit monthly water monitoring reports to the SWRCB.
Governor's 2021 Drought Declaration	Requires state agencies to partner with local water districts and utilities to make Californians aware of drought and encourage actions to reduce water usage by promoting the California Department of Water Resources' Save Our Water Campaign and other water conservation programs.
SWRCB 2022 Water Conservation Emergency Regulations	Adopted two emergency regulations that prohibit certain wasteful water use practices statewide and encourage water suppliers and Californians to monitor water use more closely while building habits to use water wisely and make conservation a way of life.
Water Conservation in Landscaping Act of 2006 (AB 1881)	Required the California Department of Water Resources to update the State Model Water Efficient Landscape Ordinance by 2009.
2015 Update of the State Model Water Efficient Landscape Ordinance (Executive Order B-29-15)	Requires that new development projects that include landscaped areas of 500 square feet or more be subject to the Model Ordinance. The previous landscape-size threshold for new development projects ranged from 2,500 square feet to 5,000 square feet.
California Plumbing Code	The California Plumbing Code was adopted as part of the California Building Code (CBC) and specifies technical standards of design, materials, workmanship, and maintenance for plumbing systems.
California Green Building Standards Code	Establishes the means of conserving water used indoors, outdoors and in wastewater conveyance, outlines means of achieving material conservation and resource efficiency; and outlines means of reducing the quantity of air contaminants.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

**Table 5.15-3 Regulations/Plans for Water Supply and Distribution**

<b>Regional</b>	
Walnut Valley Water District (WVWD) 2020 Urban Water Management Plan	A comprehensive guide for water resource management for the years 2020 to 2045; updated every five years.
WVWD Rules & Regulations	Includes applicable rates and charges for water consumption, water conservation requirements, requirements for water service connections and extensions to water mains, and rules applicable to developers and subdividers.
<b>Local</b>	
City of Walnut General Plan	Conservation, Open Space, and Recreation Element policies Land Use and Community Design Element policies Community Facilities and Infrastructure Element policies
City of Walnut Municipal Code	Chapter 2.24 California Green Building Code Chapter 6.52 Supplemental Planning Requirements - Article I. Water Efficient Landscaping

## Existing Conditions

### *Water Purveyor*

There are four different providers that serve the City; WVWD, Suburban Water Systems, Golden State Water Company, and Three Valleys Municipal Water District. WVWD would serve the project site.

WVWD's service area encompasses approximately 29 square miles and includes approximately 27,100 service connections. The service area covers the city of Diamond Bar; portions of the cities of Industry, Pomona, Walnut, and West Covina; and unincorporated areas of Los Angeles County, including Rowland Heights. WVWD's service area is primarily residential, with most commercial and industrial uses in the City of Industry.

WVWD relies on local groundwater and imported surface water sources to meet water demand in its service area. However, local groundwater sources are limited due to adjudication, and WVWD is primarily dependent on surface water from the Colorado River and Northern California that is imported by the Metropolitan Water District of Southern California through Three Valleys Municipal Water District. In 1955, WVWD, in collaboration with the City of Pomona and Rowland Water District, constructed a joint pipeline (Joint Water Line) for the purpose of delivering treated imported water to meet water demands within each water agency's service area. The Joint Water Line transports potable water from the Metropolitan Water District's Weymouth Treatment Plant in La Verne and from Three Valleys Municipal Water District's Miramar Treatment Plant in Claremont to WVWD's Edmund M. Biederman Terminal Storage Reservoir and Hydroelectric Facilities in Walnut.

To minimize its dependence on imported potable water, WVWD also operates a recycled water system for landscape irrigation, including at parks and school grounds. WVWD obtains its recycled water from LACSD's Pomona Water Reclamation Plant. The recycled water supply is augmented by groundwater pumped from the WVWD recycled-water wells. With this recycled water system, WVWD can deliver and use an average of 763 million gallons annually of recycled water (or about 2,340 acre-feet per year [afy]).



## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

The passage of SB X7-7 (also known as the Water Conservation Act of 2009) resulted in increased efforts to reduce potable water usage by requiring all California urban water suppliers to achieve a 20 percent reduction in demands (from a historical baseline) by 2020. WVWD's 2020 target is 169 gallons per capita per day (gpcd). The actual 2020 water demand was 149 gpcd. Therefore, WVWD met its 2020 water reduction target (WVWD 2021).

WVWD's current and projected potable and recycled water demands by customer class are presented in Tables 5.15-4, *Current and Projected Potable Water Demands for the WVWD (afy)*, and 5.15-5, *Current and Projected Recycled Water Demands for WVWD (afy)*.

**Table 5.15-4 Current and Projected Potable Water Demands for the WVWD (afy)**

Use Type	2020	2025	2030	2035	2040	2045
Single Family	11,387	12,108	12,256	12,408	12,547	12,688
Multi-Family	1,685	1,792	1,814	1,836	1,857	1,877
Commercial	1,687	1,794	1,816	1,838	1,857	1,877
Industrial	247	263	266	269	272	275
Institutional/Governmental	658	700	708	717	725	733
Losses	949	1,009	1,021	1,034	1,045	1,057
Other	17	18	18	19	19	19
<b>Total</b>	<b>16,630</b>	<b>17,684</b>	<b>17,899</b>	<b>18,121</b>	<b>18,324</b>	<b>18,529</b>

Source: WVWD 2021.  
afy = acre-feet/year

**Table 5.15-5 Current and Projected Recycled Water Demands for WVWD (afy)**

	2020	2025	2030	2035	2040	2045
Recycled Water Demand	1,973	3,489	3,532	5,575	3,619	3,664

Source: WVWD 2021.  
afy = acre-feet/year

Potable water demands in the WVWD's service area totaled 16,630 afy for the year 2020 and recycled water totaled 1,973 afy. The total potable water demands in the year 2045 for a normal year are projected to be 18,529 afy, and recycled water demands are projected to be 1,664 afy.

### *Water Supply Reliability*

Every urban water supplier must assess its ability to provide water service to its customers under normal, dry, and multiple dry water years. WVWD depends on a combination of imported and local supplies to meet its water demands and has taken numerous steps to ensure that it has adequate supplies. The UWMP states that WVWD will be able to meet demand with projected supplies between 2020 and 2045 during normal years, single dry years, and multiple dry years (see Table 5.15-6, *Normal, Single Dry, and Multiple Dry Year Supply and Demand (afy)*).

## 5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

**Table 5.15-6 Normal, Single Dry, and Multiple Dry Year Supply and Demand (afy)**

		2025	2030	2035	2040	2045
<b>Normal Year</b>						
Supply Totals		21,173	21,431	21,696	21,943	22,193
Demand Totals		21,173	21,431	21,696	21,943	22,193
Difference		0	0	0	0	0
<b>Single Dry Year</b>						
Supply Totals		21,003	21,261	21,523	21,768	22,016
Demand Totals		21,003	21,261	21,523	21,768	22,016
Difference		0	0	0	0	0
<b>Multiple Dry Year</b>						
First Year	Supply Totals	22,300	22,574	22,853	23,113	23,377
	Demand Totals	22,300	22,574	22,853	23,113	23,377
	<b>Difference</b>	0	0	0	0	0
Second Year	Supply Totals	22,965	23,247	23,534	23,801	24,073
	Demand Totals	22,965	23,247	23,534	23,801	24,073
	<b>Difference</b>	0	0	0	0	0
Third Year	Supply Totals	23,580	23,869	24,164	24,439	24,718
	Demand Totals	23,580	23,869	24,164	24,439	24,718
	<b>Difference</b>	0	0	0	0	0
Fourth Year	Supply Totals	21,118	21,378	21,641	21,888	22,138
	Demand Totals	21,118	21,378	21,641	21,888	22,138
	<b>Difference</b>	0	0	0	0	0
Fifth Year	Supply Totals	17,896	18,116	18,340	18,548	18,760
	Demand Totals	17,896	18,116	18,340	18,548	18,760
	<b>Difference</b>	0	0	0	0	0

Source: WVWD 2021.

### Water Distribution System

The project site is currently fully developed with water infrastructure in place. Water service is provided to the project site via water mains beneath Paseo Del Prado, South Lemon Avenue, Valley Boulevard, Paseo Tesoro, and Paseo Sonrisa.

#### 5.15.2.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project:

- U-1 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.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

U-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

#### 5.15.2.3 ENVIRONMENTAL IMPACTS

##### 2018 General Plan Update

The GPEIR found that water use would be expected to rise with the anticipated increase in population. However, the expansion in conservation practices such as low water use gardening and the use of recycled water would likely dampen demand. Also, the increase in mixed-use typically results in a lower household water use as lawn and garden irrigation practices are less necessary compared to single family homes. Using the 2020 Urban Water Use Target goals; 168 gpcd for WVWD, 169 gpcd for Suburban Water Systems, and 192 gpcd for Golden State Water Company, a weighted citywide gpcd was calculated. The projected population of 36,495 was used, resulting in a daily average use of 6.20 million gallons (or 19.0 acre-feet) per day citywide. This was combined with the roughly 300 acre-feet consumed at Mt. San Antonio College to result in an estimated 7,200 afy citywide. Low-water-use techniques and increasing use of recycled water will likely reduce per capita use. Additionally, all of the water providers have multiple stages of action due to drought that can significantly reduce water use during dry years. The projected increase in water use is partially offset by an anticipated increase in the use of recycled water for irrigation.

The GPEIR found that future development could require expanded water facilities to meet the demand from anticipated population growth, including mainline or backbone elements and local connections. The GPEIR did not identify the specific location of and timing for any potential new facilities since it would be speculative. Any future expansion of existing facilities or construction of new facilities would be required to undergo environmental review pursuant to CEQA. Impacts and measures to mitigate any significant impacts would be identified as part of the CEQA compliance process for future project-specific planning actions. Furthermore, the goals, policies, or implementation measures of the GPU were expected to reduce potential environmental impacts. Therefore, impacts were found to be less than significant.

##### Impact Analysis

The following impact analysis addresses the thresholds of significance detailed in Section 5.15.2.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.15-3: The proposed project would not result in the relocation or construction of new or expanded water facilities and, as with development pursuant to the GPU, would not cause significant environmental effects due to such activities. [Threshold U-1]**

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##### Construction

WVWD provides water delivery services the project site. Under existing conditions, water service is provided to the project site via water mains beneath Paseo Del Prado, South Lemon Avenue, Valley Boulevard, Paseo Tesoro, and Paseo Sonrisa. As a part of the proposed project, new on-site water lines for Buildings 1 and 2 would connect to the existing water main in Paseo Del Prado. Proposed on-site water lines for Buildings 3

## 5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

and 4 would connect to the water main in Paseo Tesoro. Separate water lines would be provided on-site for potable water and fire water.

No off-site water line construction or upsizing would be required to accommodate the proposed project. However, Paseo Del Prado and Paseo Tesoro would require some construction to make the necessary infrastructure connections to the water mains. The proposed water system improvements would be designed and constructed in accordance with City and WVWD requirements and would require City and WVWD approval.

Construction impacts associated with the connection to the existing water lines on-site would primarily involve trenching. The construction-related environmental impacts associated with these improvements are analyzed throughout this Draft SEIR since it is a component of the proposed project. The analysis herein focuses on whether WVWD would need to expand its water system to handle the demand generated by development accommodated by the proposed project.

Prior to ground disturbance, the proposed project's construction contractors would coordinate with WVWD to identify the locations and depth of all underground pipelines. WVWD would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. The proposed water system improvements would also be designed and constructed in accordance with City and WVWD requirements and would require City and WVWD approval. Additionally, water need for construction activities would be intermittent throughout the construction period, would be temporary in nature, and required water for construction is generally trucked in.

Therefore, construction associated with the proposed project would not require or result in the relocation or construction of new or expanded water infrastructure the construction or relocation of which could cause significant environmental effects. Furthermore, the proposed project would not result in any new or substantially more severe impacts when compared those identified in the GPEIR. Impacts would be less than significant.

### Operation

Implementation of the proposed project would require local-serving infrastructure to be appropriately sized and configured to the proposed buildings under the proposed project. Prior to the issuance of building permits, the Los Angeles County Fire Department would be required to grant approval of the final building design, including all fire prevention and suppression systems, which would ensure the proposed project is developed pursuant to Fire Code requirements. In addition, on-site water connections would be constructed, as necessary, to comply with the fire flow set for the proposed project by the County Fire Department during the plan check process.

The proposed water distribution system would also abide by the requirements of Title 20 of the Los Angeles County Code of Ordinances. Additionally, during the engineering design and plan check process, the City and WVWD would assess the infrastructure needs of the proposed project to ensure that adequate water infrastructure is available.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

Furthermore, design of the proposed project would meet requirements in the California Green Building Standards Code (CALGreen) regarding water efficiency and conservation, as codified in Part 11 of Title 24 of the California Code of Regulations. Proposed development would also abide by the requirements of the City's municipal code—Chapter 2.24, California Green Building Code, and Chapter 6.52, Article I, Water Efficient Landscaping.

Therefore, implementation of the on-site water system improvements would not result in new or substantially more severe impacts when compared to the GPU, and impacts would be less than significant.

***Level of Significance Before Mitigation:*** Impact 5.15-3 is less than significant.

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**Impact 5.15-4: As with development pursuant to the GPU, available water supplies are sufficient to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. [Threshold U-2]**

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#### Construction

Construction activities associated with the proposed project would result in a temporary increase in water demand. Water use would be associated with demolition, earthwork and soil compaction, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, water line testing and flushing, and other related short-term activities. The amount of water used during construction would vary depending on weather, soil conditions, the size of the area under construction, and the specific activities being performed. These activities would occur intermittently throughout the construction period, and would be temporary in nature, and required water would usually be trucked in. This short-term and intermittent water use during construction is not expected to be substantial when compared to operational water demands. Additionally, as concluded in WVWD's 2020 UWMP, projected water demand for the city will be met by available supplies during a normal year, single dry year, and multiple dry year hydrological conditions through 2045. Therefore, the proposed project's construction impacts on water supply would be less than significant.

#### Operation

The proposed project consists of four buildings that would accommodate both warehousing, light manufacturing, and office/retail uses. The total warehousing/industrial square footage for the proposed project would be 392,488 square feet and the total office/retail square footage would be 22,290 square feet, for a total of 414,778 square feet of building space. The total landscaped area under the proposed project would be 115,026 square feet. The building area under baseline conditions consists of 357,544 square feet of industrial space. Using spatial analysis of the project site with satellite imagery, the estimated landscaped space under existing uses is 150,550 square feet, which includes grass lawns, mature ornamental trees, and shrubs.

For indoor water demand, the sewer generation is estimated to be 90 percent of the indoor water demand (King County 2014). This accounts for water system losses which are assumed to be 10 percent of the total supplied.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

The landscape irrigation demand was estimated using the “Water Budget Workbook for New and Rehabilitated Non-Residential Landscapes, Maximum Applied Water Allowance,” from the California Department of Water Resources, with the following assumptions (see Appendix Q):

- An average Reference Evapotranspiration (ET<sub>o</sub>) of 49.20 inches per year per WVWD’s 2020 UWMP.
- An effective precipitation value of 4.30 inches per year, which is assumed to be 25 percent of the total annual precipitation of 17.2 inches per year from WVWD’s 2020 UWMP.
- All landscaping is assumed to be overhead irrigation.

As shown in Table 5.15-7, *Projected Water Demand*, the net increase in total water use under the proposed project would be approximately 11,485 gpd, which is approximately 12.9 afy.

**Table 5.15-7 Projected Water Demand**

Land Use	Area (SF)	Wastewater Generation (gpd)	Indoor Water Demand (gpd)	Outdoor Water Demand (gpd)	Total Water Demand (gpd)
<b>Existing Site Conditions</b>					
Industrial	357,544	71,509	79,454	-	79,454
Landscaping	150,500	-	-	5,178	5,178
<b>Total</b>	<b>-</b>	<b>-</b>	<b>79,454</b>	<b>5,178</b>	<b>84,632</b>
<b>Proposed Site Conditions</b>					
Industrial	392,488	78,497	87,219	-	87,219
Office/Retail	22,290	4,458	4,953	-	4,953
Landscaping	115,026	-	-	3,945	3,945
<b>Total</b>	<b>-</b>	<b>-</b>	<b>92,172</b>	<b>3,945</b>	<b>96,117</b>
<b>Difference</b>	<b>-</b>	<b>-</b>	<b>12,718</b>	<b>-1,233</b>	<b>11,485</b>

Source: LACSD 2023f; DWR 2017 (Appendix Q).

Notes: SF = square feet; afy = acre-feet-year

The project site is currently developed with commercial and light industrial uses, which were accounted for in the UWMP’s supply and demand projections. The UWMP’s projections are based on the forecasts for development under the City’s General Plan and the Southern California Council of Governments’ long-range development forecasts. The proposed project would increase water demand at the project site by approximately 12.9 afy beyond the use of the current development. This increase in demand would account for a 0.07 percent increase in the WVWD’s projected demand of 17,684 afy for 2025, as shown in Table 5.15-4. WVWD estimates that it will have sufficient water supplies to meet proposed growth for normal, single-dry, and multiple-dry years. The proposed project’s increase in demand indicates that WVWD would be able to sufficiently serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. The proposed project would not result in any new or more substantial impacts when compared to the GPEIR; therefore, impacts would be less than significant.

**Level of Significance Before Mitigation:** Impact 5.15-4 is less than significant.

## **5. Environmental Analysis**

### **UTILITIES AND SERVICE SYSTEMS**

#### **5.15.2.4 CUMULATIVE IMPACTS**

The GPEIR water supply and distribution analysis was based on future citywide plan buildout and therefore all impacts analyzed were cumulative. The GPEIR found impacts to water supplies to be less than significant. Water supply impacts associated with the proposed project can be accommodated by WVWD's system and therefore would not increase GPEIR impacts. Therefore, as with the GPU, the proposed project would not have the potential to result in cumulatively considerable impacts.

#### **5.15.2.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION**

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.15-3 and 5.15-4.

#### **5.15.2.6 MITIGATION MEASURES**

##### **Mitigation Measures from the GPEIR**

There are no water supply and distribution mitigation measures in the GPEIR.

##### **New Mitigation Measures/Conditions of Approval**

No additional project specific mitigation measures are required.

#### **5.15.2.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION**

All impacts with respect to water supply and distribution would be less than significant.

### **5.15.3 Storm Drainage**

#### **5.15.3.1 ENVIRONMENTAL SETTING**

##### **Regulatory Background**

Federal, State, regional, and local regulations are listed in Table 5.15-8, *Regulations/Plans for Storm Drainage*. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of GPU policies.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

**Table 5.15-8 Regulations/Plans for Storm Drainage**

<b>Federal</b>	
Clean Water Act (CWA) US Code, Title 33, Sections 1251 et seq.	Controls the discharge of pollutants into the waters of the United States and regulates water quality standards for surface waters; requires treatment of all effluent before it is discharged to surface waters. The US Environment Protection Agency (EPA) is authorized to set wastewater standards and runs the National Pollutant Discharge Elimination System permit program.
National Pollution Elimination Discharge System (NPDES)	Permits required for all new developments that discharge directly into Waters of the United States.
<b>State</b>	
Porter-Cologne Water Quality Act Water Code §§ 13000 et seq.	Basic water quality control law for California; gives the State Water Control Resources Board (SWRCB) control over state water rights and water quality policy.
SWRCB Construction General Permit (CGP) Order 2022-0057-DWQ	Construction activities that disturb one or more acres of land must file a notice of intent, risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement.
SWRCB Trash Amendments	Applies to all surface waters of California and include a land-use-based compliance approach to focus trash controls in areas with high trash-generation rates.
<b>Regional</b>	
Los Angeles RWQCB Regional Municipal Stormwater (MS4) Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004)	The MS4 Permit contains waste discharge requirements for municipal separate stormwater systems for both storm and non-stormwater discharges. The intent of the permit is to protect general water quality and that of receiving water bodies from pollutants and to mitigate for existing pollutants.
<b>Local</b>	
City of Walnut General Plan	Conservation, Open Space, and Recreation Element policies Land Use and Community Design Element policies Community Facilities and Infrastructure Element policies
City of Walnut Municipal Code	Chapter 5.08, Stormwater and Urban Runoff Pollution Control Chapter 2.04.040 Appendix Chapter J of said Los Angeles County Building Code supplemented by development grading standards

### Existing Conditions

The City of Walnut's storm drain system consists of 644 City-owned catch basins and 142 Los Angeles County Flood Control District (LAC-FCD) owned catch basins. Due to the topography and location of the San Jose Hills, approximately 93 percent of the city drains to the south and is tributary to Reach 1 of San Jose Creek. Stormwater and nonstorm water runoff are captured by catch basins and carried through a network of storm drains and open channels to multiple outfalls connected to Reach 1 of San Jose Creek. San Jose Creek transports runoff for the City of Walnut's outfalls approximately 12 miles to its confluence with the San Gabriel River Reach 3 just north of the interchange of State Route 60 and Interstate 605. The remaining 7 percent of the City of Walnut's jurisdictional area drains to Walnut Creek Wash (Walnut 2015).

LAC-FCD maintains the storm drain lines within the City of Walnut. LAC-FCD's jurisdiction encompasses more than 3,000 square miles, 85 cities, and approximately 2.1 million land parcels. It includes the vast majority of drainage infrastructure within incorporated and unincorporated areas in every watershed,



## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

including 500 miles of open channel, 2,800 miles of underground storm drains, and an estimated 120,000 catch basins. The city has a combination of both county and privately maintained trunk lines. Several County-managed storm drains are in Walnut (Walnut 2018).

The existing site is an industrial manufacturing park with associated landscaping, paving, and parking lots. Under existing conditions at the lot proposed for Building 1 (see Figure 5.8-1a, *Existing Hydrology Map – Lot 1*), stormwater generated on the northwest half of the site drains to the southeast and sheet flows to multiple ribbon gutters, which direct runoff to an existing on-site catch basin near the south corner of the site. The existing catch basin is directly connected to an existing 90-inch storm drain maintained by LAC-FCD. This storm drain bisects the site running from the northwest to the southeast of the site. The northeast half of the site drains to the southeast and sheet flows to multiple ribbon gutters that direct runoff over the driveways and into Paseo Sonrisa. Runoff then flows north in the curb and gutter until it is captured by existing curb inlets that are connected to the existing 90-inch storm drain.

For the lot proposed for Building 2 (see Figure 5.8-1b, *Existing Hydrology Map – Lot 2*) under existing conditions, stormwater generated on the northwest half of the site drains to the southwest and sheet flows to the two existing driveways at the southwest corner of the site and into Paseo Sonrisa. Runoff flows south in the curb and gutter and is captured in a curb inlet that connects to the existing 90-inch storm drain.

For the lot proposed for Building 3 (see Figure 5.8-1c, *Existing Hydrology Map – Lot 3*) under existing conditions, the site drains to the southwest and sheet flows to the two existing driveways along the southwest corner of the site and into Paseo Sonrisa. Runoff flows north in the curb and gutter and is captured in a curb inlet that connects to the existing 90-inch storm drain.

For the lot proposed for Building 4 (see Figure 5.8-1d, *Existing Hydrology Map – Lot 4*) under existing conditions, the site drains to the southwest and sheet flows to the existing driveways along the west property line and into Paseo Tesoro. Runoff flows north in the curb and gutter and is captured in a curb inlet that connects to an existing 90-inch storm drain.

The existing 90-inch storm drain that bisects the site flows across the site to the intersection of South Lemon Avenue and Valley Boulevard. The storm drain becomes a 96-inch drain that flows southeast into San Jose Creek. San Jose Creek flows west until it merges with the San Gabriel River, which flows south until it reaches the Pacific Ocean near Seal Beach.

#### 5.15.3.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project:

- U-1        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.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

#### 5.15.3.3 ENVIRONMENTAL IMPACTS

##### 2018 General Plan Update

The GPEIR concluded that any new projects in Walnut would have to comply with the Los Angeles County MS4 permit and include stormwater low impact development (LID) best management practices (BMP). Additionally, Walnut's Municipal Code includes requirements that regulate the implementation of the LIDs and BMPs for projects in the city.

The GPEIR also noted that any future expansion of existing storm drainage facilities or construction of new facilities would be required to undergo environmental review pursuant to CEQA. Impacts and measures to mitigate significant impacts would be identified as part of the CEQA compliance process for future project-specific planning actions. Furthermore, the goals, policies, or implementation measures of the GPU were expected to reduce potential environmental impacts. Therefore, impacts were found to be less than significant.

##### Impact Analysis

The following impact analysis addresses the thresholds of significance detailed in Section 5.15.3.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.15-5: The proposed project would not result in the relocation or construction of new or expanded storm drainage facilities and, as with development pursuant to the GPU, would not cause significant environmental effects due to such activities. [Threshold U-1]**

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The ground surface at the site generally slopes down to the south and ranges from approximately 525 feet to 520 feet above sea level (Lagan 2021). As shown on Figure 3-3, *Site Aerial*, the project site is developed with an industrial manufacturing park and associated landscaping, paving, and parking lots.

For the lot proposed for Building 1 (see Figure 3-10a, *Preliminary LID Plan Lot 1*), stormwater runoff would drain to the southeast and sheet flow to multiple ribbon gutters, which direct runoff to catch basins along the southeast property line. The runoff would be directed to an underground detention system, then to a Modular Wetland System for treatment. Treated runoff would flow to a sump pump and be pumped to the existing on-site catch basin that is connected to the existing 90-inch storm drain maintained by the LAC-FCD. This storm drain runs from the northwest to the southeast of the site. The proposed project would increase the pervious area on this lot from 9.6 percent to 10.1 percent (Atlas 2023a). According to the hydraulic analysis performed for the proposed project, the post-development condition under the proposed project would decrease the peak flow on Lot 1 by 3.45 cubic-feet per second (cfs) and runoff volume by 877 cubic-feet (cf) for the 50-year storm event (Atlas 2023e).

For the lot proposed for Building 2 (see Figure 3-10b, *Preliminary LID Plan Lot 2*) the site would drain to the southeast and sheet flow to multiple ribbon gutters, which would direct runoff to catch basins along the southeast property line. The runoff would be directed to an underground detention system and a Modular Wetland System. After treatment, the runoff would flow to a sump pump and be pumped to the curb and

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

gutter in Paseo Tesoro. Runoff would then flow north to the existing curb inlet that is connected to the existing 90-inch storm drain. The proposed development on this lot would decrease the pervious area from 10.5 percent to 8.7 percent (Atlas 2023b). According to the hydraulic analysis performed for the proposed project, the post-development condition under the proposed project would decrease the peak flow on Lot 2 by 0.01 cfs and increase runoff volume by 586 cf for a 50-year storm event (Atlas 2023f).

For the lot proposed for Building 3 (see Figure 3-10c, *Preliminary LID Plan Lot 3*) the site would drain to the south and sheet flow to multiple ribbon gutters that would direct runoff to catch basins near the south property corner. The runoff would be directed to an underground detention system then enter a Modular Wetland System for treatment. After treatment, the runoff would flow to a sump pump and would be pumped to the curb and gutter in Paseo Sonrisa. Runoff would flow north to the existing curb inlet, which is connected to the existing 90-inch storm drain. The proposed project would decrease the pervious area on this lot from 14.5 percent to 10.2 percent (Atlas 2023c). According to the hydraulic analysis performed for the proposed project, the post-development condition under the proposed project would increase the peak flow on Lot 3 by 0.96 cfs and runoff volume by 3,165 cf for a 50-year storm event (Atlas 2023g).

For the lot proposed for Building 4 (see Figure 3-10d, *Preliminary LID Plan Lot 4*) the site would drain to the south and would sheet flow to multiple ribbon gutters which direct runoff to catch basins near the south property corner. The runoff would be directed to an underground detention and Modular Wetland systems. After treatment, the runoff would flow to a sump pump and be pumped to the curb and gutter in Paseo Tesoro. Runoff would then flow north to the existing curb inlet, which is connected to the existing 90-inch storm drain. The proposed project would increase the pervious area on this lot from 10.3 percent to 10.8 percent (Atlas 2023d). According to the hydraulic analysis performed for the proposed project, the post-development condition under the proposed project would increase the peak flow on Lot 4 by 3.30 cfs and decrease the runoff volume by 148 cf for a 50-year storm event (Atlas 2023h).

A comment letter submitted by LAC-FCD notes that the proposed project would be required to submit a permit to LAC-FCD for any and all work occurring within its flood control easement for storm drain BI 8301-Line B, which runs through the proposed development (see Appendix A).

***Level of Significance Before Mitigation:*** Less than significant.

#### 5.15.3.4 CUMULATIVE IMPACTS

The GPEIR storm drainage analysis was based on future citywide plan buildout, and therefore all impacts analyzed were cumulative. The GPEIR found impacts to storm drainage systems to be less than significant. Storm drainage impacts associated with the proposed project would not be greater or substantially more severe than identified in the GPEIR. Therefore, project-related storm drainage impacts would not substantially increase GPEIR impacts or have the potential to result in cumulatively considerable impacts.

#### 5.15.3.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, Impact 5.15-5 would be less than significant.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

#### 5.15.3.6 MITIGATION MEASURES

##### Mitigation Measures from the GPEIR

There are no storm drainage mitigation measures in the GPEIR.

##### New Mitigation Measures/Conditions of Approval

No additional project specific mitigation measures are required.

#### 5.15.3.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact 5.15-5 is less than significant.

### 5.15.4 Solid Waste

#### 5.15.4.1 ENVIRONMENTAL SETTING

##### Regulatory Background

Federal, State, regional, and local regulations are listed in Table 5.15-9, *Regulations/Plans for Solid Waste*. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals and Policies*, for the full list of GPU policies.

**Table 5.15-9 Regulations/Plans for Solid Waste**

<b>Federal</b>	
Resource Conservation and Recovery Act of 1976 Code of Federal Regulations, Title 40, Part 258	Regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria.
<b>State</b>	
California Green Building Standards Code Section 5.408, Construction Waste Reduction, Disposal, and Recycling	At least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.
Assembly Bill 939	Required every California city and county to divert 50 percent of its waste from landfills by the year 2000.
Assembly Bill 1327	Each local jurisdiction must adopt an ordinance requiring commercial, industrial, institutional, and residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials.
Senate Bill 1383	Established methane emissions reduction targets by reducing organic waste in landfills.
Senate Bill 1016	SB 1016 requires that the CalRecycle Board reviews the Reduction and Recycling Element and Hazardous Waste Element of Integrated Waste Management Plans every two years.
Assembly Bill 341	Increased the statewide solid waste diversion goal to 75 percent by 2020. Mandates recycling for businesses producing four or more cubic yards of solid waste per week or multi-family residential dwellings of five or more units.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

**Table 5.15-9 Regulations/Plans for Solid Waste**

Assembly Bill 1826	Mandated organic waste recycling for businesses and multifamily dwellings with five or more units that generate two or more cubic yards of solid waste, recycling, and organic waste combined per week.
<b>Regional</b>	
County of Los Angeles Countywide Integrated Waste Management Plan	Solid waste reduction planning produced by the County and its cities in compliance with AB 939.
<b>Local</b>	
City of Walnut General Plan	Conservation, Open Space, and Recreation Element policies Land Use and Community Design Element policies Community Facilities and Infrastructure Element policies
City of Walnut Municipal Code	Chapter 3.29, Mandatory Organic Waste Disposal Reduction Chapter 3.28 Collection and Disposal of Refuse Chapter 2.24 California Green Building Code

## Existing Conditions

### *Solid Waste Collection and Disposal*

The City contracts with a private waste provider, Valley Vista Services, for solid waste pick-up and recycling services. In response to State directives for waste reduction, the City and Valley Vista Services have coordinated efforts to reduce the volume of refuse entering the waste stream. The City's foremost priority for solid waste is to reduce the volume of waste headed to landfills by ensuring contracted providers accommodate source reduction and recycling in Walnut. A secondary priority is to ensure efficient and cost-effective provision of services to Walnut residents, businesses, and institutions.

In 2019, the total solid waste disposed of to landfills by the city was 24,013 tons. Approximately 95 percent of the solid waste was sent to three landfills. The El Sobrante Landfill received 69 percent of this solid waste, Mid-Valley Sanitary Landfill received 15 percent, and the Olinda Alpha Landfill received 11 percent (CalRecycle 2019a). Table 5.15-10, *Landfill Summary*, provides more information on capacities and closing dates for the three landfills.

**Table 5.15-10 Landfill Summary**

Landfill Name	Maximum Permitted Throughput, tons per day	Average Disposal, tons per day <sup>1</sup>	Residual Disposal Capacity, tons per day	Remaining Capacity, cubic yards	Estimated Closing Year
El Sobrante Landfill	16,054	11,071	4,983	143,977,170	2051
Mid-Valley Sanitary Landfill	7,500	3,602	3,898	61,219,377	2045
Olinda Alpha Landfill	8,000	7,089	911	17,500,000	2036

Sources: CalRecycle 2019b, 2019c, 2019d, 2019e.

<sup>1</sup> Based on six days per week operation (300 days per year).

## 5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

AB 939 requires all counties to demonstrate that they have 15 years of available countywide solid waste landfill capacity, either in their jurisdiction or contracted with another entity. The El Sobrante and Mid-Valley Landfills have 15 years of available landfill capacity.

### *Solid Waste Diversion*

The Integrated Waste Management Act (2000) requires all local jurisdictions to divert 50 percent of total annual solid waste tonnage to be recycled. Additionally, in 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. Each jurisdiction has both a per capita and per employee target diversion rate, which are calculated from the average of 50 percent of generation between base years 2003 through 2006, expressed in terms of per capita disposal. Disposal rates compared to disposal targets are one of several factors in determining a jurisdiction's compliance with AB 939; therefore, actual disposal rates at or below target disposal rates do not necessarily indicate compliance with AB 939.

The City's target disposal maximum rates are 5.4 pounds per day (ppd) per capita and 20 ppd per employee. In 2021, the most recent year for which data are available, the actual disposal rates were 4.7 ppd per resident and 13.9 ppd per employee, which are both lower than target disposal rates and thus consistent with AB 939 (CalRecycle 2019f).

### **5.15.4.2 THRESHOLDS OF SIGNIFICANCE**

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project:

- U-4 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.
- U-5 Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

### **5.15.4.3 ENVIRONMENTAL IMPACTS**

#### **2018 General Plan Update**

The GPEIR found that with buildout of the GPU and WVSP, the amount of solid waste generated and disposed of at landfills may increase. However, future landfill diversion rates may improve with the City's continued implementation of solid waste reduction, recycling, and re-use measures to meet its obligation under AB 939. Additionally, the GPEIR found that landfills in the region could accommodate solid waste generated from development pursuant to the GPU, and impacts were found to be less than significant.

Furthermore, the policies and programs of the GPU would not interfere with implementation of existing solid waste disposal regulations and would in fact support them and solid wastes must be disposed of in accordance with federal and state laws.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

#### Walnut Business Park

The following impact analysis addresses the thresholds of significance detailed in Section 5.15.4.3. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.15-6: As with development pursuant to the GPU, existing and/or proposed facilities would be able to accommodate project-generated solid waste and comply with related solid waste regulations. [Thresholds U-4]**

#### Construction

Construction associated with the proposed project would result in solid waste associated primarily with grading and grubbing activities and the removal of organic and other materials potentially detrimental to soil compaction. There would be building and construction demolition debris generated. Additionally, construction activities, including that generated by construction employees, would result in the generation of construction waste.

The proposed project would be constructed in accordance with CALGreen, which requires recycling a minimum of 65 percent of the nonhazardous construction and demolition debris (by weight or volume). CALGreen also mandates the preparation of a solid waste management plan, which would be implemented for construction activities. Therefore, construction associated with the proposed project would not generate solid waste in excess of state and local standards nor exceed the capacity of local infrastructure, and impacts from construction waste would be less than significant. Furthermore, the proposed project would not result in any new or more substantial impacts when compared to the GPEIR.

#### Operational

Operation of the proposed project is estimated to generate 5,390 ppd of solid waste, as shown in Table 5.15-11, *Estimated Solid Waste Generation*. The net increase in solid waste generated compared to the existing buildings is approximately 54 ppd. Solid waste generation rates for the existing and proposed project uses are based on the CalEEMod default waste generation rate of 0.94 pound per thousand square feet per day, consistent with the assumptions in Section 5.7, *Greenhouse Gas Emissions*.

**Table 5.15-11 Estimated Solid Waste Generation**

Land Use	Area (SF)	Solid Waste Generation Rate	Solid Waste Generation (ppd)
<b>Existing Uses</b>			
Manufacturing/Warehouse	357,544	0.94 lb/1,000 SF/day	336
<b>Proposed Project</b>			
Manufacturing/Warehouse	392,488	0.94 lb/1,000 SF/day	369
Office	22,290	0.94 lb/1,000 SF/day	21
<b>Total</b>	414,778		390
<b>Net Generation</b>			54

Source: CalEEMod 2022.

Notes: ppd = pounds per day; SF = square feet; lb = pounds

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

As detailed in Table 5.15-11, the three landfills serving the city have a residual daily capacity of 19,792 tons per day (or 19.6 million ppd). The proposed project's net increase of an estimated 54 ppd equates to a fraction of 1 percent of available capacity of the three landfills serving the project site; therefore, the proposed project would be adequately served by these landfills.

Solid waste facilities would be able to accommodate project-generated solid waste. The proposed project would not 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. Furthermore, the proposed project would not result in any new or substantially more severe impacts when compared to the impacts identified in the GPEIR. Therefore, impacts would be less than significant.

***Level of Significance Before Mitigation:*** Impact 5.16-6 would be less than significant.

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**Impact 5.16-7: Project-generated solid waste would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. [Thresholds U-5]**

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Construction and operation phases of the proposed project would be implemented in accordance with all applicable federal, State, and local laws and regulations governing solid waste disposal. For example, the project would comply with the following federal, state, and local laws and regulations that govern solid waste disposal.

- The Resource Conservation and Recovery Act of 1976 and the Solid Waste Disposal Act of 1965 govern solid waste disposal.
- AB 939 (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.) required diversion of 50 percent of waste from landfills and required each county to provide landfill capacity for a 15-year period.
- AB 1327 (California Solid Waste Reuse and Recycling Access Act of 1991) requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.
- AB 1826 mandates that businesses that generate two or more cubic yards of solid waste, recycling, and organic waste combined per week start recycling organic waste.
- AB 341 mandates separating recyclables from trash and either subscribing to recycling services, self-hauling their recyclables, or contracting with a permitted private recycler.
- Chapter 3.28 of the City's municipal code governs solid waste collection and salvage of recyclable material; Chapter 2.24 adopts the California Green Building Standards Code by reference; and Chapter 3.29 implements the statewide mandated waste diversion of organic materials.

In addition, as shown in Impact 5.15-6, the proposed project's solid waste is adequately accommodated by landfills serving the project site. All development under the GPU would be required to comply with the applicable solid waste statutes and regulations listed above, and as such, the proposed project would not result



## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

in any new or substantially more severe impacts when compared to the impacts identified in the GPEIR. Therefore, impacts would be less than significant.

***Level of Significance Before Mitigation:*** Less than significant.

#### 5.15.4.4 CUMULATIVE IMPACTS

The GPEIR concluded that there was adequate landfill capacity in the region for solid waste that would be generated by the GPU buildout, and impacts would be less than significant. Solid waste impacts associated with the proposed project would not be greater or substantially more severe than identified in the GPEIR. Therefore, project-related solid waste impacts would not have the potential to result in cumulatively considerable impacts.

#### 5.15.4.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.15-6 and 5.15-7.

#### 5.15.4.6 MITIGATION MEASURES

##### Mitigation Measures from the GPEIR

There are no solid waste-related mitigation measures in the GPEIR.

##### New Mitigation Measures/Conditions of Approval

No additional project specific mitigation measures are required.

#### 5.15.4.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

All impacts related to solid waste would be less than significant.

### 5.15.5 Other Utilities

#### 5.15.5.1 ENVIRONMENTAL SETTING

##### Regulatory Background

Federal, State, regional, and local regulations are listed in Table 5.15-12, *Regulations/Plans for Other Utilities*. See Appendix B, *Regulatory Standards*, for a detailed description of the regulatory requirements. See Appendix C, *General Plan Goals Policies*, for the full list of GPU policies.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

**Table 5.15-12 Regulations/Plans for Other Utilities**

<b>Federal</b>	
Energy Independence and Security Act of 2007	Seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles.
Energy Policy Act of 2005	Includes a comprehensive set of provisions to address energy issues.
National Energy Policy	Designed to help the private sector and state and local governments promote dependable, affordable, and environmentally sound production and distribution of energy for the future.
<b>State</b>	
California Energy Commission (CEC)	Created to be the state's principal energy planning organization and meet the energy challenges of the 1973 oil embargo.
California Energy Benchmarking and Disclosure (AB 802)	Establishes a statewide energy benchmarking and disclosure program and enhances the CEC's authority to collect data from utilities and other entities for the purposes of energy forecasting, planning, and program design.
California Building Code: Building Energy Efficiency Standards	Requires the design of building shells and building components to conserve energy.
Title 24, Part 11, Green Building Standards	CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.
Appliance Efficiency Regulations	Contain energy performance, energy design, water performance, and water design standards for appliances that are sold or offered for sale in California.
<b>Local</b>	
City of Walnut General Plan	Conservation, Open Space, and Recreation Element policies Land Use and Community Design Element policies Community Facilities and Infrastructure Element policies
City of Walnut Municipal Code	Chapter 2.24 California Green Building Code

## Existing Conditions

### *Electricity*

The project site is within the service area of Southern California Edison (SCE). SCE's service area spans much of southern California—from Orange and Riverside counties on the south to Santa Barbara County on the west to Mono County on the north (CEC 2022). Total electricity consumption in SCE's service area was 103,045 gigawatt-hours in 2021 (CEC 2023). Sources of electricity sold by SCE in 2021 were:

- 31.4 percent renewable, consisting mostly of solar and wind
- 2.3 percent large hydroelectric
- 22.3 percent natural gas
- 9.2 percent nuclear

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

- 0.2 percent other
- 34.6 percent unspecified sources—that is, not traceable to specific sources (SCE 2023a)<sup>2</sup>

#### *Telecommunications*

Communication services are offered regionally by franchised telecommunications providers, such as Direct TV, Frontier, and Charter Communications.

#### 5.15.5.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project:

- U-1            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.

#### 5.15.5.3 ENVIRONMENTAL IMPACTS

##### 2018 General Plan Update

The GPEIR did not discuss impacts to electricity and telecommunication utilities and services.

##### Impact Analysis

The following impact analysis addresses the thresholds of significance detailed in Section 5.15.5.2. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.15-8: The proposed project would not result in the relocation or construction of new or expanded electricity facilities and, as with development pursuant to the GPU, would not cause significant environmental effects due to such activities. [Threshold U-1]**

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The proposed project would connect to the existing electric and communication systems that serve the existing development on the project site. The proposed project would be all electric and therefore would not connect to natural gas infrastructure.

##### Electricity

###### *Construction*

Construction activities would require electricity use to power the construction equipment. The electricity use during construction would vary during different phases of construction; most of the construction equipment during grading would be gas or diesel powered, and later construction phases would require electricity-powered equipment such as nail guns for interior construction and sprayers for architectural coatings. Overall,

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<sup>2</sup> The electricity sources listed reflect changes after the 2013 closure of the San Onofre Nuclear Generating Station, which is owned by SCE. Numbers are rounded up and may cause the total to not add up to exactly 100 percent.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

the use of electricity would be temporary and would fluctuate according to the phase of construction. It is anticipated that most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during the approximately 16 months of construction activities. Electrical energy would be available for use during construction from the existing power lines and connections available in the project site, potentially including temporary power poles. Therefore, impacts would be less than significant.

#### *Operation*

Electrical service for the proposed project would be provided by SCE through connections to existing off-site electrical lines and new on-site infrastructure as needed. The proposed project would result in the development of 414,778 square feet of industrial space. Operation of the proposed project would result in four new all-electric buildings that would generate demand for electricity. The proposed project would result in a net increase in electricity use of 968,515 kilowatt-hours per year, or 0.97 gigawatt-hours per year, when compared to the estimated existing energy demand under baseline conditions (see Section 5.5, *Energy*, Table 5.5-5, *Electricity Demand*). While the proposed project would increase energy demand at the site compared to existing/baseline conditions, all development would be required to comply with the latest applicable Building Energy Efficiency Standards and CALGreen.

Total electricity consumption in SCE's service area is forecast to increase by approximately 22,713 gigawatt-hours between 2021 and 2035 (CEC 2023b). SCE forecasts that it will have sufficient electricity supplies to meet demands in its service area, and the proposed project's net increase in electricity demand accounts for less than 1 percent of SCE's total demand. Therefore, project development would not require SCE to obtain new or expanded electricity supplies; impacts would be less than significant.

#### **Telecommunications**

Infrastructure supporting telecommunications services would be provided and installed on-site. Concealed wireless telecommunications facilities would be installed pursuant to the requirements of the Walnut Municipal Code. Installation of telecommunication infrastructure would result in physical impacts to the surface and subsurface of the project site. These impacts are part of the project's construction phase and are evaluated throughout this Draft SEIR. Furthermore, a number of franchised telecommunications providers are available in the region, and no significant expansion or construction of the telecommunications network is anticipated. Therefore, impacts would be less than significant.

***Level of Significance Before Mitigation:*** Impact 5.15-8 would be less than significant.

#### **5.15.5.4 CUMULATIVE IMPACTS**

Impacts associated with the increased electricity demand associated with the proposed project would not be greater or substantially more severe than impacts associated with development pursuant to the GPU and are therefore less than significant. Therefore, project-related impacts would not substantially increase GPU impacts or have the potential to result in a cumulatively considerable impacts.

## 5. Environmental Analysis

### UTILITIES AND SERVICE SYSTEMS

#### 5.15.5.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, Impact 5.15-8 would be less than significant.

#### 5.15.5.6 MITIGATION MEASURES

##### Mitigation Measures from the GPEIR

There are no mitigation measures related to electricity or telecommunication utilities in the GPEIR.

##### New Mitigation Measures/Conditions of Approval

No additional project specific mitigation measures are required.

#### 5.15.5.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

All impacts related to dry utilities would be less than significant.

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## 6. Significant Unavoidable Adverse Impacts

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At the end of Chapter 1, *Executive Summary*, is a table that summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. As described throughout Chapter 5, *Environmental Analysis*, and Chapter 8, *Impacts Found Not to Be Significant*, all impacts under the proposed project would be reduced to less than significant with the incorporation of general plan policies; local, State, and federal regulations; and/or mitigation measures. Therefore, the proposed project would not result in any significant and unavoidable impacts.



## 6. Significant Unavoidable Adverse Impacts

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## 7. Alternatives to the Proposed Project

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### 7.1 INTRODUCTION

#### 7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the proposed project.

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (CEQA Guidelines, Section 15126.6[b])
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (CEQA Guidelines, Section 15126.6[e][1])
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (CEQA Guidelines, Section 15126.6[e][2])
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (CEQA Guidelines, Section 15126.6[f])
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries..., and whether the proponent can reasonably acquire,

## 7. Alternatives to the Proposed Project

control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (CEQA Guidelines, Section 15126.6[f][1]).

- “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (CEQA Guidelines, Section 15126.6[f][2][A])
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (CEQA Guidelines, Section 15126.6[f][3])

For each development alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative as compared to the proposed project.
- Identifies the impacts of the project that would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.

According to Section 15126.6(d) of the CEQA Guidelines, “[i]f an alternative would cause...significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

### 7.1.2 Project Objectives

As described in Section 3.2, the following objectives have been established for the proposed project and will guide decision makers in their review of the project, the project alternatives, and associated environmental impacts.

1. Provide for the development of the site consistent with the City’s General Plan.
2. Replace an aging industrial park with modern, attractive, efficient buildings.
3. Develop a diverse industrial campus that can accommodate a mix of industrial, retail, and office uses.
4. Create an industrial and commercial development that provides employment opportunities to area residents, expands the industrial base within the city, and responds to the growing demand for warehousing and logistics businesses in the area.

### 7.1.3 Significant Impacts of the Project

As discussed previously, a primary consideration in defining project alternatives is their potential to reduce or eliminate significant impacts compared to the proposed project. Based on the analysis in Chapter 5, the proposed project would not result in any significant, unavoidable environmental impacts. Without mitigation measures, however, implementation of the proposed project would result in significant environmental impacts to the following:

## 7. Alternatives to the Proposed Project

- **Air Quality.** Construction activities associated with the proposed project would generate short-term emissions that exceed South Coast Air Quality Management District's (AQMD's) significance thresholds and would cumulatively contribute to the nonattainment designations of the South Coast Air Basin. Additionally, the combined construction and operational emissions would exceed the draft South Coast AQMD cumulative cancer risk threshold. To mitigate both impacts, construction contractors shall use equipment that meets either US Environmental Protection Agency (EPA) or California Air Resources Board (CARB) Tier 4 final emission standards.
- **Biological Resources.** The proposed project contains suitable habitat for nesting birds and roosting bats and therefore may result in significant impacts to these species types. To mitigate this impact, ground disturbance should be avoided during the nesting bird season and, if avoidance is not possible, a preconstruction survey shall be conducted by a qualified biologist. Additionally, a qualified biologist shall conduct a roost assessment survey of trees or human-made structures with potential to support bat roosts that are planned to be removed.
- **Cultural Resources.** Construction activities associated with the proposed project could encounter cultural resources resulting in the disturbance of subsurface cultural resources. GPEIR Mitigation Measure CR-3 requires projects to incorporate a Condition of Approval that identifies a procedure for the treatment of cultural resources in the event of a discovery. The proposed project therefore incorporates this mitigation measure as Condition of Approval (COA)-CUL-1 to reduce impacts to cultural resources to less than significant.
- **Greenhouse Gas Emissions.** Development of the proposed project could potentially conflict with the State's goals for carbon neutrality identified in the 2022 Scoping Plan. To mitigate this impact, prior to the issuance of a building permit, the site plan shall include automobile electric vehicle charging stations equal to the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code.
- **Transportation.** The proposed project would increase the total regional vehicle miles travelled (VMT) compared to the cumulative no project conditions. Transportation Demand Management measures, such as increased bicycle access, the provision of First-Mile/Last-Mile space, an improved pedestrian network, a car-sharing program, an employee parking cash-out, or discounted transit passes would mitigate this impact to less than significant.
- **Tribal Cultural Resources.** Ground-disturbing activities could encounter unknown and/or buried tribal cultural resources associated with the Gabrieleño Band of Mission Indians—Kizh Nation. To mitigate this impact, a Native American Monitor shall complete daily monitoring logs during ground-disturbing activities and if any discoveries of potential tribal cultural resources (TCR) are encountered, construction shall cease in the direct vicinity of the discovery and shall not resume until the discovered TCR has been fully assessed, recovered, or retained in the form and/or manner the tribe deems appropriate.

## 7. Alternatives to the Proposed Project

### 7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons they were not selected for detailed analysis in this Supplemental EIR.

“Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts” (CEQA Guidelines Section 15126.6[c]).

#### 7.2.1 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. A key question in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126[5][B][1]).

Key factors in evaluating the feasibility of potential off-site locations for EIR project alternatives include:

- If it is in the same jurisdiction.
- Whether development as proposed would require a General Plan Amendment.
- Whether the project applicant could reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). (CEQA Guidelines Section 15126.6[f][1])

According to the 2018 General Plan Update (GPU), residential properties make up approximately 58.4 percent of the total land uses in the City of Walnut. Commercial/Industrial properties make up approximately 4.2 percent of the city’s total land uses, including only 2 percent for light industrial. Industrial land uses are a relatively small portion of the overall land use in Walnut. Low-impact light industrial uses, such as light manufacturing, similar to the project site, are the predominant types of industrial businesses. Most of Walnut’s industrial land uses are in the southern portion of the city, on parcels bounded by Carrey Road to the north and east, Valley Boulevard to the south, and Lemon Creek to the west (see Figure 3-4, *General Plan Land Use*). Therefore, the proposed industrial, warehousing, and retail uses of the proposed project would not require a General Plan Amendment (GPA) if proposed within this boundary. Relocation to any other area within the city’s boundaries would require a GPA. There is no vacant land large enough to accommodate the proposed project within the area designated as “Industrial” and any site within this area would be similarly placed relative to access to Valley Boulevard, which is a designated truck route, and Interstate (I-) 10 and State Route (SR) 60, which provide regional access to the project area.

A logical alternate location for the project within the city was not identified. The project applicant does not own or control any other property. Moreover, in general, any development of the size and type proposed by the project on a project site that is already built out would have substantially the same significant impacts on air

## 7. Alternatives to the Proposed Project

quality, biological resources, cultural resources, greenhouse gases, and tribal cultural resources as the proposed project and would require similar mitigation measures. The balance of environmental impacts for the proposed project were determined to be less than significant.

It was determined, therefore, that it is unlikely that there is an alternative project site that could meet the objectives of the proposed project and reduce significant impacts of the project as proposed. This alternative has therefore been rejected from further consideration.

### 7.2.2 Reduced Hours of Operation

Comments received during the Notice of Preparation public review period suggested that the Supplemental EIR evaluate a project alternative with reduced hours of operation. A warehouse/light industrial use with limited operation hours would not be as competitive in the market and potentially would not be economically viable. The majority of prospective tenants for warehouse/light industrial uses prefer the option for 24 hours/7 day operations. Prospective tenants find restrictions on access and use of the space undesirable and will often seek other alternatives for occupancy. A study conducted by the National Center for Sustainable Transportation listed factors that influenced a tenant's selection of a warehouse facility by surveying 1,000 warehouse establishments in Southern California. The results showed that 64 percent of respondents noted that the ability to operate 24 hours a day, 7 days a week, was an important factor in choosing a warehouse location (NCST 2017). In another study conducted to understand the location choices of logistics firms, the ability to operate 24/7 was reported as one of the most important location factors in addition to land costs, proximity to transportation infrastructure, and access to a skilled workforce (Jakubicek 2010). The Southern California Association of Government's Industrial Warehousing Report also notes that the majority of third-party logistics operators operate 24/7 to improve efficiency and postpone the need for additional square footage (SCAG 2018).

The Ports of Long Beach and Los Angeles are moving toward 24/7 operations as part of a plan by the Biden administration to address supply chain bottlenecks. The implication is that the rest of the supply chain, including warehousing/logistics operations are also moving in this direction to meet supply needs (White House 2021).

Additionally, the operator of a similar facility to the proposed project, where certain sides of buildings are restricted from use at certain hours of the day, has been unsuccessful in finding interest in that property for more than a decade (Sibson, pers. comm. 2024).

## 7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the information and criteria above, the following alternatives have been determined to represent a reasonable range of alternatives with the potential to feasibly attain most of the basic objectives of the project but may avoid or substantially lessen any of the significant effects of the project. These alternatives are more fully described in Table 7-1, *Alternatives Description and Statistical Comparison*, and analyzed in the following sections.

## 7. Alternatives to the Proposed Project

- **No Project/Existing General Plan.** Under this alternative, it is assumed that existing uses on the project site would remain and operate as under existing conditions. The project site currently includes an industrial business park accommodating multiple uses, primarily commercial and light industrial, including a beef jerky manufacturer, chorizo manufacturer, roofing material supplier, car body shop repair facility, pizza restaurant, roofers’ mart, Mexican food supply store, rent-a-car office, and pet food supply outlet. The 357,544 square feet of existing uses are all allowed under the site’s GPU “Industrial” land use designation.

Since the baseline conditions for the analysis in this Draft Supplemental EIR represent the Existing General Plan land uses (which also represents existing conditions), this Draft Supplemental EIR evaluates the proposed project’s impact in comparison to the No Project alternative.

- **Mixed-Use Alternative.** This alternative includes a mix of multifamily residential units and retail. This alternative was chosen for its potential to reduce air quality and greenhouse gas impacts and because it was requested by residents at the scoping meeting. Requests to include this alternative were also received during the public comment period after the release of the Notice of Preparation. The City’s 2021-2029 Housing Element includes a residential sites inventory that includes properties that will be rezoned to meet the City’s Regional Housing Needs Allocation (RHNA). The inventory includes five study areas. The proposed project site was not included as a Study Area. Study Area 4 is east of the project site and is closer in size to the project site than the rest of the study areas. Similar to the project site, all parcels within Study Area 4 have a General Plan designation of “Industrial” and are zoned as Light Manufacturing (M-1) (City of Walnut 2022). The proposed number of units for this study area is 575 units, including 387 low income and 188 moderate income units. This alternative proposes the same number of units for the project site as Study Area 4. There is an abundance of retail in the general area of the project site and the office market is still weak (CBRE 2024). Therefore, only 20,000 square feet of retail was considered for this alternative. This alternative would require a GPA since the current General Plan designation and zoning for the site does not allow for residential uses.

**Table 7-1 Alternatives Description and Statistical Comparison**

Alternative Description	Land Use		Environmental Reasons Considered
	Designation	Square Footage/ Dwelling Units	
Proposed Project	Warehouse/Industrial Uses	392,488 square feet	N/A
	Office	22,290 square feet	
No Project/Existing General Plan	Light Industrial	357,544 square feet	Required by CEQA
Mixed-Use Alternative	Multifamily Units	575 dwelling units	Requested by attendees at the scoping meeting and comment letters received in response to the Notice of Preparation Potential to reduce impacts related to: • Air Quality
	Retail	20,000 square feet	

## 7. Alternatives to the Proposed Project

An EIR must identify an “environmentally superior” alternative, and where the No Project alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative’s environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. Section 7.4 identifies the environmentally superior alternative. The preferred land use alternative (proposed project) is analyzed in detail in Chapter 5 of this Draft Supplemental EIR.

### 7.3.1 Alternatives Comparison

Table 7-2 shows projected daily morning and evening peak-hour trips for each alternative. Trip generation is based on rates from the Institute of Transportation Engineers’ (ITE’s) *Trip Generation Manual*, 11th edition. Table 7-3 shows the projected daily vehicle miles traveled (VMT) for each alternative.

**Table 7-2 Trip Generation Comparison**

	Daily Trips	Morning Peak Hour	Evening Peak Hour
Proposed Project	1,029	118	127
No Project/Existing General Plan	826	164	67
Mixed-Use Alternative	3,761	201	268

Source: Iteris, July 2024.

**Table 7-3 Vehicle Miles Traveled Comparison**

	VMT Total	Passenger Vehicle VMT	Truck VMT <sup>1</sup>
Proposed Project	16,928	7,971	8,958
No Project/Existing General Plan	12,998	6,199	6,798
Mixed-Use Alternative	30,841	30,841	0

Source: Iteris, July 2024.

Auto VMT= 8.2 miles per trip; Truck VMT = 39.9 miles per trip.

<sup>1</sup> Trucks are defined as Class 8 trucks and include tractor trailer tractors, single-unit dump trucks, as well as non-commercial chassis fire trucks; such trucks typically have 3 or more axles.

### 7.3.2 Environmental Impact Comparison

Table 7-4, *Project Alternatives: Environmental Impact Comparison*, assesses the relative impact for each project alternative in comparison to the proposed project. All environmental categories evaluated for the proposed project in this Draft Supplemental EIR are compared, and each category shows whether the impact of that alternative is “less than” (LT), “greater than” (GT), or “similar to” (S) the respective environmental impact for the proposed project.



## 7. Alternatives to the Proposed Project

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7. Alternatives to the Proposed Project

Table 7-4      Project Alternatives: Environmental Impact Comparison

Impact	No Project/Existing General Plan	Mixed-Use Alternative
Aesthetics	<p>The site currently includes a variety of commercial and industrial uses in one-story buildings, street lighting, grass and landscaped areas, several ornamental trees, and surface parking lots for on-site parking.</p> <p>The proposed project includes buildings that would be designed as single-story, tilt-up industrial buildings, up to 35 feet, that would encompass a larger square footage than the existing uses on the project site. The proposed project would introduce new buildings with slightly larger massing. By developing the proposed project, the character of the site would completely change. Since aesthetic impacts are inherently subjective, the aesthetic impacts of this alternative and the proposed project are considered to be the same.</p> <p>S</p>	<p>To accommodate 578 dwelling units, the building(s) for this alternative would be two to three stories high and would encompass approximately the same square footage as the buildings for the proposed project. Therefore, massing for this alternative will be slightly higher. All the buildings would be designed in accordance with the City's applicable design regulations and review. The aesthetic character for this alternative would be entirely different than the proposed project. Since aesthetic impacts are inherently subjective, the aesthetic impacts of this alternative and the proposed project are considered to be the same.</p> <p>S</p>
Agricultural Resources	<p>Similar to the proposed project, the No Project alternative would have no impact on agricultural resources.</p> <p>S</p>	<p>Similar to the proposed project, the mixed-use alternative would have no impact on agricultural resources.</p> <p>S</p>
Air Quality	<p>In comparison to the proposed project, this alternative would not require demolition or construction activities and therefore would eliminate the air emissions associated with these activities. This alternative would slightly reduce the number of truck trips in comparison to the proposed project and would result in an approximate 23% truck VMT reduction and associated criteria air pollutant emissions. Therefore, the No Project alternative would reduce impacts when compared to the proposed project, which requires mitigation to reduce impacts to less than significant.</p> <p>LT</p>	<p>In comparison to the proposed project, this alternative would have similar short-term, construction-related air quality impacts. While the total building space would increase under this alternative, the additional space is unlikely to require additional off-road heavy-duty equipment to the extent that it could cause an increased air quality impact during construction. This alternative would generate an approximately 287% increase in VMT and associated emissions from passenger vehicles during operation but would generate no truck trips, eliminating the generation of an estimated 8,958 truck VMT per day. Considering the net increase in criteria air pollutant emissions resulting from the proposed project, as shown in Table 5.2-12, the shift in VMT by vehicle type is not likely to cause an exceedance of South Coast AQMD's significance thresholds. In addition, due to the elimination of substantial truck activity, this alternative would result in lower operational health risk to nearby receptors due to the elimination of substantial diesel particulate matter sources. Therefore, this alternative would reduce impacts compared to the proposed project, and air quality impacts would be less than significant.</p> <p>LT</p>
Biological Resources	<p>Under the No Project alternative, the site would not be redeveloped. No impact to biological resources would occur under this alternative, and impacts would be reduced compared to the proposed project, which requires mitigation to reduce impacts to less than significant.</p> <p>LT</p>	<p>Since, as with the proposed project, the mixed-use alternative would involve redevelopment of the entire project site, impacts to biological resources associated with this alternative would be similar to the proposed project. As with the proposed project, any potential biological impacts could be mitigated to less than significant. Therefore, impacts would be considered similar.</p> <p>S</p>
Cultural Resources	<p>Under this alternative, no demolition, grading, or redevelopment activities would occur and there would be no potential to encounter or disturb archaeological resources or demolish buildings of historic significance. Impacts would be reduced compared to the proposed project, which requires mitigation to reduce impacts to less than significant.</p> <p>LT</p>	<p>As with the proposed project, implementation of this alternative would involve redevelopment of the entire project site and would have the same potential for discovery of cultural resources during grading and excavation activities. Thus, impacts would be the same as the proposed project and would be reduced to less than significant after implementation of mitigation measures.</p> <p>S</p>
Geology and Soils	<p>Under this alternative, the existing site buildings would remain in place and no redevelopment would occur. The proposed project would result in more employees working at the project site when compared to the existing development under the No Project alternative, thereby potentially exposing more people to seismic and soil hazards. However, the buildings under the proposed project would be designed and constructed in accordance with the most recent California Building Code and would be potentially more resistant to these hazards than the existing buildings at the project site. Construction activities associated with the proposed project have the potential to encounter paleontological resources; since no redevelopment would occur under this alternative, there would be no potential to encounter or disturb paleontological resources. Therefore, impacts would be reduced compared to the proposed project.</p> <p>LT</p>	<p>As with the proposed project, implementation of this alternative would involve redevelopment of the entire project site with new buildings designed to meet the latest California Building Code and other associated requirements for seismic and soil hazard protection. However, this alternative would introduce more people to the project site when compared to the proposed project, thereby exposing more people to seismic and soils hazards when compared to the proposed project. This alternative would have the same potential for discovery of paleontological resources during grading and excavation activities. Overall, due to the increase in population at the project site, impacts would be slightly greater than the proposed project.</p> <p>GT</p>
Greenhouse Gas Emissions	<p>In comparison to the proposed project, this alternative would eliminate greenhouse gas emissions from construction activities. This alternative would decrease greenhouse gas emissions in comparison to existing conditions since it would generate slightly fewer truck trips compared to the proposed project and would reduce VMT by approximately 23%. Therefore, this alternative would reduce impacts compared to the proposed project, which requires mitigation to reduce impacts to less than significant.</p> <p>LT</p>	<p>This alternative would generate an approximate 287% increase in VMT and associated emissions from passenger vehicles during operation but would generate no truck trips, eliminating the generation of an estimated 8,958 truck VMT per day. Implementation of this alternative would require that buildings are all-electric and include off-street parking, which meets the current CALGreen Tier 2 electric vehicle (EV) charging standards to be consistent with the 2022 Scoping Plan. With this requirement, this alternative would have similar impacts compared to the proposed project, and greenhouse gas impacts of this alternative would be less than significant with mitigation.</p> <p>S</p>

7. Alternatives to the Proposed Project

Table 7-4      Project Alternatives: Environmental Impact Comparison

Impact	No Project/Existing General Plan	Mixed-Use Alternative
Energy	<p>Under the No Project alternative, impacts to energy would be greater than the impacts from the proposed project. Existing buildings that do not include energy-efficiency improvements would remain. In comparison, the proposed buildings would comply with the applicable Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) requirements would include installation of a higher-efficiency heating, ventilation, and thermal envelope. In addition, the new buildings to be constructed would be all electric and upon buildout of the proposed project, natural gas usage on-site would be eliminated, resulting in a reduction of 6,892,070 kBtu/year.</p> <p>The proposed project would also provide new employment opportunities within an urbanized area with nearby amenities and public transit options. Furthermore, the proposed project would include roadway and sidewalk/pathway improvements, which would promote alternative modes of transportation, such as walking or biking. In addition, in compliance with CALGreen, the proposed project would include bicycle racks and storage for employee use. The proposed project would also include EV charging infrastructure, which, if implemented, would reduce reliance on fossil fuels. Therefore, the No Project alternative would have an increased impact when compared to the proposed project.</p>	<p>This alternative would generate an approximately 287% increase in passenger VMT resulting in a significant increase in passenger vehicle fuel consumption (e.g., gasoline). Additionally, because this alternative includes the introduction of 575 dwelling units, the total building space is anticipated to increase beyond what is envisioned by the proposed project, generally resulting in an increase in consumption of building-related energy, such as electricity and natural gas. However, an increase in energy consumption does not necessarily mean this alternative would result in wasteful, inefficient, or unnecessary consumption of energy resources.</p> <p>All new buildings constructed under this alternative would be required to comply with the applicable Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) requirements. Compliance with these standards would contribute to reducing building energy demands through energy efficiency and use of on-site renewable energy.</p> <p>This alternative would also provide more opportunities for housing and employment for residents of the city and would be in an urbanized area with nearby amenities and public transit options. In addition, in compliance with CALGreen, this alternative would include bicycle racks and storage for employee and resident use. Therefore, this alternative would have a similar impact when compared to the proposed project.</p>
	GT	S
Hazards and Hazardous Materials	<p>As with the proposed project, the routine transport, use, and storage of hazardous materials or reasonable upset and accidental releases of hazardous wastes would be mitigated by comprehensive regulations. Existing development on the site, similar to the proposed project, would also not impair or physically interfere with the implementation of an emergency response or evacuation plan. Therefore, impacts under the No Project alternative would be similar to the proposed project.</p>	<p>As with the proposed project, the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. Therefore, impacts under the Mixed-Use alternative would be similar to the proposed project.</p> <p>As with the proposed project, this alternative would be required to comply with existing federal, state, and local regulations governing use, storage, transport, and disposal of hazardous materials and hazardous wastes. Hazards and hazardous materials impacts under this alternative would be similar to the proposed project.</p>
	S	S
Hydrology and Water Quality	<p>Existing water quality conditions, groundwater supplies, drainage patterns, and runoff amounts would not change under the No Project alternative. This alternative would not introduce new sources of water pollutants to the project area. However, this alternative would not include improvements associated with new low-impact development, source control, site design, and treatment control best management practices (BMPs) to minimize runoff and water pollution. These BMPs are required measures that would occur under the proposed project and have a beneficial impact on stormwater quality. Overall, hydrology and water quality impacts would be slightly greater under this alternative.</p>	<p>As with the proposed project, this alternative would comply with the National Pollutant Discharge Elimination System (NPDES), which regulates discharges into waters of the United States and mandates MS4 permits (regulating municipal storm sewer systems) and Stormwater Pollution Prevention Plans (SWPPPs) requiring implementation of BMPs for potential surface water and water quality impacts related to project construction. Hydrology impacts, therefore, would be similar to the proposed project.</p>
	GT	S
Land Use and Planning	<p>Under the No Project alternative, the existing conditions would remain, which is consistent with the City's Zoning Code, which zones the project site as Light Manufacturing (M-1). Though the proposed project is also consistent with the City's Zoning Code, the proposed project would be consistent will the applicable goals and policies found in the Southern California Association of Governments' (SCAG's) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the City's General Plan. The No Project alternative would comply with the current General Plan designation and Zoning Code but would fail to achieve many of the applicable goals and policies of the General Plan and the RTP/SCS. Therefore, impacts under a No Project alternative would be considered greater than impacts under the proposed project.</p>	<p>Although this alternative may be as effective in achieving the General Plan policies or the goals of the SCAG RTP/SCS, this alternative would not be consistent with the land use designation or zoning for the project site and would introduce residential units in an area that is predominantly light industrial uses. Therefore, this alternative would have a greater impact than the proposed project.</p>
	GT	GT
Mineral Resources	<p>Similar to the proposed project, the No Project alternative would have no impact on mineral resources.</p>	<p>Similar to the proposed project, the mixed-use alternative would have no impacts on mineral resources.</p>
	S	S
Noise	<p>Under the No Project alternative, because no redevelopment would occur, no construction-related noise or vibration would occur. Therefore, construction-related noise impacts would be less than the proposed project.</p> <p>Additionally, the No Project alternative encompasses a smaller building square footage when compared with the proposed project and includes dissimilar operational activities and the proposed project would include a higher number of truck trips. Therefore, this alternative will reduce noise impacts. However, as discussed in Section 5.11 of this Supplemental EIR, noise impacts of the proposed project would be less than significant.</p>	<p>Under the Mixed-Use alternative, building development intensity could slightly increase the duration of project-related construction noise impacts but would not affect peak construction noise volumes. Due to similar peak construction noise volumes and generally similar length of construction activities, construction-related noise impacts would be the same as the proposed project and remain less than significant.</p> <p>The additional vehicle trips associated with this alternative would increase the operational traffic-related noise impacts. However, traffic noise increases would not exceed land use compatibility and applicable noise increase thresholds and would remain less than significant.</p>
	LT	GT

7. Alternatives to the Proposed Project

Table 7-4      Project Alternatives: Environmental Impact Comparison

Impact	No Project/Existing General Plan	Mixed-Use Alternative
Population and Housing	<p>Typically, population growth occurs when there is an expansion of residential developments and therefore an increase of new residents. The No Project alternative would not introduce new residents or employees to the project site, and therefore would not impact population or housing. Both this alternative and the proposed project would not increase the number of residential units available or designate new land uses. However, the proposed project would result in a 14% increase in square footage of development on-site and therefore may potentially introduce new businesses and slightly additional employees that may require housing in the city. Therefore, this alternative would decrease impacts when compared to the proposed project.</p> <p>S</p>	<p>Currently, the project site includes light industrial uses and no residential units. This alternative would introduce 575 multifamily units and would increase the population of Walnut by approximately 1,880 residents (US Census Bureau 2024).<sup>1</sup> As the RHNA calculated for 2021-2029 has accounted for the housing need in Walnut, any new growth in population associated with the mixed-use project would exceed population assumptions. Additionally, the jobs lost by demolishing the existing uses on the project site would not be replaced by the mixed-use alternative. Therefore, impacts of this alternative would be greater than the proposed project.</p> <p>GT</p>
Public Services	<p>Under the No Project alternative, the public service demand would not change. The existing development does not generate school and library service demand, and demand for other public services is typically lower for commercial and industrial uses than residential uses. The No Project alternative demand for fire and police services would be similar to the proposed project.</p> <p>S</p>	<p>Like the proposed project, this alternative would comply with the California Fire Code, and implementation of existing regulations and standard conditions for fire and police services; however, fire and police services will be different than the proposed project due to the difference in land uses. Because the mixed-use project includes 575 residential units, this alternative would increase the number of residents on-site and would increase the demand for school and library services. Therefore, overall, public service demand would likely be greater than for this alternative when compared to the proposed project.</p> <p>GT</p>
Recreation	<p>Under this alternative, there would be no increase in demand for recreational facilities or services, since no residential uses would be developed. Recreation impacts for both the No Project alternative and proposed project would be less than significant. Therefore, this alternative would be similar to the proposed project.</p> <p>S</p>	<p>Unlike the proposed project, this alternative would increase the demand for recreational facilities or services, since residential uses would be developed. This alternative would increase the use of existing neighborhood and regional parks or other recreational facilities and may cause or accelerate physical deterioration to these facilities. Therefore, the impact of this alternative to recreational services would be greater than that of the proposed project.</p> <p>GT</p>
Transportation	<p>In comparison to the proposed project, average daily trips and VMT would be reduced by approximately 20% and 23%, respectively. This alternative would also not result in a cumulative regional VMT impact. Therefore, this alternative would reduce transportation impacts in comparison to the proposed project.</p> <p>LT</p>	<p>Land uses allowed under the Mixed-Use alternative would generate substantially more trips than the proposed project. Compared to the proposed project, this alternative would generate 83 additional Passenger Car Equivalent (PCE) morning peak-hour trips and 141 additional PCE evening peak-hour trips than the proposed project. This alternative would generate an approximately 287% increase in VMT and would result in a greater impact to the cumulative regional VMT that may remain significant and unavoidable. Consequently, this alternative would increase transportation impacts when compared to the proposed project.</p> <p>GT</p>
Tribal Cultural Resources	<p>Under this alternative, no ground disturbance would occur. There would be no potential for tribal cultural resource impacts, and these impacts would be reduced compared to the proposed project. However, tribal cultural resources are not a significant and unavoidable impact of the proposed project.</p> <p>LT</p>	<p>Implementation of this alternative would cover the same development area and would have the same potential for discovery of tribal cultural resources during grading and excavation activities. Thus, impacts would be the same as the proposed project and would be reduced to less than significant after implementation of mitigation measures.</p> <p>S</p>
Utilities and Service Systems	<p>As shown in Section 5.15, the proposed project would increase water demand, wastewater generation, and solid waste generation when compared to this alternative. However, the proposed project includes new buildings that would comply with the requirements of the Building Energy Efficiency Standards and CALGreen. CALGreen requires water efficiency and conservation measures, as codified in Part 11 of Title 24 of the California Code of Regulations. Proposed development would also abide by the requirements of the City's municipal code—Chapter 2.24, California Green Building Code, and Chapter 6.52, Article I, Water Efficient Landscaping. Additionally, water, wastewater, and solid waste infrastructure can accommodate the proposed project and impacts were found to be less than significant.</p> <p>LT</p>	<p>Using the Los Angeles County Sanitation District's wastewater generation rate of 157 gallons per day (gpd)/dwelling units for the 575 multifamily units proposed for this alternative and a retail rate of 100 gpd/1,000 square feet (SF), the total wastewater generation for this alternative amounts to 91,700 gpd (LACSD 2024). Assuming that the indoor water demand is 110% of wastewater generation, this amounts to a total indoor water demand of 100,870 gpd. Additionally, using a solid waste generation rate of 3.6 pounds/dwelling unit/day for multifamily residential units, and 0.94 pounds/1,000 SF/day for retail use amounts to a total solid waste generation of approximately 2,090 pounds per day (CalRecycle 2019; CalEEMod 2022). Water demand, and sewer and solid waste generation rates are all larger than the proposed project.</p> <p>GT</p>
Wildfire	<p>The project site is in an urbanized area in the City of Walnut and is not in a designated fire hazard severity zone (FHSZ). As with the proposed project, the No Project alternative would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be similar to the proposed project.</p> <p>S</p>	<p>The project site is in an urbanized area in the City of Walnut and is not in a designated fire hazard severity zone (FHSZ). As with the proposed project, the Mixed-Use alternative would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be similar to the proposed project.</p> <p>S</p>

<sup>1</sup> The persons per household for Walnut from 2018-2022 averaged 3.27.

7. Alternatives to the Proposed Project

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## 7. Alternatives to the Proposed Project

## 7.3.3 Conclusion

## 7.3.3.1 ABILITY TO REDUCE ENVIRONMENTAL IMPACTS

Table 7-5 summarizes the environmental impacts of each alternative compared to the proposed project.

**Table 7-5 Summary of Proposed Project and Alternatives Impacts**

Topic	Proposed Project Impact Significance	No Project/Existing General Plan	Mixed-Use Alternative
Aesthetics	LTS	=	=
Agricultural Resources	LTS	=	=
Air Quality	LTS/M	-	-
Biological Resources	LTS/M	-	=
Cultural Resources	LTS/M	-	=
Geology and Soils	LTS	-	+
Greenhouse Gas Emissions	LTS/M	-	=
Energy	LTS	+	=
Hazards and Hazardous Materials	LTS	=	=
Hydrology and Water Quality	LTS	+	=
Land Use and Planning	LTS	+	+
Mineral Resources	LTS	=	=
Noise	LTS	-	+
Population and Housing	LTS	=	+
Public Services	LTS	=	+
Recreation	LTS	=	+
Transportation	LTS/M	-	+*
Tribal Cultural Resources	LTS/M	-	=
Utilities and Service Systems	LTS	-	+
Wildfire	LTS	=	=

Notes: LTS = Less than Significant; LTS/M = Less than Significant with Mitigation Incorporated

\* This alternative could result in a significant and unavoidable impact.

(-) The alternative would result in less of an impact than the proposed project.

(+) The alternative would result in greater impacts than the proposed project.

(=) The alternative would result in the same/similar impacts as the proposed project.

## No Project Alternative/Existing General Plan

This alternative would result in similar impacts to eight impact categories, reduced impacts to nine environmental impact categories, and increased impacts to three categories. Impacts would be similar for aesthetics, agricultural resources, hazards and hazardous materials, mineral resources, population and housing, public services, recreation, and wildfire. This alternative would reduce impacts for air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, noise, transportation, tribal cultural resources, and utilities and services systems. Impacts to energy, hydrology and water quality, and land use and

## 7. Alternatives to the Proposed Project

planning will increase. Overall, impacts under this alternative would be decreased in comparison to the proposed project.

### Mixed-Use Alternative

This alternative would result in similar impacts to 11 impact categories, reduced impacts to 1 category, and increased impacts to 8 categories. Impacts would be similar for aesthetics, agricultural resources, biological resources, cultural resources, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, mineral resources, tribal cultural resources, and wildfire. This alternative would reduce impacts on air quality. This alternative would increase impacts to geology and soils, land use and planning, noise, population and housing, public services, recreation, and utilities and service systems and could result in a significant and unavoidable impact to transportation. Overall, impacts under this alternative would be slightly greater in comparison to the proposed project.

#### 7.3.3.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

Table 7-6 summarizes each alternative's ability to achieve the project objectives.

**Table 7-6 Ability of Each Alternative to Meet the Project Objectives**

Objective	Proposed Project	No Project/Existing General Plan	Mixed-Use Alternative
1. Provide for the development of the site consistent with the City's General Plan.	Yes	Yes	No
2. Replace an aging industrial park with modern, attractive, efficient buildings.	Yes	No	Yes
3. Develop a diverse industrial campus that can accommodate a mix of industrial, retail, and office uses.	Yes	Yes	No
4. Create an industrial and commercial development that provides employment opportunities to area residents, expands the industrial base within the City, and responds to the growing demand for warehousing and logistics businesses in the area.	Yes	No	No

The No Project/Existing General Plan alternative would meet two of the proposed project's objectives. The Mixed-Use Alternative would only meet one of the proposed project's objectives. The remaining three objectives would not be met—developing the site consistent with the City's General Plan; developing a diverse industrial campus; and creating an industrial and commercial development that provides employment opportunities to area residents and expands the industrial base within the city.

## 7.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative;" in cases where the No Project alternative is environmentally superior to the proposed project; the environmentally superior

## 7. Alternatives to the Proposed Project

development alternative must be identified. In this case, the No Project alternative would be considered the environmentally superior alternative.

There is only one alternative other than the No Project/Existing General Plan alternative, the Mixed-Use alternative. As summarized above, relative to the proposed project, this alternative would increase impacts for 8 impacts, result in similar impacts for 11 impacts, and reduce impacts for one category. Impacts would be greater than the proposed project for the following:

- Geology and Soils
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems

Impacts would be similar to the proposed project for the following:

- Aesthetics
- Agricultural Resources
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions
- Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Tribal Cultural Resources
- Wildfire



## 7. Alternatives to the Proposed Project

And this alternative would reduce the severity of only one impact in comparison to the proposed project (air quality).

This alternative would not be consistent with the land use designation or zoning for the project site and would introduce residential units in an area that is predominantly light industrial uses. Additionally, this alternative would surpass the City's cumulative VMT threshold and could result in a significant and unavoidable impact related to transportation. The proposed project has no significant and unavoidable impacts. Although the Mixed-Use alternative would reduce impacts to air quality, it would not eliminate the need for the mitigation measures associated with the proposed project for biological resources, cultural resources, greenhouse gas emissions, and tribal cultural resources. Therefore, this alternative would not be "environmentally superior" to the proposed project and no other alternatives were evaluated. Given that the proposed project would not result in any significant, unavoidable impacts, and that a Supplemental EIR need only include the information required to make the original EIR adequate for the new project, the evaluation of the No Project/Existing General Plan alternative and the Mixed-Use alternative, were determined to represent a reasonable range of alternatives. Moreover, as discussed in Section 7.2, *Alternatives Considered and Rejected*, two more alternatives were considered but rejected.

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## 7. Alternatives to the Proposed Project

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## 8. Impacts Found Not to Be Significant

California Public Resources Code Section 21003 (f) states: "...it is the policy of the state that...[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." This policy is reflected in the State California Environmental Quality Act (CEQA) Guidelines (Guidelines) Section 15126.2(a), which states that "[a]n EIR [Environmental Impact Report] shall identify and focus on the significant environmental impacts of the proposed project" and Section 15143, which states that "[t]he EIR shall focus on the significant effects on the environment."

As required by Section 15128 of the CEQA Guidelines, an EIR shall contain a brief discussion stating the reasons why various possible significant effects of a project were determined not to be significant and are therefore not discussed in detail in the EIR. In accordance with the CEQA Guidelines, this section discusses the environmental issue areas where impacts were found to not be significant and were therefore not discussed in detail in the Draft SEIR. Table 8-1, *Impacts Found Not to Be Significant*, includes an analysis for the following environmental topics where the project would have no impact:

- Agriculture and Forestry Resources
- Population and Housing
- Wildfire
- Mineral Resources
- Recreation

### 8.1 IMPACTS FOUND NOT TO BE SIGNIFICANT

**Table 8-1      Impacts Found Not to Be Significant**

Environmental Issues	Initial Study Determination
<b>II. AGRICULTURE AND FORESTRY RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. <b>Would the project:</b>	
<b>2018 General Plan Update:</b> The GPEIR found that the City of Walnut has no land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and that no land within the city limits is held under a Williamson Act contract. Also, no land is zoned as agriculture, forest, or timberlands in Walnut. Therefore, implementation of the GPU would result in no impact on agriculture and forestry resources.	

## 8. Impacts Found Not to Be Significant

**Table 8-1 Impacts Found Not to Be Significant**

Environmental Issues	Initial Study Determination
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<b>No Impact.</b> CEQA considers impacts to three categories of important farmland: Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. According to the California Department of Conservation Important Farmland Finder, similar to the buildout for the project site analyzed in the GPEIR, the project site and surrounding vicinity is designated Urban and Built-Up Land, and there are no important farmlands within or in proximity to the project site (DOC 2023a). There are also no existing agricultural uses within the project site. Therefore, similar to the buildout for the project site analyzed in the GPEIR, development in accordance with the proposed project would have no impact on important farmlands or convert any farmland to nonagricultural use.
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<b>No Impact.</b> The California Department of Conservation Division of Land Resource Protection maintains updated maps showing lands bearing Williamson Act contracts. According to the Williamson Act Enrollment Finder, there are no lands within all the City of Walnut under Williamson Act contracts (DOC 2023b). Additionally, the project site is zoned Light Manufacturing (M-1) and is therefore not zoned for agricultural use. Therefore, development in accordance with the proposed project, similar to development pursuant to the GPU, would not conflict with existing agricultural zoning or impact any Williamson Act lands.
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<b>No Impact.</b> The project site is currently developed with an industrial business park. The current and proposed zoning for the project site does not include any zoning for forest land, timberland, or timberland production. Thus, similar to development pursuant to the GPU, no impact would occur.
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<b>No Impact.</b> See response to threshold II.c.
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<b>No Impact.</b> See response to thresholds II.a through II.c.
<b>XII. MINERAL RESOURCES. Would the project:</b>	
<b>2018 General Plan Update:</b> The GPEIR found that there are no active mines, no proposals for new mining operations, and no lands zoned for mining activities in the city. Implementation of the GPU would result in no impact to mineral resources.	
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	<b>No Impact.</b> The California Geological Survey Mineral Resources Project provides information about California's nonfuel mineral resources. The Mineral Resources Project classifies lands throughout the state that contain regionally significant mineral resources as mandated by Surface Mining and Reclamation Act of 1975. The California Geological Survey classifies mineral resources area as one of the four Mineral Resource Zones (MRZs), Scientific Resource Zones, or Identified Resource Areas. The project site is in an MRZ-1 zone, which is an area where available geologic information indicates that little likelihood exists for the presence of significant mineral resources (CGS 2007a, 2007b). Based on the project site's location, development of the proposed project would not result in the loss of availability of known mineral resources. Similar to the buildout of the project site analyzed in the GPEIR, no impact would occur.

## 8. Impacts Found Not to Be Significant

**Table 8-1 Impacts Found Not to Be Significant**

Environmental Issues	Initial Study Determination
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<b>No Impact.</b> The project site is designated MRZ-1, indicating that no significant mineral deposits are present or little likelihood exists for their presence (CGS 2007a, 2007b). Similar to the buildout of the project site analyzed in the GPEIR, the project site is developed, and no mineral extraction operations currently occur on the project site or within its vicinity (DOC 2023c, 2023d). There are no locally important mineral resources recovery designated in the Walnut General Plan or any other relevant land use plan, and the proposed project would not impact the availability of locally important mineral resources. Similar to development pursuant to the GPU, no impacts would occur.
<b>XIV. POPULATION AND HOUSING. Would the project:</b>	
<b>2018 General Plan Update:</b> The GPEIR found that implementation of the GPU would result in increased residential density which, in turn, would increase the population of Walnut. The City would ensure that existing regulations and land use policies are implemented to avoid or reduce an identified potential environmental impact. Implementation of the GPU would not induce substantial population growth nor result in the displacement of housing and/or people.	
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<b>No Impact.</b> Typically, population growth occurs when there is an expansion of residential developments and therefore an increase of new residents. The proposed project would not increase the number of residential units available or designate new land uses that may generate an increased population. The baseline condition for the project site is the existing 357,544-square-foot industrial business park. The proposed project would develop four concrete tilt-up buildings that would include similar uses, including warehousing and office/retail, totaling 414,778 square feet. The proposed project would result in a 14 percent increase in square footage of development on-site and therefore may potentially introduce new businesses. However, the proposed project would include similar land uses to the existing development on-site. Therefore, potential population growth that may be induced by the proposed project would not be substantial. The proposed project would therefore not directly or indirectly induce substantial unplanned population growth in the vicinity.
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<b>No Impact.</b> Currently no housing is present or being proposed on the project site. Therefore, similar to development pursuant to the GPU, no displacement of people or housing would happen, and no impact would occur.
<b>XVI. RECREATION.</b>	
<b>2018 General Plan Update:</b> The GPU includes policies that support the addition of parklands and trails. The GPU also considers additional recreational facilities within the GPU. The GPEIR found that cumulative mitigation benefits of the policies listed in Table 18-1 of the GPEIR would result in a less-than-significant impact to significance criterion pertaining to recreation.	
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>No Impact.</b> Typically, the demand for parks is created by the development of new housing and/or actions that generate additional population. The proposed project would not construct any type of residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. Therefore, similar to the buildout of the project site that was analyzed in the GPEIR, implementation of the proposed project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, and no impact would occur.
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<b>No Impact.</b> See response to threshold XVI.a. The proposed project would not construct any new on- or off-site recreational facilities, nor would the proposed project expand existing off-site recreational facilities. Therefore, similar to the buildout of the project site that was analyzed in the GPEIR, the proposed project would not require the construction or expansion of additional recreational facilities that would have any adverse impact on the environment, and no impact would occur.

## 8. Impacts Found Not to Be Significant

**Table 8-1 Impacts Found Not to Be Significant**

Environmental Issues	Initial Study Determination
<b>XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b>	
<b>2018 General Plan Update:</b> The wildfire environmental topic was added to the CEQA checklist in 2019, so the GPEIR did not separately analyze the topic of wildfire. In Thresholds G and H of Chapter 12, <i>Hazards and Hazardous Materials</i> , the GPEIR determined that increased development adjacent to open space would potentially increase the risk of wildfire and could affect emergency response. However, cumulative mitigating benefits of the policies listed in Table 12-1 of the GPEIR would result in a less-than-significant impact.	
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<b>Less than Significant Impact.</b> The proposed project would not conflict with the City of Walnut's Emergency Operations Plan (adopted in 2021). The surrounding roadways would continue to provide emergency access to the project site and surrounding properties during and after construction. Vehicular access for the project site would be provided via 15 driveways: 5 along Paseo Del Prado, 2 along South Lemon Avenue, 3 along Paseo Sonrisa, and 5 along Paseo Tesoro. Therefore, similar to development pursuant to the GPU, the proposed project would not result in inadequate emergency access, and impacts to adopted emergency response and evacuation plans are less than significant.
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<b>Less than Significant Impact.</b> The project site is not in or near a State Responsibility Area; the project site is in an urbanized portion of the City of Walnut and is not within or immediately adjacent to any wildlands. The project site is in a Local Responsibility Area and is not designated a Very High Fire Hazard Safety Zone (FHSZ). The nearest Very High FHSZ is approximately 2.5 miles south of the project site in the City of Rowland Heights (CAL FIRE 2023). The roadways surrounding the project site would serve as fire breaks. Furthermore, the project site is generally flat without significant topography, and there are no steep slopes where high winds can exacerbate fire risks. Therefore, similar to the buildout of the project site that was analyzed in the GPEIR, the proposed project would not exacerbate wildfire risks or expose the proposed project's occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire within such an area, and impacts would be less than significant.
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<b>Less than Significant Impact.</b> The project site is not in or near a High or Very High FHSZ and is in an urbanized area of the city. As described in Section 5.14, <i>Utilities and Service Systems</i> , the proposed project would not require the construction of new or expanded electricity, natural gas, or telecommunication facilities. All new utility infrastructure would be installed underground or placed in enclosed spaces (e.g., utility closets). The proposed project would include off-site improvements that include the widening of Valley Boulevard at the northeast corner of the intersection with S. Lemon Street to include an additional right turn lane from Valley Boulevard to S. Lemon Street. These improvements would not exacerbate fire risk. The proposed project would include fire protection infrastructure required by LACFD. All the proposed fire protection infrastructure would enhance fire protection services on-site and not exacerbate fire risk. Therefore, similar to development pursuant to the GPU, impacts would be less than significant.

## 8. Impacts Found Not to Be Significant

**Table 8-1 Impacts Found Not to Be Significant**

Environmental Issues	Initial Study Determination
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<b>Less than Significant Impact.</b> The project site is not in a 100-year or 500-year floodplain (FEMA 2008). As described in Section 5.5, <i>Geology and Soils</i> , the project site is not in a zone requiring investigation for earthquake-induced landslides. The project site and adjacent properties are flat and exhibit no substantial elevation changes. In the absence of significant ground slopes, the potential for landslides is considered negligible. Therefore, it is unlikely that the project site would be susceptible to downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. The project site is also not within a Very High FHSZ. Therefore, similar to development pursuant to the GPU, impacts would be less than significant.

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## 8. Impacts Found Not to Be Significant

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## 9. Significant Irreversible Changes Due to the Proposed Project

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Section 15126.2(d) of the CEQA Guidelines requires that an Environmental Impact Report (EIR) describe any significant irreversible environmental changes that would be caused by the proposed project should it be implemented.

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highways improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The following are the significant irreversible changes that would be caused by the proposed project, should it be implemented:

- Construction activities associated with the proposed project would entail the commitment of nonrenewable and/or slowly renewable energy resources; human resources; and natural resources such as asphalt, metal, water, and fossil fuels. Operational activities would also require the use of natural gas and electricity, liquid fuels such as gasoline and diesel, and water. The commitment of resources required for the construction and operation of the proposed project would limit the availability of such resources for future generations or for other uses during the life of the proposed project.
- An increased commitment of social services and public maintenance services (e.g., police, fire, sewer, and water services) would also be required. The energy and social service commitments would be long-term obligations.
- Employment growth related to project implementation would increase vehicle trips over the long term. Emissions associated with such vehicle trips would continue to contribute to the South Coast Air Basin's nonattainment designations for ozone, particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), and lead (Los Angeles County only) under the California and National Ambient Air Quality Standards (AAQS), and nonattainment for nitrogen dioxide (NO<sub>2</sub>) under the California AAQS.

Given the low likelihood that the land would revert to lower intensity uses or to its current form, the proposed project would generally commit future generations to these environmental changes. The commitment of resources to the proposed project is not unusual or inconsistent with projects of this type and scope. However, once these commitments are made, it is improbable that the proposed project would

## 9. Significant Irreversible Changes Due to the Proposed Project

revert to its current condition. Thus, the proposed project would result in significant irreversible changes to the environment.

## 10. Growth-Inducing Impacts of the Proposed Project

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Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also required is an assessment of other projects that would foster other activities which could affect the environment, individually or cumulatively. To address this issue, potential growth-inducing effects will be examined through analysis of the following questions:

- Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would this project result in the need to expand one or more public services to maintain desired levels of service?
- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this Draft SEIR.

**Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?**

The proposed project would construct 414,778 square feet of light industrial, warehouse and office/retail uses on the approximately 23-acre project site. The project site is currently developed with 357,544 square feet of commercial and light industrial uses, which would be demolished, with the end result of an additional 57,234 square feet of building space on the project site compared to the existing building space. The proposed project is consistent with the site's Industrial land use designation and zoning district of M-1 (Light Manufacturing) and would not require a land use change.

## 10. Growth-Inducing Impacts of the Proposed Project

The project site contains utility connections from the existing uses on-site, though the proposed project would require some on-site construction to reconfigure these connections, as discussed in Section 5.14, *Utilities and Service Systems*. The proposed project would also require the off-site improvement of widening Valley Boulevard at the northeast corner of the intersection with S. Lemon Street to include an additional right turn lane from Valley Boulevard to S. Lemon Street, which would improve access to the site. This improvement would better accommodate the slight increase in traffic from the proposed project (see Section 5.13, *Transportation*) and is not expected to induce further growth in the area due to its small scale. Overall, the proposed project would not foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment.

### **Would this project result in the need to expand one or more public services to maintain desired levels of service?**

As described in Chapter 5.11, *Public Services*, public service agencies were consulted during preparation of this Draft SEIR, including the Los Angeles County Fire Department and the Los Angeles County Sheriff's Department. None of the service providers indicated that the proposed project would necessitate the immediate expansion of their services and facilities in order to maintain adequate and desired levels of service. As discussed above, the proposed project would result in a net increase of 57,234 square feet of building space on the project site when compared to existing/baseline conditions. Additionally, there are no residential uses under the proposed project, and therefore no new residents would be added to the city as a result of the proposed project. Therefore, there would be no direct impacts to parks, schools, and library services in the area. Overall, no future expansion of public services would be required to maintain existing levels of service under the proposed project.

### **Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?**

During project construction, a number of design, engineering, and construction jobs would be created. These would last until project construction is completed. Construction employees would be absorbed from the regional labor force, and the construction of the project would not attract new workers to the region. Construction would not result in a significant increase in population because construction would be temporary, and buildings would be developed as the market demands.

Operation of the proposed project is expected to generate approximately 230 jobs in the warehousing/logistics and retail/office sectors. The existing uses on the project site employ approximately 199 workers.<sup>1</sup> The proposed project would therefore generate approximately 31 new jobs in the city when compared to the baseline conditions. These new employees may seek shopping, entertainment, auto maintenance, and other economic opportunities in the City. This could encourage the creation of new businesses and/or the expansion of existing businesses to address these needs. Actual growth would depend on future market demand, site constraints, and property owners' willingness to take advantage of new development regulations. However, new neighborhood-

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<sup>1</sup> Chapter 3, *Project Description*, describes the employee generation assumptions used to estimate the number of employees generated under the proposed project (one employee per 1,800 square feet of floor area). This assumption has been used to estimate the number of employees under the existing site uses (357,544 square feet of building space divided by 1,800 square feet per employee).

## 10. Growth-Inducing Impacts of the Proposed Project

serving commercial uses developed to serve the shopping needs of future employees would likely generate additional employment opportunities. Therefore, the proposed project would have both direct and indirect economic effects that could affect the environment. The impacts from neighborhood commercial uses would be analyzed and any appropriate mitigation imposed on a project-by-project basis.

### **Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?**

The proposed project would require the approval of discretionary actions but would not set a precedent for future projects with similar characteristics. The proposed project would require the following approvals from the City:

- **Approval of Tentative Parcel Map.** Approval of a tentative parcel map will be required to approve the division of the nine proposed parcels on the project site.
- **Approval of Site Plan and Design Review.** Review and approval of site plan and design review permit for the construction.
- **Conditional Use Permit.** Approval of a conditional use permit for logistics facility and/or storage warehouse in excess of 100,000 square feet.

The proposed project would not require any changes to the existing land use and zoning designations of the project site. Furthermore, the proposed project would not change the existing protocol for project approval and would not set a precedent that would make it more likely for other projects to gain approval of similar applications.

Moreover, no changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, fire codes) are proposed or required to implement the proposed project. Therefore, the proposed project would not involve a precedent-setting action that would encourage and/or facilitate other activities that could significantly affect the environment.

## 10. Growth-Inducing Impacts of the Proposed Project

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