PUBLIC DRAFT | JULY 2025

ENVIRONMENTAL IMPACT REPORT

SCH No. 2022110184



THE BROOKSIDE PROJECT

LEAD AGENCY:

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SECTION 1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

This Draft Environmental Impact Report (DEIR) addresses the potential environmental effects associated with the implementation of the proposed Brookside Project TTM 72798 ("proposed Project" or "Project"). The California Environmental Quality Act (CEQA) requires that local government agencies consider the potential environmental consequences before taking action on projects over which they have discretionary approval authority. An environmental impact report (EIR) analyzes potential environmental consequences to inform the public and support informed decisions by local and state governmental agency decision-makers.

This DEIR has been prepared pursuant to the requirements of CEQA and the City of Walnut 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 County of Los Angeles (County) technical personnel from other departments and review of all technical subconsultant reports.

Data for this DEIR was derived from onsite 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 (i.e., Air Quality, Energy, and Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis; Biological Technical Report; Phase I Cultural Resources Assessment; Geotechnical Investigation Report; Phase I Environmental Site Assessment; Radon Analysis; Hydrology and Hydraulics; Low Impact Development Plan; Noise Impact Analysis, Transportation Impact Study; Collision Research Summary; Visual Simulations; and Conceptual Elevations). These supporting documents and technical studies are found in Appendices B through L.

1.2 PROJECT LOCATION

The City is located in the County of Los Angeles, approximately 20 miles east of the City of Los Angeles, within the San Gabriel Valley, and situated in the San Jose Hills. The City is bordered by the City of West Covina to the west and northwest, unincorporated Los Angeles County to the north, California State Polytechnic University, Pomona and the City of Pomona to the east, and the City of Industry to the south.

The Project Site is approximately 2.0 miles north of the Pomona Freeway ("State Route 60" or "SR-60"). It is north of La Puente Road, south of Meadow Pass Road, east of North Lemon Avenue, and west of Broken Lance Road. The Project Site has one associated address, 800 Meadow Pass Road, and consists of Lots 1 and 2 of Tract 45378 and Assessor's Parcels 8709-093-001, 8709-093-002, and 8709-093-003.

1.3 PROJECT SUMMARY

EXISTING CONDITIONS

The Project Site consists of approximately 25.84 acres of previously developed/disturbed land and is located on private property. The Project Site grade varies approximately from an elevation of 640 feet on the north boundary adjacent to Meadow Pass Road down to an elevation of 572 feet on the southern boundary adjacent to La Puente Road. Lemon Creek traverses the Project Site, generally flowing from northeast to southwest/south. The ground surface unpaved with exposed dirt and gravel, grass, native and non-native trees, and shrubs. The northern portion of the Project Site has improvements related to the development of Meadow Pass Road, existing entry driveway, and the discontinued equestrian uses. The

southern portion of the Project Site is free of any structures and is mostly developed by prior agricultural and equestrian uses.

In addition, there are unused facilities remaining from discontinued equestrian activities, consisting of two stables, one of which has a second story residential addition (currently unoccupied), covered stalls, two fenced corrals, maintenance storage shed, three feed sheds within fenced areas, one outdoor arena, one covered open-air arena, and one gazebo. All structures have been vacated and closed. Unimproved gravel and dirt roads traverse the Project Site and allow for vehicle access. Irrigation systems were also observed. Some existing improvements such as trails and fences are also present. Existing storm drains, culverts, water lines and sewer lines also occur onsite. No wells, septic systems, underground vaults, or underground storage tanks were reported or observed on the Project Site. The Project Site is regularly maintained.

LAND USES

General Plan

The City's General Plan designates the Project Site land use as Very Low Density Residential. The Very Low Density Residential designation applies to hillside areas with larger lots that are generally over 25,000-square-feet in size. A maximum of one detached single-dwelling unit is permitted as the primary residence. The City's RPD Residential Planned Development Zone (RPD Zone) allows attached single family dwelling units for planned residential developments within the RPD zone, but that provision (Walnut Municipal Code (WMC) Section 6.24.030 E2) does not apply to the Project since, as discussed below, the Project has elected for the R-1 option, rather than the planned residential development option, under Section 6.24.020 A1 of the WMC. Accessory dwelling units permitted consistent with the requirements of the WMC and State Law are also allowed under the General Plan. Applicable General Plan standards are:

- Density: 0.5 to 2.0 Dwelling Units/Acre
- Building Height: 2 Stories Maximum
- Population Density: 1.71 to 6.84 Persons/Acre

Zoning

With respect to zoning standards, the Project Site is located in a Residential Planned Development (RPD) zone, with a zoning designation of RPD (28,500) - 1.3 DU. The City's RPD zoning regulations are found in Chapter 6.24 of the WMC. Despite its title, the RPD zone does not require the development of a residential planned development. Rather, the RPD Zone allows development in two different ways, only one of which is actually a residential planned development. Specifically, one alternative is a conventional R-1 single-family development, subject to R-1 development standards and a minimum 28,500 square foot lot size (see WMC Section 6.24.030 A1). Second is the residential planned development alternative, with no minimum lot size, but a maximum density of 1.3 dwelling units per net acre (see WMC Section 6.24.030 A2). Pursuant to WMC Section 6.24.030, this second alternative requires a Conditional Use Permit and is subject to additional requirements contained in Chapter 6.24 of the WMC that do not apply to the R-1 alternative. For example, permitted structures for a residential planned development are set forth in WMC Section 6.24.030 E.

PROPOSED PROJECT

The proposed Project has elected for the R-1 alternative allowed under the RPD Zone. Therefore, the Project is not being developed as a planned residential development, even though it is within an RPD Zone. Details about the Project's characteristics are provided below.

The Project requests approval of a Tentative Tract Map (TTM) to create 27 residential lots (Lots 1-27) for the development of 27 single-family detached homes. Those individual lots would include associated infrastructure, open space areas, and a multiuse public trail. In addition, the TTM includes six lots (Lots A-F) which would include associated infrastructure, open space areas, and drainage areas. The TTM also includes Streets "A" and "B" to handle the internal circulation for Lots 1-25 and a short extension of San Vicente Dr. to serve Lots 26 and 27. These would all be public streets. The overall density of the Project would be 1.04 units per acre, which is consistent with the existing General Plan Very Low Density Residential Designation maximum density of 2.0 dwelling units per acre. The TTM proposes a minimum lot size of 28,500 square feet consistent with the RPD (28,500) – 1.3 DU zoning designation. Additionally, the Project would meet R-1 side yard setback, front yard setback, rear yard setback, and maximum height requirements.

CIRCULATION/ACCESS

The proposed residential development would have two vehicle access points: one from Meadow Pass Road that would access Lots 1-25 and a second from La Puente Road that would access Lots 26 and 27.

Meadow Pass Road is designated in the City General Plan Circulation Element as an Important Local Street. Important Local Streets provide connections to higher classification roadways but unlike Local Streets, generally do not allow residential driveways. They may have either two or four travel lanes, with or without a center median. Meadow Pass Road provides one travel lane in each direction along with a two-way/left-turn lane and is posted for a speed limit of 35 miles per hour in the Project vicinity.

La Puente Road is designated in the City General Plan Element a Secondary Street. Secondary Streets provide connections between arterial streets and provide up to four lanes of travel (two in each direction, divided or undivided) directly to neighborhoods Citywide. Limited or no direct residential driveway access is provided. La Puente Road is currently improved with two lanes in each direction with left turn access and is posted for a speed limit of 40 miles per hour in the Project vicinity.

Internal access for the Project would be from the local street system. The local streets would be publicly maintained. The Project would consist of three local streets: 'A' Street, 'B' Street, and San Vicente Drive. 'A' Street would have a 60-foot right-of-way and would be the primary entrance for the Project. 'B' Street would have a 51-foot right-of-way that would be a primary local roadway extending through the community. 'B' Street would terminate at a cul-de-sac, which would prohibit cut-through traffic between Meadow Pass Road and La Puente Road. San Vicente Road would consist of a 50-foot of right-of-way and would terminate at a cul-de-sac.

POTENTIALLY REQUIRED APPROVALS AND PERMITS

This EIR provides CEQA compliance for the following City of Walnut approvals for the Project:

- Tentative Tract Map

Other discretionary and/or ministerial approvals may be identified by the City as necessary to implement development and construction of the Project. Such approvals include but are not limited to:

- Site Plan and Architectural Review.
- Issuance of tree removal, grading, hauling, stockpiling, building and other construction permits.

In addition, other Responsible Agencies, Trustee Agencies, utility and service providers, and/or other organizations may also rely upon this document for compliance with CEQA to issue their own permits and approvals associated with the Project. Such entities may, but not necessarily would, include and may not be limited to:

- United States Army Corps of Engineers, Clean Water Act Section 404 Permit.
- United States Fish and Wildlife Service, Endangered Species Act Section 7 Consultation.
- Los Angeles Regional Water Quality Control Board, Clean Water Act Section 401 Water Quality Certification.
- California Department of Fish and Wildlife, California Fish and Game Code Section 1602 Streambed Alteration Agreement.
- California Department of Fish and Wildlife, Incidental Take Permit.

1.4 PROJECT OBJECTIVES

Pursuant to Section 15124(b) of the CEQA Guidelines, the EIR project description must include "[a] statement of objectives sought by the proposed project…. The statement of objectives should include the underlying purpose of the project."

The project objectives are summarized as follows:

1. Maintains consistency with the Project Site's Very Low Density General Plan and RPD (28,500) – 1.3 zoning designation.
2. Respects and enhances the health, biological function, and water quality of Lemon Creek, while assuring that the development does not increase flood risk for downstream properties.
3. Provides a multi-use trail dedicated to the City of Walnut, open to the public and provides a connection to other public trails at the Project boundaries.
4. Preserves the walnut and oak trees on the Project Site, retaining their significant historical, aesthetic, and environmental value.
5. Minimizes landform alteration by generally limiting grading to previously disturbed and/or developed areas of the Project Site and grading onsite without import or export.

1.5 ENVIRONMENTAL ISSUES/MITIGATION SUMMARY

The following summarizes the impacts, mitigation measures, and unavoidable significant impacts identified and analyzed in Section 5.0, *Environmental Analysis*, of this DEIR (Note, no unavoidable significant impacts were identified). Refer to the appropriate DEIR Section for detailed information.

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
5.1	Aesthetics		
	Impact AES-1: Would the project have a substantial adverse effect on a scenic vista?	No mitigation measures are required.	No Impact
	Impact AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No mitigation measures are required.	No Impact
	Impact AES-3: Would the project, in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	No mitigation measures are required.	Less Than Significant Impact

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
	Impact AES-4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No mitigation measures are required.	Less Than Significant Impact
5.2	**Agriculture and Forestry Resources**		
	Impact AFR-1: Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No mitigation measures are required.	No Impact
	Impact AFR-2: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	No mitigation measures are required.	No Impact
	Impact AFR-3: Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No mitigation measures are required.	No Impact
	Impact AFR-4: Would the project result in the loss of forest land or conversion of forest land to non-forest use?	No mitigation measures are required.	No Impact
	Impact AFR-5: Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use?	No mitigation measures are required.	No Impact
5.3	**Air Quality**		
	Impact AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?	No mitigation measures are required.	Less Than Significant Impact
	Impact AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	No mitigation measures are required.	Less Than Significant Impact
	Impact AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?	No mitigation measures are required.	Less Than Significant Impact
	Impact AQ-4: Would the project result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	No mitigation measures are required.	Less Than Significant Impact
5.4	**Biological Resources**		
	Impact BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the	**BIO-1:** Nesting Birds. If feasible, vegetation removal activities shall be conducted outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds. Any construction activities that occur during the	Less Than Significant Impact With Mitigation Incorporated

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
	California Department of Fish and Game or U.S. Fish and Wildlife Service?	nesting season shall require that all suitable habitats be thoroughly surveyed for the presence of nesting birds by a qualified biologist within three days before commencement of vegetation clearing/ground disturbance activities depending on which season work falls within. If any active nests are detected a buffer of 500 feet of an active threatened or endangered species or raptor nest, 300 feet of other sensitive species (non-listed), and 100 feet of most common species shall be delineated, flagged, and avoided until the nesting cycle is complete. **BIO-2:** Bat Protection. Prior to construction, all suitable areas within the Project Site and an appropriate survey buffer shall be surveyed for the presence of bat roosts by a qualified biologist. Surveys are recommended as follows: (1) An initial pre-construction survey shall be conducted in the spring prior to vegetation removal and ground disturbing activities by a qualified biologist to confirm no maternity roosts, and (2) A pre-construction survey shall be conducted by a qualified biologist no more than two weeks prior to the initiation of vegetation removal and ground disturbing activities. Surveys may entail direct inspection of the trees/suitable habitat or nighttime surveys. The following measures shall be implemented (as applicable) based upon the results of the surveys: a. If active bat roosts are present, a qualified bat biologist shall determine the species of bats present and the type of roost (i.e., day roost, night roost, maternity roost). If the biologist determines that the roosting bats are not a special- status species and the roost is not being used as a maternity roost, then the bats may be evicted from the roost by a qualified biologist experienced in developing and implementing bat mitigation and exclusion plans. b. If special-status bat species or a maternity roost of any bat species is present, but no direct removal of active roosts will occur, a qualified biologist shall determine appropriate avoidance measures, which may include implementation of a construction-free buffer around the active roost during the appropriate season. c. If special-status bat species or a maternity roost of any bat species is present and direct removal of habitat (roost location) will occur, then a bat mitigation and exclusion plan shall be developed subject to approval by the City	

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
		of Walnut. As appropriate and depending on the specific findings of the survey results, this plan shall include, for example, avoidance measures such as work timing restrictions and work zone buffers, methods for relocation and/or exclusion, creation of alternative roosts, and/or construction monitoring and reporting requirements. d. To reduce impacts to foraging bats, all construction activity shall be limited to daylight hours. If night-time work activities must occur, night-time lighting should be restricted or avoided to avoid attracting insects and consequently bats to the site. e. The implementation of demolition shall be planned in phases for both structures and trees on the site to reduce potential impacts by providing day roosting bats the opportunity to leave the site prior to demolition of all structures and trees on the site. **BIO-3:** Crotch's Bumble Bee mitigation includes the following (Rincon Consultants, Inc., January 11, 2023): a. Pre-construction surveys for CBB and nests shall be conducted within all suitable habitats within the Project Site prior to initial ground-disturbing activities (e.g., grubbing/removing vegetation, excavation, grading, construction). The purpose of these surveys is to identify active nest colonies inside of permanent and temporary impact areas. b. The pre-construction surveys shall follow the survey methodologies set out in the CDFW Survey Considerations for CESA Candidate Bumble Bee (CDFW, 2023g) or other survey methodology approved by CDFW. c. The pre-construction surveys shall be conducted during appropriate survey periods as either described in the CDFW Survey Considerations or otherwise approved by CDFW. d. If the pre-construction surveys identify active nest colonies inside of permanent and temporary impact areas within the Project footprint, an appropriate no disturbance buffer zone shall be established around the active nest colony to reduce the risk of disturbance or accidental take. The buffer distance shall be established by a qualified biologist and will provide no less than 50 feet of clearance around active nest entrances and the proponent/operator shall consult with a qualified biologist to discuss	

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		considerations and recommendations on the implementation of Project activities to avoid take of the CBB. e. If a no disturbance buffer zone is both (i) appropriate per Paragraph 4a above and (ii) feasible, construction activities will not occur within that buffer zone until a qualified biologist determines the previously active nest to no longer be active (i.e., no CBB are seen flying in or out of the nest for three consecutive days indicating the colony has completed its nesting season and the next season's queens have dispersed from the colony), after which construction activities may resume within that buffer zone. f. If avoidance of the active nest is not feasible, the Project proponent/operator shall consult with CDFW regarding potential for Project activities to result in take of the CBB and shall comply with the avoidance, minimization, and compensatory mitigation requirements set forth in any Incidental Take Permit issued for the Project by CDFW. **BIO-4:** Monarch Butterfly (Overwintering). To minimize the potential for loss of monarch overwintering colonies, removal of Eucalyptus trees will be conducted between April 1 – September 30 to avoid the overwintering season, if feasible. If Eucalyptus tree removal occurs outside of the overwintering season, no further mitigation will be required. If Eucalyptus tree removal occurs within the overwintering season (October 1 – March 31), a qualified biologist shall assess suitable habitat within the Project Site for monarch colonies no more than 14 days prior to Eucalyptus tree removal. If the species is not observed colonizing within the site, tree removal can proceed, and no further mitigation will be required. If monarch colonies are identified within the Project Site, they shall be demarcated with flagging or high-visibility construction fencing at the direction of the qualified biologist to prevent removal of the stand of trees containing the overwintering colony. Monarch overwintering colonies shall be protected throughout the duration of their presence within the site. Once the qualified biologist has determined that the species has left the site, tree removal can proceed. **BIO-5:** Burrowing Owl. A preconstruction presence/absence survey for burrowing owl shall be conducted by a qualified biologist within 30 days prior to the commencement of ground disturbing activities including vegetation clearing, grubbing, or tree removal and if an owl or owls are	

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		detected, reported to the California Department of Fish and Wildlife (CDFW). If no burrowing owls are observed during the survey, site preparation and construction activities may begin. If burrowing owl are determined present within 500 feet of the Project Site, then avoidance or minimization measures shall be undertaken in consultation with the City and CDFW. CDFW shall be sent written notification within 48 hours of detection of burrowing owls. The qualified biologist and Project Applicant/Developer shall coordinate with the City and CDFW to develop a Burrowing Owl Plan, as described below, to be approved by the City and CDFW prior to commencing Project activities. Additionally, the Project Applicant/Developer may be required to obtain a Section 2081 Incidental Take Permit, if it is believed take will occur. The Project Applicant/Developer shall implement the 2081 Incidental Take Permit if required. If applicable, the Burrowing Owl Plan shall describe proposed avoidance, relocation, monitoring, minimization, and/or mitigation actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls or information on the adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls shall also be included in the Burrowing Owl Plan. The Applicant/Developer shall implement the Burrowing Owl Plan following CDFW review and approval. If burrowing owls are observed within the Project Site during Project implementation and construction, the Project Applicant/Developer shall notify CDFW immediately in writing within 48 hours of detection. If required based on the nature of the observance, a Burrowing Owl Plan shall be submitted to CDFW for review and approval within two (2) weeks of detection and no Project activity shall continue within 500 feet of the burrowing owls until CDFW approves the Burrowing Owl Plan. The Applicant/Developer shall be responsible for implementing appropriate avoidance and mitigation measures, including burrow avoidance, passive or active relocation, or other appropriate mitigation measures as identified in the Burrowing Owl Plan. If applicable, a final report shall be prepared by a qualified biologist documenting the results of the	

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		burrowing owl surveys and detailing any avoidance, minimization, and mitigation measures. The final report shall be submitted to the City within 30 days of completion of the survey and burrowing owl monitoring for mitigation monitoring compliance record keeping. **BIO-6:** Southwestern Pond Turtle. A SWPT survey shall be conducted by a qualified southwestern pond turtle biologist within 30 days of vegetation removal or ground disturbance. A report shall also be submitted to the City detailing the findings of the survey(s). If SWPT are observed, additional avoidance, exclusion, and minimization measures shall be implemented through the development and implementation of a SWPT Avoidance Plan in coordination with the City, which may include the relocation of the SWPT upstream or downstream to an area of suitable habitat, installation of exclusionary fencing, and/or construction monitoring to ensure the species is not adversely affected from Project activities.	
	Impact BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	**BIO-7:** Jurisdictional Waters. Permanent impacts to Waters of the State, Riparian/Riverine resources, and Waters of the U.S. shall be mitigated at a ratio of 3:1 through the enhancement and restoration of portions of Lemon Creek within the Project Site, or as otherwise required by the regulatory agencies (USACE, RWQCB, and CDFW) pursuant to the issuance of federal and state permits or other authorizations for impacts to these features. If required by the regulatory agencies, enhancement shall include the one-time removal of invasive species, and restoration shall include the one-time planting of native willow (Salix spp.) cuttings obtained from mature individuals on-site and following standard installation procedures in replacement. Planting shall occur immediately prior to onset of the rainy season. If required by the regulatory agencies, he Applicant shall prepare an enhancement and restoration plan, to be approved by CDFW prior to any ground disturbance within Waters of the State or Riparian/Riverine resources located on the Project Site. The Plan shall include restoration and monitoring methods, annual success criteria, contingency actions should success criteria not be met, and long term management and maintenance goals. **BIO-8:** Jurisdictional Waters. Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City all appropriate permits and other authorizations have been obtained from the RWQCB, CDFW, and USACE.	Less Than Significant Impact With Mitigation Incorporated

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	Impact BIO-3: Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Mitigation Measures BIO-7 and BIO-8 are required.	Less Than Significant Impact With Mitigation Incorporated
	Impact BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4 and BIO-6 are required.	Less Than Significant Impact With Mitigation Incorporated
	Impact BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	**BIO-9:** Tree Canopy. Prior to occupancy of any homes in the Project, the Applicant shall implement its Tree Preservation/Replacement Plan.	Less Than Significant Impact With Mitigation Incorporated
	Impact BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No mitigation measures are required.	No Impact
5.5	**Cultural Resources**		
	Impact CR-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	**CR-1:** Prior to issuance of a grading permit, the applicant shall provide written verification that a qualified Archaeologist has been retained to implement the monitoring program. This verification shall be presented in a letter from the Project Archaeologist to the Lead Agency. **CR-2:** The Project applicant shall provide Native American monitoring during grading if the Lead Agency determines it is necessary pending results of the AB 52 Consultation process. If applicable, the Native American monitor shall work in concert with the archaeological monitor to observe ground disturbances and search for cultural materials. The Lead Agency shall coordinate with the consulting Tribe(s) to facilitate communications with the Project Developer/ Applicant so that all Parties can develop a mutually agreeable Tribal Monitoring and Treatment Agreement which includes the scope of monitoring, scheduling of monitors from individual consulting Tribe(s), and the course of action for inadvertent discoveries. **CR-3:** Prior to the issuance of a grading permit, the Project Archaeologist, in consultation with the Consulting Tribe(s), the Project Applicant, and the City, shall develop a Cultural Resources Monitoring Plan (CRMP), to address the implementation of the City's Tribal Cultural Resource Mitigation Measures including but not limited to, timing, procedures and considerations for Tribal Cultural Resources during the course of ground disturbing activities that will occur on the	Less Than Significant Impact With Mitigation Incorporated

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
		Project Site. The CRMP shall be subject to review by Tribe(s) and final approval by the City. **CR-4:** The Project Archaeologist and the Consulting Tribes(s) shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a Cultural Resources Worker Sensitivity Training to those in attendance. The Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. **CR-5:** The protocols and stipulations that the contractor, City, Consulting Tribe(s) and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation. 1. During the original cutting of previously undisturbed deposits, the archaeological and Tribal monitor shall be onsite, as determined by the consulting archaeologist, to monitor excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The consulting archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated. 2. Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed. 3. In the event that previously unidentified cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. The archaeologist shall contact the Lead Agency at the time of discovery. The archaeologist, in consultation with the Lead Agency, shall determine the significance of the discovered resources. The Lead Agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and	

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		Data Recovery Program to mitigate impacts shall be implemented by the consulting archaeologist and approved by the Lead Agency before being carried out using professional archaeological methods. If any human bones are discovered, the county coroner and Lead Agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (as identified by the NAHC) shall be contacted in order to determine proper treatment and disposition of the remains. 4. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered, and features recorded using professional archaeological methods. The Project Archaeologist in consultation with the consulting Tribe(s) shall determine the amount of material to be recovered for an adequate artifact sample for analysis. **CR-6:** One or more of the following treatments, in order of preference, shall be used in the event of a cultural resources discovery: 1. Preservation-in-Place. Avoidance, or preservation-in-place, involves leaving a resource where it was found with no development affecting its integrity. Pursuant to Public Resources Code Section 21083.2(b) avoidance is the preferred method of preservation for archaeological and cultural resources. 2. Reburial on the Project Site in an area not subject to future disturbance. Reburial of a resource shall include provisions to protect the selected reburial area from any future impacts in perpetuity. Reburial shall not occur until all required cataloging and basic recording have been completed, with the exception of sacred items, burial goods and Native American human remains. Any reburial process shall be culturally appropriate. The listing of contents and the location of the reburial shall be included in a confidential Phase IV monitoring report. 3. If Preservation-in-Place or reburial is not feasible, all cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards in a curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources (OHP 1993). The collections and associated records shall be transferred,	

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		including title and accompanied by payment of the fees necessary for permanent curation. **CR-7:** A Phase IV Monitoring Report, documenting the field and analysis results and interpreting the artifact and research data within the research context, shall be completed, and submitted to the satisfaction of the Lead Agency prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms. The Phase IV report shall be filed with the City under a confidential cover and not subject to Public Records Request and a copy of the report shall be submitted to the consulting Tribe(s).	
	Impact CR-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Mitigation Measures CR-1, CR-2, CR-3, CR-4, CR-5, CR-6 and CR-7 are required.	Less Than Significant Impact With Mitigation Incorporated
	Impact CR-3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	Mitigation Measures CR-1, CR-2, CR-3, CR-4, CR-5, CR-6 and CR-7 are required.	Less Than Significant Impact With Mitigation Incorporated and implementation of standard regulations
5.6	**Energy**		
	Impact EN-1: Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	No mitigation measures are required.	Less Than Significant Impact
	Impact EN-2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No mitigation measures are required.	Less Than Significant Impact
5.7	**Geology and Soils**		
	Impact GEO-1: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving a rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	No mitigation measures are required.	No Impact
	Impact GEO-2: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?	**GEO-1:** Prior to issuance of final grading permits, the Project Applicant or designee shall prepare and submit for review and approval by the Director of Building and Safety, a site-specific, design-phase geotechnical report, which shall consider the recommendations in the *Preliminary*	Less Than Significant Impact With Mitigation Incorporated

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		Geotechnical Investigation Report and revise as necessary for site preparation and construction in a design-phase Geotechnical Recommendations report. The report shall, at a minimum, address remedial and design grading, concrete foundation system, and building foundations. The recommendations of the design-phase geotechnical report shall be implemented during site grading and construction.	
	Impact GEO-3: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?	Mitigation Measure GEO-1 is required.	Less Than Significant Impact With Mitigation Incorporated
	Impact GEO-4: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?	Mitigation Measure GEO-1 is required.	Less Than Significant Impact With Mitigation Incorporated
	Impact GEO-5: Would the project result in substantial soil erosion or the loss of topsoil?	No mitigation measures are required.	Less Than Significant Impact
	Impact GEO-6: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	Mitigation Measure GEO-1 is required.	Less Than Significant Impact With Mitigation Incorporated
	Impact GEO-7: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Mitigation Measure GEO-1 is required.	Less Than Significant Impact With Mitigation Incorporated
	Impact GEO-8: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No mitigation measures are required.	No Impact
	Impact GEO-9: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	**PALEO-1:** Prior to the issuance of any grading permit, the Project Applicant shall provide written evidence to the City, that the Applicant has retained a qualified paleontologist to observe grading activities and salvage and catalogue fossils, as necessary. These requirements shall be documented by the Project paleontologist in a Paleontological Resource Impact Mitigation Program (PRIMP). This PRIMP shall be submitted to the Community Development Department for review and approval prior to issuance of a Grading Permit. The paleontologist shall be present at the pre-grade conference, shall discuss the PRIMP, describe procedures for paleontological resource surveillance, and shall establish, in cooperation with the Applicant and City, procedures for temporarily halting or redirecting work to permit	Less Than Significant Impact With Mitigation Incorporated

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
		sampling, identification, and evaluation of the fossils. If the paleontological resources are found to be significant, the paleontologist shall determine appropriate actions, in cooperation with the Applicant, which ensure proper exploration and/or salvage. **PALEO-2:** If paleontological resources are uncovered and after completion of the Project, the Applicant shall submit a Paleontological Monitoring Report for approval by the City. The report shall include the period of inspection, a catalogue and analysis of the fossils found, and the present repository of the fossils. The Applicant shall prepare excavated material to the point of identification. The Applicant shall offer excavated finds for curatorial purposes to the City or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to approval by the City. Applicant shall pay curatorial fees for the storage of these resources in perpetuity.	
5.8	Greenhouse Gas Emissions		
	Impact GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	No mitigation measures are required.	Less Than Significant Impact
	Impact GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No mitigation measures are required.	Less Than Significant Impact
5.9	Hazards and Hazardous Materials		
	Impact HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	No mitigation measures are required.	Less Than Significant Impact
	Impact HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	**HAZ-1:** Prior to issuance of a demolition permit, demolition of buildings that are expected to contain asbestos containing building materials or lead based paint, the Applicant shall prepare an asbestos and lead paint survey and present the findings to the City Community Development Department and Building and Safety Division. In the event asbestos containing building materials or lead paint are identified, it shall be removed and disposed of in accordance with local, state and federal regulations and guidance of a California Occupational Safety and Health Administration (Cal/OSHA) - Certified Asbestos Consultant (CAC) and/or Lead-Related Construction Inspector/Assessor. If contaminated materials are identified and removed, proof of proper disposal (e.g., report, email, or receipts from the certified consultant/inspector/ assessor) shall be provided to the City prior to issuance of a building permit.	Less Than Significant Impact With Mitigation Incorporated

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	Impact HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No mitigation measures are required.	No Impact
	Impact HAZ-4: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No mitigation measures are required.	No Impact
	Impact HAZ-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 the project result in a safety hazard or excessive noise for people residing or working in the project area?	No mitigation measures are required.	No Impact
	Impact HAZ-6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No mitigation measures are required.	Less Than Significant Impact
	Impact HAZ-7: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No mitigation measures are required.	Less Than Significant Impact
5.10	**Hydrology and Water Quality**		
	Impact HWQ-1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	No mitigation measures are required.	Less Than Significant Impact
	Impact HWQ-2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No mitigation measures are required.	No Impact
	Impact HWQ-3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or offsite?	No mitigation measures are required.	Less Than Significant Impact
	Impact HWQ-4: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite?	No mitigation measures are required.	Less Than Significant Impact

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
	Impact HWQ-5: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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?	No mitigation measures are required.	Less Than Significant Impact
	Impact HWQ-6: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?	No mitigation measures are required.	Less Than Significant Impact
	Impact HWQ-7: Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No mitigation measures are required.	Less Than Significant Impact
	Impact HWQ-8: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No mitigation measures are required.	Less Than Significant Impact
5.11	**Land Use and Planning**		
	Impact LU-1: Would the project physically divide an established community?	No mitigation measures are required.	No Impact
	Impact LU-2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	No mitigation measures are required.	Less Than Significant Impact
5.12	**Mineral Resources**		
	Impact MR-1: Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No mitigation measures are required.	No Impact
	Impact MR-2: Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	No mitigation measures are required.	No Impact
5.13	**Noise**		
	Impact NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	No mitigation measures are required.	Less Than Significant Impact
	Impact NOI-2: Would the project result in generation of excessive ground borne vibration or ground borne noise levels?	No mitigation measures are required.	Less Than Significant Impact

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	Impact NOI-3: For a project located within the vicinity of a private airstrip of an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No mitigation measures are required.	No Impact
5.14	**Population and Housing**		
	Impact PH-1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No mitigation measures are required.	Less Than Significant Impact
	Impact PH-2: Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No mitigation measures are required.	Less Than Significant Impact
5.15	**Public Services**		
	Impact PS-1: Would the project result in the need for additional fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?	No mitigation measures are required.	Less Than Significant Impact
	Impact PS-2: Would the project result in the need for additional police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?	No mitigation measures are required.	Less Than Significant Impact
	Impact PS-3: Would the project result in impacts to the availability of school facilities?	No mitigation measures are required.	Less Than Significant Impact
	Impact PS-4: Would the project result in impacts to the availability of parkland and recreational facilities?	No mitigation measures are required.	Less Than Significant Impact
	Impact PS-5: Would the project result in impacts to libraries?	No mitigation measures are required.	Less Than Significant Impact
5.16	**Recreation**		
	Impact REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No mitigation measures are required.	Less Than Significant Impact
	Impact REC-2: Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No mitigation measures are required.	Less Than Significant Impact

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
5.17	Transportation		
	Impact TRA-1: Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	No mitigation measures are required.	Less Than Significant Impact
	Impact TRA-2: Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	No mitigation measures are required.	Less Than Significant Impact
	Impact TRA-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	**TRA-1:** To maintain adequate motorist site distance, the Project Applicant/Developer or designee shall remove existing landscaping and/or install new landscaping to create a clear line of sight for vehicle movement at the proposed Street "A" and Meadow Pass Road intersection/ driveway. Prior to issuance of a building permit, the landscaping plan shall be reviewed and approved by the Community Development Department to ensure planting placement and species are appropriate to maintain a clear and unobstructed line of site at this location. The Project Applicant/Developer shall also construct or fund the construction of advance intersection/driveway warning signage on Meadow Pass Road, if determined necessary by the City Public Works Department based on City roadway design standards and requirements. If determined necessary, the signage shall be installed prior to issuance of a certificate of occupancy for any of the proposed homes.	Less Than Significant Impact With Mitigation Incorporated
	Impact TRA-4: Would the project result in inadequate emergency access?	No mitigation measures are required.	Less Than Significant Impact
5.18	Tribal Cultural Resources		
	Impact TCR-1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 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)?	**TCR-1:** Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. Prior to issuance of grading permits, the Project Applicant/Developer shall provide evidence to the Community Development Department that a certified Registered Professional Archaeologist (RPA) has been contracted to implement a Cultural Resources Monitoring Program (CRMP) that addresses the details of all activities that must be completed and procedures that must be followed regarding tribal cultural resources associated with this Project. The CRMP document shall be provided to the Community Development Director or their designee for review and approval prior to issuance of the grading permit. The CRMP provides procedures to be followed and are to ensure that impacts on tribal cultural resources will not occur without procedures that would reduce the impacts to less than significant. These measures shall include, but shall not be limited to, the following:	Less Than Significant Impact With Mitigation Incorporated

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
		A. The Project Applicant/Developer 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 onsite and any offsite 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. B. Archaeological Monitor - An adequate number of qualified monitors shall be present to ensure that all earthmoving activities are observed and shall be onsite during all grading activities for areas to be monitored including offsite improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist, in consultation with the Native American Monitor. C. A copy of the executed monitoring agreement shall be submitted to the Lead Agency (City) prior to the early commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. D. The Archaeological Monitor or Native American Monitor will complete daily monitoring logs that will 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. Copies of the logs completed shall be provided to the City monthly, until completion of any ground disturbing activities. Monitor logs will identify and describe any discovered TCRs, 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	

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
		discovered Native American (ancestral) human remains and burial goods. E. Onsite tribal monitoring shall conclude upon one of the following (1) written confirmation to the Kizh from a designated point of contact for the Project Applicant/Developer, and verified by the City, 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 (note: completeness is anticipated to mean all soils have been turned and/or excavated to maximum depth in all work locations. Monitoring of stockpiling or backfilling material is not anticipated unless evidence is provided to the City that such material is sensitive); or (2) a determination and written notification by the Kizh to the Project Applicant and City that no future, planned construction activity and/or development/construction phase at the Project Site possesses the potential to impact Kizh TCRs. **TCR-2:** Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will 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. Subsequent to the discovery of a TCR, the Applicant/Developer or any successor in interest shall comply with the following for the life of the grading permit, and shall implement the following procedures: 1. All ground disturbance activities within 50 feet of the discovered tribal cultural resource shall be halted until a meeting is convened between the developer, the Project Archaeologist, the Native American tribal representative(s) from consulting tribes (or other appropriate ethnic/cultural group representative), and the Community Development Director or their designee to discuss the significance of the find. 2. The Applicant/Developer shall call the Community Development Director or his/her designee immediately upon	

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
		discovery of the tribal cultural resource to convene the meeting. 3. At the meeting with the aforementioned parties, the significance of the discoveries shall be discussed, and a decision is to be made, with the concurrence of the Community Development Director or his/her designee, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the tribal cultural resource. 4. Further ground disturbance shall not resume within the area of the discovery until a meeting has been convened with the aforementioned parties and a decision is made, with the concurrence of the Community Development Director or their designee, as to the appropriate mitigation measures. **TCR-3:** Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects. A. 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. B. 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. C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. E. Any discovery of human remains/ burial goods shall be kept confidential to prevent further disturbance.	

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
	Impact TCR-2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Mitigation Measures TCR-1, TCR-2, and TCR-3 are required.	Less Than Significant Impact With Mitigation Incorporated
5.19	**Utilities and Service Systems**		
	Impact USS-1: Would the project require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	No mitigation measures are required.	Less Than Significant Impact
	Impact USS-2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	No mitigation measures are required.	Less Than Significant Impact
	Impact USS-3: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	No mitigation measures are required.	Less Than Significant Impact
	Impact USS-4: Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	**USS-1:** Prior to the issuance of a demolition or grading permit, the Project Applicant/Developer or designee shall prepare and submit a construction debris reduction/recycling plan designed to minimize the volume of construction debris requiring landfill disposal and incorporating measures for the separation and short-term onsite storage of construction waste materials in a manner conducive to collection and recycling/diversion efforts. The plan shall include a fire component so that reclamation activities are conducted in a fire safe manner. **USS-2:** Any hazardous waste that is generated onsite, or is found on site during demolition, rehabilitation, or new construction activities shall	Less Than Significant Impact With Mitigation Incorporated

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
		be remediated, stored, handled, and transported in compliance per appropriate local, County, State, and Federal laws.	
	Impact USS-5: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	No mitigation measures are required.	Less Than Significant Impact
5.20	**Wildfire**		
	Impact WF-1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	No mitigation measures are required.	Less Than Significant Impact
	Impact WF-2: Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No mitigation measures are required.	Less Than Significant Impact
	Impact WF-3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No mitigation measures are required.	No Impact
	Impact WF-4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No mitigation measures are required.	Less Than Significant Impact

1.6 SUMMARY OF PROJECT ALTERNATIVES

ALTERNATIVE 1: NO PROJECT, CURRENT GENERAL PLAN AND ZONING

CEQA Guidelines Section 15126.6(e) requires consideration of the "no project" alternative to allow decision makers to compare the impacts of approving the Project with the impacts of not approving the Project. Under Alternative 1: *No Project, Current General Plan and Zoning*, no new development would take place on the Project Site in the immediate future. The site would remain in its current condition for an unknown period of time, retaining onsite structures associated with previous uses, including the Winnett Farm's San Vicente Ranch and Brookside Equestrian Center structures (Main Barn/Residence and Minor Barn). The level of care required to ensure the Project Site does not pose a public safety or health risk would be less stringent compared to that required for an actively occupied site. If left unoccupied, the reduced site security may not be able to completely control potential vandalism or homeless occupation. In addition, the existing structures would likely continue to deteriorate, ultimately requiring the structures to be demolished or substantially modified. If the proposed Project is denied and Alternative 1 is selected, it is unreasonable to expect that the Project Site would remain vacant and preserved in its existing environmental condition for the distant future because the Project Site is zoned for residential development. It would be reasonable to expect that another housing development, consistent with the Project Site's current zoning, would be proposed either by the current owner or another owner if the

Project Site is sold. Pursuant to CEQA Section 15126.6(e)(3)(B) "…where failure to proceed with the project will not result in preservation of existing environmental conditions the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment." To that effect, potential environmental effects for Alternative 1 are anticipated to be substantially the same or similar to those analyzed for the proposed Project because of the existing zoning. Therefore, no additional environmental analysis is required for Alternative 1. In addition, retention of the Project Site in its existing condition would fulfill only two of the basic Project Objectives identified above. Furthermore, Alternative 1 could conflict with The Housing Crisis Act, which prohibits local jurisdictions from enacting new laws that would have the effect of reducing the legal limit on new housing within their borders or delaying new housing via administrative or other regulatory barriers.

ALTERNATIVE 2: R-1 ZONING, 27 UNITS, NO BRIDGE

Under Alternative 2, the City approved R-1 Zoning would allow for 27 units, the same number of units as the proposed Project. The site plan, development area, and open space area would be substantially the same as the proposed Project; however, Alternative 2 would eliminate the proposed internal vehicle/pedestrian bridge over Lemon Creek, resulting in greater avoidance of Lemon Creek and a more restricted circulation system within the Project Site. Resident and emergency vehicle access would be provided to 13 homes from Meadow Pass Road and to 14 homes from La Puente Road/San Vicente Drive. Alternative 2 would meet all five (5) of the Project Objectives. Alternative 2 would not result in a significant unavoidable adverse impact under CEQA.

ALTERNATIVE 3: RPD ZONING, 34 UNITS, NO BRIDGE

Alternative 3 would provide for 34 units under the residential planned development option of the RPD (28,500) – 1.3 zoning district. This alternative would maximize the number of units allowed using the 1.3du/acre density with no minimum lot sizes and would require a Conditional Use Permit (CUP). The site plan, development area, and open space area would be substantially the same as the proposed Project; however, Alternative 3 would eliminate the proposed internal vehicle/pedestrian bridge over Lemon Creek, resulting in greater avoidance of Lemon Creek and a more restricted circulation system within the Project Site. Resident and emergency vehicle access would be provided to 18 homes from Meadow Pass Road and to 16 homes from La Puente Road/San Vicente Drive. The designated open space areas would also be confined to their own lettered lots rather than located partially within residential property lots and deed restricted from development. Alternative 3 would meet all five (5) of the Project Objectives. Alternative 3 could potentially result in a significant unavoidable impact to air quality pending a more refined air quality analysis and/or implementation of mitigation measures.

ENVIRONMENTALLY SUPERIOR/PREFERRED ALTERNATIVE

CEQA requires that EIRs identify the Environmentally Superior Alternative and discuss the facts that support that selection. The Environmentally Superior Alternative is typically the Alternative that results in the least amount of significant unavoidable adverse impacts. The proposed Project would result in no impacts, less than significant impacts, and less than significant impacts with mitigation incorporated across all 20 environmental issue areas. No significant unavoidable adverse impact would occur. The proposed Project would meet all five Project Objectives.

Compared to the proposed Project, Alternative 1 would result in similar impacts across all 20 environmental issue areas. As indicated above, Alternative 1 would only meet two Project Objectives.

Compared to the proposed Project, Alternative 2 would result in reduced impacts for one issue area (biological resources), increased impacts for four issue areas (hazards/hazardous materials, land

use/planning, transportation, and wildfire), and similar impacts for 15 issue areas (aesthetics, air quality, agriculture/forestry resources, cultural resources, energy, geology/soils, greenhouse gas emissions, hydrology/water quality, mineral resources, noise, population/housing, public services, recreation, tribal cultural resources, and utilities/service systems). As indicated above, Alternative 2 would meet all five Project Objectives.

Compared to the proposed Project, Alternative 3 would result in reduced impacts for one issue area (biological resources), increase impacts for 11 issue areas (air quality, energy, greenhouse gas emissions, hazards/hazardous materials, land use/planning, public services, recreation, transportation, utilities/service systems, and wildfire), and have a similar level of impacts for eight issue areas (aesthetics, agriculture/forestry resources, cultural resources, geology/soils, hydrology/water quality, mineral resources, population/housing, and tribal cultural resources). Alternative 3 could potentially result in a significant unavoidable impact to air quality pending a more refined air quality analysis and/or implementation of mitigation measures. Impacts would be potentially significant. Alternative 3 would meet all five Project Objectives.

The proposed Project and alternatives involve trade-offs between types of impacts.

The "Environmentally Superior Alternative" is chosen from among the alternatives only. That selection does not include the proposed Project. As shown in Table 1-1, *Project Alternatives Impact Comparison Summary* above, Alternatives 2 and 3 are each environmentally superior to the Project in one respect (Biological Resources), although they also are environmentally inferior to the Project in several respects. On the other hand, the No Project alternative is "Similar" to the Project in *all* respects and, therefore, is environmentally superior to Alternatives 2 and 3. As a result, the No Project Alternative is the Environmentally Superior Alternative.

As between Alternative 2 and Alternative 3, Table 1-1 shows that Alternative 3 has "Greater" impacts than the Project in several respects more than does Alternative 2. As a result, in compliance with Guidelines §15126.6(e)(2), Alternative 2 is identified as the Environmentally Superior Alternative from among the alternatives other than the No Project alternative.

As discussed in this Section and shown in Table 1-1, Alternatives 2 and 3 were environmentally superior to the Project only with respect to Biological Resources, but none of the Alternatives were environmentally superior to the Project on an overall basis. Overall, the proposed Project would have fewer environmental impacts than any of the Alternatives and meet the Project Objectives.

Table 1-1
Project Alternatives Impact Comparison Summary

Environmental Issue Area	Proposed Project Impact Finding	Alternative 1: No Project, Current General Plan and Zoning	Alternative 2: R-1 Zoning, 27 Units, No Bridge	Alternative 3 RPD Zoning, 34 Units, No Bridge
Aesthetics	Less Than Significant with Mitigation Incorporated	Similar	Similar	Similar
Agriculture/Forestry Resources	No Impact	Similar	Similar	Similar
Air Quality	Less Than Significant Impact	Similar	Similar	Greater (Potentially Significant)
Biological Resources	Less Than Significant with Mitigation Incorporated	Similar	Lesser	Lesser
Cultural Resources	Less Than Significant with Mitigation Incorporated	Similar	Similar	Similar
Energy	Less Than Significant Impact	Similar	Similar	Greater
Geology/Soils	Less Than Significant with Mitigation Incorporated	Similar	Similar	Similar
Greenhouse Gas Emissions	Less Than Significant Impact	Similar	Similar	Greater
Hazards/Hazardous Materials	Less Than Significant with Mitigation Incorporated	Similar	Greater	Greater
Hydrology/Water Quality	Less Than Significant Impact	Similar	Similar	Similar
Land Use and Planning	Less Than Significant Impact	Similar	Greater	Greater
Mineral Resources	No Impact	Similar	Similar	Similar
Noise	Less Than Significant Impact	Similar	Similar	Greater
Population/Housing	Less Than Significant Impact	Similar	Similar	Similar
Public Services	Less Than Significant Impact	Similar	Similar	Greater
Recreation	Less Than Significant Impact	Similar	Similar	Greater
Transportation	Less Than Significant with Mitigation Incorporated	Similar	Greater	Greater
Tribal Cultural Resources	Less Than Significant with Mitigation Incorporated	Similar	Similar	Similar
Utilities/Service Systems	Less Than Significant with Mitigation Incorporated	Similar	Similar	Greater
Wildfire	Less Than Significant Impact	Similar	Greater	Greater

Table 1-2, *Project Alternatives Compliance with Project Objectives Summary*, identifies whether the proposed Project or alternatives achieve the Project Objectives. More detailed discussions are provided for the alternatives in their respective environmental issue area sections above.

Table 1-2
Project Alternatives Compliance with Project Objectives Summary

Project Objectives	Proposed Project	Alternative 1: No Project, Current General Plan and Zoning	Alternative 2: R-1 Zoning, 27 Units, No Bridge	Alternative 3 RPD Zoning, 34 Units, No Bridge
1. Maintains consistency with the Project Site's Very Low Density General Plan and RPD (28,500) – 1.3 zoning designation.	Yes	No	Yes	Yes
2. Respects and enhances the health, biological function, and water quality of Lemon Creek, while assuring that the development does not increase flood risk for downstream properties.	Yes	Yes	Yes	Yes
3. Provides a multi-use trail dedicated to the City of Walnut, open to the public and provides a connection to other public trails at the Project boundaries.	Yes	No	Yes	Yes
4. Preserves the walnut and oak trees on the Project Site, retaining their significant historical, aesthetic, and environmental value.	Yes	No	Yes	Yes
5. Minimizes landform alteration by generally limiting grading to previously disturbed and/or developed areas of the Project Site and grading onsite without import or export.	Yes	Yes	Yes	Yes

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SECTION 2.0 INTRODUCTION

2.1 OVERVIEW, PURPOSE AND AUTHORITY OF THE EIR

This Draft Environmental Impact Report (DEIR) addresses the potential environmental effects associated with a single-family residential development (Project) proposed for approximately 25.84 acres (Project Site) in the City of Walnut (City). The Project Site was previously occupied by the Brookside Equestrian Center, which has been closed since 2014, after which there have been no ongoing equestrian operations on the Project Site. The Project is described in greater detail in Section 3.0, *Project Description*.

The California Environmental Quality Act (California Public Resources Code [PRC] Section 21000 et seq.) (CEQA) requires that state and local governmental agencies consider a project's potential environmental consequences before approving projects over which they have discretionary approval authority. Under CEQA, 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" (*Guidelines* Section 21067). For the Project, the City is the "Lead Agency" and has determined that an Environmental Impact Report (EIR) is required for the Brookside Project.

This DEIR bears State Clearinghouse No. 2022110184 and has been prepared in conformance with CEQA, the CEQA Guidelines, and the City's rules, regulations, and procedures for implementation of CEQA. The principal CEQA Guidelines sections governing content of this document include Article 9, Contents of Environmental Impact Reports, Sections 15120 through 15132; and Article 11, Section 15161, Project EIR. This DEIR has been prepared to satisfy CEQA and its *Guidelines* (California Code of Regulations, Title 14, Section 15000 et seq.) for a proposed development in the City, which is described in Section 3.0, Project Description.

As referenced in *CEQA Guidelines* Section 15121(a), the primary purposes of this DEIR are to:

- Inform decision-makers and the public generally of the significant potential environmental effects of the Project.
- Identify possible ways to minimize the significant potential environmental effects of the Project.
- Describe reasonable alternatives to the Project.

The DEIR evaluates all the environmental issue areas provided in Appendix G of the CEQA Guidelines, provides cumulative impact analysis of the Project with related development projects in the Project area, and provides an alternatives analysis to the Project that includes a No Project Alternative and two additional Project alternatives.

Consistent with Guidelines Sections 15125(a) and 15126.2(a), in evaluating the potential environmental effects of the Project, this DEIR describes the existing environmental conditions in the vicinity of the Project Site, referred to as the "environmental setting." Generally, the environmental setting constitutes the baseline physical conditions by which the DEIR evaluates changes in the existing physical condition in the affected area, and determines whether a potential impact of the Project is, in fact, significant.

After identifying a potential significant effect of the Project, the DEIR will then determine whether that potential impact is avoidable or unavoidable. This will depend on whether feasible mitigation measures are available to substantially lessen or avoid that impact. If so, the DEIR will state that the impact can be mitigated and describe the applicable mitigation measure. But if not, the DEIR will state that the potential impact is "significant and unavoidable."

The mitigation measures specified in this DEIR shall be adopted as conditions of approval to minimize the significance of the Project's potential environmental impacts. In addition, the City will adopt a Mitigation Monitoring and Reporting Program (see Section 2.10 below) to ensure compliance during Project implementation with the mitigation measures contained in this DEIR.

In some instances, features incorporated into the design of the Project serve to avoid or minimize potential environmental effects that might occur without those design features. Those design features, however, are part of the description of the Project, as opposed to mitigation measures proposed by the City as lead agency. For that reason, they are not included within the Mitigation Monitoring and Reporting Program.

As noted earlier, a DEIR may determine that some potential impacts are found to be "significant and unavoidable" because they cannot be mitigated to a level considered less than significant. In accordance with *CEQA Guidelines* Section 15093(b), if a lead agency approves a project that has significant and unavoidable impacts, the lead agency must state in writing the specific reasons for approving the project, based on the Final EIR (FEIR) and any other information in the public record. *CEQA Guidelines* Section 15093 requires a "statement of overriding considerations" where the lead agency specifies the findings and public benefits for a project that is determined to outweigh the impacts and is approved. If no significant unavoidable impacts are identified, a statement of overriding considerations is not required. With respect to the Project, this DEIR has not identified any significant and unavoidable impacts.

The City, as the lead agency, and other public agencies (i.e., responsible and trustee agencies) that may use this DEIR in the decision-making or permit process will consider the information in this DEIR, along with other information that may be presented during the CEQA process, such as through the public review process described in Section 2.8 below and the public hearing process for consideration of the application for the approval of the Project.

2.2 LEAD AGENCY, PROJECT APPLICANT, AND ENVIRONMENTAL CONSULTANT

Lead Agency:

City of Walnut
Community Development
21201 La Puente Road
Walnut, California 91789

Project Applicant:

Spring Meadows Homes, LLC
18217 Gale Avenue, Suite A
City of Industry, California 91748

Environmental Consultant:

VCS Environmental
30900 Rancho Viejo Road, Suite 100
San Juan Capistrano, California 92675

2.3 NOTICE OF PREPARATION

In compliance with the *CEQA Guidelines*, the City has provided opportunities for various agencies and the public to participate in the environmental review process. During the DEIR preparation, efforts were made

to contact various federal, state, regional, and local government agencies, and other interested parties to solicit comments on the scope of the review in this document. Pursuant to Guidelines Section 15082, this included the distribution by the City of a Notice of Preparation (NOP) directly to public agencies (including the State Clearinghouse and Office of Planning and Research), special districts, and members of the public who had requested such notice. The NOP (State Clearinghouse No. 2022110184) was distributed November 10, 2022, and the 40-day public review period concluded December 20, 2022. The purpose of the NOP was to formally announce the preparation of a DEIR and that, as the lead agency, the City was soliciting input regarding the scope and content of the environmental information to be included in the DEIR.

In accordance with Section 15082 of the Guidelines, within 30 days after receiving the NOP, each responsible agency, trustee agency and the Office of Planning and Research was given 30 days from its receipt of the NOP to provide the City with specific detail about environmental information related to that agency's statutory authority for which it requested evaluation in the DEIR.

Table 2-1, *Summary of NOP Comments*, provides a summary of the comment letters received from commenting agencies/persons during the NOP process and identifies the section(s) of the DEIR where the issues are addressed. Comments that do not provide specific detail about the scope and content of the environmental information that must be evaluated in the DEIR or just provide opinion in support or opposition of the Project, have been identified as Not Evaluated in DEIR.

The NOP and NOP comments are provided as Appendix A, *Notice of Preparation and Comment Letters*, and have been addressed in each appropriate topical area of this DEIR.

Table 2-1
Summary of NOP Comments

Commenter/Letter	Summary of Comment	Impact/Section EIR Addresses Issue
California Department of Transportation (11/9/2022-12/13/2022)	The commenter asked several clarification questions regarding the difference between a 2018 project proposed at the Project Site and the current proposed Project. The letter notes that Caltrans encourages Lead Agencies to evaluate the potential to implement Transportation Demand Management (TDM) strategies that reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions. The letter states, "If there are any significant impacts to the State Highway System, the implementation of multimodal mitigation measures and other TDM strategies should be considered to reduce the number of vehicle trips… Also, signal synchronization and other Transportation System Management should be considered to improve transportation flow." The letter states, "Caltrans also encourages lead agencies to prepare traffic safety impact analysis for all developments in the CEQA review process so that… California can reach zero fatalities and serious injuries by 2050." The letter notes any oversized-transport vehicles on State Highways will need a Caltrans transportation permit; recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities; and notes a construction traffic control plan would be needed if construction traffic is expected to cause issues on any State facilities.	Section 5.17, *Transportation*.

Commenter/Letter	Summary of Comment	Impact/Section EIR Addresses Issue
PanTerraVida – Kenneth Scott (11/10/2022)	The comment letter states that they represent a private society with the goal to "purchase the land from the current owners in a reasonable buyout based on costs and duration of ownership." They recommend an alternative to turn the Project Site into a park or community area with a community center, nature preserve, community gardens, and nature center with trails. States the Project Site is unique for its trees, wildlife, and Lemon Creek.	Section 3.0, *Project Description*, under Open Space Plan. Project Alternatives are discussed in Section 6.0, *Alternatives Analysis*. Trees, wildlife and Lemon Creek are discussed in Section 5.4, *Biological Resources*.
Native American Heritage Commission (NAHC) (11/14/2022)	The comment letter describes regulations related to CEQA and the Public Resources Code; recommends consultation with California Native American Tribes that are traditionally and culturally affiliated with the geographic area; and includes recommendations for cultural resources assessments.	Section 5.18, *Tribal Cultural Resources*; Section 5.5, *Cultural Resources*.
Vijay Vakil; Wendy Toy; Charles Isaac; William Harrison; Kevin Bush (11/21/2022 - 12/21/2022)	RE: BROOKSIDE PROJECT EIR/SCOPING MEETING COMMUNITY COMMENTARY AGAINST THE PLAN 11/21/2022 – The comment letter provides "background and original plan" statements regarding recreational use and community "displeasure" against developing the Project Site. The letter requests correct ownership of the property be included in the documents. The comment makes statements and opinions about the Project Site zoning, lot sizes and requirements, proposed trail system and trespass, open space, aesthetics, and lack of a development agreement. The comment letter makes statements and expresses concern over watershed protection related to water quality, groundwater, flooding, erosion, liquefaction, impervious surface, grading near the creek, potential infrastructure associated with the creek (e.g., bridges, culverts), general Regional Water Quality Control Board principles, low impact development, and maintenance. The comment letter discusses concerns and makes statements about riparian habitat, endangered species (i.e., California gnatcatcher and least Bell's Vireo), native trees and wildlife, and restoration. The comment letter discusses concerns and makes statements about "historic/community heritage" regarding the Sentous family, Winnett ownership of the property, Walton ownership of the property as an equestrian center; historic evaluation criteria; and Walnut General Plan map designation. The letter discusses an archeological site potentially associated with the Project Site. The letter provides a "conclusion" that discusses general plan consistency; provides mention of the Los Angeles County Countywide Sustainability Plan as it relates to climate change, ecosystems, habitats, biodiversity, waterways, and open space. The letter states the commenters would like the Project Site to be used for "conservancy" not residential development.	11/21/2022 – Land use and zoning are discussed in Section 5.11, *Land Use and Planning*; trails, open space and aesthetics are discussed in Section 3.0, *Project Description*, and Section 5.16, *Recreation*; watershed issues are discussed in Section 5.10, *Hydrology and Water Quality*, and liquefaction is discussed in Section 5.7, *Geology and Soils*; riparian habitat, species, and vegetation are discussed in Section 5.4, *Biological Resources*; historic and archaeological resources are discussed in Section 5.5, *Cultural Resources*; consistency with applicable plans is discussed in Section 5.11, *Land Use and Planning*.

Commenter/Letter	Summary of Comment	Impact/Section EIR Addresses Issue
	2022,12,12 ADDENDUM TO - 21NOV2022 BROOKSIDE PROJECT EIR/SCOPING MEETING COMMUNITY COMMENTARY AGAINST THE PLAN 12/12/2022 – The comment letter expresses concern about impacts on traffic related to congestion, traffic accidents/safety, existing surrounding land uses (e.g., church), access from Meadow Pass and La Puente Road, and the Applicant's responsibility for road improvements. The letter provides "background data", a copy of a Parks and Recreation Memo, and states the Project has no additional community benefits compared to a previously denied project. The commenter raises questions about architecture and how that may impair wildlife crossings and riparian habitat. The letter describes "general EIR related" comments requesting independent environmental analysis and review; details on biological studies; concern about erosion and water toxicity; and historical analysis. [Attachments: Parks Rec Memo; Creek Issues Correspondence 2022/01/21; Winnett History Correspondence 2022/01/13; Winnett Reference Material; Winnett Family Photos & Articles]	12/12/2022 – Traffic and traffic safety are discussed in Section 5.17, *Transportation*; recreational components are described in Section 3.0, *Project Description*, and discussed in Section 5.16, *Recreation*; wildlife movement, habitat value, riparian habitat, and other biological resources/studies are discussed in Section 5.4, *Biological Resources*; CEQA requirements are discussed in Section 2.0, *Introduction*; erosion and water quality are discussed in Section 5.10, *Hydrology and Water Quality*; historical resources are discussed in Section 5.5, *Cultural Resources*.
	RE: BROOKSIDE - REQUEST FOR LEGAL OPINION - R-1 ZONING 12/12/2022 – The comment letter requests a written opinion regarding the Walnut Municipal Code Section 6.12.050.	12/12/2022 – Zoning is discussed in Section 3.0, *Project Description*, and in Section 5.11, *Land Use and Planning*.
	RE: ADDENDUM #2 – BROOKSIDE PROJECT EIR/SCOPING MEETING COMMUNITY COMMENTARY AGAINST THE PLAN 12/20/2022 – The comment letter describes the condition of other Lemon Creek segments located outside of the Project Site as observed by the commenter. The comment letter expresses concern related to previous statements about creek maintenance on private lots, water quality, erosion, flooding, and riparian habitat. [Attachment: Photos]	12/20/2022 – Maintenance is described in Section 3.0, *Project Description*; water quality, erosion, and flooding are discussed in Section 5.10, *Hydrology and Water Quality*; riparian habitat is discussed in Section 5.4, *Biological Resources*.

Commenter/Letter	Summary of Comment	Impact/Section EIR Addresses Issue
Doreen Fang (12/1/2022)	The commenter states they are "glad to know that our community will become more and more beautiful under" the Project; expresses concern about the number of homes proposed on Street A related to overcrowding; and expresses concern about views from their backyard.	Section 3.0, *Project Description*, under Open Space Plan and Conceptual Landscape Plan; Section 5.1, *Aesthetics*; Section 7.0, *Other CEQA Considerations*, under Growth-Inducing Impacts.
California Department of Fish and Wildlife (12/9/2022)	The comment letter describes CDFW's role as a Responsible and Trustee Agency under CEQA; describes regulations related to CEQA and the Public Resources Code; and recommends surveys and potential mitigation (if needed) for California gnatcatcher, Crotch's bumble bee, lake and streambed alteration, sensitive natural communities, nesting birds, landscaping, and tree disease management.	Section 5.4, *Biological Resources*; Section 5.10, *Hydrology and Water Quality*.
Los Angeles County Sanitation Districts (12/12/2022)	The comment letter discusses anticipated demand for service and details of facilities that would serve the Project. The letter states, Project wastewater would discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Lemon Avenue Trunk Sewer, located in Lemon Avenue at Valley Boulevard. The Districts' 18-inch diameter trunk sewer has a capacity of 7.8 million gallons per day (mgd) and conveyed a peak flow of 0.8 mgd when last measured in 2014. Wastewater would be treated at San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average recycled flow of 62.7 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson. The expected increase in average wastewater flow is 7,020 gallons per day. The letter notes, payment of a connection fee may be required before the Project is permitted to discharge to the Districts' Sewerage System. The letter notes that all expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial.	Section 5.19, *Utilities and Service Systems*.
Daniel Yang (12/13/2022)	The commenter states they are "saddened to hear about the residential Brookside Project. Brookside is an extremely special place to the community and is a historical landmark for many folks in the community." The comment describes the commentor's personal connection to the Project Site; states that they do not want more housing in the City; and states that the property "should be better utilized as a park/scenic area as it is in the core center of the city."	Section 3.0, *Project Description*, under Open Space Plan; Section 5.5, *Cultural Resources*, discusses the Project's historical significance; and Section 6.0, *Alternatives Analysis*, discusses the Project's alternatives.

Commenter/Letter	Summary of Comment	Impact/Section EIR Addresses Issue
Walnut Valley Water District (12/14/2022)	The comment letter notes that the Walnut Valley Water District is dependent on imported water from Metropolitan Water District; states the Project consists of fewer than 500 dwelling units so the requirements for reliable water supply stipulated under Senate Bills 221 and 610 do not apply; and states the district believes there is sufficient water supply for the proposed development.	Section 5.19, *Utilities and Service Systems*.
Bernadette Trinidad (12/19/2022)	The commenter asked if there would be a builder after the Project is reviewed by the planning commission.	Comment does not provide specific detail about the scope and content of the environmental information to be included in the DEIR. Comment not evaluated in DEIR.
Watershed Conservation Authority (12/20/2022)	The comment letter recommends an analysis of impacts to Lemon Creek's hydrological and ecosystem services including wildlife access to water; riparian vegetation; water quality; climate change variability in precipitation patterns; downstream impacts; and cumulative impacts. The letter notes that any fuel modification zone would be part of the development footprint as it requires vegetation thinning/removal. The letter recommends examining Project impacts to hydrology in relation to California's ADU ordinance and Senate Bill 9 (2022); proposes a high density or cluster development which groups all development into a single area as a Project Alternative; and recommends that Project alternatives incorporate standards for all site landscaping (including residential landscaping) to slow water to maximize water absorption and retention in the soil.	Section 3.0, *Project Description*, under Open Space Plan and Conceptual Landscape Plan; Section 5.4 *Biological Resources*; Section 5.8, *Greenhouse Gas Emissions*; Section 5.10, *Hydrology and Water Quality*; Section 6.0, *Alternatives Analysis*, under Alternative Considered and Not Advanced During the Planning Process; Section 7.0, *Other CEQA Considerations*, under Growth Inducing Impacts.

2.4 SCOPE OF THE EIR

Pursuant to Sections 15126.2 and 15126.4 of the Guidelines, this DEIR identifies any potentially significant adverse impacts and recommends mitigation to eliminate or reduce these impacts to levels of insignificance. The information in Section 3.0, *Project Description*, establishes the basis for analyzing future, Project-related potential environmental impacts.

This DEIR evaluates in separate sections the Project's potential significant impacts in the areas of Aesthetics, Agricultural & Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology & Soils, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Hydrology & Water Quality, Land Use & Planning, Mineral Resources, Noise, Population & Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities & Service Systems, and Wildfire. In addition, as required by CEQA, this DEIR evaluates the potential growth inducing and cumulative impacts of the Project. Cumulative impacts are those which result from the Project in combination with past, current, and probable future projects.

All potential environmental impacts associated with implementation of the Project were determined to be no impact, less than significant impact, or less than significant with mitigation incorporated. The DEIR did

not identify any significant and unavoidable impacts, as defined by CEQA, that would result from Project implementation.

2.5 ORGANIZATION OF THE EIR

This DEIR is organized into the following sections:

- Section 1.0, Executive Summary, provides a brief Project description and summary of the environmental impacts and mitigation measures.
- Section 2.0, Introduction, provides CEQA compliance information.
- Section 3.0, Project Description, provides a detailed Project description indicating Project location, background, and history; Project characteristics, phasing, and objectives; as well as associated discretionary actions required.
- Section 4.0, Basis for Cumulative Impacts, describes the approach and methodology for the cumulative analysis.
- Section 5.0, Environmental Analysis, contains a detailed environmental analysis of the existing conditions, existing regulatory setting, potential Project impacts, potential cumulative impacts, applicable standard conditions of approval, recommended mitigation measures, and significant unavoidable impacts (if any) for the following environmental topic areas:
  - Aesthetics
  - Agriculture and Forestry Resources
  - Air Quality
  - Biological Resources
  - Cultural Resources
  - Energy
  - Geology and Soils
  - Greenhouse Gas Emissions
  - Hazards and Hazardous Materials
  - Hydrology and Water Quality
  - Land Use and Planning
  - Mineral Resources
  - Noise
  - Population and Housing
  - Public Services
  - Recreation
  - Transportation
  - Tribal Cultural Resources
  - Utilities and Service Systems
  - Wildfire
- Section 6.0, Alternatives Analysis, describes a reasonable range of alternatives to the Project or its location that could avoid or substantially lessen the Project's significant impact and still feasibly attain the basic Project objectives.
- Section 7.0, Other CEQA Considerations, explains potential impacts that have been determined not to be significant and which were scoped out of detailed analysis in this DEIR.
- Section 8.0, Organizations and Persons Consulted, identifies all federal, state, and local agencies, other organizations, and individuals consulted.
- Technical Appendices, contains the Project's technical documentation.

2.6 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED IN THE EIR

Prior to the preparation of the DEIR, the City circulated a Notice of Preparation (NOP) on November 10, 2022 (refer to Appendix A). Comments received during the public review period from November 10, 2022,

through December 20, 2022 are included in Appendix A. A summary of comments received on the NOP is provided in Table 2-1. The table provides references to the sections of the DEIR in which these issues are evaluated. No other areas of controversy are known to the Lead Agency.

2.7 TECHNICAL STUDIES PREPARED FOR THE PROPOSED PROJECT

The following technical studies were prepared for the Project:

- Air Quality, Energy, and Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis (Appendix C)
- Biological Technical Report for the Brookside Development Project (Appendix D). The following reference documents are included in the Biological Technical Report's Appendices:
  - Arborist Report
  - Bat Habitat Assessment and Focused Survey
  - Burrowing Owl Habitat Assessment and Focused Survey
  - California Gnatcatcher Habitat Assessment
  - Least Bell's Vireo Focused Survey Report
  - Southwestern Pond Turtle Habitat Assessment and Focused Survey
  - Crotch's Bumble Bee Survey Report
- Phase 1 Cultural Resources Assessment (Appendix E). The following reference document is included in the Phase I Cultural Resources Assessment's Appendices:
  - Historical Resource Analysis Report
- Preliminary Geotechnical Investigation Report (Appendix F1)
- Geotechnical Addendum (Appendix F2)
- Phase I Environmental Site Assessment (Appendix G1)
- Radon Analysis Letter (Appendix G2)
- Lemon Creek Hydrology and Hydraulics (Appendix H1)
- Low Impact Development Plan (Appendix H2)
- Noise Impact Analysis (Appendix I)
- Transportation Impact Study (Appendix K1)
- Collision Research Summary (Appendix K2)

2.8 REVIEW OF THE DEIR

This DEIR is being circulated for a 45-day public review period beginning on June 30, 2025 and closing August 15, 2025. Interested agencies and members of the public are invited to comment in writing on the information contained in this document. Persons and agencies commenting are encouraged to provide information that they believe is missing from the DEIR and to identify where the information can be obtained. All comment letters received before the close of the public review period will be responded to in writing, and the comment letters, together with the responses to those comments, will be included in the Final EIR (FEIR).

Comment letters should be sent to:

City of Walnut
Community Development Department
21201 La Puente Road
Walnut, California 91789

Attn: Joelle Guerra, Planning and Code Enforcement Manager
Email: jguerra@cityofwalnut.org

2.9 FEIR CERTIFICATION

Pursuant to *CEQA Guidelines* Section 15132, contents of the FEIR will consist of:

a) The DEIR or a revision of the DEIR.

b) Comments and recommendations received on the DEIR either verbatim or in summary.

c) A list of persons, organizations, and public agencies commenting on the DEIR.

d) The Lead Agency's responses to significant environmental points raised in the review and consultation process; and any other information added by the Lead Agency.

2.10 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 21081(a)(1) or adopted a Negative Declaration pursuant to 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 and Reporting Program for the Project will be approved as part of the FEIR, prior to consideration of the Project discretionary permits by the City.

SECTION 3.0 PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

This Draft Environmental Impact Report (DEIR) addresses the potential environmental effects associated with a single-family residential development (Project) proposed for approximately 25.84 acres (Project Site) in the City of Walnut (City). The Project Site was previously occupied by the Brookside Equestrian Center, which has been closed since 2014, after which there have been no ongoing equestrian operations on the Project Site.

The Project proposes the development of 27 single-family detached homes, associated residential infrastructure, open space areas, and a multiuse public trail within the Project Site. Approximately 12.2 acres, or 47.2% of the Project Site would be preserved as open space. Approximately 9.5 acres of that open space would be within lots owned by individual homeowners and maintained by the Project's Homeowners Association (HOA). Another 2.7 acres of open space would be owned and maintained by the HOA and/or Los Angeles County Flood Control District. The open space within the lots of individual homeowners would be deed restricted to prohibit any use or development other than for the public trail, passive open space, and maintenance purposes, while the remaining 2.7 acres would be deed restricted to prohibit any use or development other than for flood control/basin, landscaping, passive open space, and maintenance purposes. Twenty-five (25) of the proposed homes would be accessed from Meadow Pass Road and two (2) homes would be accessed from San Vicente Drive.

3.2 LOCATION

The City is located in the County of Los Angeles, approximately 20 miles east of the City of Los Angeles, within the San Gabriel Valley, and situated in the San Jose Hills. The City is bordered by the City of West Covina to the west and northwest, unincorporated Los Angeles County to the north, California State Polytechnic University, Pomona and the City of Pomona to the east, and the City of Industry to the south.

The Project Site is approximately 2.0 miles north of the Pomona Freeway ("State Route 60" or "SR-60") as shown on Figure 3-1, *Regional Location*. It is north of La Puente Road, south of Meadow Pass Road, east of North Lemon Avenue, and west of Broken Lance Road as shown on Figure 3-2, *Local Vicinity*, and Figure 3-3, *USGS Topographic Map*. The Project Site has one associated address, 800 Meadow Pass Road, and consists of Lots 1 and 2 of Tract 45378 and Assessor's Parcels 8709-093-001, 8709-093-002, and 8709-093-003. It is located within Section 6, Township 2s, Range 9W of the United States Geological Survey (USGS) Topographic Map.

3.3 ENVIRONMENTAL SETTING

PHYSICAL SETTING

Project Site Overview

The Project Site consists of approximately 25.84 acres of previously developed/disturbed land and is located on private property. The Project Site grade varies approximately from an elevation of 640 feet on the north boundary adjacent to Meadow Pass Road down to an elevation of 572 feet on the southern boundary adjacent to La Puente Road. Lemon Creek traverses the Project Site, generally flowing from northeast to southwest/south. The ground surface unpaved with exposed dirt and gravel, grass, native and non-native trees, and shrubs. The northern portion of the Project Site has improvements related to the development of Meadow Pass Road, existing entry driveway, and the discontinued equestrian uses. The

southern portion of the Project Site is free of any structures and is mostly developed by prior agricultural and equestrian uses.

Trees

There are 454 trees within the grading limits and a total of 718 trees, which could potentially be impacted. Refer to Michael Baker International (MBI) survey and Rincon survey.[1] The extent to which trees on the Project Site would be impacted by the Project is evaluated in Section 5.4, *Biological Resources*.

The Walnut Municipal Code provides for "the preservation of all healthy trees unless compelling reasons justify the removal of such trees." See Walnut Municipal Code (WMC) Section 6.52.250. For the purpose of that tree protection policy, the WMC defines a "tree" to be "any oak tree of the genus Quercus including, but not limited to, Blue Oak (*Quercus douglasii*), California Black Oak (*Quercus kelloggi*), Valley Oak (*Quercus lobata*), California-Live Oak (*Quercus agrifolia*), Canyon Oak (*Quercus chrysolepia*), Interior Live Oak (*Quercus wislizenni*), Scrub Oak (*Quercus Dumosa*), and California Black Walnut (*Juglans californica*)." At present, approximately 91 black walnuts and 14 oaks have been documented on the Project Site. Of those, a total of 19 City-protected oak and walnut trees fall within or immediately adjacent to the grading limits, including 11 Southern California black walnut (*Juglans californica)* trees, one (1) coast live oak (*Quercus agrifolia)* tree, and seven (7) valley oak (*Quercus lobata)* trees. None of the remaining trees on site fall within the protected category of the City's tree preservation policy.

A substantial portion of the non-protected trees onsite are non-native and/or invasive. In a July 26, 2018, comment letter submitted on a draft EIR for a previously proposed development on the Project Site, the California Department of Fish and Wildlife stated that Lemon Creek "is heavily impacted by invasive plant species, impairing the biological function of this riparian habitat." The Project's Tree Preservation/ Replacement Plan is discussed in Sections 3.4, *Project Characteristics* and 5.4, *Biological Resources*, below.

Onsite Structures

In addition, there are unused facilities remaining from discontinued equestrian activities, consisting of two stables, one of which has a second story residential addition (currently unoccupied), covered stalls, two fenced corrals, maintenance storage shed, three feed sheds within fenced areas, one outdoor arena, one covered open-air arena, and one gazebo. All structures have been vacated and closed. Unimproved gravel and dirt roads traverse the Project Site and allow for vehicle access. Irrigation systems were also observed. Some existing improvements such as trails and fences are also present. Existing storm drains, culverts, water lines and sewer lines also occur onsite. No wells, septic systems, underground vaults, or underground storage tanks were reported or observed on the Project Site. The Project Site is regularly maintained. Refer to Figure 3-2, *Local Vicinity*, for an aerial view of the Project Site.

[1] The MBI survey (2017) was prepared in connection with a similar project for this Project Site. The focus of the MBI survey was to inventory and rapidly assess the health and integrity of each tree within the grading limits. The MBI survey also counted trees outside of grading limits. An updated survey was prepared by Rincon (2023) to verify MBI survey data within grading limits, as well as analyze trees immediately adjacent to grading limits that could potentially be impacted by the current project, for a total of 718 trees. There are no anticipated impacts to trees beyond those considered in the Rincon report.



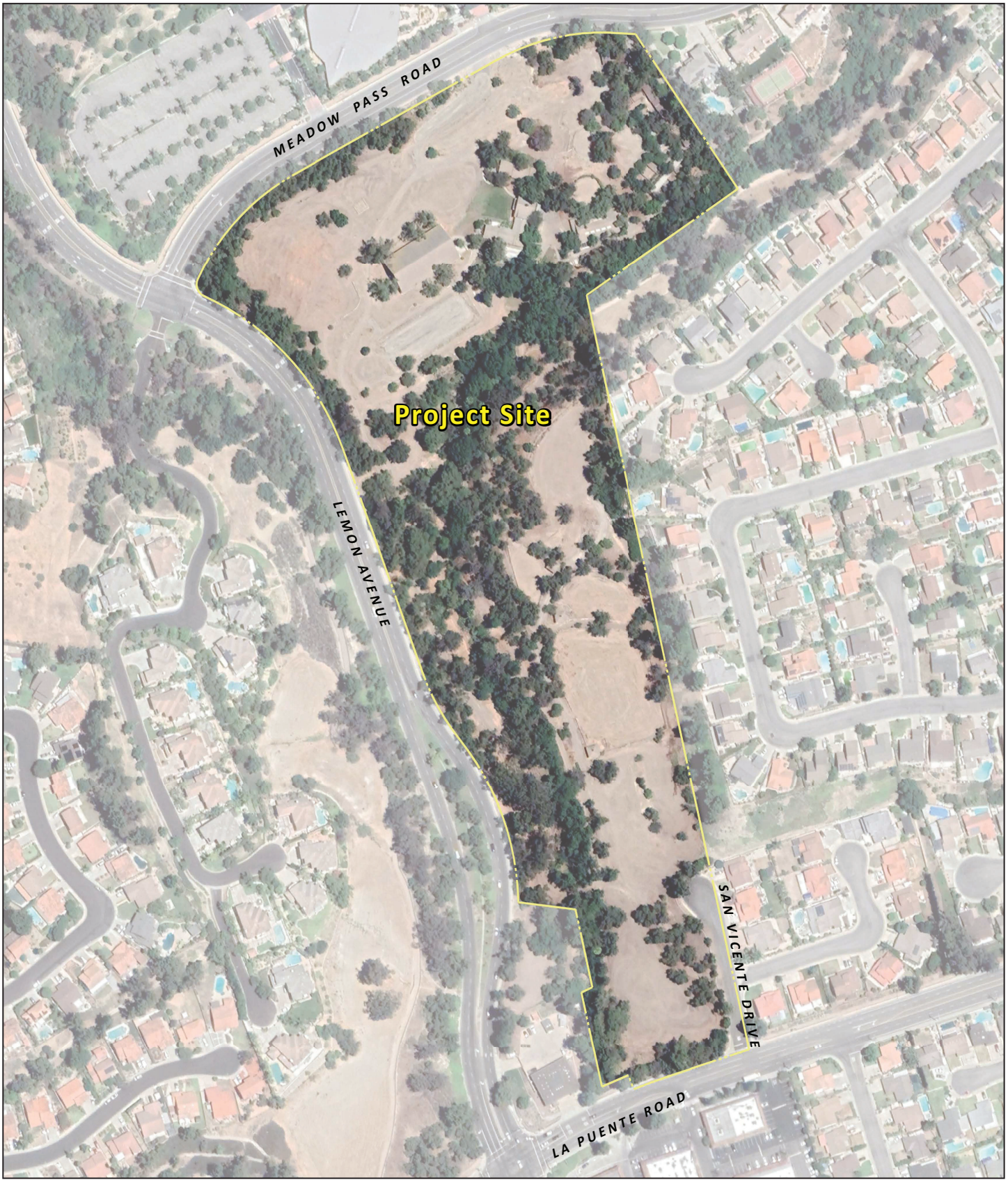
Source: ESRI and USGS; March 2024.
- approximate Project Location

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Regional Location

VCS Environmental

Figure 3-1



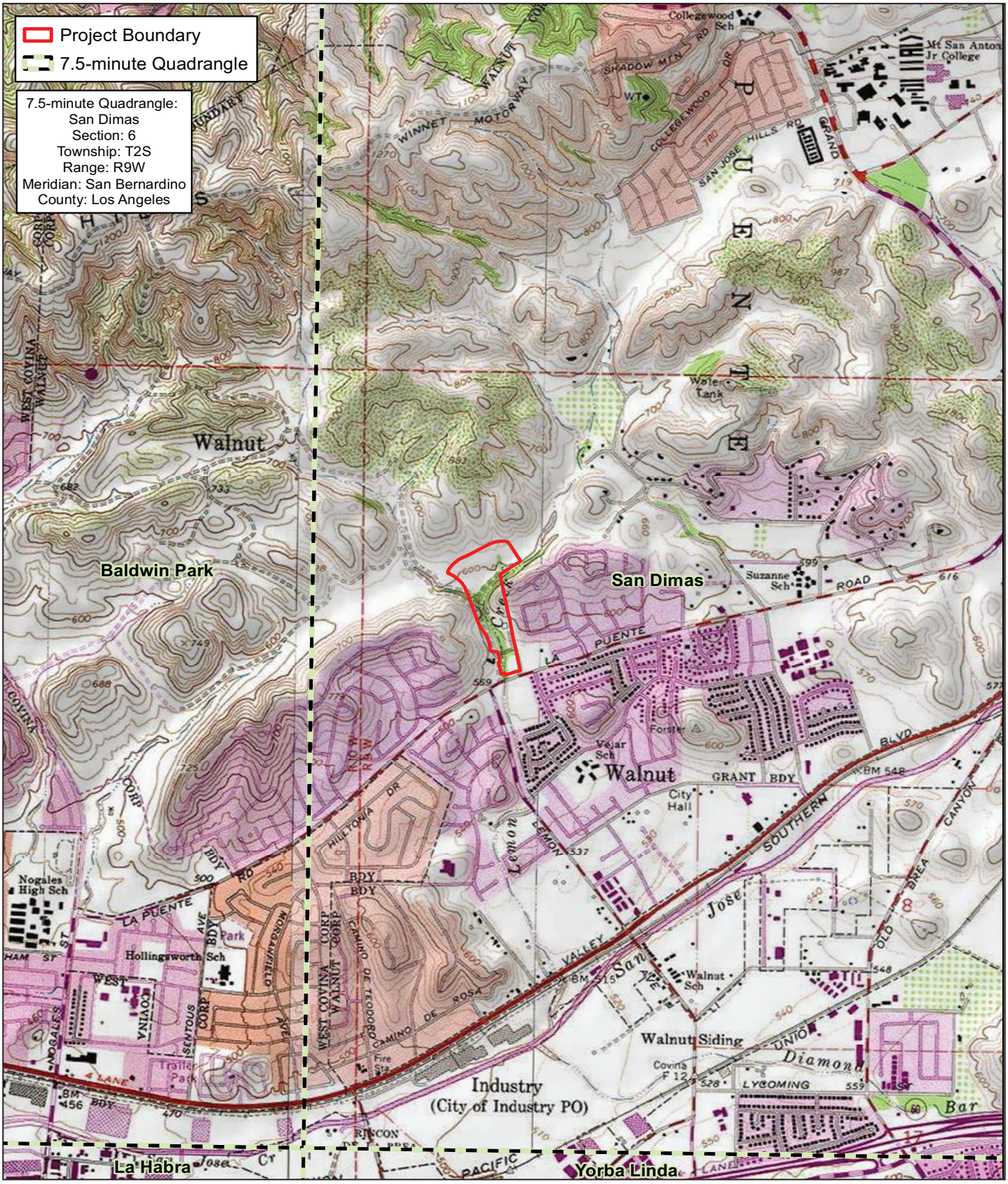
Source: PlaceWorks; October 3, 2022.

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Local Vicinity

VCS Environmental

Figure 3-2



Source: ESRI and County of Los Angeles; August 2023.

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USGS Topographic Map

VCS Environmental

Figure 3-3

Project Vicinity

For purposes of this document, the Project vicinity is considered approximately within one-quarter mile of the Project Site. The Project Site is situated within an urbanized/suburbanized area and is generally surrounded by developed land uses. Surrounding land uses are shown in Figure 3-2, *Local Vicinity*. As shown in Table 3-1, *Surrounding Land Uses*, to the north of the Project Site are existing single-family residential neighborhoods, St. Lorenzo Ruiz Catholic Church, and Vellucci Hall; to the south are existing single-family residential neighborhoods and a small commercial center; to the east are existing single-family residential neighborhoods; and to the west are existing single-family residential neighborhoods and Fire Station No. 61.

Table 3-1
Surrounding Land Uses

Direction	Existing Land Use	General Plan	Zoning
North	Single-Family Residential, St. Lorenzo Ruiz Catholic Church and Vellucci Hall	Very Low Density	RPD (28,500) - 1.3 DU
South	Single-Family Residential and Commercial Center	Low Medium Density and Commercial	R-1 One-Family Residential, 7,200 C-3 Heavy Commercial Zone
East	Single-Family Residential	Very Low Density	R-1 One-Family Residential, 8,500
West	Single-Family Residential and Fire Station 61	Low Medium Density	R-1 One-Family Residential, 7,200

San Gabriel Valley Groundwater Basin and Lemon Creek

The City is within the San Gabriel Valley Groundwater Basin. This groundwater basin is comprised of alluvial fan deposits formed by outflow from the San Gabriel Mountains. The Project Site overlies the Puente Groundwater Subbasin. The Puente Groundwater Subbasin, as defined by the Puente Basin Water Agency, is a relatively small groundwater basin that spans approximately 20 square miles and is located in eastern Los Angeles County. The Puente Groundwater Subbasin is nestled between the San Jose and Puente Hills to the north and the south and shares a boundary with the Spadra Basin and Main San Gabriel Basin to the east and west. San Jose Creek flows through the basin from the northeast to the west and Lemon Creek runs north to south. As noted earlier, Lemon Creek traverses the Project Site. Lemon Creek begins at the south-facing hillside in Walnut Ranch Park, approximately one mile north of the Project Site. Flows from the south-facing hillside and runoff from residential development collect in Lemon Creek. Lemon Creek traverses through the central portion of the Project Site in a north to south direction. Lemon Creek enters the northeastern boundary of the Project Site as an earthen feature and flows are conveyed southwest and then south through the Project Site.

PLANNING PROGRAMS (LAND USE AND ZONING)

General Plan

The City's General Plan designates the Project Site land use as Very Low Density Residential. The Very Low Density Residential designation applies to hillside areas with larger lots that are generally over 25,000-square-feet in size. A maximum of one detached single-dwelling unit is permitted as the primary residence. The City's RPD Residential Planned Development Zone (RPD Zone) allows attached single family dwelling units for planned residential developments within the RPD zone, but that provision (WMC Section 6.24.030 E2) does not apply to the Project since, as discussed below, the Project has elected for the R-1 option,

rather than the planned residential development option, under Section 6.24.020 A1 of the WMC. Accessory dwelling units permitted consistent with the requirements of the WMC and State Law are also allowed under the General Plan. Applicable General Plan standards are:

- Density: 0.5 to 2.0 Dwelling Units/Acre
- Building Height: 2 Stories Maximum
- Population Density: 1.71 to 6.84 Persons/Acre

Zoning

With respect to zoning standards, the Project Site is located in a Residential Planned Development (RPD) zone, with a zoning designation of RPD (28,500) - 1.3 DU. The City's RPD zoning regulations are found in Chapter 6.24 of the WMC. Despite its title, the RPD zone does not require the development of a residential planned development. Rather, the RPD Zone allows development in two different ways, only one of which is actually a residential planned development. Specifically, one alternative is a conventional R-1 single-family development, subject to R-1 development standards and a minimum 28,500 square foot lot size (see WMC Section 6.24.030 A1). Second is the residential planned development alternative, with no minimum lot size, but a maximum density of 1.3 dwelling units per net acre (see WMC Section 6.24.030 A2). Pursuant to WMC Section 6.24.030, this second alternative requires a Conditional Use Permit and is subject to additional requirements contained in Chapter 6.24 of the WMC that do not apply to the R-1 alternative. For example, permitted structures for a residential planned development are set forth in WMC Section 6.24.030 E.

3.4 PROJECT CHARACTERISTICS

The proposed Project has elected for the R-1 alternative allowed under the RPD Zone. Therefore, the Project is not being developed as a planned residential development, even though it is within an RPD Zone. Details about the Project's characteristics are provided below.

TENTATIVE TRACT MAP

The Project requests approval of a Tentative Tract Map (TTM) to create 27 residential lots (Lots 1-27) for the development of 27 single-family detached homes (Figure 3-4, *Conceptual Illustrative Plan*, Figure 3-5, *Conceptual Site Plan*, and Figure 3-6, *Tentative Tract Map*). Those individual lots would include associated infrastructure, open space areas, and a multiuse public trail. In addition, the TTM includes six lots (Lots A-F) which would include associated infrastructure, open space areas, and drainage areas. The TTM also includes Streets "A" and "B" to handle the internal circulation for Lots 1-25 and a short extension of San Vicente Dr. to serve Lots 26 and 27. These would all be public streets. The overall density of the Project would be 1.04 units per acre, which is consistent with the existing General Plan Very Low Density Residential Designation maximum density of 2.0 dwelling units per acre. The TTM proposes a minimum lot size of 28,500 square feet consistent with the RPD (28,500) – 1.3 DU zoning designation. Additionally, the Project would meet R-1 side yard setback, front yard setback, rear yard setback, and maximum height requirements. Details regarding the Project Site breakdown by square footage and typical lot setbacks are shown on Figure 3-5, *Conceptual Site Plan*.



Source: PlaceWorks; February 28, 2023.

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Conceptual Illustrative Plan

VCS Environmental

Figure 3-4



Project Site Breakdown

Lot Number	Lot Sf	Proposed Building Sf
1	30,000	6,500
2	31,900	5,000
3	30,000	6,500
4	31,500	6,500
5	37,200	5,000
6	29,300	6,500
7	31,800	6,500
8	32,000	6,500
9	32,300	6,500
10	36,000	5,000
11	30,600	6,500
12	28,900	6,500
13	29,500	6,500
14	50,200	5,000
15	33,400	5,000
16	33,700	5,000
17	35,000	5,000
18	36,400	5,000
19	36,400	5,000
20	30,400	5,000
21	29,300	5,000
22	29,500	5,000
23	28,500	5,000
24	28,500	5,000
25	29,100	6,500
26	28,600	6,500
27	28,600	5,000
Total Residential Lot SF	**868,600**	
Square Footage of Construction	**153,000**	

O.S. Lot A	361 sf
O.S. Lot B	4,420 sf
O.S. Lot C	50,800 sf
O.S. Lot D	37,870 sf
O.S. Lot E	950 sf
O.S. Lot F	21,840 sf
HOA Open Space	**116,216 sf**

Public Street A	37,800 sf
Public Street B	89,300 sf
San Vicente Rd.	13,200 sf
Total Road	**140,300 sf**

Total Project SF	**1,125,611**
Total Project AC	**25.84**

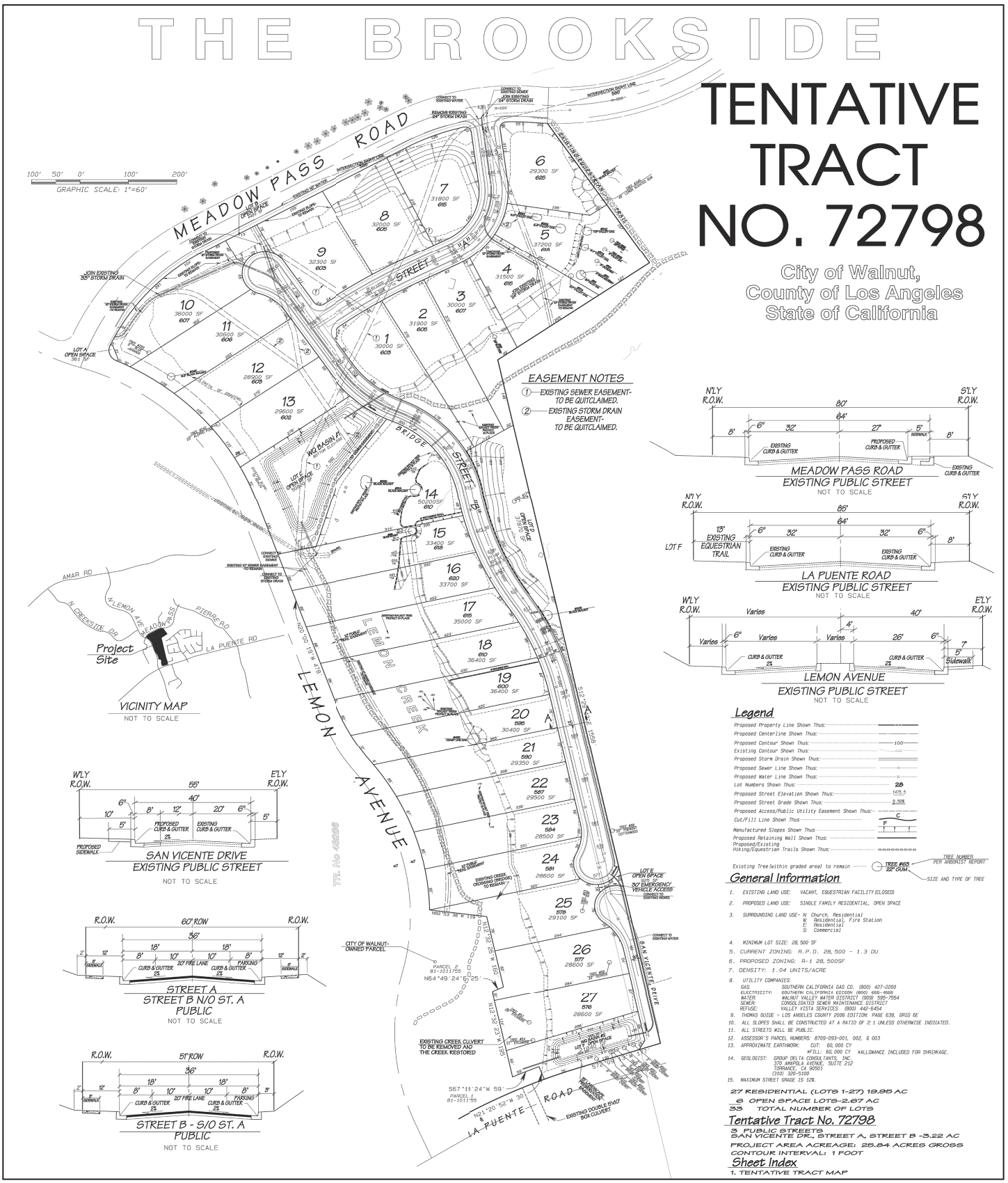
Source: PlaceWorks; March 17, 2023.

THE BROOKSIDE PROJECT
Environmental Impact Report

Conceptual Site Plan

VCS Environmental

Figure 3-5



Source: Michael Baker International; January 6, 2023.

THE BROOKSIDE PROJECT
Environmental Impact Report

Tentative Tract Map

VCS Environmental

Figure 3-6

ARCHITECTURAL DESIGN

In accordance with Chapter 6.84 of the WMC and subject to any applicable limitations under State housing law, the Project is subject to a Site Plan and Architectural Review (SPC/AR). The intent of the City's Site Plan and Architectural Review is to promote the orderly development of the City, conserve property values, preserve the architectural character of the area, encourage the most appropriate use of land, and protect the health, safety, comfort, and general welfare of the community. Through the Site Plan and Architectural Review process, the City would confirm compliance with the use, location, and size development standards of the R-1 zoning district pertaining to the individual residences. Additionally, the Site Plan and Architectural Review ensures that the architecture is compatible with existing residential uses near the Project Site and that the Project would not reduce the visual character of the Project area. As part of the Site Plan and Architectural Review, the Project would be evaluated on the criteria identified from Section 6.84.050 (Basis for Approval) of the WMC. Currently, the Project Applicant has prepared a conceptual street scene with example architectural elevations (Figure 3-7, *Conceptual Street Scene*); however, the Project does not include a request for SPC/AR at this time. A Condition of Approval would be included requiring a SPC/AR prior to the construction of any residential units.

Other discretionary and/or ministerial approvals which may be required for the Project are listed in Section 3.8 below.

CIRCULATION PLAN

Roadways

The proposed residential development would have two vehicle access points: one from Meadow Pass Road that would access Lots 1-25 and a second from La Puente Road that would access Lots 26 and 27.

Meadow Pass Road is designated in the City General Plan Circulation Element as an Important Local Street. Important Local Streets provide connections to higher classification roadways but unlike Local Streets, generally do not allow residential driveways. They may have either two or four travel lanes, with or without a center median. Meadow Pass Road provides one travel lane in each direction along with a two-way/left-turn lane and is posted for a speed limit of 35 miles per hour in the Project vicinity.

La Puente Road is designated in the City General Plan Element a Secondary Street. Secondary Streets provide connections between arterial streets and provide up to four lanes of travel (two in each direction, divided or undivided) directly to neighborhoods Citywide. Limited or no direct residential driveway access is provided. La Puente Road is currently improved with two lanes in each direction with left turn access and is posted for a speed limit of 40 miles per hour in the Project vicinity.

Internal access for the Project would be from the local street system. The local streets would be publicly maintained. As shown in Figure 3-4, *Conceptual Illustrative Plan*, and Figure 3-5, *Conceptual Site Plan*, the Project would consist of three local streets: 'A' Street, 'B' Street, and San Vicente Drive. 'A' Street would have a 60-foot right-of-way and would be the primary entrance for the Project. 'B' Street would have a 51-foot right-of-way that would be a primary local roadway extending through the community. 'B' Street would terminate at a cul-de-sac, which would prohibit cut-through traffic between Meadow Pass Road and La Puente Road. San Vicente Road would consist of a 50-foot of right-of-way and would terminate at a cul-de-sac.

Bikeways

The City of Walnut follows Caltrans' *Highway Design Manual* standards, and recognizes three classes of facilities:

- Class I – Bike Paths or Bike Trails
- Class II – Bike Lanes
- Class III – Bike Routes (On-Street)

The closest existing facility in the Project vicinity is an east-west Class II bike lane on La Puente Road (from Nogales Street to Grand Avenue). The Project development would have access to this bike lane from San Vicente Road.

Trails

As shown in Figure 3-8, *Trails Plan*, the Project proposes to construct a new multiuse trail system that would be open to the public and would connect to existing offsite trails with connections at Meadow Pass Road and at a City-owned property near the southwest portion of the Project Site near Lemon Avenue and La Puente Road. The proposed trail system would generally parallel Lemon Creek except at two creek crossings centrally located within the Project Site. Both offsite and onsite trail segments would be designed and constructed to City standards and offered for dedication to the City of Walnut. The trail would be maintained and operated by the City.

OPEN SPACE PLAN

The Open Space Plan provides for the preservation and maintenance of natural open space and the conservation of Lemon Creek. As shown in Figure 3-9, *Conceptual Open Space*, the Project proposes approximately 12.2 acres of open space, 9.5 acres of which would be privately owned and maintained by the Homeowners Association (HOA) ("Privately Owned Open Space"). The Privately Owned Open Space would be deed restricted to prohibit any use or development of the private property other than for the public trail and passive open space purposes. Additionally, another 2.7 acres of open space would be provided that would be maintained and owned by the Homeowners Association and/or Los Angeles County Flood Control District. These 2.7 acres also would be deed restricted to prohibit any development other than for flood control/basin, landscaping, and maintenance purposes.

TREE PRESERVATION/REPLACEMENT PLAN

A component of the Project itself is a "Tree Preservation / Replacement Plan" to be implemented during Project development. Components of this design element include preservation through avoidance and protection, replacement of removed trees, and enhancement of species biodiversity. Pursuant to WMC Sections 6.52.290 and 6.52.330, the Project Applicant/Developer shall obtain a Tree Permit for minor encroachment of seven protected trees including three Valley oak (*Quercus lobata*) and four California black walnut (*Juglans californica*) trees, two of which are "Heritage Trees." The Applicant/Developer shall furnish all necessary information as determined by the Community Development Director together with the appropriate fee as established by Council resolution. Additionally, the Tree Preservation/Replacement Plan shall be implemented consistent with the City's Municipal Code Chapter 6.52.330 replacement requirements for tree removals. Based on the Project's Tree Replacement Summary (Section 6 of the March 16, 2023, Arborist Report), the Applicant/Developer shall replace the tree canopy that would be removed by construction and shall install 520 California native trees throughout the development site. The Applicant/Developer shall also implement Avoidance and Minimization Measures for Preserved Trees related to monitoring, fencing, root impacts, equipment staging, soil compaction, mechanical damage, pruning, bridging footings over roots, and horizontal directional drilling for utilities (Section 5 of the March 16, 2023, Arborist Report).



Source: Bassenian Lagoni Architecture Planning Interiors; October 6, 2021.

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Environmental Impact Report

Conceptual Street Scene



Source: PlaceWorks; February 28, 2023.

THE BROOKSIDE PROJECT
Environmental Impact Report

Trails Plan

VCS Environmental

Figure 3-8



Source: PlaceWorks; March 17, 2023.

THE BROOKSIDE PROJECT
Environmental Impact Report

Conceptual Open Space

VCS Environmental

Figure 3-9

The Tree Preservation/Replacement Plan can be summarized as follows:

- Preservation: There were approximately 1,876 trees onsite as of the MBI survey (2017), of which approximately 1,416 would be preserved in place. This includes all trees protected by the Walnut Municipal Code, consisting of 91 black walnuts and 14 oaks on the Project Site as a whole. Of these, within or immediately adjacent to the grading limits are 11 Southern California black walnut (*Juglans californica*) trees, one coast live oak (*Quercus agrifolia*) tree, and seven valley oak (Quercus lobata) trees.
- Removal: 460 non-protected trees would be removed from the Project Site, all within the limits of grading. Of these, 249 are non-native species, 181 are considered "invasive" by the California Invasive Species Council, and 30 are native species.
- Replacement: The Project would replace the 460 removed trees with 520 new native trees to be located along the parkway, in side yards, slopes, rear yards, and along Meadow Pass Road, as shown in Figure 3-10a, *Conceptual Landscape Plan*. This would result in a net increase of 60 trees on the Project Site. All replacement trees are California native species such as White Alder, California Sycamore, Holly Leaf Cherry, Western Redbud, Toyon, and Madrone. The replacement trees would consist of 90 24-inch box trees and 430 15-gallon trees. At the completion of the Project and before individual homeowners have landscaped their properties, the total number of trees on the Project Site would increase from approximately 1,876 to approximately 1,936. Within that total, the number of native species trees would increase by 490 and the number of non-native and invasive species would decrease by 430.
- Protection: Construction activities would also encroach upon 126 non-protected trees (91 trees would incur "minor" encroachments, 29 trees would incur "major" encroachments, and 6 trees would incur "severe" encroachments). The anticipated encroachment outcomes are characterized as follows:
  - A minor encroachment is not expected to compromise the health or structural integrity of the tree, and/or generally would encompass less than 30% of the tree's canopy and roots.
  - A major encroachment may result in the decline of the tree, and long-term health and survival are unknown.
  - A severe encroachment may result in the significant decline, mortality, or a structurally unstable tree.
  - Seven (7) protected trees are located just within the grading limits. To preserve these seven protected trees, a four-foot retaining wall would be constructed around them and the footings for the walls would be bridged over the roots to minimize impacts to the trees.
- Tree Canopy: An additional consideration is tree canopy. The existing tree canopy covers approximately 46.4% of the Project Site, comprising 12 acres. It is estimated that of the existing canopy, 5.2 acres (20.1%) would be removed and 6.8 acres (26.3%) of tree canopy would be preserved. The 520 new native trees are projected to result in 6.4 acres (24.7%) of new tree canopy, resulting in a net 4.7% increase in total tree canopy on the Project Site to 13.2 acres (51.1%) following Project completion. These trees would create a canopy coverage offering residents a host of environmental benefits such as shading and cooling, aesthetics, and improved health and well-being. Refer to Figure 3-10b, *Canopy Coverage*.

  A detailed inventory of impacted trees and replacement requirements is shown in the Arborist Report, which can be found in Appendix C of the Biological Technical Report (Appendix D) (refer to Figure 3-11, *Overview Tree Locations and Impacts*).



Source: PlaceWorks; February 28, 2023.

THE BROOKSIDE PROJECT
Environmental Impact Report

Conceptual Landscape Plan

VCS Environmental

Figure 3-10a



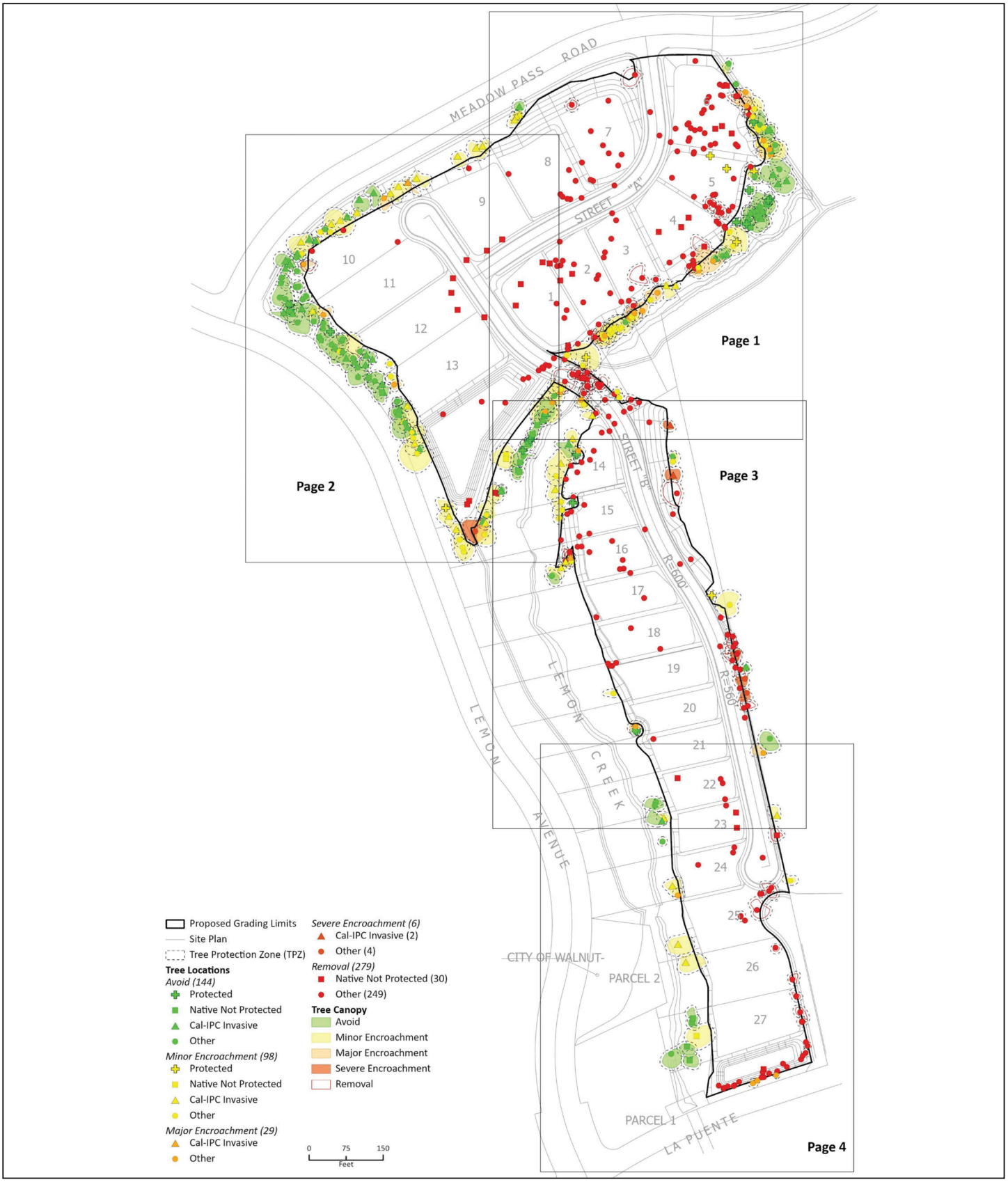
Source: PlaceWorks; February 28, 2023.

THE BROOKSIDE PROJECT
Environmental Impact Report

Canopy Coverage

VCS Environmental

Figure 3-10b



Note: A detailed inventory of impacted trees and replacement requirements can be found in Appendix C of the Biological Technical Report (Appendix D).
Source: Rincon Consultants, Inc.; March 16, 2023.

THE BROOKSIDE PROJECT
Environmental Impact Report

Overview Tree Locations and Impacts

VCS Environmental

Figure 3-11

LIGHTING AND GLARE

The Project shall be required to meet the City's Building Code and Design requirements. These regulations are designed to limit light and glare to acceptable levels. The proposed lighting types and levels would be similar to other existing residential lighting in the Project area and would be designed to ensure that all exterior lighting be confined to the Project Site to minimize and/or avoid potential spillover lighting impacts to adjoining properties. In addition, no atypical or unique structures or building materials are proposed that could cause glare impacts.

WALL AND FENCE PLAN

As shown in Figure 3-12, *Conceptual Wall and Fence Plan*, the Project proposes white post and rail fencing near the Project Site's perimeter along Meadow Pass Road, Lemon Avenue, and La Puente Road. Residential lots within the community would be separated by 6-foot-tall concrete masonry walls. The residential yards and the open space portion of residential lots would be separated by a 6-foot-tall view fence. Six (6)-foot tall painted tubular steel fencing would be used along segments of the property line and near the water quality basins. Several retaining walls would also be constructed to accommodate buildable residential pads and to avoid impacts to protected trees.

INFRASTRUCTURE PLAN

Drainage/Stormwater

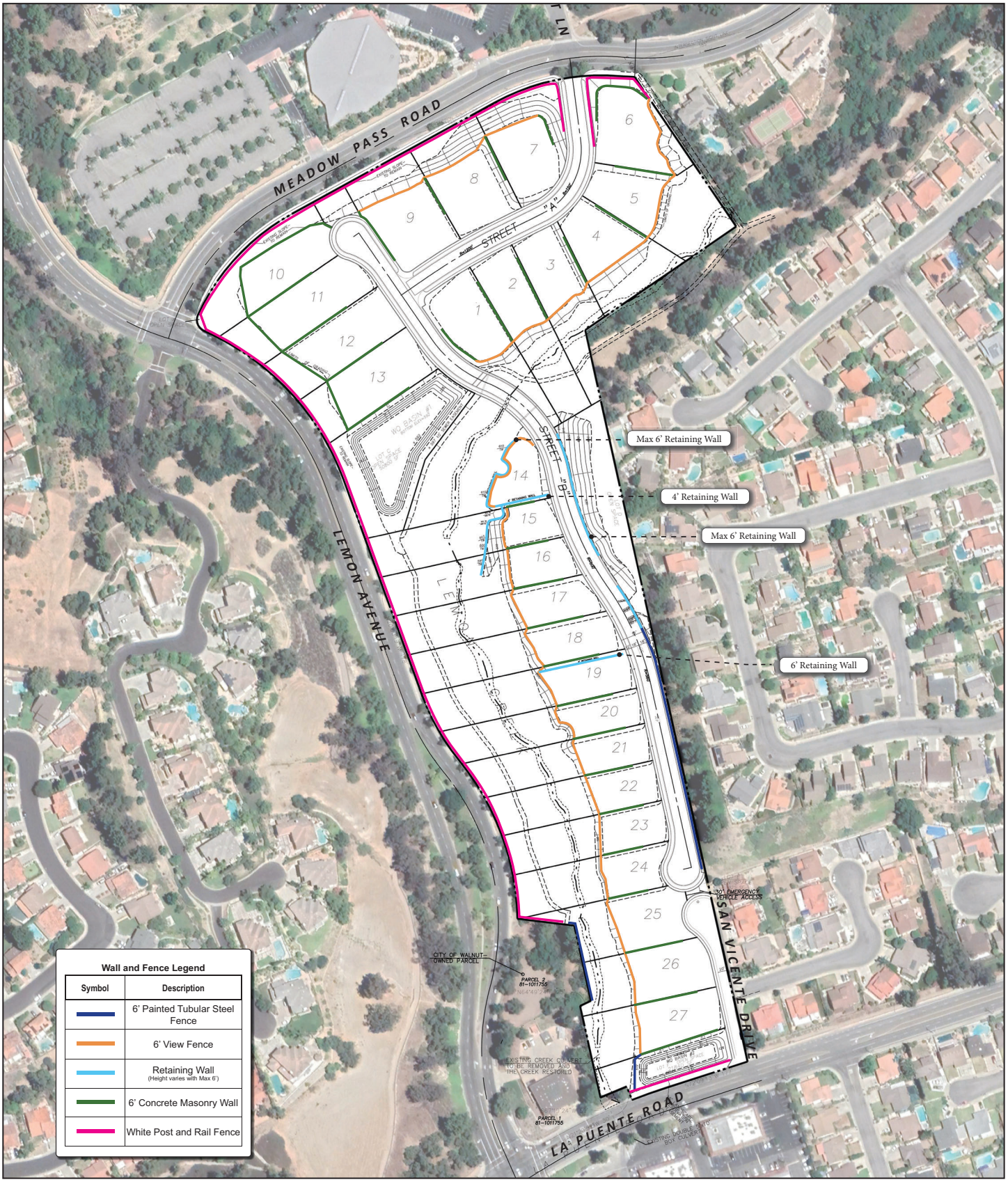
The Project would be required to comply with Chapter 5.08 of Municipal Code (Stormwater and Urban Runoff Pollution Control). A design component of the Project is its Drainage and Stormwater Plan, which has been designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface areas and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention and/or rainfall harvest and use. The Project would construct two onsite water quality detention basins to manage flow velocity and to treat urban runoff pollutants prior to water release into Lemon Creek. The existing Culvert 'A', Culvert 'B', and Culvert 'C' would remain in place. Existing Culvert 'D' would be removed, and that portion of the creek would be restored. A human-made flow restriction would replace the culvert, preserving the control that the culvert previously lent to sediment transport in the creek while removing the turbulent and potentially destructive effects of overtopping. Three public storm drain inlets along Meadow Pass Road at the northerly boundary of the Project Site would be realigned under the proposed Project streets. One of the existing outlets into Lemon Creek would remain in its current location, while the second would be relocated to a point downstream of the proposed Project bridge (Figure 3-13, *Water and Sewer Plan*).

Water Service

Water service for the Project would be provided by the Walnut Valley Water District (WVWD). The Project would construct new onsite water lines that would connect to an existing 16-inch water main in Meadow Pass Road and an existing 8-inch waterline in San Vicente Drive (Figure 3-13, *Water and Sewer Plan*).

Wastewater Service (Sewer)

Wastewater Service for the Project would be provided by the Los Angeles County Sanitation District (LACSD). The Project would construct new onsite sewer lines that would connect to an existing sewer main in Meadow Pass Road and an existing sewer line in San Vicente Drive (Figure 3-13, *Water and Sewer Plan*).



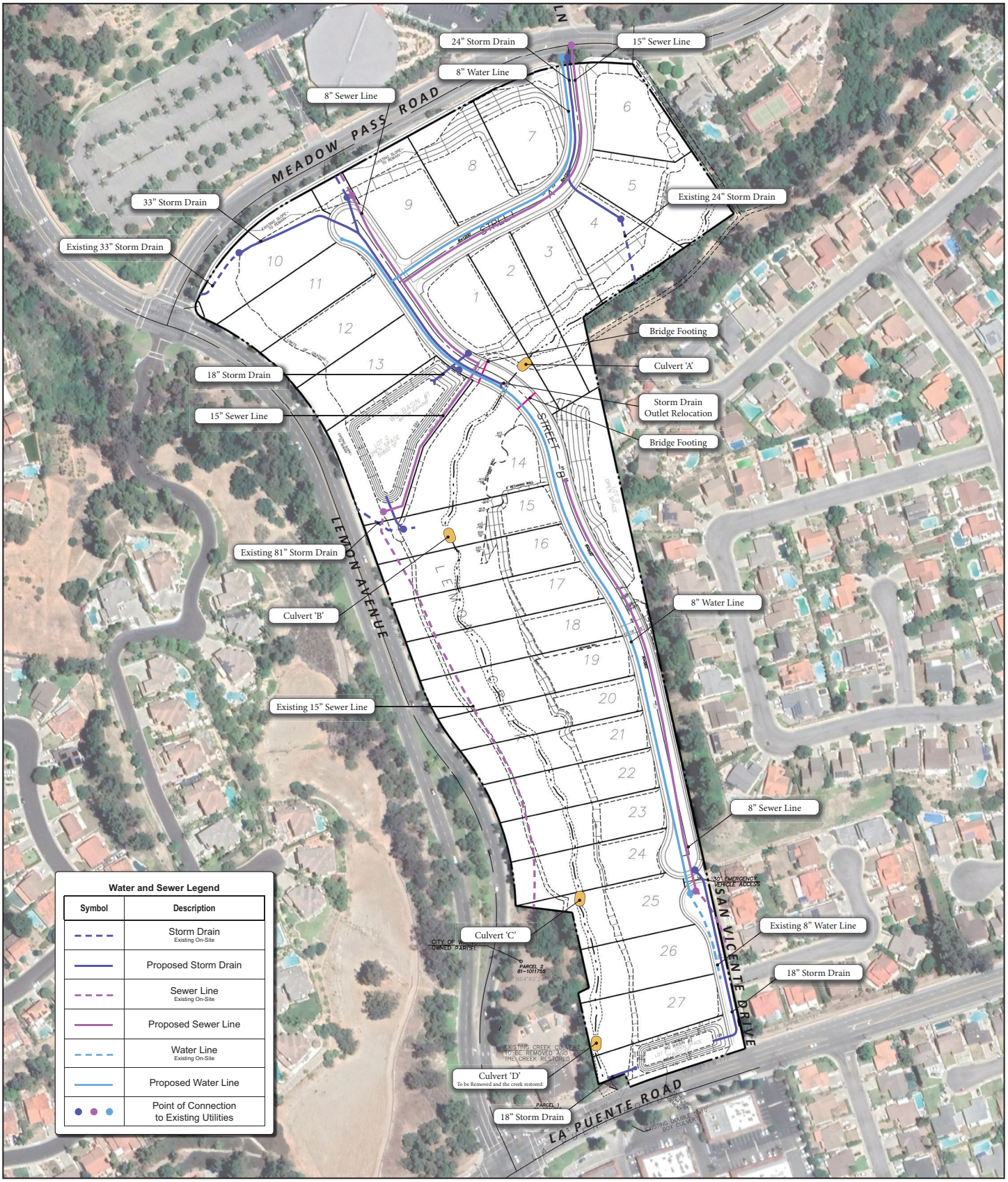
Source: PlaceWorks; February 28, 2023.

THE BROOKSIDE PROJECT
Environmental Impact Report

Conceptual Wall and Fence Plan

VCS Environmental

Figure 3-12



Source: PlaceWorks; March 15, 2023.

THE BROOKSIDE PROJECT
Environmental Impact Report

Water and Sewer Plan

VCS Environmental

Figure 3-13

Dry Utilities

Dry Utility providers for the Project are shown in Table 3-2, *Dry Utility Providers*.

Table 3-2
Dry Utility Providers

Utility	Provider
Electrical Service	Southern California Edison
Gas Service	Southern California Gas Company
Telecommunication/Telephone Service	AT&T, Frontier, other

PUBLIC SERVICES

Fire Protection

There are two fire stations serving the City of Walnut: Fire Station No. 61 and Fire Station No. 146. As shown in Table 3-3, *Project Area Fire Stations*, the two fire stations are within proximity of the Project Site.

Table 3-3
Project Area Fire Stations

Station Number	Address	Distance from Site
Station 61	20011 La Puente Road, Walnut, CA 91789	Adjacent to Project Site
Station 146	20604 Loyalton Drive, Walnut, CA 91789	1.5 miles

Police Services

The City of Walnut contracts with the County of Los Angeles for Sheriff protection services. The Sheriff's Department operates from the Walnut Substation located at 21695 E. Valley Boulevard, approximately 1.9 miles away from the Project Site.

School Services

Walnut Valley Unified School District and Rowland Unified School District serve the City of Walnut. The two districts have in total one high school, one middle school, and five elementary schools. According to the City of Walnut General Plan Community Facilities and Infrastructure Element, the Walnut Valley Unified School District would provide service to the Project Site.

Solid Waste Disposal

The City of Walnut contracts Valley Vista Services for solid waste collection and disposal. Valley Vista Services collects both solid and green waste (grass clippings, tree, and shrub clippings), and items for recycling. Solid waste disposal for the Project Site would be provided at the El Sobrante Landfill or Lamb Canyon Sanitary Landfill.

3.5 PROJECT PHASING AND CONSTRUCTION

Project construction is expected to consist of demolition, site preparation, grading, building construction, paving, and architectural coating (i.e., paints and finishes) and is estimated to take approximately 18 months to complete. The anticipated construction equipment, construction-stage schedule, and

worker/vendor vehicle trips were based on the California Emissions Estimator Model (CalEEMod) default survey data. No significant import or export of earthwork material is anticipated as the projected 60,000 cubic yards of cut material estimated during grading is proposed to be balanced onsite (i.e., reused as fill material). Refer to Figure 3-14, *Cut and Fill Plan;* for details on earthwork activities. Material laydown areas, construction equipment staging, and employee parking would be provided onsite.

Construction stages are not expected to overlap based on the proposed development approach and the relatively small size of the Project Site. The anticipated equipment and estimated schedule by construction stage are as follows:

- Demolition equipment would include one concrete/industrial saw, three excavators, and two rubber-tired dozers for approximately 20 days. Three water trucks, waste hauling truck trips, and worker travel trips are also anticipated.
- Site preparation equipment would include three rubber-tired dozers and four of either tractors/loaders/backhoes for approximately 10 days. Three water trucks and worker travel trips are also anticipated.
- Grading would include two excavators, one grader, one rubber-tired dozer, two scrapers and four of either tractors/loaders/backhoes for approximately 20 days. Three water trucks and worker travel trips are also anticipated.
- Building construction would include one crane, three forklifts, one generator set, one welder, and three of either tractors/loaders/backhoes for approximately 300 days. Worker and vendor travel trips are also anticipated.
- Paving would include two pavers, two paving equipment, and two rollers for approximately 20 days. Worker travel trips are also anticipated.
- Architectural coating would include one air compressor for approximately 20 days. Worker travel trips are also anticipated.

3.6 PROJECT OBJECTIVES

Project objectives are defined to aid decision makers in their review of the proposed Project and its associated environmental impacts. The Project objectives are to create a residential project that:

1. Maintains consistency with the Project Site's Very Low Density General Plan and RPD (28,500) – 1.3 zoning designation.
2. Respects and enhances the health, biological function, and water quality of Lemon Creek, while assuring that the development does not increase flood risk for downstream properties.
3. Provides a multi-use trail dedicated to the City of Walnut, open to the public and provides a connection to other public trails at the Project boundaries.
4. Preserves the walnut and oak trees on the property, retaining their significant historical, aesthetic, and environmental value.
5. Minimizes landform alteration by generally limiting grading to previously disturbed and/or developed areas of the site and grading onsite without import or export.



Source: PlaceWorks; February 28, 2023.

THE BROOKSIDE PROJECT
Environmental Impact Report

Cut and Fill Plan

VCS Environmental

Figure 3-14

3.7 PROJECT ALTERNATIVES

The CEQA Guidelines (Section 15126.6[a]) state that an EIR must address "a range of reasonable alternatives to the Project, or to the location of the Project, which could feasibly attain the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project and evaluate the comparative merits of the alternatives." This Alternatives Analysis is found in Section 6.0. It includes a discussion of the scope, criteria, and methodology provided by CEQA for the analysis, a list of alternatives considered but not advanced with an explanation of why those alternatives were not considered further, and an evaluation of three alternatives to the Project which were selected for consideration. Those three Project alternatives are:

- Alternative 1: No Project, Current General Plan and Zoning
- Alternative 2: R-1 Zoning, 27 Units, No Bridge
- Alternative 3: RPD Zoning, 34 Units, No Bridge

3.8 POTENTIALLY REQUIRED PROJECT PERMITS AND APPROVALS

This EIR provides CEQA compliance for the following City of Walnut approvals for the Project:

- Tentative Tract Map

Other discretionary and/or ministerial approvals may be identified by the City as necessary to implement development and construction of the Project. Such approvals include but are not limited to:

- Site Plan and Architectural Review.
- Issuance of tree removal, grading, hauling, stockpiling, building and other construction permits.

In addition, other Responsible Agencies, Trustee Agencies, utility and service providers, and/or other organizations may also rely upon this document for compliance with CEQA to issue their own permits and approvals associated with the Project. Such entities may, but not necessarily would, include and may not be limited to:

- United States Army Corps of Engineers, Clean Water Act Section 404 Permit.
- United States Fish and Wildlife Service, Endangered Species Act Section 7 Consultation.
- Los Angeles Regional Water Quality Control Board, Clean Water Act Section 401 Water Quality Certification.
- California Department of Fish and Wildlife, California Fish and Game Code Section 1602 Streambed Alteration Agreement.
- California Department of Fish and Wildlife, Incidental Take Permit.

SECTION 4.0 BASIS FOR CUMULATIVE IMPACTS

4.1 BASIS FOR CUMULATIVE ANALYSIS

Section 15130 of the California Environmental Quality Act (CEQA) Guidelines requires the discussion of cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Section 15065 of the CEQA Guidelines explains that a project's incremental effects are "cumulatively considerable" when they are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Section 15130 provides that when a lead agency is examining a project with an incremental effect that is not cumulatively considerable, the lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

Section 15355 of the CEQA Guidelines defines cumulative impacts as "... 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. Under Section 15130, cumulative impacts should generally be discussed when they are significant. However, when the cumulative impacts do not result in-part from the project, they should not be discussed in the EIR. When the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR.

Section 15130 of the Guidelines states that an EIR may determine that a project's contribution to a significant cumulative impact would be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The discussion of any cumulative impacts 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.

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

- A list of past, present, and probable future projects, producing related cumulative impacts, including, if necessary, those projects outside the control of the agency.
- A summary of projections contained in an adopted General Plan or related planning document designed to evaluate regional or area-wide conditions.

The proposed Project is located in the City of Walnut within Los Angeles County. The Project Site consists of 25.84 acres of developed/disturbed land and is located at 800 Meadow Pass Road. The Project is comprised of Assessor's Parcel Numbers (APNs) 8709-093-001, 002, and 003. Onsite topography consists of rolling foothills and is primarily associated with the heavily incised Lemon Creek which flows south through the subject site. The Project Site is on land previously occupied by the Brookside Equestrian Center which closed in 2014 and is no longer operating. Presently onsite, there are equestrian related facilities such as three covered barns, one residence quarters, open-air stables, fenced corrals, maintenance storage facilities, feed sheds, one outdoor arena, one covered open-air arena, and one gazebo. All structures have been vacated and closed. Project implementation would remove all existing facilities.

The Project Site is situated within an urbanized/suburbanized area and is generally surrounded by developed land uses. To the north is Meadow Pass Road and existing single-family residential neighborhood, as well as St. Lorenzo Ruiz Vellucci Hall and St. Lorenzo Ruiz Parish Community. To the south is La Puente Road, single-family homes, and a commercial center. To the east is Broken Lance Road and an existing single-family residential neighborhood. To the west is North Lemon Avenue, an existing single-family residential neighborhood, and Fire Station 61.

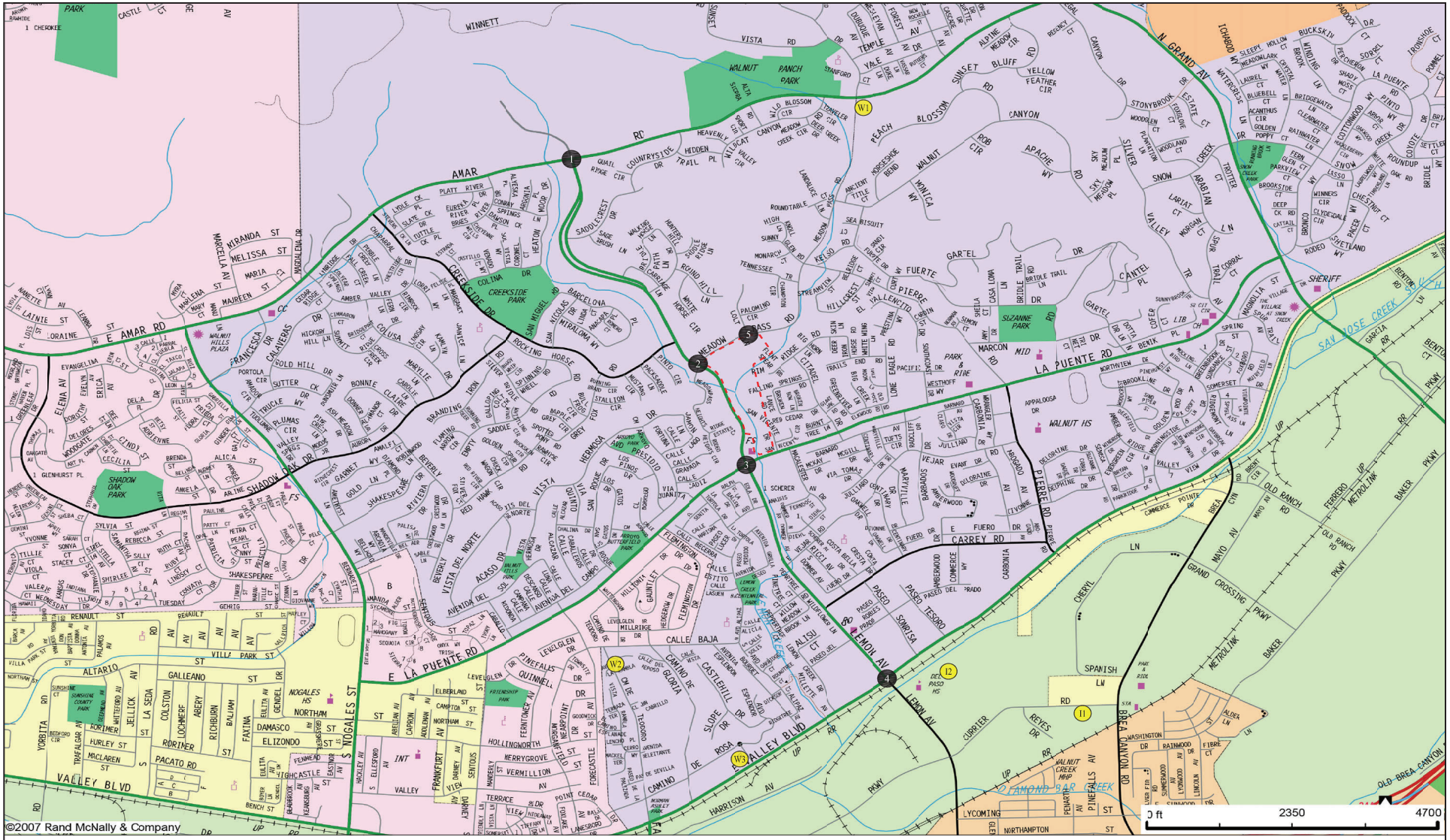
Because the Project area is built-out and there would be little opportunities for new development, a summary of Projections contained in the General Plan would not be the most relevant method to evaluate potential cumulative impacts. Therefore, the cumulative analysis in this EIR focuses on related development Projects in the area and how combined with the proposed Project, what level of cumulative impacts could occur. A summary of related Projects in the vicinity of the Project Site, which was used in the cumulative analysis, is presented in Table 4-1, *Related Cumulative Projects*. The locations of these related projects are shown in Figure 4-1, *Location of Related Projects*.

Table 4-1
Related Cumulative Projects

Project	Land-Use
1521 Meadow Pass Road	Residential: 13 DU
360 Camino De Teodoro	Residential: 4 DU
19901 Valley Boulevard	Condominium: 3 DU Commercial: 1,350 GLSF
20922 Currier Road	Light Industrial: 139,593 GSF
20701 Currier Road	Light Industrial: 107,555 GSF

4.2 CUMULATIVE ANALYSIS

The cumulative impacts analysis discussions are provided for each topic under a "Cumulative Impacts" heading found in their respective topic subsections within Section 5.0, *Environmental Analysis*.



Source: Linscott, Law & Greenspan, Engineers; February 14, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

Location of Related Projects

VCS Environmental

Figure 4-1

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SECTION 5.0 ENVIRONMENTAL ANALYSIS

Section 5.0 analyzes the environmental impacts of the proposed Project for each of the environmental issues listed below. The analysis will jointly consider the environmental setting, thresholds of significance, and characteristics of the Project. This analysis will determine the level of environmental impact according to the definitions provided below for each threshold of significance. The residual impacts following the implementation of any mitigation measure are also discussed along with any beneficial impacts that may result from Project implementation. Environmental issues and their corresponding sections are:

- Aesthetics (5.1)
- Agriculture and Forestry Resource (5.2)
- Air Quality (5.3)
- Biological Resources (5.4)
- Cultural 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)
- Mineral Resources (5.12)
- Noise (5.13)
- Population and Housing (5.14)
- Public Services (5.15)
- Recreation (5.16)
- Transportation (5.17)
- Tribal Cultural Resources (5.18)
- Utilities and Service Systems (5.19)
- Wildfire (5.20)

ORGANIZATION OF ENVIRONMENTAL ANALYSIS

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

- Introduction
- Environmental Setting
- Regulatory Setting
- Thresholds of Significance
- Environmental Impact Analysis
- Cumulative Impacts
- Mitigation Measures
- References

LEVEL OF ENVIRONMENTAL IMPACT DETERMINATIONS USED IN EIR

The level of impact is identified for each impact in this DEIR. Although the criteria for determining the level of impact significance is different for each environmental issue area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- No Impact. The Project would not result in any physical changes to the environment.
- Less Than Significant. The Project would not cause any substantial, adverse change in the environment and impacts are less than significant and do not require mitigation measures.
- Less Than Significant With Mitigation Incorporated. The EIR incorporates mitigation measures into the Project that lessen or avoid substantial adverse impacts on the environment.
- Significant and Unavoidable. The Project would cause a substantial adverse effect on the environment, and no feasible mitigation measures are available to reduce the impact to a less than significant level.

PROJECT ENVIRONMENTAL BASELINE

The State CEQA Guidelines Section 15125 provides the following guidance for establishing the Project's environmental baseline against which the Project's potential environmental impacts are measured:

> *An EIR must include 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, or if no notice of preparation is published, at the time environmental analysis was commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.*

The Notice of Preparation for the Project was published on November 10, 2022. The baseline conditions for the Project were the existing conditions on the Project Site and vicinity at that time. The following describes the existing conditions on the Project Site and vicinity at the time the Notice of Preparation was published.

INCORPORATION BY REFERENCE

Pertinent documents relating to this EIR have been cited in accordance with *CEQA Guidelines* Section 15150, which encourages incorporation by reference as a means of reducing redundancy and the length of environmental reports. The following documents are hereby incorporated by reference into this DEIR. Information contained within these documents has been utilized for different sections of this DEIR. These documents are available for review at the City of Walnut, Planning Department. The City of Walnut Community Development is located at 21201 La Puente Road, Walnut, California 91789.

- City of Walnut General Plan (Adopted May 9, 2018, Resolution No. 18-19). The Walnut General Plan is the primary source of long-range planning and policy direction that guides growth and preserves the quality of life within the community. The General Plan estimates the maximum level of development within the City that can occur. The General Plan includes the following elements: Land Use and Community Design; Circulation; Conservation, Open Space and Recreation; Community Facilities and Infrastructure; Public Safety; Noise; and Housing. The General Plan was utilized throughout this document as the fundamental planning document governing development at the Project Site. Background information and policy information from the General Plan is cited in several sections of this document.
- City of Walnut Municipal Code. City of Walnut City Code (current through Ordinance 21-01 and the April 2021 code supplement). The City of Walnut City Code (City Code) consists of regulatory, penal, and administrative ordinances of the City. It is the method the City uses to implement control of land uses, in accordance with General Plan goals and policies. Title 6, Planning and Zoning, identifies land uses permitted and prohibited according to the zoning category of particular parcels. Title 2, Building and Building Regulations, specifies rules and regulations for construction, alteration, and buildings.

These documents, incorporated by reference, were utilized throughout this analysis as the fundamental planning documents that may apply to the Project Site. Background information and policy information from these documents, as well as specific adopted rules and regulations pertaining to the City of Walnut contained therein were also relied upon throughout this DEIR.

5.1 AESTHETICS

5.1.1 INTRODUCTION

This section describes the existing aesthetic environment and analyzes the Project's potential impacts to the aesthetic character and visual quality of the Project Site and its surroundings, including potential impacts to scenic vistas and viewsheds from publicly accessible areas. The introduction of new sources of light and glare is also evaluated in this section. The analysis incorporates information provided in the City of Walnut General Plan and Zoning Code. The analysis is also based in-part on review of the visual simulations prepared for the Project in the following:

- *The Brookside View Simulations*, PlaceWorks, January 18, 2024 (included in its entirety as Appendix B1).
- *Brookside Conceptual Elevations*, Bassenian Lagoni Architecture Planning Interiors, 2021 (included in its entirety as Appendix B2).

5.1.2 ENVIRONMENTAL SETTING

EXISTING CONDITIONS OVERVIEW

The Project Site is located in the City of Walnut, County of Los Angeles, within an urbanized/suburbanized environment. To the north of the Project Site are existing single-family residential neighborhoods, St. Lorenzo Ruiz Catholic Church, and Vellucci Hall; to the south are existing single-family residential neighborhoods and a small commercial center; to the east are existing single-family residential neighborhoods; and to the west are existing single-family residential neighborhoods and Fire Station 61.

The current Project Site grade varies from approximately 572 feet on the south boundary adjacent to La Puente Road to approximately 640 feet on the north boundary. Onsite topography and features consist of unused facilities remaining from discontinued equestrian-related activities, previously graded/developed areas, improved and unimproved gravel and dirt roads, parking area, large, irrigated lawns, fences, unimproved equestrian riding and maintenance trails, and sloping topography primarily associated with Lemon Creek, which flows south through the central portion of the Project Site. The existing equestrian-related facilities consist of two stables, one of which has a second story residential addition (currently unoccupied), covered stalls, two fenced corrals, maintenance storage shed, three feed sheds within fenced areas, one outdoor arena, one covered open-air arena, and one gazebo. All structures have been vacated and closed and have been determined not to be of historic significance (refer to Section 5.5, *Cultural Resources*). Project implementation would remove all existing onsite structures. The Project Site includes a mixed plant community that is multi-canopied and includes, but is not limited to, eucalyptus, Peruvian pepper, California Walnut, Coast Live Oak, Valley Oak, white alder, common fig, and Mexican fan palm.

Lighting within the Project Site and surrounding area is typical of developed urban areas. Primary sources of light and glare in the area include motor vehicle headlights, streetlights, parking lot and exterior security lighting, and interior building lighting. Currently, light and glare are being emitted from existing residential, institutional, and commercial uses located within the area. Additionally, the Project Site fronts Meadow Pass Road, La Puente Road and San Vicente Drive, which contribute to both street lighting and traffic lighting in the Project area.

The City's General Plan does not identify any specific scenic resources or scenic vistas in the Project Site; however, the General Plan EIR (City of Walnut 2023) describes the following "visual resources" in the City as excerpted below and updated to reflect current conditions:

- Walnut's topography affords properties in its hillside areas to have scenic views of both the City and other municipalities in Los Angeles County, with the skylines of those cities visible on clear days.
- Natural features most associated with Walnut are its Black Walnut Trees (*Juglans californica*). This tree is an important biological and scenic resource within the City, and is endemic to the region.
- Three Walnut Woodlands located on the San Jose Hills around the Mt. San Antonio College (Mt. SAC) campus are considered scenic resources in the City of Walnut. The largest of these 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 and Snow Creek. These waterways feed into the San Gabriel River watershed via San Jose Creek. The scenic quality of Lemon Creek has been recognized in the General Plan and designated for preservation as one of the natural areas of the City.
- The Walnut Municipal Code (WMC) Article V *Oak/Walnut Tree Preservation Ordinance* Section 6.52.250 (note, this is an updated code reference since the General Plan EIR was written), which requires the preservation of all healthy trees unless compelling reasons justify the removal of such trees.
- In the General Plan, the Scenic Highway Element describes certain streets that possess scenic attributes that qualify them to be identified as scenic routes. These routes include: Lemon Avenue from La Puente Road to Temple Avenue, Temple Avenue from the west City limits to the east City limits, Meadow Pass Road from the Lemon Avenue Extension to the Temple Avenue extension, Mountaineer Road between Grand Avenue and San Dimas Avenue, and Grand Avenue between Valley Boulevard and the northern City limits.
- The City's Dark Sky Map shown in Figure LU-9 of the Existing Conditions Report (ECR) identifies areas in the City where light pollution is a concern. It should be noted that the City's Dark Sky Map is an unofficial Map. Note, the ECR was incorporated by reference into the General Plan EIR and was not accessible at the time of writing this DEIR.

AESTHETICS OVERVIEW

Terms to be discussed include "viewsheds" and "visual quality," both key factors in addressing impacts to aesthetics and views. The aesthetic value of an area is a measure of its visual character and quality, combined with the viewer response to the area. Viewer response is a combination of viewer exposure and viewer sensitivity. Viewer exposure is a function of the number of viewers, the number of views seen, the distance of the viewers, and the viewing duration. Viewer sensitivity relates to the extent of the public's concern for particular viewsheds.

VIEWSHED

A viewshed is a geographic area composed of land, water, biotic, and/or cultural elements that may be seen from one or more public viewpoints and has inherent scenic qualities and/or aesthetic value as determined by those who view it. The extent of a viewshed can be limited by a number of intervening elements, including trees and other vegetation, built structures, or topography such as hills and mountains.

VISUAL QUALITY

Visual quality refers to the character of the landscape, which generally gives visual value to a setting. A "typical view" seen throughout an area may include several types of scenic resources, including natural and human-made elements.

TYPES OF VIEWS

The term "views" generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. Focal views are those targeting a particular object, scene, setting, or feature of visual interest. Panoramic views or vistas, on the other hand, provide visual access to an expansive geographic area, for which the field of view is often wide and extends into the distance. Examples of focal views include distinct natural landforms, public art, landmarks, and individual buildings. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, and other bodies of water.

Private views are views seen from privately owned land and are typically viewed by individual viewers, including views from private residences. Public views are experienced by the collective public. These include views of significant landscape features, as seen from public viewing spaces, not privately-owned properties. For CEQA purposes, impacts to public views are evaluated for significance determinations and potential mitigation, while impacts to private views are not.

Scenic Views and Vistas

A scenic vista is defined as a viewpoint that provides a panoramic view of highly valued natural landscapes, such as mountains, oceans, lakes, or forests. A scenic vista benefits the public generally and is typically designated by public agencies for preservation in their planning documents. There are no General Plan designated or mapped scenic views or vistas within the City.

LIGHT AND GLARE

For the purpose of this analysis, "light" refers to light emission, or the degree of brightness, generated by a given source. Artificial lighting may be generated from point sources (i.e., focused points of origin representing unshielded light sources) or from indirectly illuminated sources of reflected light. Light may be directed downward to illuminate an area or surface, cast upward into the sky and refracted by atmospheric conditions (skyglow), or cast sideways and outwards onto offsite properties (overspill). Skyglow and overspill are considered forms of light pollution. Light introduction can be a nuisance to adjacent residential areas, diminish the view of the clear night sky, and if uncontrolled, can cause disturbances. The effects of nighttime lighting are contextual and depend upon the light source's intensity, its proximity to light-sensitive land uses (i.e., sensitive receptors such as residential units and schools), and the existing lighting environment in the vicinity of a project site.

"Glare" or "unwanted source luminance" is defined as focused, intense light directly emanated by a source or indirectly reflected by a surface from a source. Daytime glare typically is caused by the reflection of sunlight from highly reflective surfaces at or above eye level. Reflective surfaces generally are associated with buildings clad with broad expanses of highly polished surfaces or with broad, light-colored areas of paving. Daytime glare may hinder outdoor activities conducted in surrounding land uses, such as sports. Sunlight reflecting off a reflective surface can result in glare effects and unsafe visual conditions that may interfere with the vision of motorists operating vehicles in the proximity or that may otherwise generally degrade scenic views. Glare can also be produced during evening and nighttime hours by the reflection of artificial light sources such as automobile headlights.

5.1.3 REGULATORY SETTING

FEDERAL

National Scenic Byways Program

The National Scenic Byways program is part of the U.S. Department of Transportation, Federal Highway Administration. The program was established under the Intermodal Surface Transportation Efficiency Act of 1991 and was reauthorized in 1998 under the Transportation Equity Act for the 21st Century. Under the program, the U.S. Secretary of Transportation recognizes certain roads as National Scenic Byways or All-American Roads based on their archaeological, cultural, historic, natural, recreational, and scenic qualities. The only National Scenic Byway located within Southern California is the Arroyo Seco Historic Parkway – Route 110 in Los Angeles County. The National Scenic Byway is not located in the vicinity of the Project.

STATE

California Scenic Highway Program

The California Scenic Highway Program was created in 1963 to preserve and protect highway corridors located 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 Project Site is not located in the viewshed of a State scenic highway according to the State of California Department of Transportation, California Scenic Highway Mapping System.

LOCAL

City of Walnut General Plan

LAND USE AND COMMUNITY DESIGN ELEMENT

The purpose of the Land Use and Community Design Element is to provide appropriate land uses for a variety of activities including residential, commercial, public, etc., and to guide how each land use is developed and used. In so doing, the element intends to create and regulate a compatible and functional interrelationship between the various land uses.

The following are goals and policies from the Land Use and Community Design Element that are relevant to the Project:

GOAL LCD-7: Community character that reflects Walnut's distinctive small-town identity and character.

Policy LCD-7.1: Small-Town, Rural Character. Apply design requirements that maintain and enhance Walnut's small-town, rural character.

Policy LCD-7.2: Consistent Community Scale. Require new structures to be designed at a low-scale to reflect established residential neighborhoods, commercial centers, hillside terrain, open spaces, and natural areas.

Policy LCD-8.1: Enhanced Design. 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.

Policy LCD-8.2: High-quality Materials. Insist that all new development incorporate high-quality building materials, textures, and finishes that embody durability and permanence.

Policy LCD-8.4: Landscape Design. Develop specialized landscape and design treatments for entryways, intersections, parks, districts and neighborhoods, and public areas.

Policy LCD-8.5: Outdoor Spaces. 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.

GOAL LCD-10: Development that respects the natural environment of Walnut and preserves the scenic quality of hills, ridgelines, and creek areas.

Policy LCD-10.1: Development that is Sensitive to the Natural Environment Design development in a sensitive manner to compliment the natural environment. The following guidelines will be considered:

a) Encourage development to be sensitive to the topography, physical context, and community character of Walnut.

b) Minimize alteration of existing topography especially in hillside areas during the development and redevelopment process. c) Retain natural landform character by using contour grading that varies slope gradients and provides a smooth, rounded transition to existing grades.

d) Promote the protection of prominent ridgelines whenever feasible. This shall be accomplished by siting development below ridgelines in such a manner that permits the ridgeline to remain visible.

e) Ensure that structures are adapted to hillside topography to minimize grading and to limit visibility to all structures from community-level viewsheds.

f) Avoid horizontal bands of development or long structures with unbroken facades.

g) Use creative architectural design solutions to adapt the structures to the hillside topography (such as split-level design).

City of Walnut Municipal Code

As described in Section 3.0, *Project Description*, the proposed Project has elected for the R-1 alternative allowed under the RPD Zone. Therefore, the Project is not being developed as a *planned residential development* and is not subject to a Conditional Use Permit (CUP), even though it is within an RPD Zone. Because of this, provisions of the WMC regarding scenic quality in the RPD Zone and guided through the CUP process described in Sections 6.24.010, 6.24.030, and 6.24.040 are not applicable to the proposed Project. The WMC Chapter 6.12 *R-1 One-Family Residential Zone* does not contain provisions regarding scenic quality.

5.1.4 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:

- AES-1: Would the project have a substantial adverse effect on a scenic vista?

- AES-2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- AES-3: Would the project 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?
- AES-4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

5.1.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT AES-1: Have a substantial adverse effect on a scenic vista?

The Project would not have a substantial adverse effect on a scenic vista. As noted earlier, a scenic vista is defined as a viewpoint that provides a panoramic view of highly valued natural landscapes, such as mountains, oceans, lakes, or forests. A scenic vista benefits the public generally and is typically designated by public agencies for preservation in their planning documents.

The City's General Plan does not identify any existing scenic resources or scenic vistas on the Project Site; however, the General Plan EIR notes that, "Additional scenic resources can be found along Lemon Creek... The scenic quality of Lemon Creek has been recognized in the General Plan and designated for preservation as one of the natural areas of the City" (City of Walnut 2023). The portion of Lemon Creek within the Project Site, however, is not the subject of a panoramic view available to the general public. As a note, the Project proposes dedication to the City of an approximately 1,500 linear foot public trail easement mainly on the west side of Lemon Creek that would provide members of the public with a focal view (see "Types of Views" above) of Lemon Creek; refer to Figure 3-8, *Trails Plan*. Project implementation would not impact a scenic vista, and no mitigation is required.

Level of Impact Before Mitigation: The proposed Project does not have a substantial adverse effect on a scenic vista. No impact based on review of the Project Description within the context of the Project location.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT AES-2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The Project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. The State Scenic Highway Program established by the California Department of Transportation (Caltrans) is intended to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to state highways. State highways may be designated as scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. According to Caltrans (2024), there are no designated or eligible State scenic highways within the Project's viewshed. The nearest such facility is the California State Route (SR) 57 freeway (eligible for listing), located approximately 2.0 miles away to the southeast. Therefore, no impacts to scenic resources along a State scenic highway would occur, and no mitigation is required. As a note, the General Plan EIR states that Lemon Avenue from La Puente Road to Temple Avenue, and Meadow

Pass Road from the Lemon Avenue Extension to the Temple Avenue extension, possess scenic attributes that qualify them to be identified as scenic routes; however, this does not constitute designation as a state scenic highway.

Level of Impact Before Mitigation: No impact based on the absence of a designated (or eligible) scenic highway within the Project vicinity.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT AES-3: If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

IMPACT ANALYSIS (UNDER CEQA)

The Project Site is adjacent to existing residential land uses and is within an urbanized/suburbanized setting. The applicable planning programs that govern scenic quality of the Project Site would be the City of Walnut General Plan and Zoning Code.

General Plan

The proposed Project would be consistent with the General Plan's applicable Goals and Policies described above in Section 5.1.3, *Regulatory Setting*. The Project design has considered the existing topography and retains the physical context of Lemon Creek and the residential, small-town, community character of the Project vicinity using passive open space, native landscaping, and a multi-use trail (accessible by the public) along Lemon Creek. Grading has been minimized and is proposed to be balanced onsite (i.e., it would not require notable import or export of soils). No ridgelines would be obstructed from view or physically altered and community-level viewsheds would not be significantly adversely altered. More than 40% of the Project Site would be preserved as passive open space. Based on the Project's *Conceptual Landscape Plan* (Figure 3-8a) and *Canopy Coverage* (Figure 3-8b) included in Section 3.0, *Project Description*, the Project would retain a significant majority of existing trees and replace trees removed during construction with approximately 520 California native trees, retaining a healthy tree canopy for the Project Site. The proposed residential structures would be designed consistent with zoning requirements. The proposed structures would be required to meet the City's construction development standards and the design parameters of the California Uniform Building Code to ensure durability and permanence. In addition, the City would review architectural design for compliance with applicable design standards by City staff prior to issuance of construction permits. Horizontal bands of development and unbroken facades are not proposed. Existing topography is not anticipated to require creative design solutions within hillsides based on grading pad design and lot placement. Based on these factors, potential impacts would be considered less than significant, and no mitigation is required.

Walnut Municipal Code

As discussed above under Section 5.1.3, the proposed Project has elected for the R-1 alternative allowed under the RPD Zone. Therefore, the Project is not subject to the provisions of the WMC regarding scenic quality in the RPD Zone and guided through the CUP process described in Sections 6.24.010, 6.24.030, and 6.24.040. In addition, the WMC Chapter 6.12 *R-1 One-Family Residential Zone* does not contain provisions regarding scenic quality. Based on these factors, potential impacts would be considered less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impacts to applicable zoning and other regulations governing scenic quality based on Project design reviewed within the context of the Project Site and vicinity.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

VISUAL ANALYSIS (NOT UNDER CEQA)

Visual Analysis

Threshold AES-3 from Appendix G of the CEQA Guidelines addresses potential project impacts for non-urbanized areas by asking if a project would "substantially degrade the existing visual character or quality of public views of the site and its surroundings," noting that "[p]ublic views are those that are experienced from publicly accessible vantage points." Because, as noted above, the proposed Project is located in an urbanized area, this public view analysis is not relevant to the impact evaluation for the Project. Nonetheless, the following information related to the Project's effects upon "the existing visual character or quality of public views of the Project Site and its surroundings" is provided here for informational purposes.

The Project would remove all existing onsite equestrian facilities and structures and redevelop the Project Site with a residential community. Natural and passive open space areas, primarily along Lemon Creek would be made accessible to the public within a designated multi-use trail. An open space easement, deed restriction, or other protective measure would be placed over these areas to: 1) restrict homeowners from disturbing Lemon Creek, and 2) provide for maintenance.

The Project Site is located within a developed area of the City and is surrounded by residential, institutional, or commercial land uses. Existing views of the Project Site vary from slightly obstructed to obstructed, mainly due to the site's topography and dense onsite trees and vegetation located on the exterior and interior of the property, as well as along Lemon Creek. Single-family residential uses are located directly to the west and east of the Project Site. The surrounding residences are primarily two-story. Existing views from adjacent residential areas are described below:

- Residential units west of the Project Site currently have limited views into the site.
- Residential units directly east of the northeast Project boundary along Meadow Pass Road currently have no view or limited views into the site.
- Residential units directly east of the Project Site along Rim Ridge Road, Falling Springs Road, Broken Lance Road, and Red Cedar Road have limited views into the site.

View Simulation Methodology

Visual simulations were prepared from eight public and six private vantage points (view locations) in the areas surrounding the Project Site to evaluate the potential visual and aesthetic changes resulting from Project implementation. Photographs from each view location were taken to establish the baseline from which simulated development was added. The visual simulations were created utilizing finished floor elevations reflected on the grading plan prepared for the Project. The proposed dwelling units were then simulated based on the development of the building "footprint" established for each lot. In addition, building height, architectural character, colors, and landscaping were programmed into the computerized

visual simulation, based on the conceptual elevation renderings (Appendix B2)[1], in order to create an accurate depiction of the post-development views from each of the view locations, which were derived from a global position system (GPS). The visual simulations show the before and after conditions.

The view locations, which were selected in consultation with and approved by the City of Walnut, were selected because they represent locations that collectively represent views to the existing site from locations accessible to the public (and with six private view locations also included for informational purposes). View locations were selected to be representative of a general area/location. The DEIR is incapable of evaluating every conceivable visual vantage point of the Project. However, the selected view simulations, taken in their entirety, provide a representative overview of the potential view changes from within the surrounding residential community that can be anticipated as a result of Project implementation. A description of the view locations used in the simulations is provided in Table 5.1-1, *View Location Simulation Descriptions*. The view locations and orientations are depicted in Figure 5.1-1, *View Simulation Location Key Map*.

Table 5.1-1
View Location Simulation Descriptions

View Simulation No.		Location Description
A1	San Vicente Road and San Vicente Circle	Simulation View A1 photo was taken from the corner of San Vicente Road and San Vicente Circle looking west toward the Project Site. The left most lot shown is Lot 27; refer to Figure 5.1-2a, *View A1: San Vicente Road/San Vicente Circle View Simulation*.
A2	San Vicente Road and San Vicente Circle	Simulation View A2 photo was taken from the corner of San Vicente Road and San Vicente Circle looking north towards the cul-du-sac of San Vicente Road; refer to Figure 5.1-2b, *View A2: San Vicente Road/San Vicente Circle View Simulation*.
B*	Broken Lance Road	Simulation View B photo was taken from the top of the slope behind the residence at 617 Broken Lance Road looking west into the Project Site. The three residential pads in view are Lots 20, 19, 18 (left to right); refer to Figure 5.1-3, *View B: Broken Lance Road View Simulation*.
C*	Rim Ridge Road	Simulation View C photo was taken from the top of the slope behind the residence 202 Rim Ridge Road looking west into the Project Site. The two residential pads in view are Lots 15 and 14 (left to right); refer to Figure 5.1-4, *View C: Rim Ridge Road View Simulation*.
D1	Meadow Pass Road/Colt Lane	Simulation View D1 photo was taken from the corner of Meadow Pass Road and Colt Lane looking south towards the entrance of the Project Site; refer to Figure 5.1-5a, *View D1: Meadow Pass Road/Colt Lane View Simulation*.
D2	Colt Lane/Meadow Pass Road	Simulation View D2 photo was taken as a bird's eye view from the corner of Meadow Pass Road and Colt Lane looking south towards the entrance of the Project Site; refer to Figure 5.1-5b, *View D2: Meadow Pass Road/Colt Lane (Birds Eye) View Simulation*.
E	Colt Lane/Palomino Circle	Simulation View E photo was taken from the corner of Colt Lane and Palomino Circle looking south towards the entrance of the Project Site; refer to Figure 5.1-6, *View E: Colt Lane/Palomino Circle View Simulation*.

[1] Note that the elevation renderings included in Appendix B2 are conceptual. Final design of the structures would be completed during the City's Site Plan and Architectural Review Process as previously discussed.

View Simulation No.		Location Description
F1	St. Lorenzo Ruiz Catholic Church Entrance/Meadow Pass Road	Simulation View F1 photo was taken from the east entrance of St. Lorenzo Ruiz Catholic Church along Meadow Pass Road looking east towards the entrance of the Project Site; refer to Figure 5.1-7a, *View F1: St. Lorenzo Ruiz Catholic Church Entrance/Meadow Pass Road View Simulation*.
F2	St. Lorenzo Ruiz Catholic Church Driveway/Meadow Pass Road	Simulation View F2 photo was taken from the east entrance of St. Lorenzo Ruiz Catholic Church along Meadow Pass Road looking west down Meadow Pass Road; refer to Figure 5.1-7b, *View F2: St. Lorenzo Ruiz Catholic Church Entrance/Meadow Pass Road View Simulation*.
G	Lemon Avenue/Meadow Pass Heights	Simulation View G photo was taken from the corner of N Lemon Avenue and Meadow Pass Heights looking east towards the Project Site; refer to Figure 5.1-8, *View G: Lemon Avenue/Meadow Pass Heights View Simulation*.
H1*	Meadow Pass Heights	Simulation View H1 photo was taken from the top of the slope behind the residence 640 Meadow Pass Heights looking northeast into the Project Site; refer to Figure 5.1-9a, *View H1: Meadow Pass Heights View Simulation*.
H2*	Meadow Pass Heights	Simulation View H2 photo was taken from the top of the slope behind the residence 640 Meadow Pass Heights looking southeast into the Project Site; refer to Figure 5.1-9b, *View H2: Meadow Pass Heights View Simulation*.
I1*	Ridge Estate Court	Simulation View I1 photo was taken from the top of the slope behind the residence 19940 Ridge Estate Court looking northeast into the Project Site; refer to Figure 5.1-10a, *View I1: Ridge Estate Court View Simulation*.
I2*	Ridge Estate Court	Simulation View I2 photo was taken from the top of the slope behind the residence 19940 Ridge Estate Court looking east into the Project Site; refer to Figure 5.1-10b, *View I2: Ridge Estate Court View Simulation*.
Notes: *Indicates private view also included for informational purposes.		

View Simulation Analysis

The following are provided for each view location: 1) Existing Conditions, 2) Proposed Conditions: 5-10 Years after Project Completion, 3) Proposed Conditions: 2-3 Years after Project Completion, and 4) Proposed Conditions: Day 1 of Project Completion. Each view location is depicted on Figures 5.1-2 through 5.1-10, *View Simulations*. The analysis of potential changes to views are discussed separately for locations that are unique from the other views or discussed collectively for views that share similar characteristics and potential changes.

The characteristics of each viewpoint are defined within the context of foreground, middle ground, and/or background views. Characteristics located within foreground views are visible at close range and tend to dominate the view. Characteristics located within middle ground views are distinguishable, yet not as sharp as those characteristics located in the foreground views. Characteristics located within the background views have few details and distinctions in landform and surface features. The emphasis of background views is an outline or edge. Silhouettes and ridges of one land mass against another are the conspicuous visual aspects of the background, with the skyline serving as the strongest line.

View A1 and View A2: San Vicente Road and San Vicente Circle

Existing Conditions: Views A1 and A2 are on San Vicente Road immediately east of the Project Site; refer to Figure 5.1-1, *View Simulation Location Key Map*. The photos were taken on the southeast corner of San Vicente Road and San Vicente Circle looking west/northwest and northwest/north, respectively. These locations represent views from the adjacent single-family residential neighborhood into the Project Site.

The existing foreground and middle ground views consist of San Vicente Road and the onsite white rail fencing, trees, and vegetation. The background views consist of the trees located within the Project Site and skyline; refer to Figures 5.1-2a and 5.1-2b, *View A1 and View A2: San Vicente Road/San Vicente Circle View Simulation*.

Proposed Conditions: The proposed conditions show the foreground and middle ground views would still consist of San Vicente Road, but the white fence and some vegetation would be removed, and the single-family homes would become the predominant feature in the middle ground. Within five to ten years following Project completion, the replacement trees planted within the Project Site would grow to approximately 25 to 35 feet in height. The more mature landscaping and trees would serve to screen most of the single-family homes in the middle ground views looking northwest up the street. The background views would show continued maturation of replacement trees and the retained skyline; refer to Figures 5.1-2a and 5.1-2b, *View A1 and View A2: San Vicente Road/San Vicente Circle View Simulation*. Although the existing views to the Project Site would be altered, the landscaping incorporated into the Project, as well as the use of appropriate color tones for the homes and compatible building forms, masses, and roof design would undergo the City's Site Plan and Architectural Review Process. This process would require the proposed development to be consistent with building architectural styles that maintain the integrity and character of the existing surrounding urban/suburban neighborhood setting.

View B: Broken Lance Road and View C: Rim Ridge Road

Existing Conditions: View B is near Broken Lance Road and View C is near Rim Ridge Road immediately east of the Project Site; refer to Figure 5.1-1, *View Simulation Location Key Map*. The photos were taken at the top of slope between 623 and 617 Broken Lance Road looking west and from the backyard at 20201 Rim Ridge Road looking west, respectively. These photos represent private views from the adjacent single-family residential neighborhood looking into the Project Site. The foreground views show offsite sloped areas with vegetation and mature trees. The middle ground views include onsite areas at a lower elevation with disturbed areas (previously graded), trees, and white rail fencing (View B). The background views consist of trees located within the Project Site; refer to Figure 5.1-3, *View B: Broken Lance Road View Simulation*, and Figure 5.1-4, *View C: Rim Ridge Road View Simulation*.

Proposed Conditions: The proposed conditions show foreground views of the sloped area with vegetation and mature trees would remain unchanged as this area is offsite. The middle ground views show the proposed onsite roadway and newly planted replacement trees on both sides of the private street, newly planted replacement trees on and between the lots, a sidewalk, and two-story homes (maximum height of 35 feet). The background views would remain unchanged and consist of existing trees to remain in place. Within five to ten years following Project completion, the replacement trees planted along the private street and on and between the lots would grow to approximately 25 to 35 feet in height. The more mature landscaping and trees would serve to screen the visible hardscape features and single-family homes in the middle ground views; refer to Figure 5.1-3, *View B: Broken Lance Road View Simulation*, and Figure 5.1-4, *View C: Rim Ridge Road View Simulation*. Although the existing views to the Project Site would be altered, the landscaping incorporated into the Project, as well as the use of appropriate color tones for the homes and compatible building forms, masses, and roof design would undergo the City's Site Plan and Architectural Review Process. This process would require the proposed development to be consistent with building architectural styles that maintain the integrity and character of the existing surrounding urban/suburban neighborhood setting.

View D1 and View D2 (Birds Eye): Meadow Pass Road/Colt Lane

Existing Conditions: View D1 and View D2 (Birds Eye) are at the intersection of Meadow Pass Road and Colt Lane, north of the Project Site; refer to Figure 5.1-1, *View Simulation Location Key Map*. The photos were

taken from the northeast corner of Meadow Pass Road and Colt Lane looking south and represent views from the single-family residential neighborhood looking into the Project Site. The foreground views show Meadow Pass Road. The middle ground and background views include mature vegetation, trees and skyline on the other side of Meadow Pass Road and within the Project Site; refer to Figures 5.1-5a and 5.1-5b, *View D1 and View D2: Meadow Pass Road/Colt Lane View Simulation*.

Proposed Conditions: The proposed conditions show the foreground views would remain of Meadow Pass Road with added crosswalk striping. The middle ground views show the proposed entrance and newly constructed single-family homes. The background views show existing vegetation to remain and additional skyline. Within five to ten years of Project completion, the replacement trees and landscaping would mature, providing screening of the single-family homes. The visual changes to the foreground, middle ground, and background views would be similar to existing conditions; refer to Figures 5.1-5a and 5.1-5b, *View D1 and View D2: Meadow Pass Road/Colt Lane View Simulation*. The character of the existing surrounding urban/suburban neighborhood setting would be maintained.

View E: Colt Lane/Palomino Circle

Existing Conditions: View E is of the intersection of Colt Lane and Palomino Circle, north of the Project Site; refer to Figure 5.1-1, *View Simulation Location Key Map*. The photo was taken from Colt Lane looking south from the corner of Palomino Circle and toward the Project Site. This location represents the view from the single-family residential neighborhood looking toward the Project Site. The foreground view shows Colt Lane, mature vegetation and trees on both sides of Colt Lane. The middle ground and background view includes mature vegetation and trees on the St. Lorenzo Ruiz property and within the Project Site adjacent to Meadow Pass Road; refer to Figure 5.1-6, *View E: Colt Lane/Palomino Circle View Simulation*.

Proposed Conditions: The proposed condition shows the foreground, middle ground and background view would remain mostly unchanged. A portion of the middle ground view would now show part of a single-family home post construction, until after approximately five to ten years the single-family home would be mostly screened by maturation of the replacement trees and landscaping. The background view would now expose the Puente Hills to the south. The visual changes to the foreground, middle ground, and background views would be similar to existing conditions; refer to Figure 5.1-6, *View E: Colt Lane/Palomino Circle View Simulation*. The character of the existing surrounding urban/suburban neighborhood setting would be maintained.

View F1 and View F2: St.: Lorenzo Ruiz Catholic Church Entrance/Meadow Pass Road

Existing Conditions: View F1 and View F2 are of the intersection of the St. Lorenzo Ruiz Catholic Church Driveway and Meadow Pass Road, north of the Project Site; refer to Figure 5.1-1, View Simulation Location Key Map. The photos were taken from the easternmost driveway of the St. Lorenzo Ruiz Catholic Church property along Meadow Pass Road looking southeast and southwest, respectively. View F1 and View F2 represent views looking from the church property and along Meadow Pass Road into the Project Site. The foreground views include Meadow Pass Road, Project Site driveway (View F1), and onsite vegetation and trees adjacent to Meadow Pass Road. The middle ground views include the roof of the Covered Riding Arena (View F2), as well as onsite mature trees. The background views consist of trees located within the Project Site and trees located offsite in residential areas to the east and west Figures 5.1-7a and 5.1-7b, *View F1 and View F2: St. Lorenzo Ruiz Catholic Church Entrance/Meadow Pass Road View Simulation*.

Proposed Conditions: The proposed conditions show the foreground on Meadow Pass Road would not change. The middle ground views show that the Covered Riding Arena would be removed (View F2), replacement trees and vegetation would be added, and the addition of a white split-rail fence, consistent with the equestrian character of the community. The proposed single-family homes would be visible on

Day 1 post-construction, but after approximately two to three years, the replacement vegetation would mature and serve to screen the homes from Meadow Pass Road. The visual character of the foreground, middle ground, and background views would be similar to existing conditions except for the addition of the split-rail fence; refer to Figures 5.1-7a and 5.1-7b, *View F1 and View F2: St. Lorenzo Ruiz Catholic Church Entrance/Meadow Pass Road View Simulation*. The character of the existing surrounding urban/suburban neighborhood setting would be maintained.

View G: Lemon Avenue/Meadow Pass Road

Existing Conditions: View G is at the intersection of North Lemon Avenue and Meadow Pass Road, which is the northwest boundary of the Project Site; refer to Figure 5.1-1, *View Simulation Location Key Map*. The photo was taken on the western corner of North Lemon Avenue and Meadow Pass Road looking east and represents the view looking from the public right-of-way and public open space into the Project Site. The foreground view shows the intersection of North Lemon Avenue and Meadow Pass Road. The middle ground view shows the public trail and vegetated slope area on the St. Lorenzo Ruiz Catholic Church property on the northside of Meadow Pass Road. South of Meadow Pass Road are mature trees in the Project Site. The background view shows vegetation and the skyline; refer to Figure 5.1-8, *View G: Lemon Avenue/Meadow Pass Heights View Simulation*.

Proposed Conditions: The proposed condition shows the foreground, middle ground, and background view would not be altered from the existing condition; refer to Figure 5.1-8, *View G: Lemon Avenue/Meadow Pass Heights View Simulation*.

View H1 and View H2: Meadow Pass Heights and View I1 and View I2: Ridge Estate Court

Existing Conditions: View H1 and View H2 are from Meadow Pass Heights east of the Project Site. View H1 and View H2 photos were taken at the top of slope behind 640 Meadow Pass Heights looking northeast and looking southeast, respectively. View I1 and View I2 are from Ridge Estate Court east of the Project Site. View I1 and View I2 photos were taken from the backyard at 19940 Ridge Estate Court also looking northeast and looking southeast, respectively; refer to Figure 5.1-1, *View Simulation Location Key Map*. Collectively, these locations represent private views from the single-family residential neighborhood looking into the Project Site. The foreground views include mature trees and vegetation on the sloped area adjacent to the residences on Meadow Pass Heights and the vegetated area and fencing on the sloped area adjacent to the residences on Ridge Estate Court. The middle ground views include the Project Site, the St. Lorenzo Ruiz Catholic Church property, single-family homes to the north of the church property, development in the City east and southeast, and single-family homes to the northeast and east of the Project Site. The background views include additional single-family homes northeast and east of the Project Site and the San Gabriel Mountains to the northeast, and the Puente Hills to the southeast; refer to Figures 5.1-9a and 5.1-9b, *View H1 and View H2: Meadow Pass Heights View Simulation*, and Figures 5.1-10a and 5.1-10b, *View I1 and View I2: Ridge Estate Court View Simulation*.

Proposed Conditions: The proposed conditions show the foreground and background views would not be altered from the existing conditions. On Day 1 post-construction, isolated portions of the middle ground views may be noticeable with the removal of existing onsite structures and the development of single-family homes, but after approximately two to three years, the replacement vegetation would mature and the middle ground views would be substantially the same as the existing conditions; refer to Figures 5.1-9a and 5.1-9b, *View H1 and View H2: Meadow Pass Heights View Simulation*, and Figures 5.1-10a and 5.1-10b, *View I1 and View I2: Ridge Estate Court View Simulation*. The character of the existing surrounding urban/suburban neighborhood setting would be maintained.



Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View Simulation Location Key Map

VCS Environmental

Figure 5.1-1

Description: Photo was taken from the corner of San Vicente Rd and San Vicente Cir looking west toward the project site. The left most lot shown is lot #27

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View A1: San Vicente Road/San Vicente Circle View Simulation

Description: Photo was taken from the corner of San Vicente Rd and San Vicente Cir looking north towards the cul-du-sac of San Vicente Rd.

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View A2: San Vicente Road/San Vicente Circle View Simulation

Description: photo was taken from the top of the slope behind the residence at 617 Broken Lance Rd looking west into the site. The 3 residential pads in view are 20, 19, 18 (left to right)

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View B: Broken Lance Road View Simulation

Description: photo was taken from the top of the slope behind the residence 202 Rim Ridge Rd looking west into the site. The 2 residential pads in view are 15 and 14 (left to right)

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View C: Rim Ridge Road View Simulation

Description: Photo was taken from the corner of Meadow Pass Rd and Colt Ln looking south towards the entrance of The Brookside Project site.

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View D1: Meadow Pass Road/Colt Lane View Simulation

Description: Photo was taken from the corner of Meadow Pass Rd and Colt Ln looking south towards the entrance of The Brookside Project site.

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View D2: Meadow Pass Road/Colt Lane Birds Eye View Simulation

Description: Photo was taken from the corner of Colt Ln and Palomino Cir looking south towards the entrance of The Brookside Project site.

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View E: Colt Lane/Palomino Circle View Simulation

Description: Photo was taken from the east entrance of St. Lorenzo Ruiz Catholic Parish Community along Meadow Pass Rd looking East towards the entrance of The Brookside Project site.

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View F1: St. Lorenzo Ruiz Catholic Church Entrance/ Meadow Pass Road View Simulation

Description: Photo was taken from the east entrance of St. Lorenzo Ruiz Catholic Parish Community along Meadow Pass Rd looking west down Meadow Pass Rd.

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View F2: St. Lorenzo Ruiz Catholic Church Entrance/ Meadow Pass Road View Simulation

Description: Photo was taken from the corner of N Lemon Ave and Meadow Pass Heights looking east towards The Brookside project site.

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View G: Lemon Avenue/Meadow Pass Heights View Simulation

Description: photo was taken from the top of the slope behind the residence 640 Meadow Pass Heights looking north east into the site.

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View H1: Meadow Pass Heights View Simulation

Description: photo was taken from the top of the slope behind the residence 640 Meadow Pass Heights looking south east into the site.

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View H2: Meadow Pass Heights View Simulation

Description: photo was taken from the top of the slope behind the residence 19940 Ridge Estate Ct looking north east into the site.

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View I1: Ridge Estate Court View Simulation

Description: photo was taken from the top of the slope behind the residence 19940 Ridge Estate Ct looking east into the site.

Note: Architectural renderings are conceptual only. Following approval of Brookside's tentative tract map, the City of Walnut will conduct an architectural review pursuant to its Municipal Code.



EXISTING CONDITIONS



PROPOSED CONDITIONS: 5-10+ YEARS



PROPOSED CONDITIONS: 2-3 YEARS



PROPOSED CONDITIONS: DAY 1

Source: PlaceWorks; January 18, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

View I2: Ridge Estate Court View Simulation

IMPACT AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Project construction activities would occur during the day; therefore, no temporary nighttime construction lighting impacts would occur. Regarding the potential for permanent impacts, the area surrounding the Project Site is currently developed with urbanized/suburbanized land uses that provide existing various nighttime lighting levels. Project operations (i.e., occupancy of the homes) would introduce new sources of lighting into the Project area; however, all new development projects in the City are required to meet Building Code and Design requirements. These regulations are designed to limit light and glare to acceptable levels. The proposed lighting types and levels would be similar to other existing residential lighting in the Project area and would be designed to ensure that all exterior lighting be confined to the Project Site to minimize and/or avoid potential spillover lighting impacts to adjoining properties. In addition, no atypical or unique structures or building materials are proposed that could cause glare impacts. Potential impacts would be less than significant and no mitigation is required.

Level of Impact Before Mitigation: Less than significant based on the type of proposed residential development, the residential context of the Project area, and compliance with Building Code and Design requirements.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.1.6 CUMULATIVE IMPACTS

As previously analyzed above, Project implementation would not adversely impact the visual quality or character of the existing surrounding urban/suburban neighborhood setting. Based on review of the City's cumulative projects listed in Section 4.0, *Basis for Cumulative Impacts*, which includes ongoing/complete projects in the City of Walnut and the City of Industry, the cumulative projects are not within the vicinity of the proposed Project. Thus, the implementation of this Project would not contribute to any cumulative aesthetic impacts. No mitigation is required.

Level of Impact Before Mitigation: No impact based on Project location and the proposed land uses.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

5.1.7 MITIGATION MEASURES

No mitigation measures are required for aesthetics.

5.1.8 REFERENCES

Bassenian Lagoni Architecture Planning Interiors, *Brookside Conceptual Elevations.* 2021.

City of Walnut. *Environmental Impact Report, City of Walnut General Plan Update and West Valley Specific Plan (SCH No. 2017101010)*. February 2018. Accessed on November 22, 2023 at https://www.cityofwalnut.org/for-residents/departments/community-development/planning-division/walnut-general-plan-and-zoning.

City of Walnut General Plan, *Land Use and Community Design Element*. Update Adoption Date: May 9, 2018.

City of Walnut Municipal Code. Accessed on January 12, 2024.

PlaceWorks, *The Brookside View Simulations*. January 18, 2024.

State of California Department of Transportation, California Scenic Highway Mapping System. Accessed on January 7, 2024 at https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

5.2 AGRICULTURAL AND FORESTRY RESOURCES

5.2.1 INTRODUCTION

This section evaluates the proposed Project's potential impact on agricultural and forestry resources. The analysis is based, in part, on the California Department of Conservation Farmland Mapping and Monitoring Program, the City of Walnut General Plan, and the Los Angeles County General Plan.

5.2.2 ENVIRONMENTAL SETTING

Los Angeles County was once a rural county that was supported primarily by an agricultural economy that was considered to have statewide and national importance. The County's agricultural communities have experienced tremendous decline over the years. These communities continue experiencing rapid suburbanization, further reducing the County's agricultural land. Urban areas are encroaching on agricultural lands throughout the County, creating pressure to convert farmland to urban uses. The rising costs of irrigation water, agricultural land tax rates, labor costs, and damage from vandalism have increased production costs making it more difficult to have a successful agricultural operation.

According to the 2019 Los Angeles Crop Report, the total gross value of agricultural crops and commodities produced was $177,612,300. Nursery plant production continues to be the leading commodity at $98,440,000. Field crops dropped significantly below 2018 sales, primarily due to several growers ceasing production. As development spreads throughout the County, land for growing agricultural commodities is lost. Presently, there are no existing agriculture resources on the Project Site, or within the surrounding area.

According to the California Department of Conservation (CDC), Farmland Mapping and Monitoring Program, the City of Walnut has no land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDC 2022). The Project Site is entirely characterized as Urban and Built-Up Land (CDC 2022). Additionally, there are no lands within the City limits that are held under Williamson Act contracts; and there are also no lands Zoned as agriculture, forest, or timberlands in the City according to the General Plan EIR (City of Walnut 2018). In addition, there are no forestry resources located on or near the Project Site. The nearest forest land is the Angeles National Forest located approximately 10 miles away to the north, according to a review of the United States Forest Service Interactive Visitor Map (USFS 2023).

5.2.3 REGULATORY SETTING

FEDERAL

There are no federal regulations regarding agriculture and forestry that are applicable to the Project.

STATE

Farmland Mapping and Monitoring Program

The California Department of Conservation (CDC) established the Farming Mapping and Monitoring Program (FMMP) in 1982. The FMMP is a non-regulatory program that provides a consistent and impartial analysis of agricultural land use and land use changes throughout California. The FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources. The maps are updated every two years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance. The program rates agricultural lands according to physical characteristics and other factors such as irrigation status. The best quality land is classified as Prime Farmland. Additional classifications include Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. The

FMMP also inventories and maps a variety of other land use categories. For purposes of determining a project's significance under CEQA, only Prime Farmland, Unique Farmland, and Farmland of Statewide Importance are used to determine impacts. Conversion to non-agricultural uses of lands falling under any of these classifications is considered a significant impact under CEQA.

California Land Conservation Act (Williamson Act)

The Williamson Act was enacted in 1965 with the principal purpose of preserving agricultural and open space lands by discouraging "premature and unnecessary" conversion to urban uses. The principal component of the Williamson Act is a process that allows private landowners to voluntarily contract with cities and counties to restrict land to agricultural and open space uses. Landowners entering into such an arrangement agree to a 10-year contract that is automatically renewed unless either the contracting jurisdiction or the landowner chooses to opt-out at the end of the term. In return for restricting uses on their property, landowners are assessed at a significantly lower property tax rate than might be the case if their property were assessed at potential market value. In these cases, properties under the Williamson Act contract can be taxed at rates ranging from 20% to 75% below potential market value assessments. Contracting jurisdictions receive partial reimbursement for reduced property tax revenue from the State via the Open Space Subvention Act program, which is financed by California's General Fund. A Williamson Act contract on a property obligates the property owner to a variety of restrictions. The minimum contract is 10 years and remains enforceable even if the property changes ownership.

Landowners may opt out of their contract without penalty only at the end of the term. If the contract is not renewed at the end of the term, the property's assessment value reverts to its potential market value. Should the landowner desire to cancel the contract prior to the end of the term, the contracting jurisdiction must make specific findings that are supported by substantial evidence. The opportunity to alter the use of the subject property is not adequate evidence to support cancellation, nor are assertions of unsatisfactory economic return should the property retain its agricultural designation. Should the cancellation be approved, the landowner must pay a cancellation fee. The Project Site is not subject to a Williamson Act contract.

Senate Bill 275

Senate Bill (SB) 275 created the Agricultural Land Stewardship Program Act of 1995, a California Department of Conservation (CDC) grant program for local governments and nonprofit organizations to aid in the acquisition of agricultural conservation easements. CDC awards grant funding from the Agricultural Land Stewardship Program fund, which receives revenue from gifts, donations, proceeds from the sale of general obligation bonds, funds appropriated by the Legislature, Federal grants or loans, and other sources.

LOCAL

City of Walnut General Plan

LAND USE AND COMMUNITY DESIGN ELEMENT

The following are applicable goals and policies from the Land Use and Community Design Element:

Policy LCD-5.3: Community Gardens. Encourage formation of community gardens, and allow urban agriculture within residential areas (for non-commercial use only).

5.2.4 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:

- AFR-1: 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?
- AFR-2: Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- AFR-3: 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))?
- AFR-4: Result in the loss of forest land or conversion of forest land to non-forest use?
- AFR-5: 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?

5.2.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT AFR-1: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The California Department of Conservation (CDC) Farmland Mapping and Monitoring Program Important Farmland Finder identifies the Project Site as Urban and Built-Up Land with no Prime Farmland, Unique Farmland or Farmland of Statewide Importance on the Project Site (CDC 2022). Additionally, the City of Walnut's General Plan Land Use Map does not identify any agricultural lands on the Project Site or the surrounding area. No impact would occur.

Level of Impact Before Mitigation: No Impact.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT AFR-2: Conflict with existing zoning for agricultural use, or a Williamson Act contract?

The City's General Plan land use designation for the Project Site is Very Low Density and the Zoning is Residential Planned Development Zone (RPD). The Project Site would not conflict with any lands zoned for agricultural uses. There are no lands within the City limits that are held under Williamson Act contracts according to the General Plan EIR (City of Walnut 2018). Additionally, no portion of the Project Site is currently used for agricultural production. No impact would occur.

Level of Impact Before Mitigation: No Impact.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT AFR-3: Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

The City's General Plan land use designation for the Project Site is Very Low Density and the Zoning is Residential Planned Development Zone (RPD). The nearest forest land is the Angeles National Forest located approximately 10 miles away to the north (USFS 2023). No impact would occur.

Level of Impact Before Mitigation: No Impact.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT AFR-4: Result in the loss of forest land or conversion of forest land to non-forest use?

There are no existing forest lands or timberland resources on the Project Site, which is not zoned for timberland production. No impact would occur.

Level of Impact Before Mitigation: No Impact.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT AFR-5: 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?

As previously discussed, the Project Site does not contain farmland or timberland resources. Short term construction activities and long-term operation of the proposed Project would be confined to the Project Site and would not cause any onsite or offsite conversion of farmland or forest land to non-agriculture uses or non-forest uses. No impact would occur.

Level of Impact Before Mitigation: No Impact.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

5.2.6 CUMULATIVE IMPACTS

No cumulative impacts associated with the implementation of this Project would occur as the Project Site has no agricultural or forestry resources onsite. The Project would not cumulatively contribute to a loss of agricultural or forestry land uses or resources in consideration of other projects identified in previously in Section 4.0, *Basis for Cumulative Impacts*. No impact would occur.

Level of Impact Before Mitigation: No Impact.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

5.2.7 MITIGATION MEASURES

No mitigation measures are required for agricultural and forestry resources.

5.2.8 REFERENCES

California Department of Conservation (CDC). California Important Farmland Finder web application [https://maps.conservation.ca.gov/DLRP/CIFF/]. Accessed on November 13, 2022.

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State of California, *Farmland Mapping and Monitoring Program*. 2020.

United States Forest Service (USFS), Interactive Visitor Map web application [https://www.fs.usda.gov/visit/maps]. Accessed on November 13, 2023.

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5.3 AIR QUALITY

5.3.1 INTRODUCTION

This section evaluates the proposed Project's potential impacts on air quality and air pollution in a regional and local context. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (SCAQMD) and the following technical report:

- *Air Quality, Energy, and Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis*, Vista Environmental, April 17, 2024 (Appendix C). This report is herein referred to as the "Air Quality Report" in this section.

5.3.2 ENVIRONMENTAL SETTING

REGIONAL SETTING

The Project Site is located within the South Coast Air Basin (SCAB or Air Basin), an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and San Diego County to the south. The Air Basin includes all of Orange County as well as the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties, in addition to the Coachella Valley area in Riverside County. The regional climate within the Air Basin is semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Air Basin is primarily influenced by meteorology, geography, and a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry.

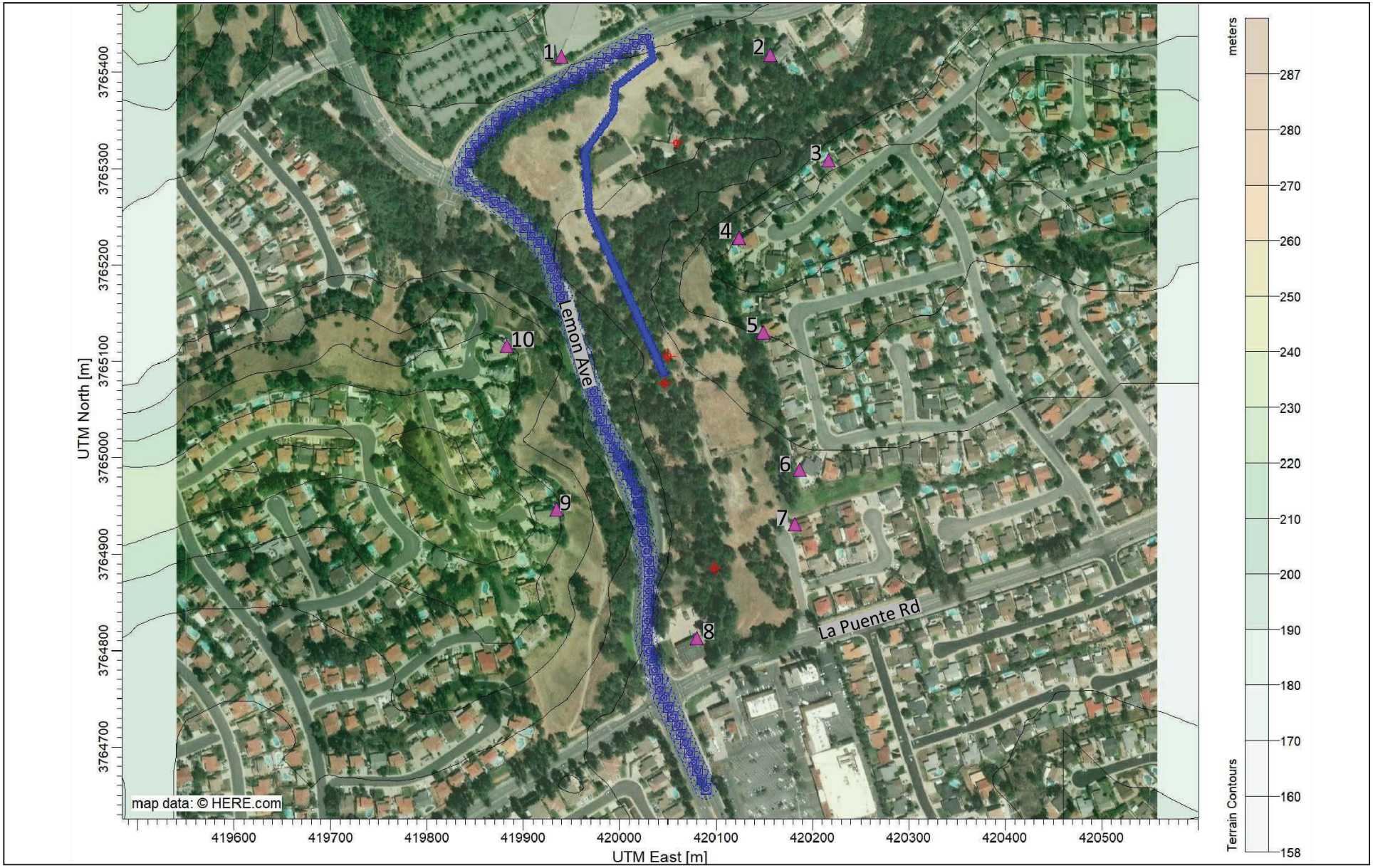
LOCAL SETTING

The SCAQMD divides the Air Basin into 38 source receptor areas (SRAs), wherein 38 monitoring stations operate to monitor the various concentrations of air pollutants in the region. The Project Site is located within SRA 10 – Pomona/Walnut Valley. Since not all air monitoring stations measure all of the tracked pollutants, the data from the following two monitoring stations, listed in the order of proximity to the Project Site, were used: Pomona Monitoring Station (Pomona Station) and Glendora Monitoring Station (Glendora Station).

SENSITIVE RECEPTORS

Sensitive receptors are considered land uses or other types of population groups that are more sensitive to air pollution exposure. Sensitive population groups include children, the elderly, the acutely and chronically ill, and those with cardio-respiratory diseases. For CEQA purposes, sensitive receptors commonly include residences, hospitals, care facilities, assisted living facilities, and schools.

The nearest sensitive receptors to the Project Site are residents at the single-family homes on the east side of the Project Site, where the nearest home is approximately 30 feet east to the east. There is also a fire station located as near as 60 feet west of the Project Site and a church located as near as 100 feet north of the Project Site. The nearest K-12 school is Vejar Elementary School, which is located approximately 0.3 mile south of the Project Site. The location of potentially effected sensitive receptors is depicted in Figure 5.3-1, *AERMOD Model Construction Sources and Receptors Placement*.



Source: Vista Environmental; February 25, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

AERMOD Model Construction Sources and Receptors Placement

VCS Environmental

Figure 5.3-1

AIR POLLUTANTS

Air pollutants are generally classified as either criteria pollutants or non-criteria pollutants. Federal ambient air quality standards have been established for criteria pollutants, whereas no ambient standards have been established for non-criteria pollutants. For some criteria pollutants, separate standards have been set for different periods. Most standards have been set to protect public health. For some pollutants, standards have been based on other values (such as protection of crops, protection of materials, or avoidance of nuisance conditions).

The federal and state Clean Air Acts have empowered the federal and state governments to regulate emissions of airborne pollutants and have established ambient air quality standards (AAQS) for the protection of public health. The United States Environmental Protection Agency (USEPA) is the federal agency designated to administer air quality regulations, while the California Air Resources Board (CARB) is the state equivalent in California. Federal and state standards have been established for six (6) criteria pollutants, including ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter less than 10 and 2.5 microns in diameter (PM_{10} and $PM_{2.5}$), and lead (Pb). California has also set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility reducing particles.

The AAQS defines the maximum amount of a pollutant, averaged over a specified time, that can be present in outdoor air without any harmful effects on people or the environment. California law continues to mandate California Ambient Air Quality Standards (CAAQS), which are often more stringent than the National Ambient Air Quality Standards (NAAQS). Air basins are the areas defined to identify which regions meet the CAAQS and NAAQS standards. If a pollutant level is too high for the region and the AAQS standard is not met, the air basin is considered a "non-attainment" area for that pollutant. The Project is located within the South Coast Air Basin, with air quality standards and monitoring set under the jurisdiction of the SCAQMD.

The Air Basin is designated by USEPA for the national standards as a non-attainment area for O_3 and $PM_{2.5}$ and partial non-attainment for Pb. The Air Basin is in attainment with the NAAQS for CO, PM_{10}, SO_2, and NO_2. The Air Basin is designated by CARB for the state standards as a non-attainment area for O_3, PM_{10} and $PM_{2.5}$ and partial nonattainment for NO_2. The Air Basin is in attainment with the CAAQS for Pb, CO, SO_2 and sulfates, and is unclassified for Hydrogen Sulfide.

Ozone (O_3)

Ozone is a secondary pollutant as it is not directly emitted. Ozone (O_3) is produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides (NO_X) and reactive organic gases (ROG)[1]. NO_X are formed during the combustion of fuels, while ROG are formed during combustion and evaporation of organic solvents. Because O_3 requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. O_3 is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors. The state 1-hour concentration standard for O_3 has been exceeded between 27 and 51 days each year over the past three years at the Pomona Station. The state 8-hour ozone standard has been exceeded between 43 and 88 days each year over the past three years at the Pomona Station.

[1] Organic compound precursors of ozone are routinely described under various terms such as Reactive Organic Gasses (ROG), Total Organic Gases (TOG), and Volatile Organic Compounds (VOC). Although chemically different, they are similar from an air quality perspective.

The federal 8-hour ozone standard has been exceeded between 41 and 84 days each year over the past three years at the Pomona Station.

Carbon Monoxide (CO)

Carbon monoxide is a local pollutant that is found in high concentrations only near the source. The major source of CO, a colorless, odorless, poisonous gas, is automobile traffic. Elevated concentrations, therefore, are usually only found near areas of high traffic volumes. CO's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity and impaired mental abilities. Data on CO emissions was not available from the Pomona Station or Glendora Station.

Nitrogen Dioxide (NO_2)

Nitrogen dioxide is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of NO_X (nitrogen oxides) produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. NO_2 absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of Particulate Matter (PM), especially PM_{10} and acid rain. The Pomona Station did not record an exceedance of either the Federal or State 1-hour NO_2 standards for the last three years.

Particulate Matter (PM_{10} and $PM_{2.5}$)

PM_{10} is particulate matter measuring no more than 10 microns in diameter, while $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates, and sulfates. Both PM_{10} and $PM_{2.5}$ are by-products of fuel combustion and wind erosion of soil and unpaved roads and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and fine particulates ($PM_{2.5}$) can be very different. The small particulates generally come from windblown dust and dust kicked up from mobile sources. The fine particulates are generally associated with combustion processes as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

No data is provided for the state 24-hour PM_{10} concentration standard at the Glendora Station. Over the past three years the federal 24-hour standard for PM_{10} has only been exceeded for two days in 2020 at the Glendora Station. The annual PM_{10} concentration at the Glendora Station has exceeded the State standard for the past three years and has not exceeded the Federal standard for the past three years. No data is provided for the federal 24-hour $PM_{2.5}$ concentration standard at the Glendora Station. Out of the last three years, the annual $PM_{2.5}$ concentration has only exceeded the state and federal standards in the year 2020 at the Glendora Station. Particulate levels in the area are due to natural sources, grading operations, and motor vehicles.

Toxic Air Contaminants (TACs)/Diesel Particulate Matter

Hazardous air pollutants, also known as toxic air pollutants (TACs) or air toxics, are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, neurological damage, or adverse environmental effects. Sources of TACs include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Examples of toxic air pollutants include:

- Benzene, which is found in gasoline;
- Perchloroethylene, which is emitted from some dry-cleaning facilities; and
- Methylene chloride, which is used as a solvent.

Transportation related emissions are focused on particulate matter constituents within diesel exhaust and TAC constituents that comprise a portion of total organic gas (TOG) emissions from both diesel and gasoline fueled vehicles. Diesel engine emissions are comprised of exhaust particulate matter and TOGs which are collectively defined as Diesel Particulate Matter (DPM). DPM and TOG emissions from both diesel and gasoline fueled vehicles are typically composed of carbon particles and carcinogenic substances including polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Diesel exhaust also contains gaseous pollutants, including volatile organic compounds (VOC) and NO_X.

Asbestos

Asbestos is listed as a TAC by CARB and as a Hazardous Air Pollutant (HAP) by the EPA. Asbestos occurs naturally in mineral formations and crushing or breaking these rocks, through construction or other means, can release asbestiform fibers into the air. Asbestos emissions can result from the sale or use of asbestos-containing materials, road surfacing with such materials, grading activities, and surface mining. The risk of disease is dependent upon the intensity and duration of exposure. When inhaled, asbestos fibers may remain in the lungs and with time may be linked to such diseases as asbestosis, lung cancer, and mesothelioma. Due to the distance to the nearest natural occurrences of asbestos (55 miles), the Project Site is not likely to contain asbestos. Potential exposure to asbestos from proposed demolition activities of existing structures is discussed in Section 5.9, *Hazards and Hazardous Materials*.

5.3.3 REGULATORY SETTING

The Project Site is located in the South Coast Air Basin (SCAB or Air Basin). The United States Environmental Protection Agency (EPA) regulates at the national level, the California Air Resources Board (CARB) regulates at the state level, and the South Coast Air Quality Management District (SCAQMD) regulates at the air basin level.

FEDERAL

The EPA oversees global, international, national, and interstate air pollution issues and policies. The EPA sets national vehicle and stationary source emission standards, oversees approval of all State Implementation Plans, conducts research, and provides guidance in air pollution programs and sets National Ambient Air Quality Standards (NAAQS), also known as federal standards. There are six common air pollutants, called criteria air pollutants, which were identified resulting from provisions of the Clean Air Act of 1970. The six criteria pollutants are ozone (O_3), particulate matter (PM), nitrogen dioxide (NO_X), carbon monoxide (CO), lead (Pb) and sulfur dioxide (SO_2). The NAAQS were established to protect public health, including that of sensitive individuals. The Air Basin is designated by USEPA for the national standards as a non-attainment area for O_3 and $PM_{2.5}$ and partial non-attainment for Pb. The Air Basin is in attainment with the NAAQS for CO, PM_{10}, SO_2, and NO_2.

STATE

The CARB also administers California Ambient Air Quality Standards (CAAQS), for the ten air pollutants designated in the California Clean Air Act (CCAA). The ten state air pollutants include the six national criteria pollutants and visibility reducing particulates, hydrogen sulfide, sulfates, and vinyl chloride. As part of its enforcement responsibilities, the EPA requires each state with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the national standards. The SIP must integrate federal, state, and local components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP. The CARB defines attainment as the category given to an area with no violations in the past three years. The EPA has designated the Air Basin for the national standards as a non-attainment area for O_3 and $PM_{2.5}$ and partial non-attainment for Pb. Currently, the Air Basin is in attainment with the NAAQS standards for CO, PM_{10}, SO_2, and NO_2.

South Coast Air Quality Management District (SCAQMD)

Under state law, the SCAQMD is required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance/non-attainment. The SCAQMD updates the plan every three (3) years. Each iteration of the SCAQMD's Air Quality Management Plan (AQMP) is an update of the previous plan and has a 20-year horizon. SCAQMD adopted the 2016 AQMP in March 2017. The 2016 AQMP incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP. The 2016 AQMP is the most currently adopted AQMP. The Final 2022 Air Quality Management Plan (2022 AQMP) was adopted by ARB on January 26, 2023 and has been submitted to the EPA for final approval, which is anticipated to occur sometime in 2024. After the 2022 AQMP is adopted, it will be incorporated into the State Implementation Plan (SIP). The 2022 AQMP establishes actions and strategies to further reduce ozone levels. The 2022 AQMP promotes extensive use of zero-emission technologies across all stationary and mobile sources coupled with rules and regulations, investment strategies, and incentives.

The 2016 AQMP was prepared to ensure continued progress towards clean air and to comply with state and federal requirements. This AQMP builds upon the approaches taken in the 2012 AQMP for the Air Basin for the attainment of state and federal ozone air quality standards. The 2016 AQMP incorporates the Southern California Association of Governments' (SCAG) adopted Final 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and updated emission inventory methodologies for applicable source categories. The 2016 AQMP also includes the new and changing federal requirements, implementation of new technology measures, and the continued development of economically sound, flexible compliance approaches.

SCAQMD develops rules and regulations, establishes permitting requirements for stationary pollutant sources, inspects emission sources, and enforces such measures through educational programs or fines, when necessary. The SCAQMD intends that by providing this guidance, the air quality impacts of plans and development proposals will be analyzed accurately and consistently throughout the Air Basin, and adverse impacts will be minimized. The following lists the SCAQMD rules that are applicable but not limited to residential development projects in the Air Basin.

Rule 402 Nuisance: Rule 402 prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which causes 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. Compliance with Rule 402 would reduce potential local air quality and odor impacts to nearby sensitive receptors.

Rule 403 Fugitive Dust: Rule 403 governs emissions of fugitive dust during construction activities and requires that no person cause or allow the emissions of fugitive dust such that dust remains visible in the atmosphere beyond the property line or the dust emissions exceed 20% opacity if the dust is from the operation of a motorized vehicle. Compliance with this rule is achieved through the application of standard Best Available Control Measures, which includes but is not limited to the measures below. Compliance with these rules would reduce potential local air quality impacts to nearby sensitive receptors.

- Utilize either a pad of washed gravel 50 feet long, 100 feet of paved surface, a wheel shaker, or a wheel washing device to remove material from vehicle tires and undercarriages before leaving the Project Site.
- Do not allow any track out of material to extend more than 25 feet onto a public roadway and remove all track out at the end of each workday.
- Water all exposed areas on active sites at least three times per day and pre-water all areas prior to clearing and soil moving activities.
- Apply nontoxic chemical stabilizers according to manufacturer specifications to all construction areas that will remain inactive for 10 days or longer.
- Pre-water all material to be exported prior to loading, and either cover all loads or maintain at least two feet of freeboard in accordance with the requirements of California Vehicle Code Section 23114.
- Replant all disturbed areas as soon as practical.
- Suspend all grading activities when wind speeds (including wind gusts) exceed 25 miles per hour.
- Restrict traffic speeds on all unpaved roads to 15 miles per hour or less.

Rules 1108 and 1108.1 Cutback and Emulsified Asphalt: Rules 1108 and 1108.1 govern the sale, use, and manufacturing of asphalt and limits the VOC content in asphalt. This rule regulates the VOC contents of asphalt used during construction as well as any on-going maintenance during operations. Therefore, all asphalt used during construction and operation of the proposed Project must comply with SCAQMD Rules 1108 and 1108.1.

Rule 1113 Architectural Coatings: Rule 1113 governs the sale, use, and manufacturing of architectural coatings and limits the VOC content in sealers, coatings, paints, and solvents. This rule regulates the VOC contents of paints available during construction. Therefore, all paints and solvents used during construction and operation of the proposed Project must comply with SCAQMD Rule 1113.

Rule 1143 Paint Thinners: Rule 1143 governs the sale, use, and manufacturing of paint thinners and multi-purpose solvents that are used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations. This rule regulates the VOC content of solvents used during construction. Solvents used during construction and operation of the proposed Project must comply with SCAQMD Rule 1143.

Rule 1403 Asbestos Removal: Rule 1403 governs asbestos emissions from demolition and renovation activities. The existing structures on the Project Site must be surveyed for asbestos prior to demolition activities. If asbestos is found within the existing structures, the asbestos would be removed through utilization of the removal procedures detailed in Rule 1403.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the federally designated Metropolitan Planning Organization (MPO) for most of the southern California region and is the largest MPO in the nation. With respect to air quality planning, SCAG has prepared the *2024-2050 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS), adopted by SCAG on April 4, 2024, which is based on the regional development and growth forecasts provided in the *2023 Federal Transportation Improvement* Program, adopted October 2022. However, per SB 375, SCAG and CARB are required to work together until CARB staff conclude that the calculations and quantifications provided would yield accurate estimates of GHG emission reductions. Since CARB staff continue to have significant outstanding concerns about the technical methodology utilized in the Connect SoCal 2024, the current approved RTP/SCS is the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*, adopted September 3, 2020, which is based on the 2019 *Federal Transportation Improvement Program*, adopted September 2018. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. These plans form the basis for the land use and transportation components of the AQMP, which are used in the preparation of air quality forecasts and in the consistency analysis included in the AQMP. The Connect SoCal 2020, 2019 FTIP, and AQMP are based on projections originating within the City and County General Plans.

LOCAL

City of Walnut General Plan

Local jurisdictions, such as the City of Walnut, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City of Walnut is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City of Walnut is also responsible for the implementation of transportation control measures as outlined in the AQMPs. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. However, the City of Walnut is not expected to have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the City and region meets federal and state standards. Instead, the City of Walnut relies on the expertise of the SCAQMD and utilizes the SCAQMD's CEQA guidance documentation for the environmental review of plans and development proposals within its jurisdiction.

5.3.4 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?

REGIONAL AIR QUALITY

The SCAQMD has established air quality emissions thresholds for criteria air pollutants for the purpose of determining whether a project may have a significant effect on the environment per Section 15002(g) of the Guidelines for implementing CEQA. By reducing emissions to be below the thresholds of significance, the Project would be in compliance with the SCAQMD Air Quality Management Plan (AQMP) and the federal and state air quality standards. Table 5.3-1, *SCAQMD Regional Air Quality Significance Thresholds*, lists the air quality significance thresholds for the six criteria air pollutants analyzed in this document. Lead is not included as part of this analysis because the Project is not expected to emit lead in any significant measurable quantity based on the nature of proposed activities. The major sources of lead emissions include metal processing plants (e.g., lead smelters), lead aviation gasoline, waste incinerators, utilities, and lead-acid battery manufacturers (CARB 2024).

Table 5.3-1
SCAQMD Regional Air Quality Significance Thresholds

Mass Daily Thresholds		
Pollutant	Construction (lbs/day)	Operation (lbs/day)
NO_X	100	55
VOC	75	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_X	150	150
CO	550	550
Source: Vista Environmental, *Air Quality Report*; April 17, 2024.		

For the purposes of this air quality impact analysis, a regional air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds during construction or operations as identified in Table 5.3-1.

LOCAL AIR QUALITY

Table 5.3-2, *SCAQMD Localized Air Quality Significance Thresholds (LST)*, lists the Localized Significance Thresholds (LST) used to determine whether a project may generate significant adverse localized air quality impacts. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard. LSTs are developed based on the ambient concentrations of four applicable air pollutants for Source Receptor Area (SRA) 10 – Pomona/Walnut Valley for a 3-acre site at a distance of 25 meters to the nearest sensitive receptor. Although the nearest sensitive receptors are located approximately less than 25 meters (82 feet) from the Project Site, SCAQMD LST methodology states that projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.

Table 5.3-2
SCAQMD Localized Air Quality Significance Thresholds (LST)

Pollutant	Construction (lbs/day)	Operation (lbs/day)
NO_X	270	270
CO	1,577	1,577
PM_{10}	13	4
$PM_{2.5}$	8	2
Source: Vista Environmental, *Air Quality Report*; April 17, 2024.		

For the purposes of this air quality impact analysis, a localized air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds during construction or operations as identified in Table 5.3-2.

TOXIC AIR CONTAMINANTS

According to the Air Quality Report (Appendix C), the SCAQMD CEQA Handbook states that any project that has the potential to expose the public to toxic air contaminants in excess of the following thresholds would be considered to have a significant air quality impact:

- If the Maximum Incremental Cancer Risk is 10 in one million or greater; or
- Toxic air contaminants from the Project would result in a Hazard Index increase of 1 or greater.

ODORS

According to the Air Quality Report (Appendix C), the SCAQMD CEQA Handbook states that an odor impact would occur if a project creates an odor nuisance pursuant to SCAQMD Rule 402, 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 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."

5.3.5 ENVIRONMENTAL IMPACT ANALYSIS

CONSTRUCTION IMPACTS

Project construction is expected to consist of demolition, site preparation, grading, building construction, paving, and architectural coating (i.e., paints and finishes) and is estimated to take approximately 18 months to complete. The anticipated construction equipment, construction-stage schedule, and worker/vendor vehicle trips were based on the California Emissions Estimator Model (CalEEMod) default survey data. No significant import or export of earthwork material is anticipated as the projected 60,000 cubic yards of cut material estimated during grading is proposed to be balanced onsite (i.e., reused as fill material).

Construction stages are not expected to overlap based on the proposed development approach and the relatively small size of the Project Site. The anticipated equipment and estimated schedule by construction stage are as follows:

- Demolition equipment would include one concrete/industrial saw, three excavators, and two rubber-tired dozers for approximately 20 days. Three water trucks, waste hauling truck trips, and worker travel trips were also modeled.
- Site preparation equipment would include three rubber-tired dozers and four of either tractors/loaders/backhoes for approximately 10 days. Three water trucks and worker travel trips were also modeled.
- Grading would include two excavators, one grader, one rubber-tired dozer, two scrapers and four of either tractors/loaders/backhoes for approximately 20 days. Three water trucks and worker travel trips were also modeled.
- Building construction would include one crane, three forklifts, one generator set, one welder, and three of either tractors/loaders/backhoes for approximately 300 days. Worker and vendor travel trips were also modeled.
- Paving would include two pavers, two paving equipment, and two rollers for approximately 20 days. Worker travel trips were also modeled.
- Architectural coating would include one air compressor for approximately 20 days. Worker travel trips were also modeled.

The Project Applicant/Developer's contractor must also follow mandatory SCAQMD rules and requirements with regard to fugitive dust control as described in Section 5.3.3. Compliance with the standard dust control measures is considered to be part of the conditions of approval for the Project and is reflected in the estimated construction emissions discussed below.

OPERATIONAL IMPACTS

The Project's operational stationary source (or area source) emissions were estimated using CalEEMod based on the proposed residential land use and number of residential units. The Project's mobile source emissions estimates were based on vehicle trip generation information provided by the *Transportation Impact Study* (Appendix K1).[2] Emissions related to energy use, solid waste generation, water use, and wastewater generation were also included in the modeling.

IMPACT AQ-1: Conflict with or obstruct implementation of the applicable air quality plan?

The Project would be considered consistent with SCAQMD's AQMP if it does not interfere with the region's ability to comply with federal and state air quality standards. Two key indicators of consistency are as follows:

1) Whether the Project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

[2] The Air Quality Report's operational analysis was based in part on trip generation rates provided in an earlier version of the Project's Transportation Impact Study. Consistent with the City's transportation study guidelines, additional traffic counts were taken in 2025 to update the Project's Transportation Impact Study to be more current; however, the trip generation rates did not change. Therefore, the 2024 Air Quality Report was deemed adequate without the need for a revised analysis.

2) Whether the Project would exceed the assumptions in the AQMP, or increments based on the year of Project buildout and phase.

As discussed below, Project emissions would remain below SCAQMD's significance thresholds and in conformance with the state and federal attainment goals for criteria pollutants. The Project would also be consistent with the land use assumptions of the City's General Plan; and therefore, consistent with the land use and buildout assumptions of the AQMP.

SHORT-TERM CONSTRUCTION IMPACTS

Based on the air quality modeling analysis, the Project's short-term maximum daily construction emissions were estimated for each construction stage. Construction-related daily air quality emissions include both onsite emission sources (e.g., equipment and dust) and offsite emission sources (e.g., worker and vendor vehicle trips). The Project's construction emissions would not result in significant impacts when compared to SCAQMD's regional thresholds of significance and SCAQMD's localized thresholds of significance, as shown in Table 5.3-3, *Regional and Localized Construction-Related Criteria Pollutant Emissions*. Note, SCAQMD does not have localized thresholds for VOC or SO_2.

Table 5.3-3
Regional and Localized Construction-Related Criteria Pollutant Emissions

Season and Year of Construction	Pollutant Emissions (pounds/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer 2025	3.39	31.8	31.4	0.06	7.81	4.05
Winter 2025	1.17	10.6	13.7	0.02	0.58	0.43
Summer 2026	1.11	9.99	13.6	0.02	0.53	0.39
Winter 2026	60.3	10.0	13.6	0.02	0.53	0.39
Maximum Daily Construction Emissions	**60.3**	**31.8**	**31.4**	**0.06**	**7.81**	**4.05**
SCQAMD Regional Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
SCAQMD Local Thresholds[1]	**--**	**178**	**1,112**	**--**	**8**	**5**
Exceeds Threshold?	No	No	No	No	No	No

Notes:
[1] The nearest sensitive receptors to the Project Site are single-family homes located as near as 30 feet (9 meters) east of the Project Site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25-meter threshold. Calculated from SCAQMD's Mass Rate Look-up Tables for two and five acres in Air Monitoring Area 10, Pomona/Walnut Valley.
Source: Vista Environmental, *Air Quality Report*; April 17, 2024.

Table 5.3-1, *SCAQMD Regional Air Quality Significance Thresholds*, shows that the Project's construction emissions would be below the applicable SCAQMD regional and localized standards and thresholds of significance and in compliance with the AQMP. As a result, the Project would not contribute substantially to an existing or projected air quality violation. Therefore, the Project's short-term impact from construction-related air quality emissions would be less than significant and no mitigation is required.

LONG-TERM OPERATIONAL IMPACTS

Operational daily air quality emissions include both onsite emission sources (e.g., residential uses) and offsite emission sources (e.g., resident vehicle trips); and represent the worst-case daily emission levels during summer or winter. The Project's operational emissions would not result in significant impacts when compared to SCAQMD's regional thresholds of significance and SCAQMD's localized thresholds of significance, as shown in Table 5.3-4, *Regional and Localized Operational-Related Criteria Pollutant Emissions*. Note, SCAQMD does not have localized thresholds for VOC or SO_2.

Table 5.3-4
Regional and Localized Operational-Related Criteria Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Mobile Sources[1]	0.82	0.67	7.17	0.02	1.66	0.43
Area Sources[2]	4.49	0.46	1.72	<0.01	0.04	0.04
Energy Usage[3]	0.02	0.26	0.11	<0.01	0.02	0.02
Total Emissions	**5.33**	**1.39**	**9.00**	**0.02**	**1.72**	**0.49**
SCQAMD Regional Operational Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
SCAQM Local Operational Thresholds[4]	**--**	**178**	**1,112**	**--**	**2**	**1**
Exceeds Threshold?	No	No	No	No	No	No

Notes:
[1] Mobile sources consist of emissions from vehicles and road dust.
[2] Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
[3] Energy usage consists of emissions from natural gas usage.
[4] The nearest sensitive receptors to the Project Site are single-family homes located as near as 30 feet (9 meters) east of the Project Site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25-meter threshold. Calculated from SCAQMD's Mass Rate Look-up Tables for two and five acres in Air Monitoring Area 10, Pomona/Walnut Valley.
Source: Vista Environmental, *Air Quality Report*; April 17, 2024.

Table 5.3-4 shows that the Project's operational emissions would be below the applicable regional and localized SCAQMD standards and thresholds of significance and in compliance with the AQMP. As a result, the Project would not contribute substantially to an existing or projected air quality violation. Therefore, the Project's long-term impact from operational-related air quality emissions would be less than significant, and no mitigation is required.

SUMMARY OF IMPACTS

As shown in Table 5.3-3 and Table 5.3-4, Project-related construction and operational emissions would be below the applicable SCAQMD thresholds of significance at the regional and local levels. The Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Potential impacts would be less than significant, and no mitigation is required.

The proposed residential development would also be a compatible use to the existing single-family residential uses on the Project Site and in the Project vicinity. As such, the Project would be in substantial compliance with the City's Land Use Element's goals and policies. Therefore, the Project would not result in an inconsistency with the current land use designations with respect to the regional forecasts utilized by the AQMP. The Project is not anticipated to exceed the AQMP's land use assumptions for the Project Site and is, therefore, found to be consistent with the AQMP. Potential impacts would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on projected emissions compared to SCAQMD's significance thresholds for criteria pollutants and based on consistency with the land use assumptions of the City's General Plan and AQMP.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT 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 of state ambient air quality standard?

As previously discussed in section IMPACT AQ-1, the Project's estimated construction and operational emissions would be less than significant when compared to SCAQMD's regional and localized thresholds of significance for criteria pollutants. The Project's projected emission levels and applicable thresholds are presented in Tables 5.3-1 through 5.3-4. Because SCAQMD considers an individual project's contribution to air quality within the Air Basin cumulatively with their established thresholds, an individual project is considered less than significant on a cumulative level if the estimated project-level emissions are found to be below the established thresholds. Since Project-specific emissions were estimated below the applicable thresholds and determined less than significant, the Project's cumulative contribution to air quality pollutants within the Air Basin are also considered less than significant. Therefore, the Project would not 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. Impacts are considered less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on projected emissions compared to SCAQMD's significance thresholds for criteria pollutants.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT AQ-3: Expose sensitive receptors to substantial pollutant concentrations?

As previously identified in Section 5.3.2, the nearest sensitive receptors to the Project Site are residents at the single-family homes on the east side of the Project Site, where the nearest home is approximately 30 feet to the east. There is also a fire station located as near as 60 feet west of the Project Site and a church located as near as 100 feet north of the Project Site. The nearest K-12 school is Vejar Elementary School, which is sufficiently far from the Project Site at approximately 0.3 mile. The nearest sensitive receptors were considered to be less than 25 meters (82 feet) from the Project Site, consistent with SCAQMD's methodology for receptors closer than 25 meters.

SHORT-TERM CONSTRUCTION IMPACTS

Project construction activities would include demolition, site preparation, and grading of the Project Site, building construction and application of architectural coatings (e.g., paints) to the proposed single-family residential structures, and paving of the proposed internal street system. The Project would generate diesel particulate matter (DPM), a known source of toxic air contaminants (TACs), during construction from off-road diesel equipment and trucks. However, the proposed Project's construction activity is not expected to be a long-term (i.e., 30 years) source of toxic air contaminant emissions. Due to the significantly reduced risk from short-term exposure, SCAQMD does not typically require the evaluation of long-term cancer risk or chronic health impacts for construction operations for a Project of this size; however, a construction emissions cancer health risk assessment was prepared.

Most of the estimated health risk from TACs can be attributed to relatively few compounds, the most important of which is DPM. DPM is a subset of $PM_{2.5}$ because the size of diesel particles are typically 2.5 microns and smaller. Diesel engines emit a complex mixture of air pollutants, composed of gaseous and solid material. Diesel exhaust also contains a variety of harmful gases and over 40 other cancer-causing

substances. California's identification of DPM as a TAC was based on its potential to cause cancer, premature deaths, and other health problems. Exposure to DPM is a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. Overall, diesel engine emissions are responsible for the majority of California's potential airborne cancer risk from combustion sources.

In order to provide a perspective of risk, it is often estimated that the incidence in cancer over a lifetime for the U.S. population ranges around 1 in 3, or a risk of about 300,000 per million persons. The SCAQMD conducted the Multiple Air Toxics Exposure Study (MATES) studies, which estimated that of cancers associated with known risk factors, about 30% were related to tobacco, about 30% were related to diet and obesity, and about 2% were associated with environmental pollution related exposures that includes hazardous air pollutants. The Project Site is located in the South Coast Air Basin, which has an average estimated cancer risk of 299 per million persons chance of cancer. In comparison, the estimated cancer risk for the Project vicinity is 471 per million persons.

As previously discussed, the Project would be considered to have a significant air quality impact if the potential to expose the public to toxic air contaminants would be in excess of the following thresholds:

- If the Maximum Incremental Cancer Risk is 10 in one million or greater; or
- Toxic air contaminants from the Project would result in a Hazard Index increase of 1 or greater.

Table 5.3-5, *Construction-Related DPM Emissions Cancer Risks*, provides a summary of the calculated DPM concentrations at the nearest sensitive receptors and associated cancer risk from DPM emissions at the nearby homes, church, and fire station.

Table 5.3-5
Construction-Related DPM Emissions Cancer Risks

Sensitive Receptor[1]	Receptor Location		Annual DPM Concentration (µg/m³)		Cancer Risk Per Million People[2]
	X	Y	2025	2026	
1	419,940	3,765,416	0.0042	0.0037	0.8
2	420,156	3,765,418	0.0088	0.0078	1.8
3	420,217	3,765,309	0.0069	0.0061	1.4
4	420,124	3,765,228	0.0089	0.0079	1.8
5	420,149	3,765,130	0.0152	0.0134	3.0
6	420,187	3,764,988	0.0102	0.0090	2.0
7	420,182	3,764,931	0.0168	0.0149	3.4
8	420,080	3,764,813	0.0156	0.0138	3.1
9	419,935	3,764,947	0.0040	0.0035	0.8
10	419,883	3,765,116	0.0036	0.0032	0.7
				Threshold of Significance	10
				Exceed Threshold?	No

Notes:
1 The locations of each Sensitive Receptor are shown in Figure 5.3-1, *AERMOD Model Construction Sources and Receptors Placement*.
2 The residential cancer risk based on: C_{air} (2025) * 55 + C_{air} (2026) * 164.
Source: Vista Environmental, *Air Quality Report*; April 17, 2024.

Table 5.3-5 shows that the cancer risk from construction-related DPM emissions would be as high as 3.4 per million persons at the single-family homes located on the east side of the Project Site; therefore, the Project-related cancer risk from construction-related DPM emissions would be well below the SCAQMD's threshold of 10 per million persons. This analysis indicates Project construction would result in a less than significant impact due to the cancer risk from DPM emissions. In addition, Table 5.3-5 shows that the highest annual offsite concentration of DPM would be 0.0168 $\mu g/m^3$, which when modeled, would result in a Hazard Index increase of 0.00336. Because the modeled Hazard Index increase would be less than 1, per the criteria threshold, the Project's potential impact on chronic health is considered less than significant. Based on the analysis presented above, impacts are considered less than significant, and no mitigation is required.

LONG-TERM OPERATIONAL IMPACTS

The SCAQMD does not consider residential land uses to be a major source of TACs that may result in exposure of sensitive receptors to significant pollutant concentrations. Examples of land uses that are major sources of TACs include distribution centers with heavy truck traffic, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing stations.

The Project's local air quality impacts would occur from onsite sources such as maintenance of architectural coatings, landscaping equipment, and onsite usage of natural gas appliances. As presented in Table 5.3-4, *Regional and Localized Operational-Related Criteria Pollutant Emissions*, the Project's operational emission levels would not exceed SCAQMD's localized significance thresholds for the applicable criteria pollutants: NO_X, CO, PM_{10}, or $PM_{2.5}$. Based on the proposed residential land use and low estimated emission levels, impacts are considered less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on proposed residential land uses and projected emissions compared to SCAQMD's localized significance thresholds for criteria pollutants.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Generally, the impact of an odor results from a variety of factors such as frequency, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to an odor in the ambient environment. The intensity refers to an individual's or group's perception of the odor strength or concentration. The duration of an odor refers to the elapsed time over which an odor is experienced. The offensiveness of the odor is the subjective rating of the pleasantness or unpleasantness of an odor. The location accounts for the type of area in which a potentially affected person lives, works, or visits; the type of activity in which he or she is engaged; and the sensitivity of the impacted receptor.

Sensory perception has four major components: detectability, intensity, character, and hedonic tone. The detection (or threshold) of an odor is based on a panel of responses to the odor. There are two types of thresholds: the odor detection threshold and the recognition threshold. The detection threshold is the lowest concentration of an odor that will elicit a response in a percentage of the people that live and work in the immediate vicinity of the Project Site and is typically presented as the mean (or 50% of the population). The recognition threshold is the minimum concentration that is recognized as having a characteristic odor quality, this is typically represented by recognition by 50% of the population. The intensity refers to the perceived strength of the odor. The odor character is what the substance smells like.

The hedonic tone is a judgment of the pleasantness or unpleasantness of the odor. The hedonic tone varies in subjective experience, frequency, odor character, odor intensity, and duration. Potential odor impacts have been analyzed separately for construction and operations below.

SHORT-TERM CONSTRUCTION IMPACTS

Potential sources of odors during construction activities include the application of coatings such as asphalt pavement, paints, and solvents and from emissions from diesel equipment. Standard construction requirements that limit the time of day when construction may occur as well as SCAQMD Rule 1108 that limits VOC content in asphalt and Rule 1113 that limits the VOC content in paints and solvents would minimize odor impacts from construction. As such, the objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the Project Site's boundaries. Through compliance with the applicable regulations that reduce odors and due to the transitory nature of construction odors, a less than significant odor impact would occur, and no mitigation would be required.

LONG-TERM OPERATIONAL IMPACTS

The Project operation does not propose land uses or facilities identified as likely to be associated with the generation of odors or dust by the SCAQMD (SCAQMD 2005). Such facilities, for example, include those associated with agriculture, chemical plants, asphalt and cement plants, composting operations, auto body facilities, dairy facilities, and landfills. The proposed Project would consist of a residential development. Potential sources that may emit odors during on-going operations would primarily occur from the trash storage areas. Pursuant to City regulations, permanent trash enclosures that protect trash bins from rain as well as limit air circulation would be required for the trash storage areas. Based on the type of development and with implementation of standard City requirements, potential impacts would be less than significant.

Level of Impact Before Mitigation: Less than significant impact based on compliance with standard regulations and proposed residential land uses.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.3.6 CUMULATIVE IMPACTS

As previously discussed in section IMPACT AQ-2, the Project's estimated construction and operational emissions would be less than significant when compared to SCAQMD's regional and localized thresholds of significance for criteria pollutants. The Project's projected emission levels and applicable thresholds are presented in Tables 5.3-1 through 5.3-5. Since Project-specific emissions were estimated below the applicable thresholds and determined less than significant, the Project's cumulative contribution to air quality pollutants within the Air Basin are also considered less than significant. Cumulative projects identified in Section 4.0, *Basis for Cumulative Impacts*, would also be subject to the same environmental review for compliance with the applicable SCAQMD thresholds. Therefore, the Project would not result in a cumulatively considerable impact to air quality. Impacts are considered less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on compliance with standard regulations, estimated emission levels, and proposed residential land uses.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.3.7 MITIGATION MEASURES

No mitigation measures are required for air quality.

5.3.8 REFERENCES

California Air Resources Board (CARB), *Lead and Health.* 2024. Accessed January 17, 2024 at https://ww2.arb.ca.gov/resources/lead-and-health#:~:text=The%20major%20sources%20of%20lead, and%20lead%2Dacid%20battery%20manufacturers.

City of Walnut, City of Walnut General Plan. Adopted May 9, 2018.

Linscott, Law & Greenspan, Engineers (LLG), *Transportation Impact Study, The Brookside (TTM 72798) Project*. February 14, 2024.

South Coast Air Quality Management District (SCAQMD), *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. May 6, 2005. Accessed January 2024 at https://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf.

Vista Environmental, *Air Quality, Energy, and Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis*. April 17, 2024.

5.4 BIOLOGICAL RESOURCES

5.4.1 INTRODUCTION

This section evaluates the proposed Project's potential impacts on biological resources. The analysis in this section is based in part on the following technical documents:

- *Biological Technical Report for the Brookside Development Project*, VCS Environmental, June 2025 (Appendix D). The following reference documents are included in the Biological Technical Report's Appendices:
  - Arborist Report; March 16, 2023 [*Appendix C*].
  - Bat Habitat Assessment and Focused Survey; March 20, 2023 [*Appendix E*].
  - Burrowing Owl Habitat Assessment and Focused Survey; March 20, 2023 [*Appendix F*].
  - California Gnatcatcher Habitat Assessment; June 30, 2023 [*Appendix G*].
  - Least Bell's Vireo Focused Survey Report; March 2023 [*Appendix H*].
  - Southwestern Pond Turtle Habitat Assessment and Focused Survey; March 20, 2023 [*Appendix I*].
  - Crotch's Bumble Bee Survey Report; January 11, 2024 [*Appendix J*].

Based on the Biological Technical Report, the "Study Area" for biological resources included the Project Site and various distance buffers around the Project Site based on species for field surveys and aerial reviews as detailed in the Biological Technical Report. In terms of database research for the Study Area, a two-mile search radius from the Project Site was used. The "Impact Area" includes the approximate 19.82 acres of the Project Site that would be directly impacted by Project construction activities.

5.4.2 ENVIRONMENTAL SETTING

The Project Site has one associated address, 800 Meadow Pass Road, and consists of Lots 1 and 2 of Tract 45378 and Assessor's Parcels 8709-093-001, 8709-093-002, and 8709-093-003 (Project Site). Project Site It is located within Section 6, Township 2s, Range 9W of the United States Geological Survey (USGS) Topographic Map.

The Project Site consists of approximately 25.84 acres and was previously occupied by the Brookside Equestrian Center, which has been closed since 2014, after which there have been no ongoing equestrian operations on the Project Site. There are unused facilities remaining from discontinued equestrian activities, consisting of two stables, one of which has a second story residential addition (currently unoccupied), covered stalls, two fenced corrals, maintenance storage shed, three feed sheds within fenced areas, one outdoor arena, one covered open-air arena, and one gazebo. All structures have been vacated and closed. Unimproved gravel and dirt roads traverse the Project Site and allow for vehicle access and irrigation systems. Some existing improvements such as trails and fences are also present. Existing storm drains, culverts, water lines and sewer lines also occur onsite. No wells, septic systems, underground vaults, or underground storage tanks were reported or observed on the Project Site. Onsite topography consists of rolling foothills and two water bodies that converge onsite: Lemon Creek and an unnamed tributary referred to as Drainage A. The site is primarily associated with the heavily incised Lemon Creek, which flows south through the central portion of the Project Site. The area immediately surrounding these streambeds is comprised of mixed forest with unpaved trails along either side. The majority of the Project Site is located between approximately 570 and 660 feet (174-201 meters) above mean sea level and slopes to the south.

EXISTING ONSITE CONDITIONS

Vegetation Communities

Vegetation/land cover mapping and acreages for each vegetation community and land type within the Project Site are shown in Table 5.4-1, *Vegetation Communities/Land Cover Observed*, and are depicted on Figure 5.4-1, *Vegetation/Land Cover*. A vegetation community/land cover is considered 0.10 acres or larger in size. The majority of the vegetation within the Project Site is characterized by annual brome grasslands and ruderal forbs.

Table 5.4-1
Vegetation Communities/Land Cover Observed

Vegetation Community/Land Cover Type	Acres
Annual Brome Grasslands & Ruderal Forbs	8.39
Disturbed/Developed	2.75
Eucalyptus/Shamel Ash/Pepper Tree Groves	7.75
Ornamental	6.24
Southern Sycamore Alder Riparian Woodland	0.72
Total	25.84*

Note: *Sum is 0.01 acre larger due to rounding; 25.84 acres is the correct total.
Source: VCS Environmental, *Biological Technical Report*; June 2025.

ANNUAL BROME GRASSLANDS AND RUDERAL FORBS

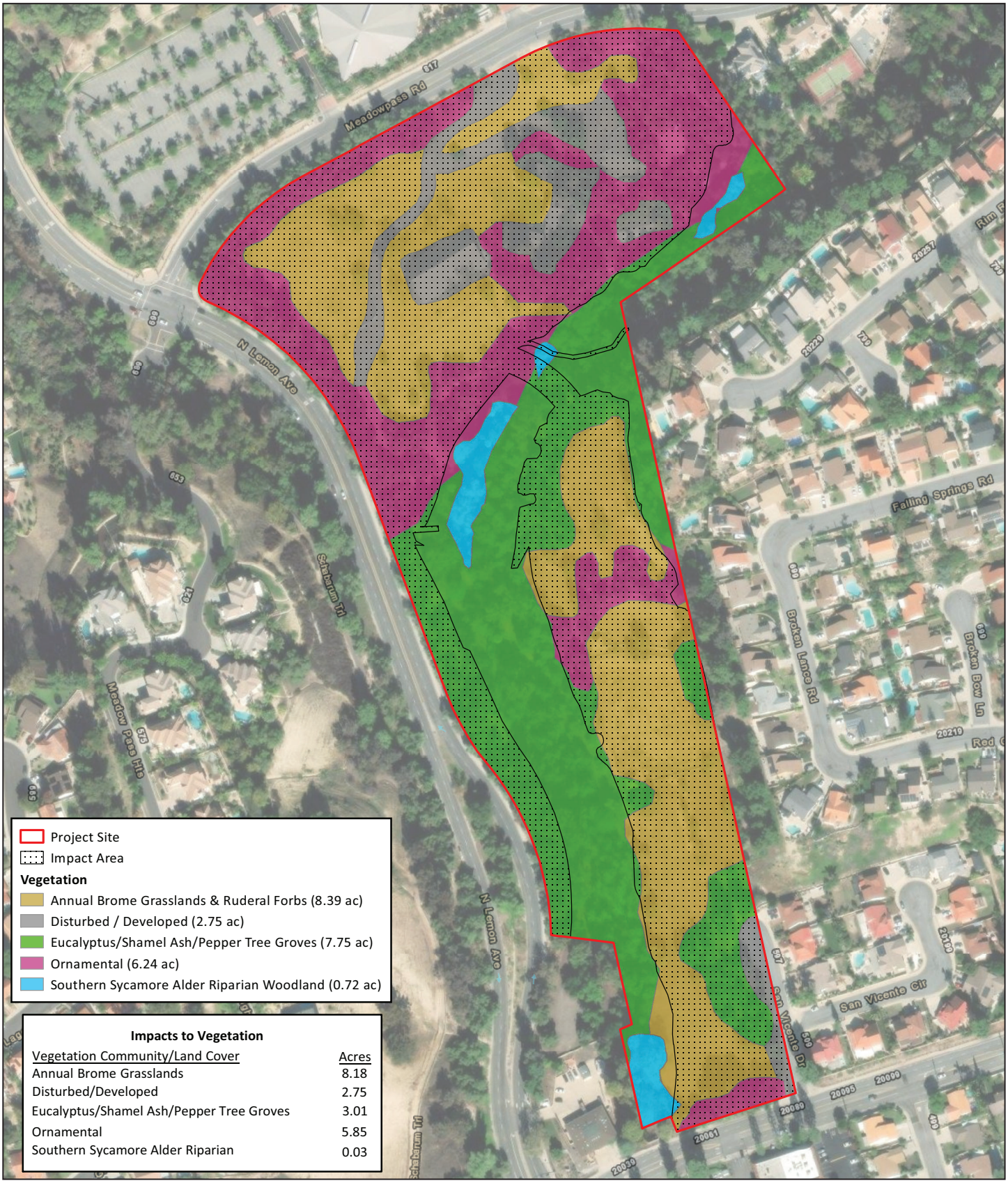
Several ruderal fields are located on the eastern side of the Project Site. This plant community is dominated by non-native grasses and early successional plant species. Plant species observed in this community include Bermuda grass (*Cynodon dactylon*), Italian ryegrass (*Festuca perennis*), Russian thistle (*Salsola australis*), Seaside heliotrope (*Heliotropium curassavicum*), cheeseweed (*Malva parviflora*), and panic veldtgrass (*Ehrharta erecta*). Direct impacts to this vegetation community would not be significant as none of the plant species in this vegetation community are considered sensitive and removal or disturbance of this community would not have a significant effect on sensitive or special status wildlife species.

DISTURBED/DEVELOPED

Small areas within the northern portion of the site can be characterized as disturbed/developed. These areas are generally in the area of the vacated former equestrian facilities described above. Direct impacts to this vegetation community would not be significant as none of the plant species in this community are considered sensitive and removal or disturbance of this community would not have a significant effect on sensitive or special status wildlife species.

EUCALYPTUS/SHAMEL ASH/PEPPER TREE GROVES

A eucalyptus/shamel ash/pepper tree plant community surrounds Lemon Creek, traversing the Project Site from the east continuing north to south. This plant community is multicanopied with no single dominant species. Co-dominant plant species observed include shamel ash (*Fraxinus uhdei*), white alder (*Alnus rhombifolia*), eucalyptus (*Eucalyptus* sp.), and Peruvian pepper tree (*Schinus molle*), within which occur occasional California walnut (*Juglans californica*), western sycamore (*Platanus racemosa*), valley oak (*Quercus lobabta*) and Mexican fan palm (*Washingtonia robusta*). Due to the presence of dense shamel ash, eucalyptus, and Peruvian pepper, there is little to no vegetation in the understory. A full list of plant species observed is located in *Appendix B* of the *Biological Technical Report* (Appendix D). Direct impacts to this tree community on the Project Site could be considered potentially significant in certain areas, particularly with respect to oak and black walnut trees protected by the City's Tree Preservation ordinance.



Source: VCS Environmental; July 2024.

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Vegetation/Land Cover

VCS Environmental

Figure 5.4-1

ORNAMENTAL

The ornamental plant community is located along the perimeter of the southern, northern, northwestern, and northeastern portion of the site in addition to a small patch in the mid-eastern portion of the site. It consists mostly of Jacaranda (*Jacaranda mimosifolia*), Peruvian pepper trees, Ngaio tree (*Myoporum laetum*), Afghan Pine (*Pinus brutia* var. *eldarica*), western sycamore, and Brush cherry (*Syzgium paniculatum*). Direct impacts to the ornamental plant community have the potential be considered significant where native trees are impacted.

SOUTHERN SYCAMORE ALDER RIPARIAN WOODLAND

Southern sycamore alder riparian woodland community is located in the southern, northeastern, and central portion of the site along Lemon Creek. This vegetation community consists mostly of western sycamore trees and white alder. This vegetation community is not defined in the Manual of California Vegetation. Direct impacts to this riparian land cover type would be considered potentially significant where native trees are impacted.

SPECIAL STATUS VEGETATION COMMUNITIES

There are no special status vegetation communities within the Project Site.

Plants

A total of 74 plant species were observed within the Project Site during the 2022 biological surveys and are listed in *Appendix B* of the *Biological Technical Report* (Appendix D). Some of the more common non-native plant species observed include barley (*Hordeum* sp.), black mustard (*Brassica nigra*), and Russian thistle (*Salsola australis*). Common native species observed include toyon (*Heteromeles arbutifolia*). coast live oak (*Quercus agrifolia*), and valley oak (*Quercus lobata*).

In general, sensitive plant species include federally or state listed threatened or endangered species and those species listed on the California Native Plant Society's (CNPS) rare and endangered plant inventory. Species with the potential to occur onsite were analyzed based on distribution, habitat requirements, and existing site conditions.

As reflected in a Michael Baker International (MBI) Arborist Report updated May 10, 2017, an arborist survey for a prior development proposal with a different site plan for the Project Site was conducted in the fall of 2016. That survey identified 91 California black walnut (*Juglans nigra)* trees across the entire Project Site, only one of which was within the limits of grading of that proposed development. A March 16, 2023, Arborist Report for the current Project prepared by Rincon Consultants, Inc., noted that eleven of those black walnut trees fall within or are immediately adjacent to the Project's grading limits, with the canopies of four of those potentially impacted by Project construction. None of those eleven black walnut trees, however, are proposed for removal. California black walnut is a fairly small tree, growing to about 9 meters, and can be found on hillsides and canyons of southern California. It has a CNPS rare plant rank of 4.2[1]. California black walnuts are the primary constituent of a California walnut grove, which is designated as a

[1] CRPR: 4 = California Rare Plant Rank 4: Plants of Limited Distribution - A Watch List. 0.2 = fairly endangered in California (20-80% occurrences threatened/moderate degree and immediacy of threat).

sensitive vegetation community (global and state rarity rank of G3 and S3.2, respectively)[2] but a California walnut grove as so designated is not present on the Project Site.

The 2023 Arborist Report also identified one coast live oak (*Quercus agrifolia*) and seven valley oak (*Quercus lobata*) trees as being within or immediately adjacent to the Project's grading limits. None of those trees are proposed for removal.

No other special status plant species has a moderate or higher potential to occur within the Project Site (*Appendix D* of the *Biological Technical Report*).

Wildlife

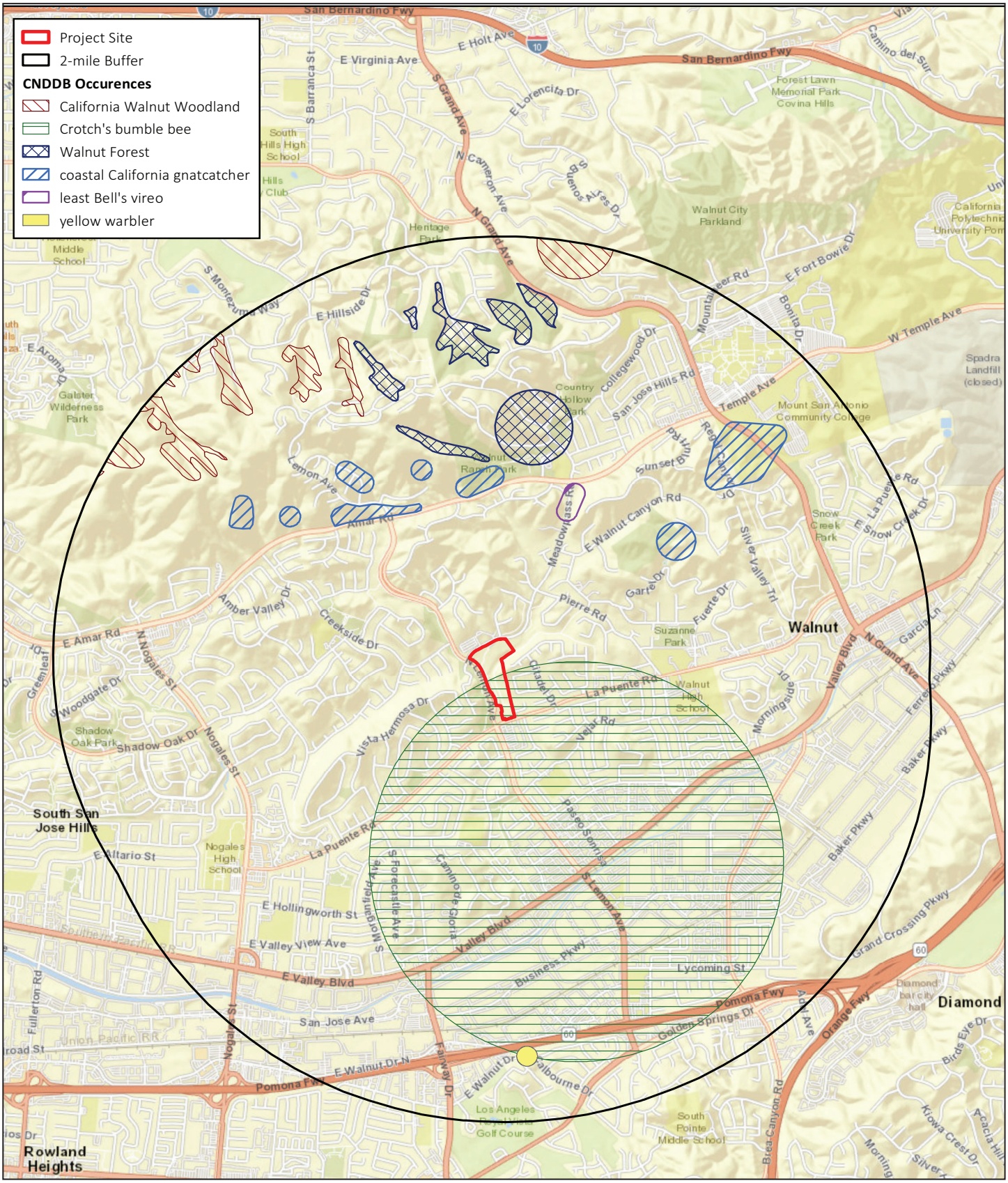
A total of 62 wildlife species, or signs thereof, were observed during the 2022 surveys and are listed in *Appendix B* of the *Biological Technical Report* (Appendix D). Some of the more common species observed include American crow (*Corvus brachyrhynchos*), Say's phoebe (*Sayornis saya*), mourning dove (*Zenaida macroura*), white-crowned sparrow (*Zonotrichia leucophyrs*), red-tailed hawk (*Buteo jamaicensis*), desert cottontail (*Sylvilagus audubonii*), and California ground squirrel (*Ostopermophilus beechey*).

Species of wildlife are designated "special status" by federal agencies, state agencies (e.g., United States Fish and Wildlife Service [USFWS], California Department of Fish and Wildlife [CDFW], and United States Forest Service [USFS]), and/or non-governmental organizations because of their recognized rarity, potential vulnerability to extinction, and local importance. These species typically have a limited geographic range and/or limited habitat and are referred to collectively as "special status" species. According to the California Natural Diversity Database (CNDDB), California walnut woodland, Crotch's Bumble Bee, walnut forest, coastal California gnatcatcher, least Bell's vireo, and yellow warbler have historically been recorded occurring within 2 miles of the Project Site as shown on Figure 5.4-2, *CNDDB Occurrences*.

No special status animal species were observed within the Project Site during the 2022 general biological survey; however, eight special status animal species were observed during the 2022 and 2023 focus surveys. The five special status animal species observed within the Project Site during the focus surveys include yellow warbler (*Setophaga petechia*), Least Bell's Vireo (one migrant; *Vireo bellii pusillus* (LBV)), silver-haired bat (*Lasionycteris noctivagans*), hoary bat (*Lasiurus cinereus*), and Crotch's Bumble Bee (one in-transit; *Bombus crotchii* (CBB)). The three special status animal species observed within the Study Area include Cooper's hawk (*Accipiter cooperii*), Vaux's swift (*Chaetura vauxi*), and Lawrence's goldfinch (*Spinus lawrencei*). A complete list of sensitive wildlife species analyzed with potential to occur within the Project Site is included in *Appendix D* of the *Biological Technical Report* (Appendix D).

Five special status animal species not observed but with at least a low to moderate or higher potential to occur within the Project Site include Monarch butterfly (*Danaus plexippus*), pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus*), and western yellow bat (*Lasiurus xanthinus*). All other special status wildlife species analyzed exhibit a low potential to occur within the Project Site (*Appendix D* of the *Biological Technical Report*).

[2] G3 and S3 = Vulnerable – At moderate risk of extinction due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors. S3 = Vulnerable – At moderate risk of extirpation in the state due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors.



Source: VCS Environmental; July 2024.

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CNDDB Occurrences

VCS Environmental

Figure 5.4-2

CRITICAL HABITAT

The USFWS's online service for information regarding Threatened and Endangered Species Final Critical Habitat designation within California was reviewed to determine if the Project Site occurs within any species designated Critical Habitat. No Critical Habitat exists within the Project Site. The nearest critical habitat is for California Gnatcatcher, located approximately 0.9 miles north of the Project Site, as shown in Figure 5.4-3, *Critical Habitat*.

WILDLIFE MOVEMENT

Wildlife corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. The fragmentation of open space areas by urbanization creates isolated "islands" of wildlife habitat. Corridors effectively act as links between different populations of a species. An increase in a population's genetic variability is generally associated with an increase in a population's health.

Corridors mitigate the effects of habitat fragmentation by:

- Allowing wildlife to move between remaining habitats, which allows depleted populations to be replenished and promotes genetic diversity;
- Providing escape routes from fire, predators, and human disturbances, thus reducing the risk that catastrophic events (such as fires or disease) will result in population or local species extinction; and
- Serving as travel routes for individual wildlife species as they move within their home ranges in search of food, water, mates, and other needs.

Wildlife movement activities usually fall into one of three movement categories:

- Dispersal (e.g., juvenile animals from natal areas, individuals extending range distributions);
- Seasonal migration; and
- Movements related to home range activities (foraging for food or water, defending territories, searching for mates, breeding areas, or cover).

Although a portion of the Project Site is disturbed, it offers cover and suitable habitat for dispersing wildlife species. Lemon Creek and the associated mixed forested vegetation, which runs through the Project Site, provide a useful area for local wildlife movement. Wildlife species such as skunks, opossums, raccoons, fish, and birds may travel through the site and neighboring developed areas for connectivity between larger open spaces, but the Project Site does not provide connectivity between large areas of open space on a regional scale. It is more likely that wildlife species would disperse through undisturbed habitat as opposed to the developed urban land surrounding Lemon Creek and the Project Site. Although the Project Site may serve a limited function in local wildlife dispersal and foraging, due to the obstruction of the surrounding roads and urban development, it is not expected that the Project Site would function as a regional wildlife movement corridor. In terms of wildlife movement through Lemon Creek, such as fish, no fish were observed in Lemon Creek during the biological surveys. According to review of the CNDDB records, no fish species have been historically recorded in this area or within a two-mile radius of the Project Site. In addition, the City of Walnut does not include Essential Fish Habitat (EFH) according to review of the National Oceanic and Atmospheric Administration's EFH database as discussed in the Biological Technical Report.



Source: VCS Environmental; July 2024.

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Critical Habitat

VCS Environmental

Figure 5.4-3

AVIAN NESTING AND BAT ROOSTS

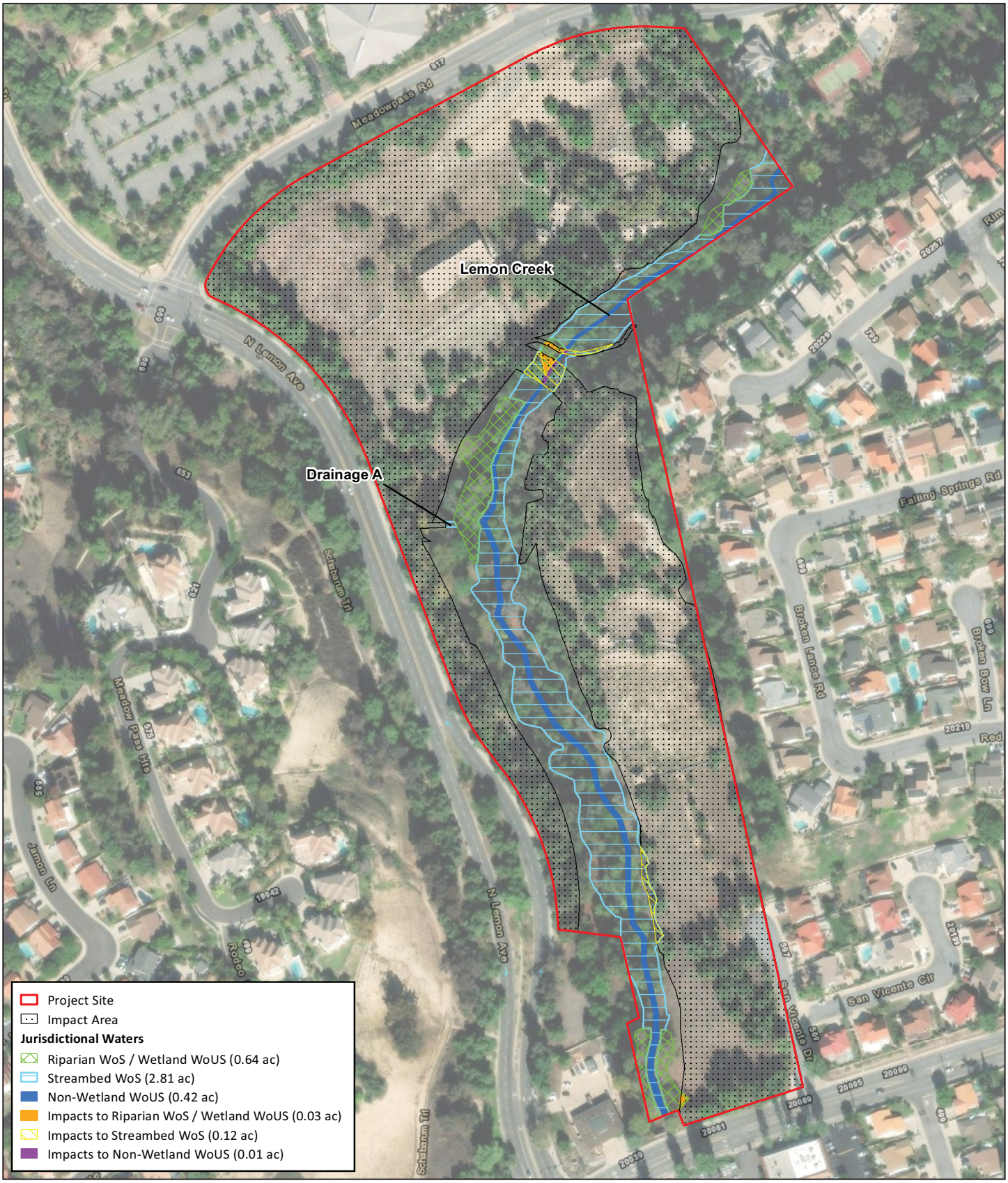
Birds can nest in a variety of different habitats, including disturbed/developed areas, shrubs, trees, and burrows. The Project Site, particularly the habitat associated with Lemon Creek, has potential to support avian foraging and various avian species and raptor nests due to the presence of shrubs and trees. Additionally, some avian species nest on the ground and there is potential for ground nesting birds to use the Project Site. Therefore, there is potential for avian nesting and foraging within the Project Site. If construction activities are to take place during nesting season, a preconstruction nesting bird survey should be performed to assess the site prior to start of work to remain in compliance with State and Federal laws. There is also potential for bat roosting to occur within the Project Site. During the 2022 focused bat survey, bats were observed foraging and day roosting in the Project Site, but no maternity roosts were observed. There is potential for bat roosting to occur within the Project Site primarily in the trees, man-made structures, and within the culverts associated with Lemon Creek. Potential also exists for foraging throughout the riparian habitat.

Jurisdictional Waters

The Project Site is located within the San Gabriel watershed and the upper San Jose Creek subwatershed. Lemon Creek begins at the south-facing hillside in Walnut Ranch Park, approximately one mile north of the Project Site. Flows from the south-facing hillside and runoff from residential development collect in Lemon Creek. Lemon Creek traverses through the central portion of the site in a north to south direction. Lemon Creek enters the northeastern boundary of the site as an earthen feature and flows are conveyed southwest and then south through the Project Site. Vegetation associated with Lemon Creek consists of mixed native and non-native tree species, non-native grasses, and shrubs. The natural course of Lemon Creek has been altered and flows are conveyed through portions of channelization, rock rip-rap, and several culverts. A total of 0.42 acres (2,229 linear feet) of non-wetland Waters of the U.S. and 0.64 acres (611 linear feet) of wetland Waters of the U.S. were delineated within the Project Site; refer to Figure 5.4-4, *Jurisdictional Waters of the U.S. (WoUS) and State (WoS)*. Potential impacts to WoUS and WoS are regulated by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) as described below in Section 5.4.3, *Regulatory Setting*. The Project Site contains two drainage features (i.e., Lemon Creek and Drainage A) that have jurisdictional indicators including an Ordinary High Water Mark (OHWM) and evidence of water flow.

City-Protected Trees and Tree Surveys

The Walnut Municipal Code (WMC) provides for "the preservation of all healthy trees unless compelling reasons justify the removal of such trees" (see WMC Section 6.52.250). The WMC defines a "tree" to be "any oak tree of the genus Quercus including, but not limited to, Blue Oak (*Quercus douglasii*), California Black Oak (*Quercus kelloggi*), Valley Oak (*Quercus lobata*), California-Live Oak (*Quercus agrifolia*), Canyon Oak (*Quercus chrysolepia*), Interior Live Oak (*Quercus wislizenni*), Scrub Oak (*Quercus Dumosa*), and California Black Walnut (*Juglans californica*)." A substantial portion of the non-protected trees onsite are non-native and/or invasive. In a July 26, 2018, comment letter submitted on a draft EIR for a previously proposed development on the Project Site, the California Department of Fish and Wildlife stated that Lemon Creek "is heavily impacted by invasive plant species, impairing the biological function of this riparian habitat."



Source: VCS Environmental; July 2024.

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Jurisdictional Waters of the U.S. (WoUS) and State (WoS)

VCS Environmental

Figure 5.4-4

According to the updated Arborist Report conducted by Rincon dated March 16, 2023 ("Rincon survey") (*Appendix C* of the *Biological Technical Report*), a survey of City protected and non-protected trees within and immediately adjacent to grading limits of the Project Site was conducted in November 2021 (Note: for purposes of the City's tree preservation ordinance, non-protected trees include both natives and non-natives that are not protected by the City of Walnut). Additionally, the Rincon survey verified tree data from the previous MBI survey. Refer to Figure 3-11, *Overview Tree Locations and Impacts*, in Section 3.0, *Project Description*.

The MBI survey had indicated that there were approximately 1,877 trees of various species, both native and non-native, on the Project Site, including approximately 91 black walnuts and five oaks. The Rincon survey of 718 non-protected trees and 19 City-protected trees identified those trees that could potentially be impacted by Project implementation.

5.4.3 REGULATORY SETTING

FEDERAL

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) designates threatened and endangered animals and plants and provides measures for their protection and recovery. The "Take" of a listed animal or plant species in areas under federal jurisdiction is prohibited without obtaining a federal permit. A Take is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect or attempt to engage in any such conduct. Harm includes any act which kills or injures fish or wildlife, including significant habitat modification or degradation that significantly impairs essential behavioral patterns of fish or wildlife. Activities that damage the habitat of listed species require approval from U.S. Fish and Wildlife Service (USFWS) for terrestrial species or from National Marine Fisheries Service (NMFS) for marine species. FESA also requires determination of critical habitat for listed species and impacts to designated critical habitat is prohibited. FESA contains two pathways for obtaining permission to Take a listed species. Under Section 7 of FESA, a federal agency that authorizes, funds, or carries out a project that may affect a listed species or its critical habitat must consult with USFWS or NMFS to ensure that their actions do not jeopardize the continued existence of endangered or threatened species or result in the destruction or modification of the critical habitat of these species.

In those circumstances, a Biological Opinion (BO) would be prepared by USFWS and NMFS to determine if the activity would jeopardize the continued existence of the listed species. If a BO determines that the activity would not threaten the existence of the listed species and a no jeopardy opinion is provided, then a project may proceed. If a BO finds that a project would result in jeopardy to the listed species (jeopardy opinion), then reasonable and prudent measures would need to be incorporated into a project to reduce potential effects to a level that would not be likely to jeopardize the continued existence of the species. Under Section 10 of FESA, Incidental take permits may be sought when a non-federal entity believes their otherwise lawful activities may result in the Take of endangered or threatened animal species. A habitat conservation plan (HCP) must accompany an application for an incidental take permit. The habitat conservation plan associated with the permit ensures that the effects of the authorized incidental take are adequately minimized and mitigated.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) implements international treaties between the United States and other nations that protect migratory birds, including their nests and eggs, from killing, hunting, pursuing, capturing, selling, and shipping unless expressly authorized or permitted.

Clean Water Act

Pursuant to Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged and/or fill material into waters of the United States. Project proponents intending to work within jurisdictional waters under the purview of the USACE are required to obtain a 404 permit, which includes conditions that must be followed to protect and compensate for impacts to waters of the United States. The term "waters of the United States" is defined in USACE regulations as:

(1) All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide.

(2) All interstate waters including interstate wetlands.

(3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect foreign commerce including any such waters:

- Which are or could be used by interstate or foreign travelers for recreational or other purposes.
- From which fish or shellfish are or could be taken and sold in interstate or foreign commerce.
- Which are used or could be used for industrial purposes by industries in interstate commerce.

(4) All impoundments of waters otherwise defined as waters of the United States under the definition.

(5) Tributaries of waters identified in paragraphs (a)(1)-(4) of this section.

(6) The territorial seas.

(7) Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a)(1)-(6) of this section. Pursuant to Section 404 of the Clean Water Act, the term "wetlands" (a subset of "waters of the United States") is defined as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support ... a prevalence of vegetation typically adapted for life in saturated soil conditions. The methodology set forth in the USACE's 1987 Wetland Delineation Manual and the Arid West Supplement generally requires that, in order to be considered a wetland, the vegetation, soils, and hydrology of an area exhibit at least minimal hydric characteristics.

Projects with impacts to waters of the United States are regulated under Sections 401 and 404 of the Clean Water Act and by connectivity with adjacent watersheds. On June 22, 2020, a revised rule regarding jurisdictional Waters of the United States went into effect. The revised rule states that Waters of the United States do not include ephemeral features that flow only in direct response to precipitation, including ephemeral streams, swales, gullies, rills, and pools.

Additionally, on May 25, 2023, the United States Supreme Court issued its decision in *Sackett v. Environmental Protection Agency*, narrowing the scope of federal jurisdiction over wetlands under the Clean Water Act to "relatively permanent bod[ies] of water connected to traditional interstate navigable waters); and second, that … have a continuous surface connection with that water" (*Sackett v. EPA*, No. 21–454 (2023)). On August 29, 2023, the USACE and EPA issued a final rule to amend the final "Revised Definition of 'Waters of the United States' rule, published in the Federal Register on January 18, 2023." This

final rule conforms the definition of "waters of the United States" to the U.S. Supreme Court's May 25, 2023, decision in the case of *Sackett v. Environmental Protection Agency*. The conforming rule, "Revised Definition of 'Waters of the United States'; Conforming," published in the Federal Register and became effective on September 8, 2023 (EPA, 2023).

STATE

California Environmental Quality Act

The California Environmental Quality Act (CEQA) was enacted in 1970 to provide for disclosure of environmental impacts before issuance of a permit by a state or local public agency. In addition to state and federally listed species, sensitive plants and animals receive consideration under CEQA. Sensitive species include wildlife Species of Special Concern listed by California Department of Fish and Wildlife (CDFW) and plant species on the California Native Plant Society list 1A, 1B or 2. Plants with a California Rare Plant Rank of 1A are presumed extirpated or extinct in California because they have not been seen or collected in the wild for many years and are either rare or extinct elsewhere. California Rare Plant Rank 1B plants are rare, threatened, or endangered in California and Elsewhere. California Rare Plant Rank 2 plants are presumed extirpated or are rare, threatened, or endangered in California but are either common or more common elsewhere.

California Fish and Game Code Section 1600

California Fish and Game Code Sections 1600 to 1617, collectively known as the Lake and Streambed Alteration (LSA) Program, are designed to protect and conserve the state's fish and wildlife resources. Pursuant to Section 1600 et seq. of the California Fish and Game Code, CDFW regulates all diversions, obstructions, or changes to the natural flow of the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW defines a "stream" (including creeks and rivers) as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation." CDFW's definition of "lake" includes "natural lakes or manmade reservoirs."

CDFW jurisdiction within altered or artificial waterways is based upon the value of those waterways to fish and wildlife. CDFW jurisdictional limits closely mirror those of the USACE. Exceptions are CDFW's exclusion of isolated wetlands (those not associated with a river, a stream, or a lake), the addition of artificial stock ponds and irrigation ditches constructed on uplands, and the addition of riparian habitat supported by a river, a stream, or a lake regardless of the riparian area's federal wetland status.

In accordance with Section 1600 of the Fish and Game Code, CDFW must be notified prior to beginning any activity that would obstruct or divert the natural flow of, use material from, or deposit or dispose of material into a river, stream, or lake, whether permanent, intermittent, or ephemeral water bodies. The notification process can culminate in the issuance of a Streambed Alteration Agreement. CDFW has 60 days to review the proposed actions and propose measures to protect affected fish and wildlife resources. The final proposal that is negotiated by CDFW and the Applicant is the Streambed Alteration Agreement. Streambed Alteration Agreements include conditions that must be followed to protect and compensate for impacts to water, habitat, and species resources.

California Fish and Game Code Sections 2080 and 2080.1

CDFW enforces Sections 2081 and 2080.1 of the California Endangered Species Act (CESA) to regulate activities that may impact state-listed threatened or endangered species. Section 2081 authorizes CDFW to issue incidental take permits (ITPs) for otherwise lawful projects that may result in the "take" (i.e., harm,

kill, or capture) of these species, provided the impacts are minimized and fully mitigated, and that the take will not jeopardize the species' continued existence. Applicants must submit detailed plans describing proposed activities, mitigation measures, and monitoring. Section 2080.1, on the other hand, provides a streamlined process for applicants who already hold federal incidental take authorization (e.g., under the Endangered Species Act), allowing them to request a consistency determination from CDFW. If CDFW finds the federal authorization meets CESA standards, separate state permitting under Section 2081 may not be required. Together, these regulations aim to balance species protection with lawful development or land use projects.

Natural Community Conservation Planning Act

CDFW regulates and oversees the implementation of The Natural Community Conservation Planning (NCCP) Act, which aims to conserve biological diversity while allowing for compatible economic development. Its primary purpose is to protect ecosystems and species, particularly those that are rare, threatened, or endangered, by promoting comprehensive, long-term, and regional conservation planning rather than piecemeal project-by-project permitting. The Act encourages the development of Habitat Conservation Plans (HCPs) or Natural Community Conservation Plans (NCCPs), which address the needs of multiple species and habitats across a large geographic area. These plans must meet rigorous scientific standards and include strategies for habitat preservation, species protection, and adaptive management. The Project Site is not within an HCP or NCCP.

California Fish and Game Code Sections 3503, 3503.5, 3513, 3800, 3801

California Fish and Game Code Sections 3503, 3503.5, 3513, 3800, and 3801 are designed to protect native birds and their habitats in the state of California. Collectively, these laws prohibit the take, possession, or destruction of birds, their nests, or eggs, with certain exceptions. Section 3503 prohibits the destruction of bird nests and eggs; 3503.5 provides special protections for birds of prey (raptors), banning their take or possession; Section 3513 aligns state law with the federal Migratory Bird Treaty Act, prohibiting the take or possession of migratory birds unless authorized; and Sections 3800 and 3801 address the general unlawful possession of non-game birds and outline circumstances under which their possession may be allowed. These statutes are enforced by the California Department of Fish and Wildlife (CDFW), which is responsible for ensuring compliance, issuing permits where applicable, and investigating violations to support bird conservation and biodiversity across the state.

Porter-Cologne Water Quality Control Act

All of the drainages within the Study Area are tributary to downstream navigable waters and as such are subject to Regional Water Quality Control Board (RWQCB) jurisdiction under Section 401 of the Clean Water Act, pursuant to the California Porter-Cologne Water Quality Control Act. Project proponents intending to work within jurisdictional waters under the purview of the RWQCB are required to obtain a Water Quality Certification (WQC) or Waste Discharge Requirement (WDR), which include conditions that must be followed to protect and compensate for impacts to water quality.

LOCAL

City of Walnut Preservation of Oak and Walnut Trees

Chapter 6.52 of the WMC regulates the removal of trees. Under the WMC, a “protected tree” is defined as any of the following tree species measuring 6 inches or more in circumference (1.9 inches diameter at breast height-DBH) at 4.5 feet above the ground level at the base of the tree: any oak tree of the genus *Quercus* including, but not limited to, Blue Oak (*Quercus douglasii*), California Black Oak (*Quercus kelloggii*), Valley Oak (*Quercus lobata*), California-Live Oak (*Quercus agrifolia*), Canyon Oak (*Quercus chrysolepis*),

Interior Live Oak (*Quercus wislizeni*), Scrub Oak (*Quercus dumosa*), and California Black Walnut (*Juglans californica*). The trees protected zone (TPZ) is defined as the dripline plus five feet, or 15 feet from the trunk, whichever is greater.

In addition, Heritage oak/walnut tree means any tree measuring 40 inches or more in circumference or, in the case of a multiple trunk tree, two or more trunks measuring 30 inches or greater in circumference, measured three feet above the natural grade surrounding such tree. The Planning Commission and/or City Council may classify a tree, regardless of size, as a heritage oak/walnut tree if it is determined by a majority vote thereof that such tree has exceptional historic importance, aesthetics and/or prominence to the community.

In accordance with the WMC, no person, partnership, firm, corporation, government agency, or other legal entity shall cut, prune, remove, relocate, endanger, or damage any protected tree except in accordance with the conditions of a valid tree permit issued by the City.

City of Walnut General Plan

CONSERVATION, OPEN SPACE, AND RECREATION ELEMENT

The following are relevant goals and policies from the City of Walnut General Plan Conservation, Open Space, and Recreation Element:

GOAL COR-2:	Intact natural habitats and protected open spaces that support wildlife.
Policy COR-2.2:	Habitat. Protect and enhance natural habitat areas that are vital for wildlife, including Coastal Sage Scrub for the California Gnatcatcher.
Policy COR-2.3:	Open Space Linkages. Provide additional linkages between open space in order to accommodate wildlife movement.
Policy COR-2.5:	Ecological Reserve and Sanctuary. Coordinate with Mt. San Antonio College and Cal Poly Pomona to preserve, enhance, and promote the Mt. SAC Wildlife Sanctuary and the Voorhis Ecological Reserve.
Policy COR-2.6:	Fencing. Confine fencing on hillside property to the area around a building rather than around an entire site to allow for the migration of wild animals.
GOAL COR-3:	Preserved and rehabilitated riparian areas and creeks.
Policy COR-3.1:	Preserve and Enhance. Preserve and enhance existing waterways and natural riparian areas to achieve natural states that support wildlife and that provide flood control and groundwater recharge functions.
GOAL COR-4:	A healthy and vibrant community forest.
Policy COR-4.1:	Incentives. Provide incentives and adopt policies to encourage a healthy and abundant tree canopy Citywide.
Policy COR-4.2:	Planting Program. 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.
Policy COR-4.3:	Private Tree Preservation. Implement effective programs that provide protection for mature trees on private properties.

Policy COR-4.4: California Black Walnut/Oak Trees. Encourage the preservation, maintenance, and protection of California Black Walnut/Oak Trees, as well as other important native tree species Citywide.

5.4.4 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:

- BIO-1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- BIO-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?
- BIO-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?
- BIO-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?
- BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- BIO-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?

5.4.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT BIO-1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Plant and wildlife species can be afforded "special status" by federal agencies, state agencies, and/or non-governmental organizations because of their recognized rarity, potential vulnerability to extinction, and/or local importance. These species typically have a limited geographic range and/or limited habitat and are referred to collectively as "special status" species. The Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service as discussed below.

SPECIAL STATUS PLANT SPECIES

The Project Site predominantly consists of common plant species including non-native trees, herbaceous forbs, and common ruderal plant species. As previously discussed, a total of 74 plant species were observed

within the Project Site during the general biological survey. Of the 74 plant species observed, one type of special status plant species was identified on the Project Site, California black walnut.

California black walnut has a CNPS rare plant rank of 4.2 (i.e., Plants of Limited Distribution - A Watch List/fairly endangered in California). Although no California black walnut groves are present, Project implementation may require encroachment into the canopy of four California black walnut individual trees during construction, which would be considered a potentially significant impact absent Project design features to address this potential impact.

As detailed in the *Project Description*, Chapter 3.4 above, the Project includes a Tree Preservation/Replacement Plan. Consistent with the City of Walnut's Oak/Walnut Tree Preservation Sections 6.52.290 and 6.52.330, the Project Applicant/Developer proposes to obtain a Tree Permit for minor encroachment of seven protected trees including three Valley oak (*Quercus lobata*) and four California black walnut (*Juglans californica*) trees, two of which are "Heritage Trees." The Applicant/Developer shall be required to furnish all necessary information as determined by the Director together with the appropriate fee as established by council resolution. Additionally, mitigation shall be implemented consistent with the City's Municipal Code Chapter 6.52.330 replacement requirements for tree removals. Based on the Project's Tree Replacement Summary (Section 6 of the Rincon survey), the Project Applicant/Developer shall replace the tree canopy that will be removed by construction and shall install 520 California native trees throughout the development site. The Applicant/Developer shall also implement Avoidance and Minimization Measures for Preserved Trees related to monitoring, fencing, root impacts, equipment staging, soil compaction, mechanical damage, pruning, bridging footings over roots, and horizontal directional drilling for utilities (Section 5 of the Rincon survey).

Therefore, implementation of the Project's Tree Preservation/Replacement Plan reduces potential temporary construction impacts to less than significant. No permanent operational impacts are anticipated as the trees would be protected within the proposed designated open space areas.

No other special status plant species that were evaluated have at least a "moderate" or higher potential to occur within the Project Site. All other plants evaluated have either a "low" potential of occurrence or are considered "absent" based on various factors (e.g., unsuitable habitat, elevational range, soil conditions). Therefore, no impacts to other special status plant species are anticipated and no additional mitigation is required.

SPECIAL STATUS WILDLIFE SPECIES

A total of 62 wildlife species, or signs thereof, were observed during the 2022 surveys as previously discussed. Of the 62 wildlife species observed, eight special status animal species were observed within the Project Site or Study Area during the 2022 and 2023 focus surveys. The five special status animal species observed within the Project Site include yellow warbler (*Setophaga petechia*), Least Bell's Vireo (one migrant; *Vireo bellii pusillus* (LBV)), silver-haired bat (*Lasionycteris noctivagans*), hoary bat (*Lasiurus cinereus*), and Crotch's Bumble Bee (one in-transit; *Bombus crotchii* (CBB)). The three special status animal species observed within the Study Area include Cooper's hawk (*Accipiter cooperii*), Vaux's swift (*Chaetura vauxi*), and Lawrence's goldfinch (*Spinus lawrencei*). Additionally, five special status animal species not observed onsite have at least low to moderate potential to occur (i.e., western yellow bat, western mastiff bat, pallid bat, monarch butterfly, and burrowing owl). No designated USFWS critical habitat exists onsite.

Species Confirmed Present in Study Area/Project Site

Descriptions of the eight special status animal species observed within the Study Area/Project Site are listed below:

- Cooper's Hawk. Cooper's hawk is a Watch List species meaning it was previously designated a "Species of Special Concern" but no longer qualifies as such. The Watch List status, in reference to this species, specifically applies to nesting Cooper's hawk and their associated habitat. This species typically inhabits woodlands and other forested areas. They are frequently sighted in neighborhoods and fields, especially when larger trees surround the area. Cooper's hawk typically nests near water and in deciduous trees or conifers, usually 10-80 feet above the ground. The pepper tree/eucalyptus woodland and sycamore willow woodlands onsite have a high potential to support nesting and foraging Cooper's hawk. Cooper's hawks were observed in the Study Area during the 2022 Burrowing Owl (BUOW) and Southwestern Pond Turtle (SWPT) surveys and during the 2022 LBV surveys, where two recently fledged individuals and an adult individual were detected. Through incorporation of Mitigation Measure BIO-1, potential temporary construction impacts to this species would be less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, maintain existing healthy trees, and replace non-native and unhealthy trees with native trees, potential permanent impacts to this species would be less than significant.

- Yellow Warbler. Yellow warbler is a CDFW designated Species of Special Concern indicating that the species has had declining population levels, limited ranges, and or continuing threats that have made them vulnerable to extinction. This species has frequent parasitism by the brown-headed cowbird (*Molothrus ater*), which has led to significant declines in its numbers. The yellow warbler typically inhabits areas that are considered open-canopy riparian woodlands. It typically nests 2-16 feet above the ground within saplings or shrubs. The willows and riparian habitat on the Project Site have high potential to support breeding and foraging yellow warbler. Yellow warblers were observed during the 2022 SWPT survey and the LBV surveys, where between one and five individuals were observed within the Project Site in the riparian habitat along Lemon Creek. Through incorporation of Mitigation Measure BIO-1, potential temporary construction impacts to this species would be less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, maintain existing healthy trees, and replace non-native and unhealthy trees with native trees, potential permanent impacts to this species would be less than significant.

- Vaux's Swift. Vaux's swift is a USFWS designated Bird of Conservation Concern indicating that without additional conservation actions, they are likely to become candidates for listing under the Endangered Species Act (ESA), and a CDFW designated Species of Special Concern indicating that the species has had declining population levels, limited ranges, and or continuing threats that have made them vulnerable to extinction. This species is a summer resident of northern California and usually migrate to Mexico and Central America, but a few winter in coastal lowlands of Southern California. They prefer redwood and Douglas-fir habitats and nest in hollow trees and snags, especially tall, burned-out stubs. They prefer to forage over rivers and lakes and are active during the day. The woodlands associated with Lemon Creek on the Project Site have a high potential to support foraging Vaux's swift. One individual was detected within the Study Area during the 2022 LBV survey. Through incorporation of Mitigation Measure BIO-1, potential temporary construction impacts to this species would be less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, maintain existing healthy trees, and replace non-native and unhealthy trees with native trees, potential permanent impacts to this species would be less than significant.

- Lawrence's Goldfinch. Lawrence's goldfinch is a USFWS designated Bird of Conservation Concern and is on the Yellow Watch List of the North American Bird Conservation Initiative. This species prefers open woodland or shrubland with water nearby. They build nests in dense foliage of trees

or shrubs—preferably oak, but also cypress, cedar, or riparian thickets. The riparian habitat associated with Lemon Creek on the Project Site has a high potential to support foraging/nesting Lawrence's goldfinch. One individual was observed within the Study Area during the 2022 LBV survey. Through incorporation of Mitigation Measure BIO-1, potential temporary construction impacts to this species would be less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, maintain existing healthy trees, and replace non-native and unhealthy trees with native trees, potential permanent impacts to this species would be less than significant.

- Least Bell's Vireo. The eight focus surveys for LBV were performed April 10, April 22, May 15, May 30, June 11, July 5, July 16, and July 29 of 2022. One LBV was detected during the April 10 survey within the Project Site; however, due to the relatively narrow riparian corridor and lack of a dense shrub layer canopy, the observed LBV was determined to be a migrant rather than establishing and/or defending territory, occupying the site, or breeding. Therefore, the potential for LBV to occupy the Project Site is low (refer to *Appendix H* of the *Biological Technical Report*). Through incorporation of Mitigation Measure BIO-1, potential temporary construction impacts to LBV would be less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, maintain existing healthy trees, and replace non-native and unhealthy trees with native trees, potential permanent impacts to this species would be less than significant.

- Silver-haired Bat. Silver-haired bat is designated as a medium priority of concern with the Western Bat Working Group (WBWG). This species is primarily a coastal and montane forest dweller, feeding over streams, ponds and open brushy areas. They roost in hollow trees, beneath exfoliating bark, abandoned woodpecker holes, and rarely under rocks. Suitable habitat to support the species, including bushy areas, hollow trees, and exfoliating bark along Lemon Creek is present; therefore, the Project Site has a high potential to support the species. Silver-haired bat was detected within the Project Site during the 2022 bat surveys. Through incorporation of Mitigation Measure BIO-1, potential temporary construction impacts to this species would be less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, maintain existing healthy trees, and replace non-native and unhealthy trees with native trees, potential permanent impacts to this species would be less than significant.

- Hoary Bat. Hoary bat is a CDFW designated Species of Special Concern and ranked as a medium priority with the WBWG. This species typically roosts in trees in deciduous and coniferous forests and woodlands but occasionally roosts in rock crevices. Habitats suitable for bearing young include all woodlands and forests with medium to large-size trees and dense foliage. They forage in open areas, typically along riparian corridors over water and their diet primarily consists of moths. During migration in southern California, the males are found in foothills, deserts, and mountains, and females in lowlands and coastal valleys. The dense trees along Lemon Creek and presence of suitable diet observed within the Project Site have a high potential to support the species. Hoary bat was detected within the Project Site during the 2022 bat surveys. Through incorporation of Mitigation Measure BIO-2, potential temporary construction impacts to this species would be less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, maintain existing healthy trees, and replace non-native and unhealthy trees with native trees, potential permanent impacts to this species would be less than significant.

- Crotch's Bumble Bee. Crotch's Bumble Bee (CBB) is state listed as a candidate endangered species and is therefore granted full protection of threatened species under the California Endangered

Species Act (CESA) during the pendency of its listing status period. This species' preferred food plants generally include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, Eriogonum, lotus, Encelia species, milk weed, and non-native grassland. CBB generally inhabits large open undisturbed lands. By contrast, the Project Site/Study Area is highly disturbed. However, green-ways and open habitats are present within one kilometer. CBB are known to nest in small mammal burrows such as those created by California ground squirrels (*Otospermophilus beecheyi*). Five Crotch's Bumble Bee field surveys were performed between March 4, 2023, and August 24, 2023.[3] Despite the low-quality habitat to support CBB, a single CBB was observed on the Project Site on August 24, 2023, foraging in a non-native, ornamental Jacaranda (*Jacaranda mimosifolia*) that was planted on the Project Site near Meadow Pass Road. However, during the initial habitat assessment, it was confirmed that the ground squirrel burrows on the Project Site are occupied (by ground squirrels), which precludes CBB from establishing nest colonies. Furthermore, following the initial habitat assessment, it was assumed that the potential for CBB to occur would be unlikely because few nectar sources were observed within the Study Area at that time and because there were several areas identified on site where chipped bark and leaf litter was present (which limits potential for establishing nest colonies) and areas consisted of primarily disturbed soil, dirt pedestrian trails, and non-native weed species. The small size of the Study Area, the presence of low-quality habitat to support CBB, and the sparse distribution of open areas are not optimal conditions for CBB to establish nesting colonies. As such, the single observed CBB was probably only in-transit for foraging opportunities, and likely originated from a nest somewhere offsite. Therefore, based on these assessments, the Study Area does not contain habitat of sufficient quality to support CBB; however, since a single observed CBB was found foraging onsite, incorporation of Mitigation Measure BIO-3 would be required for potential temporary construction impacts to this species to be considered less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, potential permanent impacts to this species would be less than significant.

Species With Potential To Occur

Four special status animal species not observed but with at least a low to moderate or higher potential to occur within the Project Site are listed below:

- Western Yellow Bat. Western yellow bat is a CDFW designated species of special concern and ranked as a high priority with the WBWG. This species occurs in arid regions of the southwestern United States. They are typically found in riparian woodlands, oak or pinyon-juniper woodland, desert wash, palm oasis habitats, and urban or suburban areas. They roost in trees, often between palm fronds. The urban/suburban location of the Project Site, the riparian habitat, and the trees, particularly the palms, within the survey area warrant a moderate potential to support the species; however, no western yellow bats were detected during the 2022 bat surveys. Through incorporation of Mitigation Measure BIO-2, potential temporary construction impacts to this species would be less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, maintain existing healthy trees, and replace non-native and unhealthy trees with native trees, potential permanent impacts to this species would be less than significant.

[3] Four of these surveys were conducted by qualified entomologist Ken Osborne of Osborne Biological Consulting, with the other survey conducted by qualified biologist Kelly Rios of Rincon Consultants, Inc. (refer to *Appendix J* of the *Biological Technical Report*).

- Western Mastiff Bat. Western mastiff bat is a CDFW designated Species of Special Concern, a BLM Sensitive Species, and ranked as a high priority with the WBWG. This species inhabits open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, annual and perennial grasslands, palm oases, chaparral, desert scrub, and urban areas. Their suitable habitat consists of extensive open areas with abundant roost locations provided by crevices in rock outcrops and buildings. The palm trees and abandoned structures within the Project Site have a moderate potential to support the species; however, no western mastiff bats were detected during the 2022 bat surveys. Through incorporation of Mitigation Measure BIO-3, potential temporary construction impacts to this species would be less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, maintain existing healthy trees, and replace non-native and unhealthy trees with native trees, potential permanent impacts to this species would be less than significant.

- Pallid Bat. The pallid bat is a CDFW designated Species of Special Concern, a BLM Sensitive Species, a USFS Sensitive Species, and is ranked as a high priority with the WBWG. This species is found in a variety of habitats including deserts, grasslands, shrublands, woodlands, and forests. They are most common in open, dry habitats with rocky areas for roosting. They roost in crevices of rock outcrops, caves, mine tunnels, buildings, bridges, and hollows of live and dead trees. They are very sensitive to disturbance of their roosting sites. The palm trees and abandoned structures on the Project Site have a moderate potential to support the species; however, no pallid bats were detected during the 2022 bat surveys. Through incorporation of Mitigation Measure BIO-2, potential temporary construction impacts to this species would be less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, maintain existing healthy trees, and replace non-native and unhealthy trees with native trees, potential permanent impacts to this species would be less than significant.

- Monarch Butterfly (California Overwintering Population). The monarch butterfly is a USFS Sensitive Species. In 2014, monarchs were petitioned to be listed under the federal ESA. In December 2020, the USFWS found that listing was warranted but precluded by other listing actions on its National Priority List. The monarch is a winter migrant along the California coast and overwinters in groves, typically close to the coast, populated by a variety of tree species, including blue gum eucalyptus (*Eucalyptus globulus*), Monterey pine (*Pinus radiata*), and Monterey cypress (*Hesperocyparis macrocarpa*). There has been no previous monarch observation recorded onsite; however, the Eucalyptus groves onsite may provide suitable habitat for the species and therefore have a low to moderate potential to occur within the Project Site. The closest monarch overwintering site is recorded 4.5 miles from the Project Site. Through incorporation of Mitigation Measure BIO-3, potential temporary construction impacts to this species would be less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, maintain existing healthy trees, and replace non-native and unhealthy trees with native trees, potential permanent impacts to this species would be less than significant.

Species Confirmed Absent With Habitat Assessment/Focus Surveys

All other special status species of wildlife analyzed exhibit a low potential to occur within the Project Site. Additional focus surveys conducted for species that were determined absent are detailed below:

- Burrowing Owl Habitat Assessment and Focused Survey Results. The habitat assessment and four focus surveys for burrowing owl (BUOW) were performed on April 6 and 27, May 18, and June 8 of 2022. While the surveys deviated slightly from the protocol, with the last survey not being conducted after June 15 (the last survey conducted was on June 8), the findings are considered accurate and indicate BUOW is not expected to occupy the site. Therefore, BUOW is considered to

have a low potential to occur within the Study Area (refer to *Appendix F* of the *Biological Technical Report*). Through incorporation of Mitigation Measure BIO-5, potential temporary construction impacts to BUOW with potential to colonize the site in the future would be less than significant. No permanent impacts are anticipated since the Project Site is not occupied.

- California Gnatcatcher Habitat Assessment. A habitat assessment for the California Gnatcatcher (CAGN) was conducted on June 30, 2023 (refer to *Appendix G* of the *Biological Technical Report*). No CAGN or CAGN habitat (i.e., coastal sage scrub habitat) was found onsite. California gnatcatchers are obligate breeders of coastal sage scrub vegetation communities which are dominated by a variety of low shrubs (mostly 3-6 feet tall). There is no suitable habitat for CAGN anywhere within the Study Area or surrounding habitat, primarily due to lack of coastal sage scrub habitat. Based on review of aerial imagery, the nearest open space that may contain coastal sage scrub is approximately 1 mile to the north of the Study Area. The Study Area is partially developed with vegetation communities dominated by native and ornamental trees and non-native grassland, which are not suitable for CAGN foraging or breeding. No temporary construction impacts or permanent impacts would occur based on the absence of suitable habitat and species. No mitigation is required.

- Southwestern Pond Turtle Habitat Assessment and Focused Survey Results. The habitat assessment and four focus surveys for the Southwestern Pond Turtle (SWPT) conducted on July 5 and 25, August 12, and September 1, 2022, indicated that although suitable habitat for SWPT is present, no SWPT were observed or detected (e.g., suitable burrows) within the Study Area. Therefore, SWPT are considered absent from the Project Site (refer to *Appendix I*, *Southwestern Pond Turtle Habitat Assessment and Focused Survey,* of the *Biological Technical Report*); however, potential to occur remains because this species can move significant distances. Therefore, through incorporation of Mitigation Measure BIO-6, potential temporary construction impacts to SWPT would be less than significant. Because the Project would designate approximately 12.2 acres (predominantly along Lemon Creek) as open space, potential permanent impacts to this species would be less than significant.

Level of Impact Before Mitigation: Potentially significant temporary construction impact to special status wildlife species (Cooper's hawk, yellow warbler, Vaux's swift, Lawrence's goldfinch, least Bell's vireo, burrowing owl, silver-haired bat, hoary bat, western mastiff bat, pallid bat, Crotch's Bumble Bee, monarch butterfly, and southwestern pond turtle).

Mitigation Measures: Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5 and BIO-6 described in Section 5.4.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT BIO-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?

RIPARIAN HABITAT

A total of 0.42 acres (2,229 linear feet) of non-wetland Waters of the United States (WoUS) and 0.64 acres (611 linear feet) of wetland WoUS were delineated within the Project Site. A total of 2.81 acres (2,229 linear feet) of streambed Waters of the State (WoS) and 0.64 acres (611 linear feet) of riparian WoS were delineated within the Project Site (note, WoS are inclusive of WoUS, not exclusive). These features are

regulated by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) as described above in Section 5.4.3, *Regulatory Setting*. The WoUS and WoS are depicted on Figure 5.4-4, *Jurisdictional Waters of the U.S. (WoUS) and State (WoS)*.

The Project has been designed to avoid impacts to Lemon Creek but would require constructing two onsite water quality detention basins (outside of jurisdictional areas) to manage flow velocity and to treat urban runoff pollutants prior to water release into Lemon Creek. Based on the Project Description, the existing Culvert 'A', Culvert 'B', and Culvert 'C' would remain in place. Existing Culvert 'D' would be removed, and that portion of the creek would be restored. A human-made flow restriction would replace the culvert, preserving the control that the culvert previously lent to sediment transport in the creek while removing the turbulent and potentially destructive effects of overtopping. One of the existing outlets into Lemon Creek would remain in its current location, while the second would be relocated to a point downstream of the proposed Project bridge. Impacts to jurisdictional waters associated with these improvements would be related to removing the existing Culvert 'D', relocating one of the existing outlets, and constructing the internal roadway bridge footings. Permanent impacts to jurisdictional waters are described in Table 5.4-2, *Permanent Impacts to Waters of the U.S. and State within the Project Site*.

Table 5.4-2
Permanent Impacts to Waters of the U.S. and State within the Project Site

Jurisdictional Waters	Acres	Linear Feet
Waters of the U.S.		
Non-Wetland Waters of the U.S.	0.01	61
Wetland Waters of the U.S.	0.03	3
Waters of the State		
Streambed Waters of the State*	0.12	61
Riparian Waters of the State*	0.03	3
Note: *Inclusive of waters of the U.S., not additive. Source: VCS Environmental, *Biological Technical Report*; June 2025.		

With implementation of Mitigation Measures BIO-7 and BIO-8, permanent impacts to jurisdictional waters would be reduced to less than significant by providing compensatory mitigation to offset the loss of waters. Additionally, due to the proximity of Project impacts to the remainder of Lemon Creek within the Project Site, potential indirect edge effects are possible that may impact sensitive biological resources within that jurisdictional water. This includes minor temporary impacts around the immediate improvement areas required for constructing the proposed bridge footings and storm water/drainage facilities. Best management practices (BMPs) mandated by the required regulatory permits described in Mitigation Measure BIO-8 would reduce those temporary edge effects during construction to less than significant.

OTHER SENSITIVE NATURAL COMMUNITY

No other sensitive natural communities were identified on the Project Site.

Level of Impact Before Mitigation: Potentially significant impact to Waters of the United States and Waters of the State associated with temporary construction and permanent bridge footings and storm water/drainage facilities improvements.

Mitigation Measures: Mitigation Measures BIO-7 and BIO-8 described in Section 5.4.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT BIO-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?

Please refer to the discussion above under IMPACT BIO-3.

Level of Impact Before Mitigation: Potentially significant impact to Waters of the United States and Waters of the State associated with temporary construction and permanent bridge footings and storm water/drainage facilities improvements.

Mitigation Measures: Mitigation Measures BIO-7 and BIO-8 described in Section 5.4.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT BIO-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?

The Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. The Project Site could serve a function in local wildlife dispersal and foraging; however, due to the disturbed nature of the site and the degraded habitats, the loss of foraging habitat and/or effect on local wildlife movement would be less than significant. No long-term or significant effects to wildlife movement are anticipated due to Project implementation. Because the Project Site does not lie within a designated wildlife corridor and is adjacent to residential development, the proposed Project is not anticipated to have significant impacts related to habitat fragmentation and/or regional wildlife movement. In addition, the Project has been designed to retain approximately 12.2 acres of open space (approximately 47% of the Project Site), predominantly along the channel of Lemon Creek.

The Project Site has the potential to support various avian species, raptor nests, and bat species due to the presence of a few shrubs, ground cover, palm trees and other ornamental plants onsite. Crotch's Bumble Bee, monarch butterfly (wintering), burrowing owl, and southwestern pond turtle (although all determined to be absent) could potentially move onto the site at a future time. Therefore, Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, and BIO-6 would be required for mitigating potential temporary construction impacts to less than significant levels. Less than significant permanent impacts are anticipated based on the findings of the biological research prepared for the Project and based on the proposed amount of open space.

Level of Impact Before Mitigation: Potentially significant impact to nesting birds, roosting bats, Crotch's Bumble Bee, monarch butterfly (wintering), burrowing owl, and southwestern pond turtle during temporary construction activities.

Mitigation Measures: Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4 and BIO-6 described in Section 5.4.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Project is subject to the City's Tree Preservation requirements. The Project would result in the removal of 460 non-protected trees (30 native species and 430 non-native species, of which 181 are considered "invasive" by the California Invasive Species Council). Additionally, construction activities would encroach on 126 non-protected trees (91 would incur "minor" encroachments, 29 would incur "major" encroachments, and 6 would incur "severe" encroachments), and 132 non-protected trees would be completely avoided during construction and would not be impacted by the Project. Minor encroachment, major encroachment, and severe encroachment are defined as follows:

- A minor encroachment is not expected to compromise the health or structural integrity of the tree, and/or generally would encompass less than 30 percent of the tree's canopy and roots.
- A major encroachment may result in the decline of the tree, and long-term health and survival are unknown.
- A severe encroachment may result in the significant decline, mortality, or a structurally unstable tree.

A total of 19 City protected oak and walnut trees fall within or are immediately adjacent to the grading limits including 11 California black walnut (*Juglans californica*) trees, one coast live oak (*Quercus agrifolia*) tree, and seven valley oak (*Quercus lobata*) trees. Seven of these protected trees would experience "minor" encroachments during construction activities, and the remaining 12 protected trees would be avoided by the Project.

No City protected trees would be removed by the Project; however, construction activities would result in the removal of 30 non-protected native trees, 249 non-native trees, and 181 invasive trees, for a total of 460 non-protected trees that would be removed. Through implementation of Mitigation Measure BIO-9, the Project's Tree Preservation/Replacement Plan, the Applicant/Developer would be required, prior to occupancy of any homes within the Project, to replace the 30 non-protected native species trees with 24-inch box native trees at a ratio of 3-to-1, while the non-native and invasive species would be replaced by 15-gallon native trees at 1-to-1 ratio. In total, 520 native trees would be planted throughout the development site, resulting in a net gain of 60 trees as part of the Project construction. Particularly relevant to the biodiversity of Lemon Creek, that net gain reflects a net loss of 430 non-native and invasive species and a net increase of 490 native species.

The existing tree canopy covers approximately 46.4% of the Project Site, comprising 12 acres. It is estimated that Project implementation would remove 5.2 acres (20.1%) of tree canopy and 6.8 acres (26.3%) of tree canopy would be preserved. The required planting of 520 native trees is projected to result in 6.4 acres (24.7%) of tree canopy that would be installed, resulting in a total tree canopy on the Project Site of 13.2 acres (51.1%). The tree canopy that would be preserved when combined with the canopy that would be installed is estimated to result in a 4.7% increase in tree canopy following Project completion, when compared to the existing tree canopy on the site.

Although the Applicant/Developer is proposing its Tree Preservation/Replacement Plan as a Project design feature, for purposes of this CEQA analysis it will be considered to be an incorporated mitigation measure to address the potential impacts related to temporary construction impacts and permanent impacts related to tree canopy loss. With implementation of Mitigation Measure BIO-9, temporary construction impacts and permanent impacts would be less than significant.

Level of Impact Before Mitigation: Potentially temporary and significant impacts to tree canopy coverage absent the Project's Tree Preservation/Replacement Plan.

Mitigation Measures: Mitigation Measure BIO-9 described in Section 5.4.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT BIO-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?

Review of the City of Walnut General Plan Conservation, Open Space, and Recreation Element indicates that the Project Site is not located in a Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state HCP. According to the Biological Technical Report, the nearest such designated area is the Orange County Transportation Authority NCCP/HCP located in Orange County, approximately 5.6 miles south of the Project Site. Therefore, no impacts would occur.

Level of Impact Before Mitigation: No impact based on the Project Site's location, which is not within a designated HCP, NCCP, or other approved local, regional, or state HCP.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

5.4.6 CUMULATIVE IMPACTS

Development of the Project Site would result in the direct removal of non-native and native trees, herbaceous forbs and other common plant species. The majority of the Project Site consists of landscaped areas comprised of native and non-native species typical of urbanized residential areas. The Project Site consists of five vegetation communities/land cover types: Eucalyptus/Shamel Ash/Pepper tree Groves, non-native ornamental, annual brome grasslands and ruderal forbs, disturbed/developed, and southern sycamore alder riparian woodland. With the implementation of Mitigation Measure BIO-9, the Project's Tree Preservation/Replacement Plan, potential impacts to these vegetation communities would be reduced to less than significant and the Project would not result in a cumulatively considerable contribution to impacts based on review of other projects listed in Section 4.0, *Basis for Cumulative Impacts*. One sensitive plant species type, California black walnut, was identified on the Project Site. California black walnuts are the primary constituent of California walnut groves which are designated as a sensitive vegetation community. Walnut groves are not on the Project Site. Four individual walnut trees are proposed for minor encroachment impacts. With the implementation of the Project's Tree Preservation/Replacement Plan, impacts to this species would be considered less than cumulatively significant. Construction activities would result in the removal of 30 non-protected native trees, 249 non-native trees, and 181 invasive trees, for a total of 460 non-protected trees that would be removed, which would be considered a potentially significant impact; however, the Project would replace the removed trees entirely with native species that would consist of 90 24-inch box trees and 430 15-gallon trees, for a total of 520 native trees that would be installed throughout the development site. With the implementation of the Project's Tree Preservation/Replacement Plan, the Project would not result in a cumulatively considerable contribution to impacts in the loss of native trees in the region.

No USFWS designated critical habitat is present on or near the Project Site. Eight special status wildlife species were observed during focus surveys including the Cooper's hawk, yellow warbler, Vaux's swift, Lawrence's goldfinch, least Bell's vireo (migrant), silver-haired bat, hoary bat and Crotch's Bumble Bee (migrant). In addition, five special status wildlife species have the potential to occur within the Project Site

including monarch butterfly, western yellow bat, western mastiff bat, pallid bat, and southwestern pond turtle. The majority of their suitable habitat within the Project Site is planned to be avoided and is not located within the Project Impact Area. However, a small portion of their suitable habitat is in the southwest and the northern portion of the Project Impact Area. With the implementation of Mitigation Measure BIO-1 for Cooper's hawk, yellow warbler, Vaux's swift, Lawrence's goldfinch, and least Bell's vireo; Mitigation Measure BIO-2 for silver-haired bat, hoary bat, western yellow bat, western mastiff bat, and pallid bat; Mitigation Measure BIO-3 for Crotch's Bumble Bee; Mitigation Measure BIO-4 for monarch butterfly; Mitigation Measure BIO-5 for burrowing owl; and Mitigation Measure BIO-6 for southwestern pond turtle, potential cumulative impacts would be less than significant based on review of other projects listed in Section 4.0, *Basis for Cumulative Impacts*.

A total of 0.42 acres of non-wetland WoUS and 0.64 acres of wetland WoUS were delineated within the Project Site. A total of 2.81 acres of streambed WoS and 0.64 acres of riparian WoS were delineated in the Project Site. The Project Site contains two drainage complexes that have jurisdictional indicators including an OHWM and evidence of water flow. With Mitigation Measures BIO-7 and BIO-8, impacts to jurisdictional waters would be reduced to less than significant and the Project would not result in a cumulatively considerable contribution to impacts to jurisdictional waters based on review of other projects listed in Section 4.0, *Basis for Cumulative Impacts*.

The Project Site may serve as a function in local wildlife dispersal and foraging; however, due to the obstruction of the surrounding roads and urban development, it is not expected that the Project Site functions as a regional wildlife movement corridor. With the avoidance of approximately 6.02 acres of natural open space onsite, the marginal role the Project Site plays in local wildlife dispersal, foraging, nesting and roosting is expected to continue. In addition, the Project has been designed to retain approximately 12.2 acres of open space (approximately 47% of the Project Site), predominantly along the channel of Lemon Creek. Therefore, the Project would not result in a cumulatively considerable contribution to impacts to wildlife corridors based on review of other projects listed in Section 4.0, *Basis for Cumulative Impacts*.

Compliance with local, state, and federal laws would reduce the potential impacts to less than significant. Therefore, the proposed Project, considered with the related Projects, would not contribute considerably to cumulatively significant impacts to biological resources.

Level of Impact Before Mitigation: Potentially Significant Impact.

Mitigation Measures: Mitigation Measures Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, BIO-8 and BIO-9 described in Section 5.4.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

5.4.7 MITIGATION MEASURES

BIO-1: Nesting Birds. If feasible, vegetation removal activities shall be conducted outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds. Any construction activities that occur during the nesting season shall require that all suitable habitats be thoroughly surveyed for the presence of nesting birds by a qualified biologist within three days before commencement of vegetation clearing/ground disturbance activities depending on which season work falls within. If any active nests are detected a buffer of 500 feet of an active threatened or endangered species or raptor nest, 300 feet of other sensitive species (non-listed), and 100 feet of most common species shall be delineated, flagged, and avoided until the nesting cycle is complete.

BIO-2: Bat Protection. Prior to construction, all suitable areas within the Project Site and an appropriate survey buffer shall be surveyed for the presence of bat roosts by a qualified biologist. Surveys are recommended as follows:

(1) An initial pre-construction survey shall be conducted in the spring prior to vegetation removal and ground disturbing activities by a qualified biologist to confirm no maternity roosts, and

(2) A pre-construction survey shall be conducted by a qualified biologist no more than two weeks prior to the initiation of vegetation removal and ground disturbing activities.

Surveys may entail direct inspection of the trees/suitable habitat or nighttime surveys. The following measures shall be implemented (as applicable) based upon the results of the surveys:

a. If active bat roosts are present, a qualified bat biologist shall determine the species of bats present and the type of roost (i.e., day roost, night roost, maternity roost). If the biologist determines that the roosting bats are not a special- status species and the roost is not being used as a maternity roost, then the bats may be evicted from the roost by a qualified biologist experienced in developing and implementing bat mitigation and exclusion plans.

b. If special-status bat species or a maternity roost of any bat species is present, but no direct removal of active roosts will occur, a qualified biologist shall determine appropriate avoidance measures, which may include implementation of a construction-free buffer around the active roost during the appropriate season.

c. If special-status bat species or a maternity roost of any bat species is present and direct removal of habitat (roost location) will occur, then a bat mitigation and exclusion plan shall be developed subject to approval by the City of Walnut. As appropriate and depending on the specific findings of the survey results, this plan shall include, for example, avoidance measures such as work timing restrictions and work zone buffers, methods for relocation and/or exclusion, creation of alternative roosts, and/or construction monitoring and reporting requirements.

d. To reduce impacts to foraging bats, all construction activity shall be limited to daylight hours. If night-time work activities must occur, night-time lighting should be restricted or avoided to avoid attracting insects and consequently bats to the site.

e. The implementation of demolition shall be planned in phases for both structures and trees on the site to reduce potential impacts by providing day roosting bats the opportunity to leave the site prior to demolition of all structures and trees on the site.

BIO-3: Crotch's Bumble Bee mitigation includes the following (*Rincon Consultants, Inc., January 11, 202*3):

a. Pre-construction surveys for CBB and nests shall be conducted within all suitable habitats within the Project Site prior to initial ground-disturbing activities (e.g., grubbing/removing vegetation, excavation, grading, construction). The purpose of these surveys is to identify active nest colonies inside of permanent and temporary impact areas.

b. The pre-construction surveys shall follow the survey methodologies set out in the CDFW Survey Considerations for CESA Candidate Bumble Bee (CDFW, 2023g) or other survey methodology approved by CDFW.

c. The pre-construction surveys shall be conducted during appropriate survey periods as either described in the CDFW Survey Considerations or otherwise approved by CDFW.

d. If the pre-construction surveys identify active nest colonies inside of permanent and temporary impact areas within the Project footprint, an appropriate no disturbance buffer zone shall be established around the active nest colony to reduce the risk of disturbance or accidental take. The buffer distance shall be established by a qualified biologist and will provide no less than 50 feet of clearance around active nest entrances and the proponent/operator shall consult with a qualified biologist to discuss considerations and recommendations on the implementation of Project activities to avoid take of the CBB.

e. If a no disturbance buffer zone is both (i) appropriate per Paragraph 4a above and (ii) feasible, construction activities will not occur within that buffer zone until a qualified biologist determines the previously active nest to no longer be active (i.e., no CBB are seen flying in or out of the nest for three consecutive days indicating the colony has completed its nesting season and the next season's queens have dispersed from the colony), after which construction activities may resume within that buffer zone.

f. If avoidance of the active nest is not feasible, the Project proponent/operator shall consult with CDFW regarding potential for Project activities to result in take of the CBB and shall comply with the avoidance, minimization, and compensatory mitigation requirements set forth in any Incidental Take Permit issued for the Project by CDFW.

BIO-4: Monarch Butterfly (Overwintering). To minimize the potential for loss of monarch overwintering colonies, removal of Eucalyptus trees will be conducted between April 1 – September 30 to avoid the overwintering season, if feasible. If Eucalyptus tree removal occurs outside of the overwintering season, no further mitigation will be required.

If Eucalyptus tree removal occurs within the overwintering season (October 1 – March 31), a qualified biologist shall assess suitable habitat within the Project Site for monarch colonies no more than 14 days prior to Eucalyptus tree removal. If the species is not observed colonizing within the site, tree removal can proceed, and no further mitigation will be required.

If monarch colonies are identified within the Project Site, they shall be demarcated with flagging or high-visibility construction fencing at the direction of the qualified biologist to prevent removal of the stand of trees containing the overwintering colony. Monarch overwintering colonies shall be protected throughout the duration of their presence within the site. Once the qualified biologist has determined that the species has left the site, tree removal can proceed.

BIO-5: Burrowing Owl. A preconstruction presence/absence survey for burrowing owl shall be conducted by a qualified biologist within 30 days prior to the commencement of ground disturbing activities including vegetation clearing, grubbing, or tree removal and if an owl or owls are detected, reported to the California Department of Fish and Wildlife (CDFW). If no burrowing owls are observed during the survey, site preparation and construction activities may begin.

If burrowing owl are determined present within 500 feet of the Project Site, then avoidance or minimization measures shall be undertaken in consultation with the City and CDFW. CDFW shall be sent written notification within 48 hours of detection of burrowing owls. The qualified biologist and Project Applicant/Developer shall coordinate with the City and CDFW to develop a Burrowing Owl Plan, as described below, to be approved by the City and CDFW prior to commencing Project activities. Additionally, the Project Applicant/Developer may be required to obtain a Section 2081 Incidental Take Permit, if it is believed take will occur. The Project Applicant/Developer shall implement the 2081 Incidental Take Permit if required.

If applicable, the Burrowing Owl Plan shall describe proposed avoidance, relocation, monitoring, minimization, and/or mitigation actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls or information on the adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls shall also be included in the Burrowing Owl Plan. The Applicant/Developer shall implement the Burrowing Owl Plan following CDFW review and approval.

If burrowing owls are observed within the Project Site during Project implementation and construction, the Project Applicant/Developer shall notify CDFW immediately in writing within 48 hours of detection. If required based on the nature of the observance, a Burrowing Owl Plan shall be submitted to CDFW for review and approval within two (2) weeks of detection and no Project activity shall continue within 500 feet of the burrowing owls until CDFW approves the Burrowing Owl Plan. The Applicant/Developer shall be responsible for implementing appropriate avoidance and mitigation measures, including burrow avoidance, passive or active relocation, or other appropriate mitigation measures as identified in the Burrowing Owl Plan.

If applicable, a final report shall be prepared by a qualified biologist documenting the results of the burrowing owl surveys and detailing any avoidance, minimization, and mitigation measures. The final report shall be submitted to the City within 30 days of completion of the survey and burrowing owl monitoring for mitigation monitoring compliance record keeping.

BIO-6: Southwestern Pond Turtle. A SWPT survey shall be conducted by a qualified southwestern pond turtle biologist within 30 days of vegetation removal or ground disturbance. A report shall also be submitted to the City detailing the findings of the survey(s). If SWPT are observed, additional avoidance, exclusion, and minimization measures shall be implemented through the development and implementation of a SWPT Avoidance Plan in coordination with the City, which may include the relocation of the SWPT upstream or downstream to an area of suitable habitat, installation of exclusionary fencing, and/or construction monitoring to ensure the species is not adversely affected from Project activities.

BIO-7: Jurisdictional Waters. Permanent impacts to Waters of the State, Riparian/Riverine resources, and Waters of the U.S. shall be mitigated at a ratio of 3:1 through the enhancement and restoration of portions of Lemon Creek within the Project Site, or as otherwise required by the regulatory agencies (USACE, RWQCB, and CDFW) pursuant to the issuance of federal and state permits or other authorizations for impacts to these features.

If required by the regulatory agencies, enhancement shall include the one-time removal of invasive species, and restoration shall include the one-time planting of native willow (*Salix* spp.)

cuttings obtained from mature individuals on-site and following standard installation procedures in replacement. Planting shall occur immediately prior to onset of the rainy season.

If required by the regulatory agencies, the Applicant shall prepare an enhancement and restoration plan, to be approved by CDFW prior to any ground disturbance within Waters of the State or Riparian/Riverine resources located on the Project Site. The Plan shall include restoration and monitoring methods, annual success criteria, contingency actions should success criteria not be met, and long term management and maintenance goals.

BIO-8: Jurisdictional Waters. Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City all appropriate permits and other authorizations have been obtained from the RWQCB, CDFW, and USACE.

BIO-9: Tree Canopy. Prior to occupancy of any homes in the Project, the Applicant shall implement its Tree Preservation/Replacement Plan.

5.4.8 REFERENCES

City of Walnut, *City of Walnut General Plan*. Adopted May 9, 2018.

City of Walnut Municipal Code. Accessed July 19, 2024.

VCS Environmental, *Biological Technical Report for the Brookside Development Project.* June 2025.

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5.5 CULTURAL RESOURCES

5.5.1 INTRODUCTION

Cultural resources comprise historical, archaeological, and paleontological resources. 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 with historic events or figures. In California, historic resources cover human activities over the past 12,000 years. Archaeology is the branch of paleontology that studies human artifacts, such as places, objects, and settlements that reflect group or individual religious, cultural, or everyday activities. Paleontological resources are the fossilized remains of plants and animals (note: because paleontological sensitivity is associated with geological structure and soil composition, the Project's potential impact to paleontological resources is discussed in Section 5.7, *Geology and Soils*). Collectively, cultural resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements.

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

- *Phase 1 Cultural Resources Assessment*, VCS Environmental, September 2023 (Appendix E). Referred to in this Section as the "Cultural Report".
- *Historical Resource Analysis Report*, Urbana Preservation & Planning, LLC. Referred to in this Section as the "Historical Report" and is included as *Attachment D* to the Cultural Report (Appendix E).

5.5.2 ENVIRONMENTAL SETTING

Cultural resources include prehistoric archaeological sites, historic archaeological sites, historic structures, and artifacts made by people in the past. Prehistoric archaeological sites are places that contain the material remains of activities carried out by the native population of the area (Native Americans) prior to the arrival of Europeans in southern California. Artifacts found in prehistoric sites include flaked stone tools such as projectile points, knives, scrapers, and drills; ground stone tools such as manos, metates, mortars, and pestles for grinding seeds and nuts; and bone tools. Historic archaeological sites are places that contain the material remains of activities carried out by people during the period when written records were produced after the arrival of Europeans. Historic archaeological material usually consists of refuse, such as bottles, cans, and food waste deposited near structure foundations.

CULTURAL CONTEXT

Prehistory

According to the Cultural Report (Appendix E), a long-standing tenet of New World archaeology has been that humans did not arrive in the western hemisphere until about 12,000 to 13,000 Years Before Present (YBP). Increasingly, researchers are arguing for earlier dates of entry, but the evidence has not been universally accepted by archaeologists. With more recent evidence, that is changing, the most recent being the discovery of 21,000 to 23,000-year-old human footprints preserved in an ancient lakeshore in White Sands National Park in New Mexico.

Most of the generally accepted early remains indicate a very small, mobile population apparently dependent on hunting large game animals as the primary subsistence strategy. While early populations certainly used other resources, the bulk of the few traces remaining today are related to large game hunting. This situation results from the fact that hunting equipment involved many lithic tools that do not decay, while the remainder of the population's material culture was of wood or leather, which are more

subject to attrition through taphonomic (post depositional processes) factors. Therefore, lithic artifacts are the only surviving material from the Paleo-Indian Period. These consist primarily of large and extremely well-made projectile points and large but cruder tools such as scrapers and choppers. Encampments were not permanent but were probably sited near a major kill. Occupation would have lasted only until the resources of that kill were exhausted. Such an economy, using only a small fraction of the available resources, would not have supported a large population. It is probable that the Paleo-Indians lived in groups no larger than extended families and that contact with other such groups was infrequent. However, recent evidence suggests that some very early people may have had a more sedentary lifestyle and probably relied upon a variety of resources. Several chronologies are generally used to describe the sequence of the later prehistoric periods of coastal southern California as described in the Cultural Report (Appendix E) and summarized below.

Horizon I: Early Man or Paleo Indian Period (11,000 BCE to 7,500 BCE[1]). While initially termed Early Man Horizon (I), this early stage of human occupation is more commonly referred to as the Paleo Indian Period. The precise start of this period is still a topic of considerable debate. At inland archaeological sites, the surviving material culture of this period is primarily lithic, consisting of large, extremely well made stone projectile points and tools such as scrapers and choppers. Encampments were probably temporary, located near major kills or important resource areas.

Horizon II: Milling Stone Assemblages (7,500 BCE to 1,000 BCE). Encompassing a broad expanse of time, the Milling Stone Period was named for the abundant millingstone tools associated with sites of this period. These tools, the mano and metate, were used to process small, hard seeds from plants associated with shrub-scrub vegetation communities. An annual round of seasonal migrations was likely practiced with movements coinciding with ripening vegetal resources and the periods of maximal availability of various animal resources. Along the coast, shell midden sites are common site types. Some formal burials, occasionally with associated grave goods, are also evident. As millingstones are common and projectile points are comparatively rare during this time period, hunting was less important than the gathering of vegetable resources. Later studies suggested that a diversity of subsistence activities, including hunting of various game animals, were practiced during this time period. At present, little is known about cultural change during this period of time in southern California. While this lack of noticeable change gives the appearance of cultural stasis, almost certainly many regional and temporal cultural shifts did occur over the course of this time period.

Horizon III: Intermediate Cultures (1,000 BCE to 750 CE). The Intermediate Period is identified by a mixed strategy of plant exploitation, terrestrial hunting, and maritime subsistence strategies. Chipped stone tools (e.g., Projectile points) generally decrease in size, but increase in number. Abundant bone and shell remains have been recovered from sites dating to these time periods. In coastal areas, the introduction of the circular shell fishhook and the growing abundance of fish remains in sites over the course of the period suggest a substantial increase in fishing activity during the Intermediate Period. It is also during this time period that mortar and pestle use intensified dramatically. The mano and metate continued to be in use on a reduced scale, but the greatly intensified use of the mortar and pestle signaled a shift away from a subsistence strategy based on seed resources to that of the acorn. It is probably during this time period that the acorn became the food staple of the majority of the indigenous tribes in southern California. This subsistence strategy continued until European contact. Material culture generally became more diverse and elaborate during this time period and included steatite containers, perforated stones, bone tools, ornamental items, and asphalt adhesive.

[1] BCE stands for “Before Common Era” and CE stands for “Common Era”. These alternative forms of “BC” and “AD”, respectively, are used throughout this document.

Horizon IV: Late Prehistoric Cultures (750 CE to 1769 CE). During the Late Prehistoric Period, exploitation of many food resources, particularly marine resources among coastal groups, continued to intensify. The material culture in the Late Prehistoric Horizon increased in complexity in terms of the abundance and diversity of artifacts being produced. The recovery and identification of a number of small Projectile points during this time period likely suggests a greater utilization of the bow and arrow, which was likely introduced near the end of the Intermediate Period. Shell beads, ornaments, and other elements of material culture continue to be ornate, varied and widely distributed, the latter evidence suggestive of elaborate trade networks. The Late Prehistoric Period includes the first few centuries of early European contact (1542 CE to 1769 CE); this period is also known as the Protohistoric Period, as there was a low level of interaction between native Californians and Europeans prior to Portolá's overland expedition in 1769.

In the few centuries prior to European contact, the archaeological record reveals substantial increases in the indigenous population. Some village sites may have contained as many as 1,500 individuals. Apparently, many of these village sites were occupied throughout the year rather than seasonally. This shift in settlement strategy was likely influenced by improved food procurement and storage technology, which enabled population growth and may have helped stimulate changes in sociopolitical organization.

Evidence is growing that prehistoric cultural change has been much more variable through time and across culture areas than previously thought. Cultural traits such as maritime economies, seafaring, complex trade networks, and year-round occupation of villages appear to have developed much earlier than previously thought. Culture change during the Late Prehistoric Period, in particular, may have been driven more by environmental and resource pressures than optimal adaptation to the environment.

History

CALIFORNIA

In California, the historic era is generally divided into three periods: the Spanish or Mission Period (1769 to 1821), the Mexican or Rancho Period (1821 to 1848), and the American Period (1848 to present). The Spanish Period is represented by exploration of the region; establishment of the San Diego Presidio and missions at San Juan Capistrano, San Gabriel, and San Luis Rey; and the introduction of livestock, agricultural goods, and European architecture and construction techniques. The Old Spanish Trail, used by explorers, missionaries, and traders extended through the area.

The Mexican Period (1821-1848) began with Mexican independence from Spain and continued until the end of the Mexican-American War. The Secularization Act resulted in the transfer, through land grants (called ranchos) of large mission tracts to politically prominent individuals.

The American Period (1848-present) began with the Treaty of Guadalupe Hidalgo, and in 1850, California was accepted into the Union of the United States primarily due to the population increase created by the Gold Rush of 1849. The cattle industry reached its greatest prosperity during the first years of the American Period. Mexican Period land grants had created large pastoral estates in California, and demand for beef during the Gold Rush led to a cattle boom that lasted from 1849–1855. However, beginning about 1855, the demand for beef began to decline due to imports of sheep from New Mexico and cattle from the Mississippi and Missouri Valleys. When the beef market collapsed, many California ranchers lost their ranchos through foreclosure.

CITY OF WALNUT

The history below is adapted from the City of Walnut's current website (Walnut, City of [no date]), accessed on September 7, 2023):

> The history of Walnut dates back to the Indians who were of Shoshone origin. They were called Gabrielino Indians by the Spaniards because they lived in an area controlled by the San Gabriel Mission. Walnut was primarily used for the grazing of cattle and sheep by the Mission.
>
> Spaniards who arrived here 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 one of the 24 ranchos belonging to the San Gabriel Mission.
>
> 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 Alvardo 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 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 portion of Walnut and became part of Rancho 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.
>
> In order to preserve part of the community's history, the City of Walnut's Bicentennial Commission selected the construction of Lemon Creek Park and the restoration of the William R. Rowland Adobe Redwood Ranch House as Walnut's bicentennial Project. In 1871, the Lemon Creek Park area became the property of Sheriff William Rowland, who inherited the 29,000-acre ranch from his father, John Rowland. The modest structure served as the home of Mr. Meridith, ranch foreman for William Rowland. It was built in 1883. The adobe redwood ranch house is one of the few remaining original ranch style redwood and adobe structures in the area. On October 1, 1975, the State Landmark Committee placed the W.R. Rowland ranch house in the National Registry of Historical Places.

PROJECT SITE

According to the Historical Report (*Attachment D* to the Cultural Report (Appendix E)), originally comprising Rancho La Puente, between 1880 and 1890 the land was purchased and developed by the Sentous Brothers, an early family in area history involved in the cattle and meat business through ownership of a slaughterhouse and butcher shop in Los Angeles. In 1938, 1,800 acres of the original 3,500-acre Sentous family land holding was sold to P.G. Winnett who established a hobby farm and recreational equestrian ranch. At the time of Winnett's purchase, all buildings relating to the Sentous era of ownership were demolished except the Sentous Family ranch house dating to 1890. During Winnett's ownership period, 1938-1968, roughly 1,720 acres were further subdivided and sold and developed leaving roughly 80 acres of the original holding to a group of private colleges who maintained ownership through 1983. Between 1968 and 1983, roughly 55 acres were sold off for private development leaving the existing 25-acre Project Site (or Brookside property). In 1983, the remnant 25 acres were purchased and in 1986 were opened as

the Brookside Equestrian Center. At the time of purchase, there were an estimated six historic-era[2] buildings, at least 45 to 50 years old, on the Brookside property that dated to the Winnett era of ownership: the Sentous Family Ranch House (1890), the Winnett Ranch House (1938), the Main Barn and Stables (1938), the Minor Stables (1938), the Horse Barn (1938), and an unidentified structure (1952-1960). Following renovation in the 1980s, the Brookside property maintained two historic-era buildings, the Main Barn and Stables (1938) and the Minor Stables (1938), as well as eleven contemporary period buildings and structures: the covered riding arena, paddocks, sheds, holding pens, and riding rings, all constructed between the 1980s and 2000s. From 1983 to 2014, the Brookside property was occupied by the Brookside Equestrian Center, and today is colloquially referred to as Brookside by area stakeholders. Refer to Figure 5.5-1, *Existing Structures Locations*, for the locations of the existing structures and Figure 5.5-2, *Barn and Stables Photographs*, for photographs of the historic-era structures. For a more detailed description of the Project Site refer to the Historical Report (*Attachment D* to the Cultural Report (Appendix E).

ARCHAEOLOGICAL RECORDS SEARCH

Data Sources

A literature review of documents on file at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton was completed by the SCCIC on September 12, 2022. The SCCIC is the designated branch of the California Historical Resources Information System (CHRIS) and houses records concerning archaeological and historic resources in San Bernardino, Orange, Los Angeles, and Ventura Counties. The records search provided data on known archaeological and built environment resources as well as previous studies within one mile of the Project Site. Data sources consulted at the EIC included archaeological records, Archaeological Determinations of Eligibility (DOE), and the Historic Property Data File (HPDF) maintained by the California Office of Historic Preservation (OHP). The HPDF contains listings for the California Register of Historical Resources (CRHR) and/or National Register of Historic Places (NRHP), California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI).

Cultural Resources Studies

The SCCIC lists no cultural resources studies previously completed that include the Project Site. Twenty-four studies have been completed within one mile of the Project Site according to the SCCIC. One cultural resources assessment (Smith 2015) and one historical resources study (Daly 2015) were previously completed that included the Project Site but were not accessioned into the collections of the SCCIC at the time of this records search. The cultural resources assessment (Smith 2015) and historical resources study (Daly 2015) were completed for the same Project footprint as the current Project. No cultural or historical resources were noted on the Project Site as a result of the assessments; however, the cultural resources assessment (Smith 2015) describes the same archaeological site (P-19-00521) described in Cultural Resources Recorded section below. Table 5.5-1, *Cultural Resources Studies Within One-Half Mile of the Project Site*, lists the studies previously prepared.

[2] "Historic-era" means at least 45 to 50 years old (built earlier than 1978) but not necessarily evaluated as significant. A "contemporary period" property is one that was built after 1978 or is less than 45 to 50 years old.



Source: Urbana Preservation & Planning; October 2023.

THE BROOKSIDE PROJECT
Environmental Impact Report

Existing Structures Locations

VCS Environmental

Figure 5.5-1



View east of the Main Barn and Stables.



View southeast of the Main Barn and Stables.



View southeast of the Minor Stables.



View west of the Minor Stables building.

Source: Urbana Preservation & Planning; October 2023.

THE BROOKSIDE PROJECT
Environmental Impact Report

Barn and Stables Photographs

Table 5.5-1
Cultural Resources Studies Within One-Half Mile of the Project Site

Report Number: LA-	Author(s) (Year)	Type/Size/Resources
00342	Taylor (1978)	Survey; 5 sites and linear; 1 resource
00559	Cottrell (1979)	Survey; 725 acres; 1 resource
00591	Daly et al. (1979)	Survey; 1 resource
00765	Schroth (1980)	Excavation; 1 resource
01392	Anon. (1980)	Survey/Excavation; 3 resources
01421	Sutton (1984)	Survey; 0 resources
01434	King (1984)	1 resource
01581	Bissell (1986)	Survey; 1 resource
01984	Leonard (1975)	Survey; 0 resources
01985	Leaonard (1975)	Survey; 0 resources
02135	Mason (1990)	Survey; 25 acres; 0 resources
02882	McKenna (1993)	Survey/Evaluation; 2 resources
04337	SRS (1979)	Survey; 3 resources
04835	Ashkar (1999)	Survey; 3 resources
04959	Duke (2001)	Survey, cell site; 0 resources
05923	Bonner (2000)	Survey, cell site; 0 resources
08249	Peterson (2002)	Survey; linear; 7 resources
09583	Bonner (2008)	Survey, cell site; 1 resource
09881	Bonner & Williams (2009)	Survey, cell site; 1 resource
10621	Smith (2008)	Survey, cell site; 1 resource
10957	Bonner (2011)	Survey, cell site: 0 resources
10993	Wlodarski (2008)	Survey, cell site; 2 resources
10997	Glenn (2007)	Survey, linear; 5 resources
11236	Storey (2003)	Survey, road; 4 resources
None*	Smith (2015)	Survey; 1 resource
None*	Daly (2015)	Survey; 0 resources

Note:
*Studies not accessioned into the collections of the SCCIC at the time of this records search.
Source: VCS Environmental, *Phase I Cultural Resources Assessment*; September 2023 (Appendix E).

Cultural Resources Recorded

The SCCIC records search identified seven cultural resources recorded within one mile of the Project Site; refer to Table 5.5-2, *Cultural Resources Within One-Half Mile of the Project Site*. As shown in Table 5.2-2, no cultural resources have been recorded on the Project Site except for Resource P-19-00521, which was recorded as Lithic scatter/Habitation debris. The P-19-00521 site is identified as having been recorded within the Project Site; however, it was actually located 50-100 yards east of Lemon Creek and off the Project Site. It was initially recorded in 1973 and confirmed destroyed in a subsequent recordation in 1982. The site consisted of a mano, a hammerstone, and one cogged stone. Presumably, other cultural material was also noted at the campsite. The P-19-00521 site was destroyed sometime in or after 1973 during the

construction of the existing residential development on the knoll east and south of the bend in Lemon Creek.

Table 5.5-2
Cultural Resources Within One-Half Mile of the Project Site

Resource Number (P-19-)	Recorder(s) (most recent) (Year)	Type
*000521	Mack (1982)	Lithic scatter/Habitation debris
001040	Daly (1979)	Vejar Adobe site
001066	Clevenger et al. (1979)	Lithic scatter
001070	Banks (1979)	Habitation debris
001071	Banks (1979)	Lithic scatter; Habitation debris
186112	Kachour (2019)	UPRR; SPRR LA Division
186579	Mize (1975)	Roland Adobe Redwood Ranch House

Note:
*Recorded on the Project Site in 1973 per SCCIC. Subsequently confirmed in 1982 located offsite and had been destroyed.
Source: VCS Environmental, *Phase I Cultural Resources Assessment*; September 2023 (Appendix E).

HISTORIC AERIAL REVIEW

According to the Cultural Report (Appendix E), review of historic aerial photographs revealed that the Project Site was planted with what appears to be a citrus orchard. The alluvial bench (i.e., sediment deposit that is part of an old stream bed) to the east of Lemon Creek was cleared and a small structure could be seen near its southern end. In 1980, additional structures were observed built in this southern bench area and the residential community was constructed to the east. Sometime before 1985, all the structures on the bench were removed and the area was cleared. In 1991, a small, grassy area with a small parking area to the south appeared on the bench, between Lemon Creek and the residential community. White picket fencing, asphalt and dirt pathways, and three small gazebo structures were subsequently added to the area.

SACRED LANDS FILE SEARCH

A Native American Heritage Commission (NAHC) Sacred Lands File Search and Tribal contacts list was requested and received on January 5, 2023 (*Attachment C* of the Cultural Report (Appendix E)). The NAHC also provided a Tribal contacts list of local Tribes that may wish to consult on the Project. They included the following (*Attachment C* of the Cultural Report (Appendix E)):

- Gabrieleño Band of Mission Indians – Kizh Nation; Andrew Salas, Chairperson
- Gabrieleno/Tongva San Gabriel Band of Mission Indians; Anthony Morales, Chairperson
- Gabrielino/Tongva Nation; Sandonne Goad, Chairperson
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame; Chairperson
- Gabrielino Tongva Indians of California Tribal Council, Christina Conley, Tribal Consultant and Administrator
- Gabrielino-Tongva Tribe; Charles Alvarez
- Santa Rosa Band of Cahuilla Indians; Lovina Redner, Tribal Chair
- Soboba Band of Luiseño Indians; Isaiah Vivanco, Chairperson
- Soboba Band of Luiseño Indians; Joe Ontiveros, Cultural Resources Department

FIELD SURVEY

An archaeological survey of the Project Site was conducted on November 16, 2022. No cultural artifacts were found onsite.

5.5.3 REGULATORY SETTING

STATE

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires a lead agency to determine whether a Project would have a significant impact on one or more historical resources. According to Section 15064.5(a) of the State CEQA Guidelines, a "historical resource" is defined as a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (Public Resources Code (PRC) §21084.1); a resource included in a local register of historical resources (14 CCR §15064.5[a][2]); or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (14 CCR §15064.5[a][3]).

Section 5024.1 of the PRC, Section 15064.5 of the State CEQA Guidelines (14 CCR), and Sections 21083.2 and 21084.1 of the CEQA Statutes were used as the basic guidelines for the Cultural Report (Appendix E). PRC 5024.1 requires evaluation of historical resources to determine their eligibility for listing in the CRHR. The purposes of the CRHR are to maintain listings of the State's historical resources and to indicate which properties are to be protected from substantial adverse change. The criteria for listing resources in the CRHR, which were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP) (per the criteria listed at 36 CFR §60.4), are stated below (PRC §5024.1).

> Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered a historical resource . . . Generally, a resource shall be considered by a lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources including the following:
>
> (a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; or
>
> (b) Is associated with the lives of persons important in our past; or
>
> (c) 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
>
> (d) Has yielded, or may be likely to yield, information important in prehistory or history.

Impacts that would materially impair the significance of a resource listed in or eligible for listing in the CRHR are considered to have a significant effect on the environment. Impacts to historical resources from the proposed Project are considered significant if the Project (A) demolishes or materially impairs in an adverse manner those physical characteristics that convey its historical significance and that justify its inclusion in, or eligibility for, the California Register; (B) demolishes or materially impairs in an adverse manner those physical characteristics that account for its inclusion in a local register; or (C) demolishes or materially

impairs in an adverse manner those physical characteristics that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency (§15064.5[b][2]).

The purpose of a Phase I cultural resources investigation is to evaluate whether any cultural resources remain exposed on the surface of a Project Site or whether any cultural resources can reasonably be expected to exist in the subsurface. If resources are discovered, additional investigations would be required to evaluate the resources for CRHR eligibility and appropriate management of these resources would be required prior to Project implementation.

Broad mitigation guidelines for treating historical resources are codified in Section 15126.4(b) of the CEQA Guidelines. Public agencies should seek to avoid significant impacts to historical resources, with preservation-in-place being the preferred alternative. If not feasible, a data recovery plan shall be prepared to guide subsequent excavation. Mitigation for historical resources such as buildings, bridges, and other structures that are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties will generally be considered mitigated below a level of significance.

Assembly Bill 52

This Project is subject to the requirements of Assembly Bill (AB) 52. AB 52 is applicable to Projects that have filed a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) or notice of a Mitigated Negative Declaration (MND) or Negative Declaration (ND) on or after July 1, 2015. The law requires lead agencies to initiate consultation with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the Project and have requested such consultation, prior to determining the type of CEQA documentation that is applicable to the Project (i.e., EIR, MND, ND). Significant impacts to "tribal cultural resources" are considered significant impacts to the environment.

For "tribal cultural resources," PRC §21074, enacted and codified as part of a 2014 amendment to CEQA through Assembly Bill 52, provides the statutory definition as follows:

> "Tribal cultural resources" are either of the following:
>
> 1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
>
>   A. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
>
>   B. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
>
> 2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

To determine if such resources exist, under AB 52 (PRC §21080.3.1) lead agencies must consult with tribes that request consultation and must make a reasonable and good faith effort to mitigate the impacts of a development on such resources to a less than significant level. AB 52 allows tribes 30 days after receiving notification to request consultation and the lead agency must then initiate consultation within 30 days of the request by tribes.

The City of Walnut is undertaking AB 52 consultation with interested tribes.

Human Remains

California Health and Safety Code Section 7050.5 regulates the discovery of human remains. It states that any person who knowingly disinters, mutilates, or removes human remains without authority of law in a location other than a cemetery is guilty of a misdemeanor. Pursuant to the regulations, construction or excavation must stop in the vicinity of discovered human remains until the County coroner can determine the nature of the find. If human remains are encountered during excavation activities, all work must halt and the County Coroner must be notified (California Health and Safety Code, §7050.5). The Coroner then determines whether the remains are of forensic interest. If the Coroner determines that the remains are prehistoric, they will contact the NAHC within 24 hours. The NAHC is responsible for immediately designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the California Public Resources Code. The MLD must make their recommendation within 48 hours of being granted access to the site. The MLD's recommendation must be followed if feasible and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If the landowner rejects the MLD's recommendations, the landowner must rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance.

LOCAL

City of Walnut Municipal Code

The City of Walnut's Municipal Code (WMC) has a Historical Preservation ordinance (Chapter 6), that develops criteria for designating Landmarks and Points of Historical Interest in the City. It establishes procedures and guidelines to protect and preserve historical and culturally significant resources.

The criteria for a Landmark designation is an improvement, object, or natural feature that may be designated a landmark by the City Council upon recommendation of the Historic Preservation Commission if it is determined eligible, retains integrity (i.e., the ability of a resource to convey its significance) and meets one or more of the following criteria (Section 6.104.060):

A. It meets the criteria for listing in the National Register of Historic Places; or

B. It meets the criteria for listing in the California Register of Historic Resources; or

C. It meets one of more of the following criteria:

    1. It exemplifies or reflects elements of the City's history, heritage, or culture;

    2. It is identified with persons or events significant in local, state, or national history;

    3. It is representative of the work of notable builder, designer, architect, or artists;

    4. It embodies distinguishing architectural characteristics of a style, type, period, or method of construction;

    5. It is a noteworthy example of the use of indigenous material or craftsmanship;

    6. It embodies elements that represent significant structural, engineering, or architectural achievement or innovation;

    7. It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community or the City; or

8. It is one of the few remaining examples in the City, region, state or nation possessing distinguishing characteristics of an architectural or historical type of specimen.

Procedures for designation and/or removal of individual historical resource (6.104.070):

A. Any person(s) or group(s) may request, with the owner's consent, to designate a structure or site as a historic resource by submitting a written request ("nomination") to the Community Development Department. The request shall contain sufficient documentation and information indicating how the nominated resource meets the criteria for designation as a historical resource subject to the established criteria in the section above.

B. Any person(s) or group(s) may submit a written request, with the owner's consent, to remove a historic resource from the historic resource register. The written request shall include the reason(s) why the historical resource should be removed from the register.

C. The historical preservation ad-hoc advisory committee shall consider the request in accordance with the procedures established in the section above and recommend to the City Council and/or Planning Commission findings relative to the nomination, or removal, of a historic resource. The City Council shall conduct a public hearing.

D. No discretionary or ministerial permit shall be issued which may affect a historical resource under consideration for listing in the historical resources register, or for which may be removed from the register, while the designation or removal process is pending.

City of Walnut General Plan

CONSERVATION, OPEN SPACE, AND RECREATION ELEMENT

The following are relevant goals and policies from the Conservation, Open Space, and Recreation Element providing for the protection of cultural resources:

GOAL COR-9: The recognition and prioritization of cultural and historical preservation.

Policy COR-9.1: Historical Resource Identification and Protection. Protect identified historical sites and continue to assess over time the historical significance of additional properties.

Policy COR-9.2: Archaeological Resources. Assure that all development properly addresses the potential for subsurface archaeological deposits.

Policy COR-9.3: Cultural Resources. 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.

HISTORICAL AND CULTURALLY SIGNIFICANT SITES

According to the 2018 General Plan Figure COR-2 and Table COR-2, *Historical and Culturally Significant Sites*, the Brookside Equestrian Center is identified along with nine other locations as a significant site; however, there is no supporting documentation within the General Plan Draft EIR or General Plan Final EIR as to the reason for the Project Site's or the other listed site's inclusion. Table COR-2 only notes that the Project Site was originally part of the 2,200-acre Sentous Family Ranch. According to the Historical Report (*Attachment D* to the Cultural Report (Appendix E)), an earlier historical evaluation prepared for the Project Site had determined that the property was not significant and ineligible for listing on the NRHP, the CRHR, and the Local Register, which at that time was referred to as the "City's future Historical Resources Register"

indicating that the register had not yet been established via formal designation of one or more properties under the City's eligibility criteria. Within this context, the existing Brookside Equestrian Center was reevaluated for historical significance as discussed below in Section 5.5.5, *Environmental Impact Analysis*, IMPACT CR-1.

5.5.4 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:

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

5.5.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT CR-1: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

OVERVIEW

Project implementation would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. The Project involves demolition and removal of all existing buildings and structures within its boundaries to construct the proposed residential development. Evaluation of the existing Brookside Equestrian Center buildings on the Project Site (also referred to in this section as the Brookside property) resulted in a finding of not eligible for listing on the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or Local Register as discussed in detail within the Historical Report (*Attachment D* to the Cultural Report (Appendix E)) and as adapted/summarized in this section below.

PRIOR EVALUATIONS AND HISTORICAL RESOURCE STATUS

According to the Historical Report, the Brookside property was previously evaluated for historical significance by Daly & Associates in 2015. The 2015 evaluation concluded that the property was not significant and ineligible for listing on the NRHP, the CRHR and the Local Register, which at that time was referred to as the "City's future Historical Resources Register", indicating that the register had not yet been established through formal designation of one or more properties under the City's eligibility criteria. The 2015 report concluded that the property did not appear to be eligible for listing in the City's future Historical Resources Register using the criteria of the Historical Preservation Ordinance.

In 2017, the Brookside property was subsequently included on the list of "Historical and Culturally Significant Sites", contained within the City of Walnut General Plan Conservation, Recreation, and Open Space Element (adopted 2018). As of the writing of the Historical Report, no information had been provided to validate how the list of Historical and Culturally Significant Sites was prepared and/or whether the properties on the list, including the Brookside property, were researched, or formally documented and evaluated under the NRHP, CRHR or Local Register, or criteria prior to being placed on the list.

Despite the 2015 Daly & Associates conclusions, and the lack of data for the 2017 list (adopted 2018), due to its inclusion on the list of Historical and Culturally Significant Sites, the Project Site may be regarded as a presumptive historical resource if the General Plan list, adopted by Council resolution in 2018, amounts to the City's Local Register of Historical Resources. In the General Plan, the Brookside property is described as follows: "This site first belonged to the Sentous family, holders of the 2,200-acre Sentous Ranch." The Walton Family were the owners during the property's use as the Brookside Equestrian center from 1983 to 2013 (the center officially closed in 2014). The City has since verified that the Brookside property and others found on the City's list of Historical and Culturally Significant Sites had not all been formally evaluated for inclusion on the City's official Local Register of Historical Resources.

In light of the 2015 evaluation of ineligibility by Daly & Associates and the subsequent inclusion in the General Plan list without available supporting documentation, a new historical evaluation of the Brookside property was prepared to assess whether the property is eligible for designation and listing under the criteria of the CRHR and the Local Register, and to analyze the Project's potential impacts to historical resources. An analysis under the CRHR and Local Register criteria is included below.

CRHR Criterion 1: Associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Local Register Criterion 1: It exemplifies or reflects elements of the City's history, heritage or culture.

CRHR Criterion 1 is equivalent to Local Register Criterion 1. The Brookside property was originally part of the Rancho La Puente, which at its peak was 48,790 acres. The modern era of the Brookside property began with the Sentous Family who owned approximately 3,500 acres of land in the late nineteenth century under the Sentous Brothers firm. The firm's land holding was divided by the three Sentous brothers as their business partnership dissolved. Exupere Sentous maintained the Brookside property and operated a family ranch on the land and surrounding area. The family grew hay and grain as was typical in the region; the area at the time was relatively undeveloped, sparsely populated by family farms. The family of Exupere Sentous lost the property through foreclosure in 1935, and the 1,800-acre property was sold to P.G. Winnett in 1938. Winnett altered the property for use as a horse breeding and training facility, and as a weekend ranch. The property was used for this purpose until the 1980s when it became the Brookside Equestrian Center. The property continued to operate as an equestrian facility. There are only two remaining historic-era[3] buildings at the property that date to the 1938-1938 Winnett period: the Main Barn and Stables, and the Minor Stables (Figure 5.5-2, *Barn and Stables Photographs*). All buildings and structures related to Sentous Family Ranch, dating from the 1880s or 1890s to 1935, have been demolished and the acreage has been reduced through time such that there is no opportunity to assert positive eligibility under Local Register and CRHR Criterion 1 relative to the Sentous Family Ranch period. Hobby farms or ranches, such as the Winnett Ranch, were common activities for wealthy businessmen, and raising horses was considered a popular recreational activity prior to the post-war housing boom in World War II. While the Winnett Ranch likely provided employment opportunities for the local community, the boarding, breeding, and training of horses is not considered a significant element of the local area's history.

The City of Walnut was largely a rural agricultural community prior to incorporation in the late 1950s. The area is associated with cattle ranching, the growing and picking of walnuts, lemons and other orchard fruits, and other agricultural activities, which were the main economic activities prior to 1959. The property, as it currently exists, is not considered to have made a significant contribution to local, state, or national history while owned and occupied by the Winnett Ranch. Moreover, the two remaining historic-era structures do not culminate in a significant association with or representation of the larger operation that historically

[3] "Historic-era" means at least 45 to 50 years old (built earlier than 1978) but not necessarily evaluated as significant. A "contemporary period" property is one that was built after 1978 or is less than 45 to 50 years old.

existed at the Winnett Ranch such that they could be found significant under CRHR and Local Register Criterion 1.

The contemporary equestrian center use does not represent a significant element of history or culture heritage. Therefore, the Brookside property is not considered eligible under CRHR Criterion 1 or Local Register Criterion 1.

CRHR Criterion 2: Associated with the lives of persons important to local, California, or national history.

Local Register Criterion 2: It is identified with persons or events significant in local, state, or national history.

CRHR Criterion 2 and Local Register Criterion 2 are equivalent as they relate to association with the lives of persons or groups significant in local, state, or national history. The Brookside property is most closely related to P.G. Winnett. Winnett was notable for his leadership within the Bullock's Department Store and the larger Bullock's Incorporated. He rose from an entry position within the company to become the President of Bullock's Incorporated after the death of John Bullock in 1933. The Bullock's Department Store was among the most successful stores in Los Angeles, and Winnett operated in a leadership role in the company for most of his career.

The Brookside property would not be the property most closely associated with Winnett's life. The Bullock's Wilshire Building in Los Angeles was listed on the National Register of Historic places in 1978, and better represents Winnett's legacy. In the 1996 book, *Bullock's Wilshire*, Davis emphasized Winnett's impact on the construction of the building, noting the collaborative approach between Bullock, Winnett, and the architects John and Donald Parkinson. Further, Winnett used the Brookside property as a weekend retreat, not as a primary residence or as his primary career/income stream. A year before the purchase of the ranch, Winnett purchased a resort home at Lake Arrowhead. Similar to the Brookside property, this home was used as a getaway location, and not as a primary residence. Horse riding, training, and other equestrian activities appear to have been a passion of Winnett's, but it was not his primary occupation, and the ranch was not his primary residence, nor was it his only weekend retreat. As such, the Brookside property is not eligible under CRHR Criterion 2/Local Register Criterion 2.

CRHR Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method or construction, or represents the work of a master, or possesses high artistic values.

Local Register Criterion 3: It is representative of the work of a notable builder, designer, architect, or artist.

Local Register Criterion 4: It embodies distinguishing architectural characteristics of a style, type, period, or method of construction.

CRHR Criterion 3 is equivalent to Local Register Criterion 3 and 4 and relates to the architecture and architect of the Brookside property. The Brookside property includes two historic-era buildings, the Main Barn and Stables and the Minor Stables (Figure 5.5-2, *Barn and Stables Photographs*). The Main Barn and Stables building was constructed in a modified Monitor Barn style; the building has a U shape, and the second story hay loft has been converted to a living space. The Minor Stable building is a modified Dutch Barn; the building has been altered with an extended roof that creates a covered walkway. Each building was constructed in 1938 when Winnett retrofitted the property to a weekend horse ranch. The architect of the buildings is unknown. When constructed, the buildings would have been typical of equestrian barns and stables of the period. However, in recent decades the historic-era buildings have been altered to better serve the property as a contemporary period commercial equestrian center. The stable wings of the Main

Barn and Stables have been significantly widened by approximately 8 feet to accommodate a covered corridor and individual tack boxes. The building was significantly altered in 1995 when the second floor of the Main Barn and Stables was altered from a hay loft and barn to a residential space. The interior was altered into an apartment space, and the exterior was altered with the addition of balconies, a new roof form, and large double doors. The buildings date to the 1930s when they were built as part of the much larger Winnett Ranch. The acreage of the property was significantly reduced when sold in the 1980s, and many of the original Winnett-era buildings, including the main Ranch House and Horse Barn, were lost in the subsequent renovation. The Brookside property as seen now is not an accurate representation of the Winnett-era Ranch. When built in the 1930s, the Main Barn and Stable and the Minor Stable buildings were typical examples of barns and stables. In recent decades, however, they have been significantly altered from their original form. As such, they are not eligible under CRHR Criterion 3, or Local Register Criterion 3 or 4.

CRHR Criterion 4: It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Local Register Criterion 5: It is a noteworthy example of the use of indigenous materials or craftsmanship.

Research and analysis of the Brookside property has not yielded, nor does it appear to have the potential to yield further information that could be considered important in local, regional, state, or national history, and the extant built environment features at the property do not represent the use of indigenous materials or craftsmanship. The property is not eligible under CRHR Criterion 4/Local Register Criterion 5.

Local Register Criterion 6: It embodies elements that represent a significant structural, engineering, or architectural achievement or innovation.

The Brookside property includes two historic-era buildings originally constructed in 1938 and altered in contemporary renovation campaigns. They are considered typical barn and stable structures, and do not represent a significant structural, engineering, or architectural achievement or innovation. The property is not eligible under Local Register Criterion 6.

Local Register Criterion 7: It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community or the City.

The Brookside property has existed in its current form since 1983 and, due to changes through time, no longer maintains the appearance, configuration and features, and environmental setting that existed in the historic period. During the Winnett Ranch era, the property spanned approximately 1,800 acres before being reduced to 80 acres by the 1960s. The current property is approximately 25 acres. In the 1980s, many of the historic-era buildings were removed. Further, the topography was altered and leveled during the 1980s renovation campaign. Notably, the hill that was previously behind the Main Barn and Stables building was leveled. Suburban development, primarily development of residential tracts, has further compromised the former ranch and hobby farm property such that it is a remnant of what it once was. The Brookside property is in a low-density area of the City; it has been open to the public with access from the Lemon Creek trail system, however, it is not a public park. The Historical Report opines that the remnant acreage does not qualify as a unique location or singular physical characteristic, and its existence as a familiar property to those interested in the equestrian activities that occurred in the contemporary period, does not constitute a 'familiar visual feature' that could be asserted eligible under this criterion. When viewing the property as a whole, in light of the substantial change that has occurred, the property is not considered eligible under Local Register Criterion 7.

Local Register Criterion 8: It is one of the few remaining examples in the City, region, state or nation possessing distinguishing characteristics of an architectural or historical type of specimen.

In its current appearance and last phase of renovation, the Brookside property is typical of a modern equestrian center. It was updated and renovated to compete with current standards for equestrian centers. There are several equestrian centers throughout Los Angeles County; the Brookside property is not a rare example of the property type. As such, it is not eligible under Local Register Criterion 8.

Integrity

According to the Historical Report (*Attachment D* to the Cultural Report (Appendix E)), evaluation of integrity must always be grounded in an understanding of a property's physical features and how they relate to historic significance. To retain historic integrity, a property will possess several, and usually most, of the following seven aspects of integrity: location, materials, design, setting, workmanship, feeling, and association. If it is determined that a property is eligible for inclusion on the NRHP, CRHP, or Local Register because it meets one or more of the adopted designation criteria, the integrity of the resource must be evaluated. Integrity is the ability of a resource to convey its significance. Only after the historic significance of a resource is fully established can the issue of integrity be addressed. Within this context, the Historical Report found the Brookside property not individually eligible for designation and not eligible under any criteria. Therefore, further integrity analysis of the Brookside property is not merited.

HISTROICAL ANLYAIS CONCLUSIONS

The results of the historical analysis have determined the Brookside property has not been found eligible under any of the criteria of the CRHR or Local Register in its current appearance and configuration. Based on this new evaluation, the property does not appear to meet the definition of a historic resource pursuant to the CEQA Guidelines or the WMC Criteria for Establishment of a Historical Resource. Because the property has been found ineligible for designation, Project implementation would not result in a significant impact to a historical resource.

Because historical resources are known to occur within the region, there is the potential that historical resources could be discovered during excavation activities. To avoid adverse impacts to historical resources that could be encountered during construction, it is recommended that a qualified archaeologist be retained to monitor grading of the Project Site. Should the archaeologist find the potential exists for impacts to historical resources, the archaeologist will have the authority to temporarily divert, redirect, or halt grading activities to allow recovery of archaeological and/or cultural resources. With implementation of Mitigation Measures CR-1 through CR-7, potential impacts to unknown historical resources would be less than significant.

Level of Impact Before Mitigation: Potentially significant impact if historical resources are discovered during construction grading or excavation activities.

Mitigation Measures: Mitigation Measures CR-1, CR-2, CR-3, CR-4, CR-5, CR-6 and CR-7 described in Section 5.5.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT CR-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Project implementation would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. The SCCIC records search identified seven cultural

resources recorded within one mile of the Project Site. Only, one resource (P-19-00521) is identified as having been recorded within the Project Site in 1973 (the site consisted of a mano, a hammerstone, and one cogged stone); however, it was later determined to be located 50-100 yards east of Lemon Creek and off the Project Site. The P-19-00521 resource was believed to have been destroyed some time before 1982 during the construction of the existing residential development on the knoll to the east. In addition, the field survey resulted in negative findings. Therefore, no impacts are anticipated to a known cultural resource with Project implementation. To avoid potential impacts to unknown archaeological resources that could be discovered during construction grading or excavation activities, Mitigation Measures CR-1 through CR-7 are required, which would reduce potential impacts to less than significant.

Level of Impact Before Mitigation: Potentially significant impact if archaeological resources are discovered during construction grading or excavation activities.

Mitigation Measures: Mitigation Measures CR-1, CR-2, CR-3, CR-4, CR-5, CR-6 and CR-7 described in Section 5.5.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT CR-3: Disturb any human remains, including those interred outside of dedicated cemeteries?

No human remains or cemeteries are known to exist within or near the Project Site. However, there is always the potential that subsurface construction activities could encounter and potentially damage or destroy previously undiscovered human remains. Accordingly, this is considered a potentially significant impact. In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 must be followed.

Section 7050.5 of the *California Health and Safety Code* provides for the disposition of accidentally discovered human remains. Section 7050.5 states that, if human remains are found, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. Section 5097.98 of the Public Resources Code (PRC) states that, if remains are determined by the Coroner to be of Native American origin, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours which, in turn, must identify the person or persons they believe to be the most likely descended from the deceased Native American. The descendants must complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. With the implementation of standard regulations and Mitigation Measures CR-1 through CR-7, potential impacts to human remains would be less than significant.

Level of Impact Before Mitigation: Potentially significant impact if human remains are discovered during construction grading or excavation activities.

Mitigation Measures: Mitigation Measures CR-1, CR-2, CR-3, CR-4, CR-5, CR-6 and CR-7 described in Section 5.5.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated and implementation of standard regulations.

5.5.6 CUMULATIVE IMPACTS

The context for assessing cumulative impacts to local cultural resources is to determine whether the Project would result in a loss of these resources that could diminish or eliminate important information relevant to the City of Walnut and/or the surrounding area, and if combined with the effects of the Project, would result in a cumulatively significant impact to cultural resources.

As previously discussed, the Project Site (or Brookside property) was determined ineligible for listing on the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and Local Register. The SCCIC records search identified seven cultural resources recorded within one mile of the Project Site. One resource (P-19-00521) is identified as having been recorded within the Project Site (the site consisted of a mano, a hammerstone, and one cogged stone); however, it was later determined to be located 50-100 yards east of Lemon Creek and off the Project Site. The P-19-00521 site was also believed to have been destroyed some time before 1982 during the construction of the existing residential development on the knoll to the east. In addition, the field survey resulted in negative findings. No impacts to a known resource are anticipated; however, the Project would be required to comply with Mitigation Measures CR-1 through CR-7 to minimized and/or avoid impacts to a cultural resource discovered during construction grading or excavation activities. These measures would reduce the Project's potential direct impact on cultural resources to less than significant.

Related cumulative development Projects shown in Section 4.0, *Basis for Cumulative Impacts*, would also undergo environmental review and be required to evaluate their potential impacts to cultural resources pursuant to CEQA. Compliance with federal, state, and local laws that provide for the protection of cultural resources and, where needed, project-specific measures to minimize such impacts to cultural resources would also be required. Therefore, the proposed Project, considered with the related cumulative development Projects, would not contribute considerably to cumulatively significant impacts to cultural resources. No additional mitigation is required.

Level of Impact Before Mitigation: Less than significant impact as there is no notable incremental Project contribution to a loss of known cultural resources.

Mitigation Measures: No additional mitigation measures are required beyond those required for potential Project-specific impacts: CR-1, CR-2, CR-3, CR-4, CR-5, CR-6 and CR-7 described in Section 5.5.7.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated and implementation of standard regulations.

5.5.7 MITIGATION MEASURES

CR-1: Prior to issuance of a grading permit, the applicant shall provide written verification that a qualified Archaeologist has been retained to implement the monitoring program. This verification shall be presented in a letter from the Project Archaeologist to the Lead Agency.

CR-2: The Project applicant shall provide Native American monitoring during grading if the Lead Agency determines it is necessary pending results of the AB 52 Consultation process. If applicable, the Native American monitor shall work in concert with the archaeological monitor to observe ground disturbances and search for cultural materials. The Lead Agency shall coordinate with the consulting Tribe(s) to facilitate communications with the Project Developer/Applicant so that all Parties can develop a mutually agreeable Tribal Monitoring and Treatment Agreement which includes the scope of monitoring, scheduling of monitors from individual consulting Tribe(s), and the course of action for inadvertent discoveries.

CR-3: Prior to the issuance of a grading permit, the Project Archaeologist, in consultation with the Consulting Tribe(s), the Project Applicant, and the City, shall develop a Cultural Resources Monitoring Plan (CRMP), to address the implementation of the City's Tribal Cultural Resource Mitigation Measures including but not limited to, timing, procedures and considerations for Tribal Cultural Resources during the course of ground disturbing activities that will occur on the Project Site. The CRMP shall be subject to review by Tribe(s) and final approval by the City.

CR-4: The Project Archaeologist and the Consulting Tribes(s) shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a Cultural Resources Worker Sensitivity Training to those in attendance. The Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols.

CR-5: The protocols and stipulations that the contractor, City, Consulting Tribe(s) and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.

1. During the original cutting of previously undisturbed deposits, the archaeological and Tribal monitor shall be onsite, as determined by the consulting archaeologist, to monitor excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The consulting archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.

2. Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed.

3. In the event that previously unidentified cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. The archaeologist shall contact the Lead Agency at the time of discovery. The archaeologist, in consultation with the Lead Agency, shall determine the significance of the discovered resources. The Lead Agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be implemented by the consulting archaeologist and approved by the Lead Agency before being carried out using professional archaeological methods. If any human bones are discovered, the county coroner and Lead Agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (as identified by the NAHC) shall be contacted in order to determine proper treatment and disposition of the remains.

4. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered, and features recorded using professional archaeological methods. The Project Archaeologist in consultation with the consulting Tribe(s) shall determine the amount of material to be recovered for an adequate artifact sample for analysis.

CR-6: One or more of the following treatments, in order of preference, shall be used in the event of a cultural resources discovery:

1. Preservation-in-Place. Avoidance, or preservation-in-place, involves leaving a resource where it was found with no development affecting its integrity. Pursuant to Public Resources Code Section 21083.2(b) avoidance is the preferred method of preservation for archaeological and cultural resources.

2. Reburial on the Project Site in an area not subject to future disturbance. Reburial of a resource shall include provisions to protect the selected reburial area from any future impacts in perpetuity. Reburial shall not occur until all required cataloging and basic recording have been completed, with the exception of sacred items, burial goods and Native American human remains. Any reburial process shall be culturally appropriate. The listing of contents and the location of the reburial shall be included in a confidential Phase IV monitoring report.

3. If Preservation-in-Place or reburial is not feasible, all cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards in a curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources (OHP 1993). The collections and associated records shall be transferred, including title and accompanied by payment of the fees necessary for permanent curation.

CR-7: A Phase IV Monitoring Report, documenting the field and analysis results and interpreting the artifact and research data within the research context, shall be completed, and submitted to the satisfaction of the Lead Agency prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms. The Phase IV report shall be filed with the City under a confidential cover and not subject to Public Records Request and a copy of the report shall be submitted to the consulting Tribe(s).

5.5.8 REFERENCES

City of Walnut, *City of Walnut General Plan*. Adopted May 9, 2018.

City of Walnut, Walnut Municipal Code, Title 6 – Planning and Zoning.

Urbana Preservation & Planning, LLC., *Historical Resource Analysis Report*. October 2023.

VCS Environmental, *Brookside Residential Project Phase I Cultural Resources Assessment.* September 2023.

5.6 ENERGY

5.6.1 INTRODUCTION

This section evaluates the proposed Project's potential energy-related impacts and ways in which the Project would reduce unnecessary energy consumption, consistent with the suggestions contained in Appendix F of the CEQA Guidelines. Analysis in this section is based in part on the following technical report:

- *Air Quality, Energy, and Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis*, Vista Environmental, April 17, 2024 (Appendix C). This report is herein referred to as the "Energy Report" in this section.

5.6.2 ENVIRONMENTAL SETTING

The 2018 amendments and additions to the State CEQA Guidelines added an energy section to analyze a project's energy consumption to avoid or reduce inefficient, wasteful, or unnecessary consumption of energy. Since the energy section has been added, no state or local agencies have adopted specific criteria or thresholds to be utilized in an energy impact analysis; however, Section 15126.2(b) of the 2018 *Guidelines for the Implementation of the California Environmental Quality Act,* provides the following direction on how to analyze a project's energy consumption:

> "If analysis of the project's energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources, the EIR shall mitigate that energy use. This analysis should include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project's size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project. This analysis is subject to the rule of reason and shall focus on energy use that is caused by the project. This analysis may be included in related analyses of air quality, greenhouse gas emissions, transportation or utilities in the discretion of the lead agency."

If the proposed Project creates inefficient, wasteful, or unnecessary consumption of energy during construction or operation activities or conflicts with a state or local plan for renewable energy or energy efficiency, then the proposed Project would create a significant energy impact. This section represents a summary of the proposed Project's anticipated energy needs, impacts, and conservation measures.

Energy service providers to the Project Site include Southern California Edison (SCE) for electrical service and Southern California Gas Company (SoCalGas) for natural gas.

5.6.3 REGULATORY SETTING

FEDERAL

There are no federal regulations applicable to the Project.

STATE

Warren-Alquist State Energy Resources Conservation and Development Act of 1974

Energy conservation management in the State was initiated by the 1974 Warren-Alquist State Energy Resources Conservation and Development Act that created the California Energy Resource Conservation and Development Commission (currently named California Energy Commission [CEC]), which was originally

tasked with certifying new electric generating plants based on the need for the plant and the suitability of the site of the plant. In 1976, the Warren-Alquist Act was expanded to include new restrictions on nuclear generating plants, which effectively resulted in a moratorium of any new nuclear generating plants in the State. The following details specific regulations adopted by the State to reduce the consumption of energy.

California Code of Regulations (CCR) Title 20

On November 3, 1976, the CEC adopted the Regulations for Appliance Efficiency Standards Relating to Refrigerators, Refrigerator-Freezers and Freezers and Air Conditioners, which were the first energy-efficiency standards for appliances. The appliance efficiency regulations have been updated several times by the Commission and the most current version is the 2016 Appliance Efficiency Regulations, adopted January 2017 and now includes almost all types of appliances and lamps that use electricity, natural gas as well as plumbing fixtures. The authority for the CEC to control the energy-efficiency of appliances is detailed in California Code of Regulations (CCR), Title 20, Division 2, Chapter 4, Article 4, Sections 1601-1609.

California Code of Regulations (CCR) Title 24, Part 6

The CEC is also responsible for implementing the CCR Title 24, Part 6: *California's Energy Efficiency Standards for Residential and Nonresidential Buildings* (Title 24 Part 6) that were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. In 2008, the State set an energy-use reduction goal of zero-net-energy use of all new homes by 2020 and the CEC was mandated to meet this goal through revisions to the Title 24, Part 6 regulations.

The Title 24 standards are updated on a three-year schedule and since 2008 the standards have been incrementally moving to the 2020 goal of the zero-net-energy use. The 2022 Title 24 standards are the current standards that went into effect on January 1, 2023. The 2022 Title 24 standards will: (1) Increase onsite renewable energy generation; (2) Increase electric load flexibility to support grid reliability; (3) Reduce emissions from newly constructed buildings; (4) Reduce air pollution for improved public health; and (5) Encourage adoption of environmentally beneficial efficient electric technologies.

California Code of Regulations (CCR) Title 24, Part 11

CCR Title 24, Part 11: *California Green Building Standards* (CALGreen) was developed in response to continued efforts to reduce GHG emissions associated with energy consumption. The CALGreen Building Standards are also updated every three years and the current version is the 2022 California Green Building Standard Code that became effective on January 1, 2023.

The CALGreen Code contains requirements for construction site selection; storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verifying that all building systems (e.g., heating, and cooling equipment and lighting systems) are functioning at their maximum efficiency.

The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others. Implementation of the CALGreen Code measures reduce energy consumption and vehicle trips and encourages the use of alternative-fuel vehicles, which reduces pollutant emissions.

Senate Bill 1020

Senate Bill 1020 (SB 1020) was adopted September 16, 2022 and would speed up the timeline retail electricity is supplied by renewable energy sources over the prior adoption timelines provided in SB 100, SB 350, SB 1078, SB 107, and SB X1-2. SB 1020 requires that retail sales of electricity be from renewable energy resources and zero-carbon resources supply 90% by December 31, 2035, 95% by December 31, 2040, and 100% by December 31, 2045.

Executive Order N-79-20

The California Governor issued Executive Order N-79-20 on September 23, 2020 that requires all new passenger cars and trucks and commercial drayage trucks sold in California to be zero-emissions by the year 2035 and all medium- heavy-duty vehicles (commercial trucks) sold in the state to be zero-emission by 2045 for all operations where feasible. Executive Order N-79-20 also requires all off-road vehicles and equipment to transition to 100% zero-emission equipment, where feasible by 2035.

Executive Order B-48-18 and Assembly Bill 2127

The California Governor issued Executive Order B-48-18 on January 26, 2018 that orders all state entities to work with the private sector to put at least five million zero-emission vehicles on California roads by 2030 and to install 200 hydrogen fueling stations and 250,000 electric vehicle chargers by 2025. Currently there are approximately 350,000 electric vehicles operating in California, which represents approximately 1.5% of the 24 million vehicles total currently operating in California. Implementation of Executive Order B-48-18 would result in approximately 20% of all vehicles in California to be zero emission electric vehicles. Assembly Bill 2127 (AB 2127) was codified into statute on September 13, 2018 and requires that the CEC working with CARB prepare biannual assessments of the statewide electric vehicle charging infrastructure needed to support the levels of zero emission vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030.

Assembly Bill 1109

California Assembly Bill 1109 (AB 1109) was adopted October 2007, also known as the Lighting Efficiency and Toxics Reduction Act, prohibits the manufacturing of lights after January 1, 2010 that contain levels of hazardous substances prohibited by the European Union pursuant to the Restriction of Hazardous Substances (RoHS) Directive. AB 1109 also requires reductions in energy usage for lighting and is structured to reduce lighting electrical consumption by: (1) At least 50% reduction from 2007 levels for indoor residential lighting; and (2) At least 25% reduction from 2007 levels for indoor commercial and all outdoor lighting by 2018. AB 1109 would reduce GHG emissions through reducing the amount of electricity required to be generated by fossil fuels in California.

Assembly Bill 1493

California Assembly Bill 1493 (also known as the Pavley Bill, in reference to its author Fran Pavley) was enacted on July 22, 2002 and required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. In 2004, CARB approved the “Pavley I” regulations limiting the amount of GHGs that may be released from new passenger automobiles that are being phased in between model years 2009 through 2016. These regulations will reduce GHG emissions by 30% from 2002 levels by 2016. In June 2009, the EPA granted California the authority to implement GHG emission reduction standards for light duty vehicles, in September 2009, amendments to the Pavley I regulations were adopted by CARB and implementation of the “Pavley I” regulations started in 2009.

The second set of regulations "Pavley II" was developed in 2010 and is being phased in between model years 2017 through 2025 with the goal of reducing GHG emissions by 45% by the year 2020 as compared to the 2002 fleet. The Pavley II standards were developed by linking the GHG emissions and formerly separate toxic tailpipe emissions standards previously known as the "LEV III" (third stage of the Low Emission Vehicle standards) into a single regulatory framework. The new rules reduce emissions from gasoline-powered cars as well as promote zero-emissions auto technologies such as electricity and hydrogen, and through increasing the infrastructure for fueling hydrogen vehicles. In 2009, the U.S. EPA granted California the authority to implement the GHG standards for passenger cars, pickup trucks, and sport utility vehicles and these GHG emissions standards are currently being implemented nationwide.

The EPA has performed a midterm evaluation of the longer-term standards for model years 2022-2025, and based on the findings of this midterm evaluation, the EPA proposed The Safer Affordable Fuel Efficient (SAFE) Vehicles Proposed Rule for Model Years 2021-2026 that amends the corporate average fuel economy (CAFE) and GHG emissions standards for light vehicles for model years 2021 through 2026. The SAFE Vehicles Rule was published on April 30, 2020 and made effective on June 29, 2020.

LOCAL

City of Walnut General Plan

LAND USE AND COMMUNITY DESIGN ELEMENT

The applicable energy plan is the City of Walnut General Plan Land Use and Community Design Element, which provides the following details on how energy efficiency is accounted for in the City. The energy-related goals and policies from the Land Use and Community Design Element are shown below:

GOAL LCD-9: A built environment with development approaches that apply sustainability principles.

Policy LCD-9.1: Conservation. Encourage the use of building design and materials that conserve energy and material resources.

Policy LCD-9.2: Green Building Education. Encourage consultation with organizations, neighborhoods, developers, and businesses to offer green building educational programs.

Policy LCD-9.3: Sustainable Building Features. 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.

Policy LCD-9.4: Building Design. Support building designs that assist with the management of stormwater runoff, preserve and enhance soil permeability, and reduce other negative effects on the urban development.

Policy LCD-9.5: City Sustainability. Perform energy consumption audits of City buildings and create an environment that promotes energy-efficiency within repair, construction, and operation of City Buildings.

Policy LCD-9.6: Vehicle Charging Stations. Encourage the implementation of programs that support electric vehicle charging readiness Citywide. Permit the installation of electric vehicle charging stations on private property.

5.6.4 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:

- EN-1: Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- EN-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

5.6.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT EN-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The proposed Project would consume energy resources during temporary construction activities and long-term operations. Energy resources would include electricity, natural gas, and petroleum-based fuel supplies and distribution systems. This analysis includes a discussion of the Project's potential impacts on energy resources, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy within the context of CEQA. The Project's energy usage associated with construction and operations was estimated using the California Emissions Estimator Model (CalEEMod) as presented in the Energy Report (Appendix C).

SHORT-TERM CONSTRUCTION IMPACTS

Energy Consumption

Project construction activities are anticipated to include demolition, site preparation, grading, building construction of the homes, paving onsite roads, and the application of architectural coatings (e.g., paints). The proposed Project would consume energy resources during construction in the form of electricity, petroleum-based fuels, and construction materials.

Electricity

The Project would consume electricity to construct the new structures and infrastructure. Electricity would be supplied to the Project Site by Southern California Edison (SCE) and would be obtained from the existing electrical lines within and adjacent to the Project Site. The use of electricity from existing power lines rather than temporary diesel or gasoline powered generators would reduce potential impacts on energy use. Electricity consumed during Project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities include electricity associated with the conveyance of water that would be used during Project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Overall, construction activities associated with the proposed Project would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies and infrastructure (Vista Environmental 2024). Therefore, the use of electricity during Project construction would not be wasteful, inefficient, or unnecessary. In addition, it is anticipated that only nominal improvements would be required to Southern California Edison Utility distribution lines and equipment. Compliance with the City's guidelines and requirements would ensure that the Project fulfills its responsibilities relative to infrastructure installation,

coordinates any electrical infrastructure removals or relocations, and limits any impacts associated with construction. Potential impacts are considered less than significant, and no mitigation is required.

Petroleum Fuel Use

The Project's use of petroleum products would primarily be associated with construction vehicles and transportation-related activities. This includes gasoline and diesel fuel usage for off-road equipment and worker and vendor vehicle trips. The off-road construction equipment fuel usage was estimated, which found that Project construction activities would consume 3,086 gallons of gasoline and 51,798 gallons of diesel fuel. This equates to 0.0001% of the gasoline and 0.03% of the diesel consumed annually in Los Angeles County (i.e., 3,659 million gallons of gasoline and 300 million gallons of diesel). Construction activities associated with the Project would be required to adhere to all state and South Coast Air Quality Management District (SCAQMD) regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. In addition, there is nothing within the Project description to indicate an unusual amount of petroleum would need to be used (i.e., the proposed development and use of equipment would be typical of other similar residential development projects). As such, construction activities would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Potential impacts are considered less than significant, and no mitigation is required.

Construction Materials

Construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass would be required to implement the Project. There is nothing within the Project description to indicate the need for an unusual amount or type of such materials (i.e., the proposed development and use of construction materials would be typical of other similar residential development projects). Development of the Project would not result in the need to manufacture construction materials or create new building material facilities specifically to supply the Project. It is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete; it is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. As such, construction activities would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Potential impacts are considered less than significant, and no mitigation is required.

LONG-TERM OPERATIONAL IMPACTS

Energy Consumption

The on-going Project operations (i.e., occupancy of the development) would require the use of energy resources for multiple purposes including, but not limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, appliances, and electronics. Energy would also be consumed during operations related to water usage, solid waste disposal, landscape equipment and vehicle trips.

Electricity

Project operations would result in net zero electricity usage with implementation of 2022 Title 24 Part 6 requirements that require the implementation of building energy efficiency standards that include a variety of measures to make new homes more energy efficient and also requires the installation of photovoltaic (PV) systems of adequate size to generate enough electricity to meet the zero-net energy use standard. The size of the PV system required for the Project pursuant to the 2022 Title 24 standards was calculated, which found that the Project would need to install at least an estimated 162.5 kilowatts of photovoltaic panels within the proposed development. Ultimate requirements would be based on the final building sizes. Therefore, it is anticipated that the Project would be designed and built to minimize electricity use and that

existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Impacts regarding electrical supply and infrastructure capacity would be less than significant, and no mitigation measures would be required.

Natural Gas

Project operations would result in increased consumption of natural gas at the Project Site. The Project would consume an estimated 1,035,054 kilo British thermal units (kBTU) per year, which is equivalent to 10,353 Therms per year of natural gas. This consumption equates to 0.0004% of the natural gas consumed annually in Los Angeles County (i.e., 2,820 million Therms of natural gas). As such, the operations-related natural gas use would be nominal, when compared to current natural gas usage rates in the County. It should be noted that, the Project would comply with all federal, state, and County requirements related to the consumption of natural gas, that includes CCR Title 24, Part 6 Building Energy Efficiency Standards and CCR Title 24, Part 11: California Green Building Standards. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed structures, including enhanced insulation as well as use of efficient natural gas appliances and HVAC units. Therefore, it is anticipated that the Project would be designed and built to minimize natural gas use and that existing and planned natural gas capacity and natural gas supplies would be sufficient to support the Project's natural gas demand. Impacts regarding natural gas supply and infrastructure capacity would be less than significant, and no mitigation measures would be required.

Petroleum Fuel Use

Project operations would result in increased consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. The Project would consume an estimated 31,922 gallons of gasoline fuel per year from vehicle travel. This equates to 0.0009% of the gasoline consumed in Los Angeles County annually (i.e., 3,659 million gallons of gasoline). As such, the operations-related petroleum use would be nominal, when compared to current petroleum usage rates. It should be noted that the Project would comply with all federal, state, and City requirements related to the consumption of transportation energy that includes California Code of Regulations Title 24, Part 10 California Green Building Standards that require all new garages for the proposed homes to install electrical panels of adequate size to support the installation of electric vehicle charging systems. Therefore, it is anticipated that the Project would be designed and built to minimize transportation energy through the promotion of the use of electric-powered vehicles and it is anticipated that existing and planned capacity and supplies of transportation fuels would be sufficient to support the Project's demand. Impacts regarding transportation energy supply and infrastructure capacity would be less than significant, and no mitigation measures would be required.

Level of Impact Before Mitigation: Less than significant impact based on evaluation of the Project description and based on compliance with standard regulations.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT EN-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The applicable energy plan for the proposed Project is the City of Walnut General Plan Conservation, Open Space and Recreation Element, adopted May 9, 2018. The proposed Project's consistency with the energy conservation policies from the General Plan are shown in Table 5.6-1, *Project Consistency with the General Plan Energy Conservation Policies*.

Table 5.6-1
Project Consistency with the General Plan Energy Conservation Policies

General Plan Policy	Proposed Project Implementation Actions
Goal LCD-9: A built environment with development approaches that apply sustainability principles.	
Policy LCD-9.1: Conservation. Encourage the use of building design and materials that conserve energy and material resources.	**Consistent.** The proposed homes would be designed to meet or exceed the 2022 Title 24 Part 6 building standards that require all single-family homes built in California to have rooftop solar PV systems, enhanced insulation, and to install energy efficient appliances.
Policy LCD-9.2: Green Building Education. Encourage consultation with organizations, neighborhoods, developers, and businesses to offer green building educational programs.	**Not Applicable.** This policy is for the City to implement.
Policy LCD-9.3: Sustainable Building Features. 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.	**Consistent.** The proposed homes would be designed to meet or exceed the 2022 Title 24 Part 6 building standards that require all single-family homes built in California to have rooftop solar PV systems, enhanced insulation, and to install energy efficient appliances.
Policy LCD-9.4: Building Design. Support building designs that assist with the management of stormwater runoff, preserve, and enhance soil permeability, and reduce other negative effects on the urban development.	**Consistent.** The proposed Project would be designed to meet the current stormwater runoff requirements that will preserve and enhance soil permeability and will minimize stormwater runoff. Two water quality detention basins would manage and treat pollutants from stormwater.
Policy LCD-9.5: City Sustainability. Perform energy consumption audits of City buildings and create an environment that promotes energy-efficiency within repair, construction, and operation of City Buildings.	**Not Applicable.** This policy is for City buildings and for the City to implement.
Policy LCD-9.6: Vehicle Charging Stations. Encourage the implementation of programs that support electric vehicle charging readiness Citywide. Permit the installation of electric vehicle charging stations on private property.	**Consistent.** The proposed homes would be designed to meet or exceed the 2022 Title 24 Part 6 building standards that require the garages in all new single-family homes to be wired for a Level 2 electric vehicle charger.
Source: Vista Environmental, *Energy Report*; April 17, 2024.	

As shown in Table 5.6-1, the Project would be consistent with all applicable energy conservation policies from the General Plan Land Use and Community Design Element. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on evaluation of the Project description and General Plan and based on compliance with standard regulations.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.6.6 CUMULATIVE IMPACTS

Project implementation would increase demands for electricity, natural gas, and petroleum fuels in the Project vicinity. It is unknown, and would be speculative, as to whether this increased demand within the Project vicinity would be greater or less than the demand-needs of these same new residents if they were to reside somewhere else in the State. As was previously discussed, the Project is not anticipated to result in significant energy impacts due to wasteful, inefficient, and unnecessary consumption of energy resources. This determination was based on evaluation of the Project description and based on compliance with standard regulations. Similarly, the related development projects described in Section 4.0, *Basis for Cumulative Impacts*, would also be required to comply with the building energy efficiency standards, which would reduce their energy consumption impacts. Therefore, the proposed Project's incremental consumption of energy resources would not be cumulatively significant. No mitigation measures are required.

Level of Impact Before Mitigation: Less than significant impact based on evaluation of the Project description and cumulative projects list and based on compliance with standard regulations.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.6.7 MITIGATION MEASURES

No mitigation measures are required for energy.

5.6.8 REFERENCES

City of Walnut, *City of Walnut General Plan*. Adopted May 9, 2018.

Vista Environmental, *Air Quality, Energy, and Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis*. April 17, 2024.

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5.7 GEOLOGY AND SOILS

5.7.1 INTRODUCTION

This section evaluates the Project's potential impacts on geological and soil resources, paleontological resources, and/or unique geologic features. The analysis in this section is based in part on the following technical reports:

- *Preliminary Geotechnical Investigation Report*, Group Delta Consultants, Inc., March 17, 2023 (Appendix F1), referred to in the section as the Geotechnical Report.
- *Geotechnical Addendum*, Group Delta Consultants, Inc., August 3, 2023 (Appendix F2), referred to in the section as the Geotechnical Addendum.
- *Phase I Cultural Resources Assessment, Brookside Development Project,* VCS Environmental, September 2023 (Appendix E), referred to in the section as the Cultural Report.

5.7.2 ENVIRONMENTAL SETTING

REGIONAL GEOLOGY

The Project Site is located in the Peninsular Range geomorphic province characterized by northwest trending ridges and valleys. It is a tectonically complex area accommodating rotation stress imposed by the continental plate boundary along the San Andreas Fault. Ridge and valley defining structures include active strike slip fault zones, including the Newport-Inglewood, Elsinore, and San Jacinto faults.

LOCAL GEOLOGY

Locally, the site is situated along the southern margin of the San Jose Hills, centrally within the Puente Hills block. The South San Jose Creek has incised and filled a relatively narrow southwest trending valley, locally known as Los Nogales. The foothills are comprised of elevated and folded Tertiary sedimentary rock. Lemon Creek flows south through the Project Site in an open channel. Young alluvial deposits fill the creek floor and overbank areas. Slopes are comprised of Monterey (Puente) Formation, Miocene-aged silt and sandstone, intermixed sandstone and claystone, with the bedrock regionally mapped as Tuscaloosa Marine Shale. Regional maps indicate bedding dips 35 to 45 degrees to the south-southeast.

SURFACE CONDITIONS

The Project Site grade varies approximately from an elevation of 640 feet on the north boundary adjacent to Meadow Pass Road down to an elevation of 572 feet on the southern boundary adjacent to La Puente Road. The southern portion of the Project Site is free of any structures and mostly developed by prior agricultural and equestrian uses. The northern portion of the site has improvements related to the development of Meadow Pass Road and an abandoned equestrian facility. In review of a historical topographic map from 1926, it appears that significant cuts and fills have been placed to develop the current landscape at the Project Site. Some improvements such as trails and fences are present. The surface is mostly unpaved with grass, trees and shrubs.

SUBSURFACE CONDITIONS

North of Lemon Creek (Near proposed Lot 1 through Lot 13 and Basin #1)

The subsurface conditions north of Lemon Creek (near proposed Lot 1 through Lot 13 and Basin #1) consists of existing artificial fill soils underlain by alluvium, organic rich soils, and bedrock of the Puente Formation.

Artificial fill soils consisting of expansive, stiff clay and fragments of bedrock materials were encountered in about 2 to 5 feet thick during testing. Fill soils become thicker toward Lemon Creek and were encountered up to 10 feet thick. The origin and compaction of the fill is unknown; however, it was likely associated with the development of Meadow Pass Road and the existing nearby developments. The fill soils are underlain by alluvium, which consist predominantly of clayey soils. The clayey soils above groundwater are porous; however, they are stiff to very stiff, having unconfined compressive strength. The clayey soils below groundwater become weaker and compressible. The alluvium is underlain by organic rich soils. The organic rich soils are very soft and compressible. The organic rich soils have the potential to continue to decompose when they are not saturated. Continued decomposition of the organics in the soil would result in differential volume changes resulting in variable settlements. The organic rich soils are underlain by Miocene bedrock materials of the Puente Formation Soquel Member. As described regionally, the unit is a tan to light gray sandstone containing concretions and interbedded siltstone and claystone. The sandstone is fine grained and friable and the claystone/siltstone is thinly bedded, weathered, and contained hard concreted layers. Bedding orientation was not well observed in test pits due to weathering of the near surface rock.

Near Proposed Lot 14 through Lot 27 and Basin #2

The subsurface soils consist of artificial fill, alluvium, and colluvial soils underlain by Monterey (Puente) Formation. The alluvium and colluvium consist predominantly of porous, stiff to very stiff clayey soils. The thickness of alluvium is about 5 feet thick or less in the area between Lot 15 and Lot 18 and becomes greater to more than 35 feet near proposed Lot 27 and Basin #2. The alluvium along the eastern outer bank of Lemon Creek contains loose layers of silty sand and sandy silt, which may be susceptible to liquefaction when saturated during a significant earthquake event.

GROUNDWATER

Groundwater was encountered at depths ranging from approximately 18 feet to 35 feet below the existing ground surface during the geotechnical explorations. There is also surface water flowing within the unconfined channel of Lemon Creek. Available data of the historical highest groundwater levels adjacent to the Project Site is deeper than 20 feet below ground surface. Since the shallowest groundwater encountered in the borings was 18 feet below existing ground surface, the design groundwater level was assumed to be at a depth of 18 feet. The design groundwater level is deeper than the bottom of the existing Lemon Creek near proposed residential Lots 20 to 24 and Lots 25 to 27. Therefore, the geotechnical analysis conservatively assumed a design groundwater level of 12 feet in those locations for the analysis.

SEISMICITY

The Project Site is located within the seismically active area of southern California and has a high potential to experience strong ground shaking from local and regional faults. The intensity of ground shaking is highly dependent upon the distance of the fault to the site, the magnitude of the earthquake, and the underlying soil conditions. A search for local historical earthquakes recorded by the United States Geological Survey earthquake online catalog within a 100-kilometer radius of the Project Site from the year 1800 to present includes 168 recorded events with a 4.5 magnitude or greater. Of the 168 events, 5 were 6.5 magnitude and greater and include the 1971 6.6 magnitude San Fernando Earthquake and the 1994 6.7 magnitude Northridge Earthquake. Fifty-one recorded events were 5.0 to 6.0 magnitude earthquakes. The closest recorded earthquakes of 4.5 or greater magnitude include a 4.6 magnitude earthquake recorded in 1935 located about 5.8 miles north of the Project Site and a 5.1 magnitude earthquake recorded in 2014 located about 7.0 miles south of the Project Site. No known earthquake-related damage has been reported at the Project Site. The closest known active faults are shown in Table 5.7-1, *List of Known Earthquake Faults Closest to the Project Site*.

Table 5.7-1
List of Known Earthquake Faults Closest to the Project Site

Abbreviated Fault Name	Fault Type	Maximum Magnitude	Approximate Closest Distance (Miles)
San Jose	Reverse	6.5	1.0
Elsinore	Strike-Slip	7.5	5.6
San Andreas	Strike-Slip	8.0	26.4
Source: Group Delta Consultants, Inc., *Preliminary Geotechnical Investigation Report*; March 17, 2023 (Appendix F1).			

EARTHQUAKE FAULT RUPTURE

The Project Site is not within the Alquist-Priolo Zone. The closest active surface fault is the San Jose fault, which is considered capable of generating a 6.5 magnitude earthquake. It is mapped about 1.0 mile north of the Project Site and trends roughly northeast-southwest. There are no Earthquake Fault Zones of Required Investigation mapped at the Project Site or trending just outside the site. Based on review of available published geologic maps there are no mapped active faults that cross-through or project-toward the Project Site. Therefore, the potential for surface fault rupture hazard at the site is low.

LIQUEFACTION

Liquefaction involves the sudden loss in strength of a saturated, cohesionless soil (sand and nonplastic silts) caused by the build-up of pore water pressure during cyclic loadings, such as those produced by an earthquake. This increase in pore water pressure can temporarily transform the soil into a fluid mass, resulting in a vertical settlement, and can also cause lateral ground deformations. Typically, liquefaction occurs in areas where there are loose to medium dense sands and silts, and where the depth to groundwater is less than 50 feet from the surface. Additionally, vibration caused by seismic shaking can cause seismic settlement (seismic compaction known as dry sand settlement) of loose to medium dense, dry, clean, and silty granular soils. In summary, three simultaneous conditions are required for liquefaction:

- Loose to medium dense cohesionless soils,
- Groundwater within 50 feet of the surface, and
- Strong shaking, such as caused by an earthquake.

The northern portion of the Project Site and southern end of the site is located in a mapped liquefaction hazard zone on the California Seismic Hazard Zone Map for San Dimas 7.5-minute Quadrangle, as shown in Figure 7 of the Geotechnical Report (Appendix F1) and according to the City of Walnut General Plan Figure PS-4 *Seismic Hazards*. Because the Project Site is partially within a designated liquefaction zone, a liquefaction triggering analyses was performed. The results of the liquefaction triggering analyses indicated that the potential of liquefaction is high in the southern portion of the site near Lemon Creek and decreases to the eastern portion of the Project Site where building pads are planned. The results also indicated the potential of liquefaction is low in the northern portion of the Project Site. The limit of high liquefaction potential areas indicated the need for design-level geotechnical investigation.

Seismically-induced settlement is often caused by loose to medium-dense granular soils densified during ground shaking. Dry and partially saturated soils as well as saturated granular soils are subject to seismically-induced settlement. Up to 4 inches of seismically-induced settlement is estimated locally near the existing Lemon Creek.

Analysis of open slopes along the Lemon Creek indicate liquefaction-induced lateral spreading may occur during a significant seismic event. Preliminary calculations indicate the potential lateral offsets to be less than 12 inches.

LANDSLIDE

An earthquake-induced landslide zone is mapped just west of the Project Site according to the California Seismic Hazard Zone Map for San Dimas 7.5-minute Quadrangle, as shown in Figure 7 of the Geotechnical Report (Appendix F1). The City of Walnut General Plan Figure PS-4 *Seismic Hazards* is a regional map identifying areas requiring investigation for seismically induced geologic hazards, including Fault Rupture, Landslide, and Liquefaction. The General Plan Figure PS-4 is cited as sourced from the California Department of Conservation, Seismic Hazards Zones (1999) and shows this earthquake-induced landslide zone being within the Project Site. According to the Geotechnical Report, these references should reflect consistent hazard zones and the regional scale of these maps can be misleading as to the actual seismic hazard zone limits for landslides in relation to the Project Site.

The landslide zone mapped in the General Plan Figure PS-4 appears to extend from the west facing slope, cross Lemon Creek Road, then cross Lemon Creek, and terminate irregularly within the lower portions of the existing eastern slope. The State Seismic Hazard Zone map illustrates the same zone, just west of the Project Site, within the hills extending up from Lemon Creek Road. In addition, the identified liquefaction hazard zone on Figure PS-4 is mapped outside of the creek area and within bedrock slope areas. These factors indicate that the location of the hazard areas in relation to the Project Site needed to be further evaluated at a site-specific scale with a site geologic context. Therefore, additional analysis was performed in the Geotechnical Addendum (Appendix F2) to evaluate site-specific conditions, which included an overlay comparison of the site plan with the California Department of Conservation Seismic Hazards Zones Geographic Information System (GIS) mapping data, additional geotechnical borings within the identified zones, and laboratory testing of soil samples. The subsurface soils were found to consist of artificial fill, alluvium and colluvial soils underlain by Monterey (Puente) Formation. The alluvium and colluvium consist predominantly of medium stiff to stiff clayey soils and medium dense sand. Results of the additional analysis indicated the Project Site generally has global stability.

LATERAL SPREADING

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. Lateral displacement (lateral spread) at the Project Site is estimated to be on an order of 3 inches.

EROSION

Substantial soil erosion can occur along slopes and gentle gradients where loose and weakly vegetated soils are present and exposed to surface water flow and/or wind. The Project Site has a stream (Lemon Creek) cutting through the site that is subject to significant erosion. Between the stream's erosional potential and planned exposed land (not covered by concrete/established trees) there is significant potential for erosion. Slopes steeper than 2 Horizontal: 1 Vertical are subject to higher probability and rate of erosion as well. However, there are several ways to address erosion; including but not limited to establishing deep-rooted vegetation or fortifying susceptible areas with rock or concrete.

EXPANSIVE SOIL

Expansive soils are defined as fine grained silts and clays, which are subject to swelling and contracting. The amount of swelling and contracting would be subject to the amount of fine-grained clay materials present in the soils and the amount of moisture either introduced or extracted from the soils. The existing clayey soils on the Project Site have a high potential for expansion.

5.7.3 REGULATORY SETTING

FEDERAL

National Earthquake Hazards Reduction Program

The National Earthquake Hazards Reduction Program (NEHRP) was established by the U.S. Congress when it passed the Earthquake Hazards Reduction Act of 1977, Public Law 95–124. In establishing the NEHRP, Congress recognized that earthquake-related losses could be reduced through improved design and construction methods and practices, land use controls and redevelopment, prediction techniques and early warning systems, coordinated emergency preparedness plans, and public education and involvement programs. Implementation of NEHRP priorities is accomplished primarily through original research, publications, and recommendations to assist and guide state, regional, and local agencies in the development of plans and policies to promote safety and emergency planning.

STATE

Alquist-Priolo Earthquake Fault Zoning Act

In response to the severe structural damages caused by the 1971 San Fernando Earthquake, the State of California enacted the Alquist-Priolo Earthquake Fault Zoning Act (Act). This Act regulates development near active faults to mitigate the hazards of surface fault-rupture. Under the Act, the State Geologist is required to delineate special study zones along known active faults. The Act also requires that prior to approval of a project, a geologic study is required to be prepared to define and delineate any hazards from surface rupture.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act, enacted in 1977, was developed to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure and from hazards caused by earthquakes. The act requires the State Geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these zones.

California Building Standard Code

Title 24 of the California Code of Regulations, also known as the California Building Standards Code, sets forth minimum requirements for building design and construction. The California Building Standards Code is a compilation of three types of building standards from three different origins:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes.
- Building standards have been adopted and adapted from the national model code standards to meet California conditions.

- Building standards authorized by the California legislature constitute extensive additions not covered by the model codes that have been adopted to address California concerns. In the context of earthquake hazards, the California Building Standards Code design standards have a primary objective of assuring public safety and a secondary goal of minimizing property damage and maintaining function during and following a seismic event.

National Pollutant Discharge Elimination System

Pursuant to the Clean Water Act (CWA) in 2012, the State Water Resources Control Board issued a statewide general NPDES Permit for stormwater discharges from construction sites (National Pollutant Discharge Elimination System No. CAS000002). Under this Statewide General Construction Activity Permit, discharges of stormwater from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for stormwater discharges or be covered by the General Permit. Coverage by the General Permit is accomplished by completing and filing a Notice of Intent with the State Water Resources Control Board and developing and implementing a Storm Water Pollution Prevention Plan (SWPPP). Each applicant under the General Construction Activity Permit must ensure that a SWPPP is prepared prior to grading and is implemented during construction. The SWPPP must list best management practices (BMPs) implemented on the construction site to protect stormwater runoff and must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a monitoring plan if the site discharges directly to a water body listed on the state's 303(d) list of impaired waters.

California Public Resources Code

The State of California Public Resources Code, Chapter 1.7, Sections 5097.5 and 30244, includes additional state level requirements for the assessment and management of paleontological resources. These statutes require reasonable mitigation of adverse impacts to paleontological resources resulting from development on state lands, define the removal of paleontological "sites" or "features" from state lands as a misdemeanor, and prohibit the removal of any paleontological "site" or "feature" from State land without permission of the jurisdictional agency. These protections apply only to State of California land.

LOCAL

City of Walnut General Plan

PUBLIC SAFETY ELEMENT

The following are relevant goals and policies from the Public Safety Element pertaining to geology and soils:

GOAL PS-3: Minimized risks associated with seismic and geologic hazards.

Policy PS-3.2: Geotechnical Evaluation. 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.

Policy PS-3.3: Landslide Hazards. Require that any site with a slope exceeding 10 percent be reviewed against current Landslide Hazard Potential Zone maps of the State of California to determine the need for geotechnical and structural analysis.

Policy PS-3.4: Seismic Building Codes. Require that all new developments 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.

5.7.4 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:

- GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving a 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.
- GEO-2: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?
- GEO-3: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?
- GEO-4: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?
- GEO-5: Result in substantial soil erosion or the loss of topsoil?
- GEO-6: 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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse?
- GEO-7: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
- GEO-8: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
- GEO-9: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

5.7.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving a 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.

The Alquist-Priolo Earthquake Fault Zoning Act (Act) regulates development near active faults to mitigate the potential hazards of surface fault-rupture. The State Geologist is required to delineate special study zones, known as Alquist-Priolo Earthquake Fault Zones, along with known active faults. A fault is considered "active" if it has experienced earthquake activity in the past 11,000 years. The Act also requires that prior to approval of a project, a geologic study be prepared to define and delineate any hazards from surface rupture and that a building setback be established from any known trace fault hazard. According to the

California Geologic Survey and the Geotechnical Report (Appendix F1), there are no Alquist-Priolo Earthquake Fault Zones on the Project Site or in the Project vicinity. The closest active surface fault is the San Jose fault (refer to Table 5.7-1 above), which is mapped about 1.0 mile north of the Project Site. Therefore, the Project Site and Project activities would not be exposed to ground rupture impacts.

Level of Impact Before Mitigation: No impact based on Project location and database review.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT GEO-2: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The Project Site is situated within a seismically active region that would likely be subject to ground shaking impacts from active faults in the region. The intensity of ground shaking would be highly dependent upon the distance of the fault to the site, the magnitude of the earthquake, and the underlying soil conditions. The Project Site may experience strong seismic shaking in the future due to nearby faults shown previously in Table 5.7-1, *List of Known Earthquake Faults Closest to the Project Site*. The closest recorded earthquakes, dating back to 1800, of 4.5 or greater magnitude include a 4.6 magnitude earthquake recorded in 1935 located about 5.8 miles north of the Project Site and a 5.1 magnitude earthquake recorded in 2014 located about 7.0 miles south of the Project Site. No known earthquake-related damage has been reported at the Project Site.

The potential seismic shaking risks at the Project Site would be like other areas in southern California. The proposed structures on the Project Site would be required to meet the City's construction development standards and the seismic design parameters of the California Uniform Building Code to withstand potential seismic shaking impacts caused by an earthquake within an acceptable level of risk. Additionally, the Project would be required to implement seismic design recommendations provided in a design-level, Project-specific geotechnical report pursuant to Mitigation Measure GEO-1. Compliance with the City construction development standards, California Uniform Building Code Seismic Safety Standards and implementation of seismic design recommendations as required by Mitigation Measure GEO-1 would minimize risks related to seismic shaking impacts. Potential impacts would be considered less than significant.

Level of Impact Before Mitigation: Potentially significant without implementation of design-level geotechnical recommendations and compliance with standard building regulations.

Mitigation Measures: Mitigation Measure GEO-1 described in Section 5.7.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT GEO-3: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

As previously discussed above, the northern portion of the Project Site and southern end of the site is located in a mapped liquefaction hazard zone on the California Seismic Hazard Zone Map for San Dimas 7.5-minute Quadrangle, and according to the City of Walnut General Plan Figure PS-4 *Seismic Hazards*. Because the Project Site is partially within a designated liquefaction zone, a liquefaction triggering analyses was performed (Appendix F1). The results of the liquefaction triggering analyses indicated that the potential of liquefaction is low in the northern portion of the Project Site. The results also indicated the potential of

liquefaction is high in the southern portion of the site near Lemon Creek and decreases to the eastern portion of the Project Site where the proposed building pads are planned.

More specifically, the subsurface soils adjacent to Lemon Creek and near proposed residential Lot 20 through Lot 28 consist of alluvial deposits, which are susceptible to liquefaction when saturated. The seismically-induced settlement is estimated to be on an order of 4 inches. In addition, lateral displacement (lateral spread) is estimated to be on an order of 3 inches. According to the Los Angeles County guidelines for Liquefaction and Lateral Spread, structural mitigation alone without ground improvement is acceptable if the total seismically-induced settlement is on an order of up to 4 inches. Therefore, structures within proposed Lots 21 through 28 should be designed to accommodate total/differential seismically-induced settlement. In addition, the estimated permanent seismic lateral displacement is about 3 inches, which is less than the upper limit on permanent horizontal ground displacement, or 18 inches, per applicable standards. Therefore, ground improvement may not be required. However, permanent seismic lateral displacement of 3 inches should be considered for the structural design for Lot 25 through Lot 28. Based on these findings, Mitigation Measure GEO-1 would require the Project Applicant/Developer to prepare a site-specific, design-phase geotechnical report based on recommendations made in the Geotechnical Report (Appendix F1) to identify the specific measures needed to address potential seismic ground failure. Such specific measures may include use of mat foundations or use of piles. Implementation of Mitigation Measure GEO-1 would reduce potential impacts from seismic ground failure to less than significant.

Level of Impact Before Mitigation: Potentially significant without implementation of site-specific, design-phase geotechnical recommendations and compliance with standard building regulations.

Mitigation Measures: Mitigation Measure GEO-1 described in Section 5.7.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT GEO-4: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

As previously discussed, the City's General Plan Figure PS-4 *Seismic Hazards* map identifies a potential "landslides" zone on the northwestern portion of the Project Site. However, according to the Geotechnical Addendum (Appendix F2), the State Seismic Hazard Zone map, included as Figure 7 in the Geotechnical Report (Appendix F1), illustrates the same "earthquake-induced landslide zone" but located just west of the Project Site, within the hills extending up from Lemon Creek Road. Based on additional review and an overlay comparison of the Project Site plan with the California Department of Conservation Seismic Hazards Zones GIS mapping data, the mapped earthquake-induced landslide zone is considered outside of the Project Site to the west. No potential impacts are anticipated.

Review of the California Geological Survey landslide inventory map from 1998 (Figure 8 of the Geotechnical Report (Appendix F1)) documents a dormant landslide north of North Lemon Avenue and Meadow Pass Road. The dormant landslide is described as a debris flow and portions of the debris flow may be present in the northwestern corner of the Project Site. Currently, the inflow of debris and surface water is controlled through storm drains leading into Lemon Creek at the Project Site. In addition, the dormant landslide area is presently developed by residential homes in Tract No. 48286. Tract No. 48286 was developed in 1990. Localized landslides were also mapped within the western slopes ascending from Lemon Creek Avenue; however, there is a buttress constructed at Lemon Creek Avenue along the ascending slope west of the Project Site. The potential for a landslide hazard on the offsite western slope to impact the Project Site is considered low due to the existing buttress improvements. Therefore, the potential for indirect or offsite landslide impacts is considered less than significant.

Regarding the potential for onsite landslide impacts, the Project Site is not considered within an earthquake-induced landslide zone. Because the Project proposes various cut and fill slopes during grading of the Project Site, a slope stability analysis was performed. Four key cross sections were selected on the Project Site to evaluate potential impacts associated with proposed earthen cuts of up to 30 feet and proposed fill placements of up to 13 feet as detailed in the Geotechnical Report (Appendix F1). Results of the slope stability analysis indicated that the static and seismic stability factor of safety of the proposed cut and fill slopes against global instability are greater than 1.5 and 1.1 for the static case and the seismic case, respectively; therefore, the potential of impacting the neighboring properties due to the proposed cut and/or fill slopes are considered low if properly addressed by engineered mitigations. Based on these results, Mitigation Measure GEO-1 would require the Project Applicant/Developer to prepare a site-specific, design-phase geotechnical report based on recommendations made in the Geotechnical Report (Appendix F1) to identify the specific measures needed to address potential onsite landslides. Such specific measures may include use of soil nails or ground improvements to strengthen the shear strength of the existing fill soils; reinforced soil locations where fill soils are of more than 1 foot are being placed; ground improvements constructed near the toe of new fill slopes to increase lateral resistance of the existing slope; and/or deep cement soil mixing. In addition, the proposed development may be setback from adjacent slopes in accordance with Section 1808.7 of the 2022 California Building Code. No other special structural setback would be required. Implementation of Mitigation Measure GEO-1 and compliance with standard building regulations would reduce potential impacts from landslides to less than significant.

Level of Impact Before Mitigation: Potentially significant without implementation of site-specific, design-phase geotechnical recommendations and compliance with standard building regulations.

Mitigation Measures: Mitigation Measure GEO-1 described in Section 5.7.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT GEO-5: Result in substantial soil erosion or the loss of topsoil?

Temporary Project construction activities would require grading on most of the Project Site except for the areas along Lemon Creek. Proposed land clearing and grading activities would uncover soil, which could be subject to erosion impacts caused by water and wind. Additionally, the Project construction equipment and vehicles could indirectly transport sediment to offsite locations. The Project would disturb more than one acre of land and would be required to obtain coverage under a General Construction Permit issued by the State Water Resources Control Board. The General Construction Permit would require the filing of a Notice of Intent with the State Water Resources Control Board and the preparation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would provide a list of Best Management Practices (BMPs) to reduce potential erosion impacts to less than significant. Such BMPs would include use of sandbags or waddles near drainages, and use of rumble racks or wheel washers or other measures to avoid sediment transport. Compliance with General Construction Permit conditions and preparation and implementation of a SWPPP would reduce potential impacts related to soil erosion or the loss of topsoil to less than significant.

The Project would permanently alter the existing drainage pattern of the Project Site to accommodate the proposed residential pads, roads, and stormwater infrastructure; however, the overall drainage pattern of the Project Site and Lemon Creek would generally remain consistent with the existing “before project” conditions. Lemon Creek would remain mostly untouched and retain its natural shape and pervious bottom. Drainage within the newly developed and impervious surfaces at the Project Site would be routed to two water quality basins for retention and treatment prior to release into Lemon Creek.

The potential for erosion occurs in all natural drainage systems, including in the "before project" condition, and the potential for new or novel impacts resulting from Project implementation was evaluated by determining if an increase in erosion potential would occur. An erosion potential analysis was performed for the "before project" and "after project" conditions, indicating no increase in long-term onsite or offsite erosion potential (PACE, 2024 (Appendix H1)). A short-term erosion potential analysis showed a slight increase in the potential for erosion in the "after project" condition for one segment of Lemon Creek in the southern portion of the Project Site, during the 25-year and 50-year storm events but not in the 2-year, 5-year, or 100-year storm events. This segment is from Culvert C to the La Puente culvert entrance (identified as "Reach 5" in the Hydrology Report). Based on these results, an additional conservative analysis was prepared to analyze the maximum short term erosion potential in the 25-year and 50-year storm events. The findings of this additional analysis determined that in the event Lemon Creek were to erode in the short-term due to erosion in the 25-year or 50-year storm events, it would be localized and not significantly impact Lemon Creek or present a hazard to nearby properties or people in either the "before project" or "after project" conditions. The results of the Hydrology Report and Low Impact Development (LID) Plan indicate potential erosion, sedimentation, and siltation impacts would be less than significant and no mitigation is required.

Additionally, improvements would be made to the existing stormwater drainage system by removing Culvert D, which currently overtops during large storm events and creates a greater risk of erosion in the system in the "before project" condition. Therefore, the Project may reduce existing erosion and sedimentation issues in Lemon Creek. Potential impacts are considered less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant with implementation of standard conditions and based on the current design.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT GEO-6: 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 offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

As previously described above, results of the landslide analysis, liquefaction analysis, and lateral spreading analysis indicate the Project Site has global stability and would be suitable for the proposed development with the implementation of standard regulatory conditions and with the implementation of site-specific, design-phase geotechnical recommendations as required under Mitigation Measure GEO-1. No additional mitigation measures would be required.

According to the Geotechnical Report (Appendix F1), the following summarizes the findings related to potential for collapse and/or subsidence.

- Soft clays and organic rich soils encountered near proposed Lot 2 through Lot 6 pose the risk of collapsing or settlement under the weight of proposed new fills; however, geotechnical recommendations (Mitigation Measure GEO-1) that may include supporting the proposed structure on mat foundations established on ground improvement, or use of deep foundations would reduce this potential impact to less than significant.
- The onsite soils consist predominantly of clayey alluvium underlain by bedrock. The clayey alluvium and bedrock are not subject to hydroconsolidation (i.e., settlement occurring when loose, dry,

sandy soils become saturated). Therefore, potential of hydroconsolidation is considered low, and thus, less than significant.

- Subsidence in the southern California region is typically associated with groundwater withdrawal, oil extraction, and/or peat loss. State and local regulations have allowed for monitoring programs and general management to reduce the negative impacts of subsidence due to groundwater and oil withdrawal. The Project Site is neither mapped in an active subsidence area, as defined by the USGS, online mapped of Areas of Land Subsidence in California nor is it within an active oil field as defined by the CalGEM GIS Well-Finder. The potential for a subsidence hazard at the Project Site is considered low, and thus, less than significant.

The Geotechnical Report (Appendix F1) and Geotechnical Addendum (Appendix F2) both indicate that the proposed Project and associated improvements would be feasible from a geotechnical standpoint, provided site-specific, design-phase geotechnical recommendations as required under Mitigation Measure GEO-1 are implemented. In addition, the Project would be required to comply with the City Construction Development Standards as well as the California Uniform Building Code Seismic Safety Standards. Implementation of Mitigation Measure GEO-1 and compliance with standard building regulations would reduce potential impacts associated with soil stability to less than significant.

Level of Impact Before Mitigation: Potentially significant without implementation of site-specific, design-phase geotechnical recommendations and compliance with standard building regulations.

Mitigation Measures: Mitigation Measure GEO-1 described in Section 5.7.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT GEO-7: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils are defined as fine grained silts and clays, which are subject to swelling and contracting. The amount of swelling and contracting would be subject to the amount of fine-grained clay materials present in the soils and the amount of moisture either introduced or extracted from the soils. According to the Geotechnical Report (Appendix F1), the clayey soils onsite have a high potential for expansion and could significantly impact building slab support, hardscape, pavement, and flat works (i.e., smooth paved surfaces) if not remediated. Based on these results, Mitigation Measure GEO-1 would require the Project Applicant/Developer to prepare a site-specific, design-phase geotechnical report based on recommendations made in the Geotechnical Report (Appendix F1) to identify the specific measures needed to address expansive soils. Such specific measures may include excavation and replacing the upper expansive clay with non-expansive import soils and/or use of reinforced pavements. Implementation of Mitigation Measure GEO-1 and compliance with standard building regulations would reduce potential impacts from expansive soils to less than significant.

Level of Impact Before Mitigation: Potentially significant without implementation of site-specific, design-phase geotechnical recommendations and compliance with standard building regulations.

Mitigation Measures: Mitigation Measure GEO-1 described in Section 5.7.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT GEO-8: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The City of Walnut provides wastewater disposal through the City sewer systems. The Project would be served by the City's existing sewer system and no septic tanks or alternative wastewater disposal systems are proposed. The potential for waste-water disposal to be a hazard at the Project Site is low, and thus, no impacts are anticipated.

Level of Impact Before Mitigation: No impacts are anticipated based on the presence of available utilities and current design.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT GEO-9: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Natural History Museum of Los Angeles County (NHMLAC) completed a paleontological resources literature review for the Project Site and vicinity, included as *Attachment B* of the Cultural Report (Appendix E) and summarized below. The paleontological records search revealed that there are no recorded fossil localities within the Project Site, but fossil localities are recorded nearby from the same type of sedimentary deposits that occur in the Project Site. Table 5.7-2, *Fossil Localities in the Vicinity of the Project Site*, shows the closest known localities in the collection of the Natural History Museum of Los Angeles County.

Table 5.7-2
Fossil Localities in the Vicinity of the Project Site

Locality Number	Location	Formation	Taxa	Depth
LACM VP 16171	San Jose hills, west of the intersection of N. Grand Avenue and Amar Road	Puente Formation (dense tan shale)	Herring/Anchovy family (*ganolytes*)	Unknown
LACM VP 6951, LACM IP 17558	North slope of San Tuze Hill NNW of peak	Puente Formation	Herring (*Etringus*), drumfish (*Lompoquia*), bristlemouth (*Cyclothone*), deep-sea smelt (*Bathylagidae*); Argonaut (*Mizuhobaris lepta*)	Unknown
LACM VP 7930-7932	Near the intersection of Shadow Oak Drive and S. Woodgate Drive	Monterey Formation (Yorba Shale; sandstone & diatomaceous shale)	Bony fish (*Oseteichthyes*), including ray-finned fishes (*Clupeidae*)	6.5-7 feet below ground surface

Locality Number	Location	Formation	Taxa	Depth
LACM VP 7933	50 feet W of intersection of Shadow Oak Drive and West Covina community center entrance	Monterey Formation, Yorba Shale Member (grayish shale)	Topsmelt (*Atherinops*)	Unknown, collected during trenching for a pipeline
LACM VP 7871 – 7877; LACM IP 17944	City of Industry Water Recycling Project; north side of Amar Road near intersection with N. Nogales Street.	Monterey Formation, Yorba Shale Member (mottled light gray and grayish-gray, clayey siltstone to greenish-gray silty claystone to cream-colored diatomaceous shale)	Drumfish (*Lompoquia*), lanternfish (*Diaphus*), herring (*Xyne grex*), bony fish (*Scombridae*), ridgehead (*Scopelogadus),* deep-sea smelt *(Bathylagus),* viperfish *(Chauliodus),* cod *(Gadidae*); Plants; bivalves	Unknown (collected during grading activities)
Source: VCS Environmental, *Phase I Cultural Resources Assessment*; September 2023 (Appendix E).				

Review of the geologic map for the area shows the recorded fossil locality nearest Lemon Creek as covered in Quaternary Alluvium of gravels, sands, and silt of valleys and floodplains. Portions of the Puente Formation are present on the eastern and western sides of the Project Site. The Project Site is covered mostly by Quaternary alluvial sediments. The eastern side of the Project Site, east of Lemon Creek, is underlain by the Soquel sandstone facies of the Monterey (Puente) Formation and may interfinger with its La Vida Shale member to the west. These are paleontologically sensitive rock units. Based on the presence of sensitive paleontological rock units, Mitigation Measures PALEO-1 and PALEO-2 would require the Project Applicant/Developer to retain a qualified paleontologist to monitor earthwork in paleontologically sensitive soils, and to recover and properly manage any paleontological resources that may be uncovered. Implementation of Mitigation Measures PALEO-1 and PALEO-2 would reduce the potential risk of destroying a unique paleontological resource to less than significant.

The Project Site is situated within a predominantly developed area that is moderately vegetated by trees. The Project Site is bounded by streets to the north, south, and west. The east and southeast boundaries of the Project Site are bordered by residential homes. Proposed Project activities near or within the banks of Lemon Creek would largely be avoided except for construction of isolated stormwater culvert improvements and the proposed roadway bridge over Lemon Creek, required as part of the proposed residential development's infrastructure. There is no potential of destroying a unique natural geological feature according to the Geotechnical Report (Appendix F1). No additional mitigation measures are required.

Level of Impact Before Mitigation: Potentially significant without a paleontologist to monitor earthwork activities in paleontologically sensitive soils and properly manage paleontological resources in the event of a discovery.

Mitigation Measures: Mitigation Measures PALEO-1 and PALEO-2 described in Section 5.7.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

5.7.6 CUMULATIVE IMPACTS

Geology and soils impacts are site-specific and generally do not combine to result in cumulative impacts. Like other areas in southern California, land uses developed could be subject to seismic shaking impacts and seismic-related ground failure, such as liquefaction. Other geologic constraints could include unstable geologic units or soils, lateral spreading, subsidence, or expansive soils. Potential geologic and soil impacts would be evaluated at the project-level through site-specific geotechnical and soil investigations and would be mitigated through site-specific recommendations for design and construction. Additionally, the proposed structures would be required to be designed to meet the City's construction development standards, and the seismic design parameters of the California Uniform Building Code. Therefore, the proposed Project would not contribute considerably to cumulatively significant impacts regarding seismic shaking or geological impacts. Related development Projects shown in Section 4.0, *Basis for Cumulative Impacts*, could also be subject to seismic, geologic and soil constraints; would be evaluated as such; and would be required to comply with state and local building codes and incorporate mitigation measures as-needed to ensure geologic stability, which would reduce potential cumulative geologic impacts to less than significant.

The proposed Project and related development Projects shown in Section 4.0 could involve construction activities which could result in soil erosion or loss of topsoil. Cumulative impacts would depend upon each respective cumulative site's topography and onsite soils susceptibility to erosion. Impacts would be evaluated at the project-level through site-specific soil investigations and would be mitigated through site-specific recommendations for design and construction. Compliance with existing regulations and implementation of site-specific recommendations outlined in site-specific soil investigations, would reduce cumulative impacts concerning soil erosion or loss of topsoil to less than significant. The Project impacts related to soil erosion or loss of topsoil would be reduced through compliance with the State Water Resources Control Board General Construction Permit requirements. Therefore, the Project's incremental effects involving exposure of persons or structures to potential substantial adverse effects related to soil erosion and loss of topsoil would not be considerable.

In the immediate vicinity of the Project Site, no significant paleontological resources were identified that if altered, could combine with the effects of the Project to result in a cumulatively significant impact to paleontological resources. The Project would implement Mitigation Measures PALEO-1 and PALEO-2, which require excavations to be monitored to recover and properly manage any fossil remains and any fossils recovered. With implementation of Mitigation Measures PALEO-1 and PALEO-2, potential impacts to paleontological resources or site or unique geologic features would be less than significant, and the Project would not contribute considerably to significant cumulative impacts to paleontological resources.

Related development projects shown in Section 4.0 in the area involving ground disturbance would be required to evaluate if the construction activities could have the potential to damage paleontological resources that could be buried in those project sites. As with the proposed Project, other projects would require site-specific paleontological analysis that could lead to mitigation requiring monitoring and recovery, identification, and curation of any resources discovered, which would reduce the potential for significant cumulative impacts to paleontological resources. Therefore, the Project considered with the related cumulative development Projects, would not contribute considerably to cumulatively significant impacts to paleontological resources.

Level of Impact Before Mitigation: Potentially significant without a paleontologist to monitor earthwork activities in paleontologically sensitive soils and properly manage paleontological resources in the event of a discovery.

Mitigation Measures: Mitigation Measures PALEO-1 and PALEO-2 described in Section 5.7.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

5.7.7 MITIGATION MEASURES

GEO-1: Prior to issuance of final grading permits, the Project Applicant or designee shall prepare and submit for review and approval by the Director of Building and Safety, a site-specific, design-phase geotechnical report, which shall consider the recommendations in the *Preliminary Geotechnical Investigation Report* and revise as necessary for site preparation and construction in a design-phase Geotechnical Recommendations report. The report shall, at a minimum, address remedial and design grading, concrete foundation system, and building foundations. The recommendations of the design-phase geotechnical report shall be implemented during site grading and construction.

PALEO-1: Prior to the issuance of any grading permit, the Project Applicant shall provide written evidence to the City, that the Applicant has retained a qualified paleontologist to observe grading activities and salvage and catalogue fossils, as necessary. These requirements shall be documented by the Project paleontologist in a Paleontological Resource Impact Mitigation Program (PRIMP). This PRIMP shall be submitted to the Community Development Department for review and approval prior to issuance of a Grading Permit.

The paleontologist shall be present at the pre-grade conference, shall discuss the PRIMP, describe procedures for paleontological resource surveillance, and shall establish, in cooperation with the Applicant and City, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of the fossils. If the paleontological resources are found to be significant, the paleontologist shall determine appropriate actions, in cooperation with the Applicant, which ensure proper exploration and/or salvage.

PALEO-2: If paleontological resources are uncovered and after completion of the Project, the Applicant shall submit a Paleontological Monitoring Report for approval by the City. The report shall include the period of inspection, a catalogue and analysis of the fossils found, and the present repository of the fossils. The Applicant shall prepare excavated material to the point of identification. The Applicant shall offer excavated finds for curatorial purposes to the City or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to approval by the City. Applicant shall pay curatorial fees for the storage of these resources in perpetuity.

5.7.8 REFERENCES

City of Walnut, *City of Walnut General Plan*. Adopted May 9, 2018.

Group Delta Consultants, Inc., *Geotechnical Addendum*. August 3, 2023.

Group Delta Consultants, Inc., *Preliminary Geotechnical Investigation Report*. March 17, 2023.

Pacific Advanced Civil Engineering, Inc. (PACE), *Lemon Creek Hydrology & Hydraulics Brookside Development Project*. April 2024.

Pacific Advanced Civil Engineering, Inc. (PACE), *Low Impact Development Plan Brookside Project*. April 7, 2023.

VCS Environmental, *Phase I Cultural Resources Assessment, Brookside Development Project.* September 2023.

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5.8 GREENHOUSE GAS EMISSIONS

5.8.1 INTRODUCTION

This section evaluates the proposed Project's potential impact on greenhouse gas (GHG) emissions. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (SCAQMD). Because no single project is large enough to result in a measurable increase in global concentrations of GHG, potential climate change impacts are evaluated on a cumulative basis. GHG emission modeling was conducted using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1 and the California Air Resources Board's (CARB) EMFAC2021. Analysis in this section is based in part on the following technical report:

- *Air Quality, Energy, and Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis*, Vista Environmental, April 17, 2024 (Appendix C). This report is herein referred to as the "Greenhouse Gas Report" in this section.

5.8.2 ENVIRONMENTAL SETTING

Constituent gases of the Earth's atmosphere, called atmospheric greenhouse gases (GHGs), play a critical role in the Earth's temperature regulation by trapping infrared radiation from the Earth's surface, which otherwise would have escaped to space. This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) GHG emissions in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and commercial and residential land uses. Prominent GHG types contributing to this process include carbon dioxide (CO_2), methane (CH_4), ozone (O_3), water vapor, nitrous oxide (N_2O), and chlorofluorocarbons (CFCs).

GLOBAL WARMING POTENTIAL

Different GHG types have varying global warming potential (GWP). The GWP is the potential of a gas or aerosol to trap heat in the atmosphere; it is the cumulative radiative forcing effects of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to the reference gas, which is CO_2. The GHGs listed by the International Panel on Climate Change (IPCC) and the CEQA Guidelines are discussed in this section in order of abundance in the atmosphere. Water vapor, the most abundant GHG, is not included in this list because its natural concentrations and fluctuations far outweigh its anthropogenic (human-made) sources. To simplify reporting and analysis, GHGs are commonly defined in terms of their GWP. The IPCC defines the GWP of various GHG emission types on a normalized scale that recasts all GHG emission types in terms of a CO_2 equivalent (CO_2e). As such, the GWP of CO_2 is equal to a GWP rating of 1, while CH_4, O_3, N_2O, and CFCs are assigned their own GWP ratings accounted for in the GHG analysis.

GREENHOUSE GAS EMISSIONS INVENTORY

According to the Carbon Dioxide Information Analysis Center, as described in the Greenhouse Gas Report (Appendix C), 9,855 million metric tons (MMT) of CO_2e emissions were created globally in the year 2014. The breakdown of global GHG emissions by sector consists of 25% from electricity and heat production; 21% from industry; 24% from agriculture, forestry and other land use activities; 14% from transportation; 6% from building energy use; and 10% from all other sources of energy use.

According to the *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2021,* prepared by EPA and as described in the Greenhouse Gas Report (Appendix C), total U.S. GHG emissions in 2023 were 6,340 million metric tons (MMT) of CO_2e. Total U.S. emissions have decreased by 2.3% between 1990 and 2021, which is down from a high of 15.8% above 1990 levels in 2007. Emissions increased from 2020 to 2021 by 5.2%. There was a decline in 2020 emissions due to the impacts of the COVID-19 pandemic on travel and other economic activities. Between 2020 and 2021, the increase in GHG emissions was driven largely by an increase in fossil fuel combustion due to economic activity rebounding after the height of the COVID-19 pandemic.

According to *California Greenhouse Gas Emissions for 2000 to 2021 Trends of Emissions and Other Indicators*, prepared by the CARB and as described in the Greenhouse Gas Report (Appendix C), the State of California created 381.3 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) in 2021. The 2021 emissions were 12.6 $MMTCO_2e$ higher than 2020 but 23.1 $MMTCO_2e$ lower than 2019 levels. Both the 2019 to 2020 decrease and the 2020 to 2021 increase in emissions are likely due in part to the impacts of the COVID-19 pandemic that were felt globally. The transportation sector showed the largest increase in emissions of 10 $MMTCO_2e$ (7.4%) compared to 2020, which is most likely from passenger vehicles whose activity and emissions rebounded after COVID-19 shelter in place orders were lifted.

5.8.3 REGULATORY SETTING

FEDERAL

The EPA is responsible for implementing federal policy to address global climate change. The Federal government administers a wide array of public-private partnerships to reduce U.S. GHG intensity. These programs focus on energy efficiency, renewable energy, methane, and other non-CO_2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions. EPA implements several voluntary programs that substantially contribute to the reduction of GHG emissions. Additionally, over the last several years EPA has adopted a number of rulings providing for the reduction of GHG emissions, including requiring CO_2 and other GHGs be regulated as pollutants under the Federal Clean Air Act (CAA), requiring suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions to submit annual reports to EPA, limit emissions from new sources to 1,100 pounds of CO_2 per mega-watt hour (MWh) for fossil fuel-fired utility boilers, and 1,000 pounds of CO_2 per MWh for large natural gas-fired combustion units, and lower power sector GHG emissions by 11 million tons by the year 2030.

On April 30, 2020, the EPA and the National Highway Safety Administration published the Final Rule for the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule). Part One of the Rule revokes California's authority to set its own GHG emissions standards and zero-emission vehicle mandates in California, which results in one emission standard to be used nationally for all passenger cars and light trucks that is set by the EPA.

STATE

The California Air Resources Board (CARB) has the primary responsibility for implementing State policy to address global climate change; however, there are State regulations related to global climate change that affect a variety of State agencies. CARB, which is a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both the federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the State Implementation Plan (SIP). In addition, CARB establishes emission standards for motor vehicles sold in California, consumer products (e.g., hairspray, aerosol paints,

and barbeque lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

In 2008, CARB approved a Climate Change Scoping Plan that proposes a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health." The Climate Change Scoping Plan has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. In 2014, CARB approved the First Update to the Climate Change Scoping Plan that identifies additional strategies moving beyond the 2020 targets to the year 2050. On December 14, 2017, CARB adopted the California's 2017 Climate Change Scoping Plan, that provides specific statewide policies and measures to achieve the 2030 GHG reduction target of 40% below 1990 levels by 2030 and the aspirational 2050 GHG reduction target of 80% below 1990 levels by 2050. In addition, the State has passed the following laws directing CARB to develop actions to reduce GHG emissions, which are listed below in chronological order, with the most current first.

California Code of Regulations (CCR) Title 24, Part 6

The Title 24 Part 6 standards have been developed by the California Energy Commission (CEC) primarily for energy conservation. The 2022 Title 24 standards aim to: (1) Increase onsite renewable energy generation; (2) Increase electric load flexibility to support grid reliability; (3) Reduce emissions from newly constructed buildings; (4) Reduce air pollution for improved public health; and (5) Encourage adoption of environmentally beneficial efficient electric technologies. The 2022 Title 24 standards are the current standards that went into effect on January 1, 2023. It should be noted that implementation of the CalGreen Building standards would also reduce GHG emissions, since energy usage from buildings creates 9.7% of GHG emissions in the State.

California Code of Regulations (CCR) Title 24, Part 11

The CalGreen Building standards have been developed by the CEC primarily for energy conservation. The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others. It should be noted that implementation of the CalGreen Building standards would also reduce GHG emissions, since energy usage from buildings creates 9.7% of GHG emissions in the State.

Senate Bill 1020

Senate Bill 1020 (SB 1020) was adopted September 16, 2022 and would speed up the timeline retail electricity is supplied by renewable energy sources over the prior adoption timelines provided in SB 100, SB 350, SB 1078, SB 107, and SB X1-2. SB 1020 requires that retail sales of electricity are from renewable energy resources and zero-carbon resources supply 90% by December 31, 2035, 95% by December 31, 2040, and 100% by December 31, 2045.

Executive Order B-55-18 and Assembly Bill 1279

The California Governor issued Executive Order B-55-18 in September 2018 that establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045. This executive order directs the CARB to work with relevant State agencies to develop a framework for implementation and accounting that tracks progress toward this goal as well as ensuring future scoping plans identify and

recommend measures to achieve this carbon neutrality goal. Assembly Bill 1279 was passed by the legislature in September 2022 that codifies the carbon neutrality targets provided in Executive Order B-55-18. The 2022 Scoping Plan for Achieving Carbon Neutrality, adopted by CARB on December 16, 2022, was prepared in order to meet the carbon neutrality goal targets developed in Executive Order B-55-18 and codified in Assembly Bill 1279.

Executive Order N-79-20

The California Governor issued Executive Order N-79-20 on September 23, 2020 that requires all new passenger cars and trucks and commercial drayage trucks sold in California to be zero-emissions by the year 2035 and all medium- heavy-duty vehicles (commercial trucks) sold in the state to be zero-emission by 2045 for all operations where feasible. Executive Order N-79-20 also requires all off-road vehicles and equipment to transition to 100% zero-emission equipment, where feasible by 2035.

Executive Order B-48-18 and Assembly Bill 2127

Executive Order B-48-18 and Assembly Bill 2127 (AB 2127) provides measures to put at least five million zero-emission vehicles on California roads by 2030 and to install 200 hydrogen fueling stations and 250,000 electric vehicle chargers by 2025.

Executive Order B-30-15, Senate Bill 32 and Assembly Bill 197

The California Governor issued Executive Order B-30-15 on April 29, 2015 that aims to reduce California's GHG emissions 40% below 1990 levels by 2030. This executive order aligns California's GHG reduction targets with those of other international governments, such as the European Union that set the same target for 2030 in October 2014. This target will make it possible to reach the ultimate goal of reducing GHG emissions 80% under 1990 levels by 2050 that is based on scientifically established levels needed in the U.S.A. to limit global warming below 2 degrees Celsius – the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels. Assembly Bill 197 (AB 197) and Senate Bill 32 (SB 32) codified into statute the GHG emissions reduction targets of at least 40% below 1990 levels by 2030 as detailed in Executive Order B-30-15. AB 197 also requires additional GHG emissions reporting that is broken down to sub-county levels and requires CARB to consider the social costs of emissions impacting disadvantaged communities.

Executive Order B-29-15

The California Governor issued Executive Order B-29-15 on April 1, 2015 and directed the State Water Resources Control Board to impose restrictions to achieve a statewide 25% reduction in urban water usage and directed the Department of Water Resources to replace 50 million square feet of lawn with drought tolerant landscaping through an update to the State's Model Water Efficient Landscape Ordinance. The Ordinance also requires installation of more efficient irrigation systems, promotion of greywater usage and onsite stormwater capture, and limits the turf planted in new residential landscapes to 25% of the total area and restricts turf from being planted in median strips or in parkways unless the parkway is next to a parking strip and a flat surface is required to enter and exit vehicles. Executive Order B-29-15 would reduce GHG emissions associated with the energy used to transport and filter water.

Assembly Bill 341 and Senate Bills 939 and 1374

Senate Bill 939 (SB 939) requires that each jurisdiction in California to divert at least 50% of its waste away from landfills, whether through waste reduction, recycling or other means. Senate Bill 1374 (SB 1374) requires the California Integrated Waste Management Board to adopt a model ordinance by March 1, 2004 suitable for adoption by any local agency to require 50 to 75% diversion of construction and demolition of

waste materials from landfills. Assembly Bill 341 (AB 341) was adopted in 2011 and builds upon the waste reduction measures of SB 939 and 1374, and sets a new target of a 75% reduction in solid waste generated by the year 2020.

Senate Bill 375

Senate Bill 375 (SB 375) was adopted September 2008 in order to support the State's climate action goals to reduce GHG emissions through coordinated regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires CARB to set regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established targets for 2020 and 2035 for each of the Metropolitan Planning Organizations (MPO) within the State. It was up to each MPO to adopt a sustainable community's strategy (SCS) that would prescribe land use allocation in that MPOs Regional Transportation Plan (RTP) to meet CARB's 2020 and 2035 GHG emission reduction targets. These reduction targets are required to be updated every eight years.

The Connect SoCal 2020 provides a 2035 GHG emission reduction target of 19% reduction over the 2005 per capita emissions levels. The Connect SoCal 2020 includes new initiatives of land use, transportation and technology to meet CARB's new 19% GHG emission reduction target for 2035. CARB is also charged with reviewing SCAG's RTP/SCS for consistency with its assigned targets.

City and County land use policies, including General Plans, are not required to be consistent with the RTP and associated SCS. However, new provisions of CEQA incentivize, through streamlining and other provisions, qualified projects that are consistent with an approved SCS and categorized as "transit priority projects."

Assembly Bill 1109

AB 1109 requires reductions in energy usage for lighting and is structured to reduce lighting electrical consumption by: (1) At least 50% reduction from 2007 levels for indoor residential lighting; and (2) At least 25% reduction from 2007 levels for indoor commercial and all outdoor lighting by 2018. AB 1109 would reduce GHG emissions through reducing the amount of electricity required to be generated by fossil fuels in California.

Executive Order S-1-07

Executive Order S-1-07 was issued in 2007 and proclaims that the transportation sector is the main source of GHG emissions in the State, since it generates more than 40% of the State's GHG emissions. It establishes a goal to reduce the carbon intensity of transportation fuels sold in the State by at least 10% by 2020. This Executive Order also directs CARB to determine whether this Low Carbon Fuel Standard (LCFS) could be adopted as a discrete early-action measure as part of the effort to meet the mandates in AB 32. In 2009, CARB approved the proposed regulation to implement the LCFS. The standard was challenged in the courts but has been in effect since 2011 and was re-approved by the CARB in 2015. The LCFS is anticipated to reduce GHG emissions by about 16 MMT per year by 2020. The LCFS is designed to provide a framework that uses market mechanisms to spur the steady introduction of lower carbon fuels.

Senate Bill 97

Senate Bill 97 (SB 97) was adopted in August 2007 and acknowledges that climate change is a prominent environmental issue that requires analysis under CEQA. SB 97 directed the Governor's Office of Planning and Research (OPR), which is part of the State Natural Resources Agency, to prepare, develop, and transmit to CARB guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required

by CEQA, by July 1, 2009. The Natural Resources Agency was required to certify and adopt those guidelines by January 1, 2010.

Pursuant to the requirements of SB 97 as stated above, on December 30, 2009, the Natural Resources Agency adopted amendments to the State CEQA guidelines that address GHG emissions. The CEQA Guidelines Amendments changed 14 sections of the CEQA Guidelines and incorporated GHG language throughout the Guidelines. However, no GHG emissions thresholds of significance were provided, and no specific mitigation measures were identified. The GHG emission reduction amendments went into effect on March 18, 2010, and are summarized below:

- Climate Action Plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.
- Local governments are encouraged to quantify the GHG emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines, OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.
- When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies or recommended by experts.
- New amendments include guidelines for determining methods to mitigate the effects of GHG emissions in Appendix F of the CEQA Guidelines.
- OPR is clear to state that "to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project; general compliance with a plan, by itself, is not mitigation."
- OPR's emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR, therefore, approves tiering of environmental analyses and highlights some benefits of such an approach.
- Environmental Impact Reports must specifically consider a project's energy use and energy efficiency potential.

Assembly Bill 32

In 2006, the California State Legislature adopted Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. AB 32 requires CARB to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through an enforceable statewide emission cap which will be phased in starting in 2012. Emission reductions shall include carbon sequestration projects that would remove carbon from the atmosphere and utilize best management practices that are technologically feasible and cost effective.

CARB's Scoping Plan that was adopted in 2009, proposes a variety of measures including: strengthening energy efficiency and building standards, targeted fees on water and energy use, a market-based cap-and-trade system, achieving a 33% renewable energy mix, and a fee regulation to fund the program. The 2014 update to the Scoping Plan identifies strategies moving beyond the 2020 targets to the year 2050.

The Cap and Trade Program established under the Scoping Plan sets a statewide limit on sources responsible for 85% of California's GHG emissions and has established a market for long-term investment in energy efficiency and cleaner fuels since 2012.

Assembly Bill 1493

AB 1493 or the Pavley Bill sets tailpipe GHG emissions limits for passenger vehicles in California as well as fuel economy standards.

Executive Order S-3-05

In 2005 the California Governor issued Executive Order S 3-05, GHG Emission, which established the following reduction targets:

- 2010: Reduce greenhouse gas emissions to 2000 levels,
- 2020: Reduce greenhouse gas emissions to 1990 levels, and
- 2050: Reduce greenhouse gas emissions to 80% below 1990 levels.

The Executive Order directed the secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. To comply with the Executive Order, the secretary of CalEPA created the California Climate Action Team (CAT), made up of members from various state agencies and commissions. The team released its first report in March 2006. The report proposed to achieve the targets by building on the voluntary actions of businesses, local governments, and communities and through State incentive and regulatory programs. The State achieved its first goal of reducing GHG emissions to 2000 levels by 2010.

REGIONAL – SOUTHERN CALIFORNIA

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin. To that end, as a regional agency, the SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments and cooperates actively with all federal and state agencies.

South Coast Air Quality Management District

SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emission sources, and enforces such measures through educational programs or fines, when necessary. SCAQMD is directly responsible for reducing emissions from stationary, mobile, and indirect sources. The SCAQMD is also responsible for GHG emissions for projects where it is the lead agency. However, for other projects in the SCAG where it is not the lead agency, it is limited to providing resources to other lead agencies to assist them in determining GHG emission thresholds and GHG reduction measures.

Since neither CARB nor the OPR has developed a GHG emissions threshold, the SCAQMD formed a Working Group to develop significance thresholds related to GHG emissions. At the September 28, 2010 Working Group meeting, the SCAQMD released its most current version of the draft GHG emissions thresholds, which recommends a tiered approach that either provides a quantitative annual threshold of 3,500 $MTCO_2e$ for residential uses, 1,400 $MTCO_2e$ for commercial uses, and 3,000 $MTCO_2e$ for mixed uses. An alternative annual threshold of 3,000 $MTCO_2e$ for all land use types is also proposed.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the federally designated Metropolitan Planning Organization (MPO) for the majority of the southern California region and is the largest MPO in the nation. SCAG's current applicable Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the Project area region is the Connect SoCal 2020 and 2019 Federal Transportation Improvement Program (FTIP), which have been prepared to meet the GHG emissions reduction targets set by SB 375 for the SCAG region of a 19% reduction over the 2005 per capita emissions levels. The Connect SoCal 2020 includes new land use, transportation, and technology strategies to meet the new 19% GHG emission reduction target for 2035. Although the Connect SoCal 2020 and 2019 FTIP are primarily planning documents for future transportation projects, a key component of these plans is to integrate land use planning with transportation planning that promotes higher density infill development close to existing transit service. These plans form the basis for the land use and transportation components of the Air Quality Management Plan (AQMP), which are used in the preparation of air quality forecasts and in consistency analysis included in the AQMP. The Connect SoCal 2020, 2019 FTIP, and 2022 AQMP are based on projections originating within the City and County General Plans.

LOCAL

City of Walnut General Plan

Local jurisdictions, such as the City of Walnut, have the authority and responsibility to reduce GHG emissions through their police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of GHG emissions resulting from its land use decisions. In accordance with CEQA requirements and the CEQA review process, the City assesses the global climate change potential of new development projects, requires mitigation of potentially significant global climate change impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

CONSERVATION, OPEN SPACE AND RECREATION ELEMENT

The applicable GHG plan for the proposed project is the City of Walnut General Plan Conservation, Open Space and Recreation Element. The GHG-related goals and policies from the Conservation, Open Space and Recreation Element are shown below:

GOAL COR-10: Clean local air quality and reduced greenhouse gas emissions.

Policy COR-10.1: Climate Change Laws. Find creative means to comply with State laws addressing climate change.

Policy COR-10.2: Coordination. Assure the City provides updated data to the Southern California Regional Governments to assist in updates to the Sustainable Communities Strategies and Regional Transportation Plan.

Policy COR-10.3: Rooftop Solar Projects. Streamline solar panel permits for small-scale residential and commercial business roof-top projects by removing discretionary planning permits or allowing approval over the counter.

Policy COR-10.4: Green Buildings. Require LEED or similar building efficiency certifications for all new public facilities and buildings, and encourage similar green building certifications for private development projects.

5.8.4 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:

- 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?

SCAQMD GREENHOUSE GAS (GHG) INTERIM SIGNIFICANCE THRESHOLDS

The SCAQMD has published the Interim CEQA Greenhouse Gas (GHG) Significance Thresholds, December 2008, to assist local agencies with determining the impact of a project's GHG emissions. SCAQMD's objective in providing the GHG guidelines is to establish a performance standard that will ultimately contribute to reducing GHG emissions below 1990 levels, and thus achieve the requirements of the California Global Warming Solutions Act (AB 32). In the absence of a formal threshold established by the State, SCAQMD's interim GHG threshold has been established for use by lead agencies in determining significance of GHG emissions in CEQA. SCAQMD guidance describes a five-tiered approach for determining significance. Tier 3 is the primary method used for development projects of this size and is the approach used in this analysis. The Tier 3 approach limits the amount of GHG emissions from residential and commercial development projects to 3,000 metric tons of CO_2 equivalents per year ($MTCO_2e$). If the Project would exceed 3,000 $MTCO_2e$ per year, then the impact would be considered significant, unless mitigation measures can demonstrate emissions would be reduced to below the threshold.

5.8.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The proposed Project would not generate significant GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The Project proposes construction and operation (i.e., occupancy) of a single-family residential development. The Project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste disposal, water usage, and construction equipment. The Project's GHG emissions were estimated for both onsite and offsite construction and operational activities using the California Environmental Emissions Estimator Model (CalEEMod) as presented in the Greenhouse Gas Report (Appendix C) and summarized below.

The Project's total construction-related GHG emissions were estimated, including equipment and worker vehicle emissions for all stages of construction. The total GHG construction emissions were also amortized over 30 years (i.e., estimates were spread over the assumed life of the Project) pursuant to SCAQMD's recommendations. Because impacts from construction-related activities occur over a relatively short period of time, they contribute to a relatively small portion of the overall lifetime Project GHG emissions, and GHG emissions reduction measures for construction equipment are relatively limited. Therefore, the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime and added to the overall Project operational emissions. For the purposes of determining the Project's GHG impact significance, the construction emissions were included with the long-term operational emissions to assess the Project's overall GHG impacts, as further discussed below. The Project's operational GHG emissions from area sources, energy usage, mobile sources, waste disposal, and water usage were also calculated.

The data provided in Table 5.8-1, *Project Related Greenhouse Gas Annual Emissions*, shows that the proposed Project would generate 377 $MTCO_2e$ per year.

According to the SCAQMD draft threshold of significance, the Project's potential cumulative global climate change impact would be significant if total GHG emissions exceeded 3,000 $MTCO_2e$ per year. Because the Project's total GHG emissions were estimated at 377 $MTCO_2e$ per year, GHG impacts are considered less than significant, and no mitigation is required.

Table 5.8-1
Project Related Greenhouse Gas Annual Emissions

Category	Greenhouse Gas Emissions (Metric Tons per Year)			
	CO_2	CH_4	N_2O	CO_2e
Mobile Sources[1]	281.00	0.01	0.01	286.00
Area Sources[2]	6.91	<0.01	<0.01	6.92
Energy Usage[3]	54.90	<0.01	<0.01	55.10
Water and Wastewater[4]	3.39	0.03	<0.01	4.46
Solid Waste[5]	1.91	0.19	0.00	6.68
Refrigeration[6]	--	--	--	0.22
Construction[7]	17.90	<0.01	<0.01	18.0
Total GHG Emissions	**366.01**	**0.23**	**0.02**	**377.34**
SCAQMD Draft Threshold				**3,000**
Exceed Threshold?				**No**

Notes:
[1] Mobile sources consist of GHG emissions from vehicles.
[2] Area sources consist of GHG emissions from consumer products, architectural coatings, hearths, and landscaping equipment.
[3] Energy usage consists of GHG emissions from electricity and natural gas usage.
[5] Water includes GHG emissions from electricity used for transport of water and processing of wastewater.
[4] Waste includes the CO_2 and CH_4 emissions created from the solid waste placed in landfills.
[6] Refrigeration includes GHG emissions from refrigerants used in air conditioning units.
[7] Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.
Source: Vista Environmental, *Greenhouse Gas Report*; April 17, 2024.

Level of Impact Before Mitigation: Less than significant impact based on the Project's estimated GHG emissions compared to SCAQMD's threshold of significance.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT GHG-2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. The applicable plan is the City of Walnut General Plan Conservation, Open Space and Recreation Element, which provides goals and policies to minimize GHG emissions in the City through implementation of state laws, coordination with regional government agencies, promotion of rooftop solar photovoltaic (PV) systems, and green building requirements for new construction. The Project would be required to meet the current Title 24 Part 6 building standards that require all new homes to

install enhanced insulation and to include rooftop solar PV systems that are of adequate size to result in net zero electricity usage. Through adherence to the current Title 24 Part 6 building standards, the Project would meet the reduction goals provided in the General Plan. As also previously discussed under the section IMPACT GHG-1, the Project is anticipated to generate 377 $MTCO_2e$ per year, which is well below the SCAQMD threshold of significance of 3,000 $MTCO_2e$ per year. Therefore, the Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on the Project's estimated GHG emissions compared to SCAQMD's threshold of significance and based on consistency with applicable plans.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.8.6 CUMULATIVE IMPACTS

Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide. Therefore, Project-specific GHG emissions are evaluated in terms of their contribution to cumulative GHG impacts. Project implementation would not exceed the greenhouse gas emissions significance threshold of 3,000 $MTCO_2e$ per year and would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the GHG emissions. Therefore, Project-related GHG emissions and their contribution to global climate change (or global warming potential) would not be cumulatively considerable. Potential cumulative GHG impacts would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on the Project's estimated GHG emissions compared to SCAQMD's threshold of significance and based on consistency with applicable plans.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.8.7 MITIGATION MEASURES

No mitigation measures are required for GHG emissions.

5.8.8 REFERENCES

City of Walnut, City of Walnut General Plan. Adopted May 9, 2018.

Vista Environmental, *Air Quality, Energy, and Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis*, April 17, 2024.

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5.9 HAZARDS AND HAZARDOUS MATERIALS

5.9.1 INTRODUCTION

This section evaluates the proposed Project's potential impacts on human health and the environment due to potential exposure to hazardous materials or conditions associated with the Project Site, project construction, and project operations. The analysis in this section is based, in part, upon the following source:

- *Phase I Environmental Site Assessment*, Group Delta Consultants, Inc., August 4, 2022 (Appendix G1).
- *Radon Analysis Letter*, Citadel EHS, April 11, 2024 (Appendix G2).

5.9.2 ENVIRONMENTAL SETTING

Title 22 of the California Code of Regulations (CCR), Division 4.5, Chapter 11, Article 3, classifies hazardous materials into the following four categories based on their properties:

- Toxic (causes human health effects),
- Ignitable (has the ability to burn),
- Corrosive (causes severe burns or damage to materials), and
- Reactive (causes explosions or generates toxic gases).

Hazardous materials have been and are commonly used in commercial, agricultural, and industrial applications as well as in residential areas to a limited extent. Hazardous wastes are hazardous materials that no longer have practical use, such as substances that have been discarded, discharged, spilled, contaminated, or are being stored prior to proper disposal. The health impacts of hazardous materials exposure are based on the frequency of exposure, the exposure pathway, and individual susceptibility. A Phase I Environmental Site Assessment was prepared to identify known or suspected environmental concerns or recognized environmental conditions that could be associated with the Project Site, adjoining properties, and nearby locations or suspected sites of environmental contamination.

PROJECT SITE

Historical Land Use

The Project Site is comprised of three parcels, Assessor's Parcel Numbers (APN): 8709-093-001, 002, and 003 (associated address of 800 Meadow Pass Road). Available historic aerial photographs and topographic maps dating between 1928 and 2018 were reviewed to identify the historic land development and any surface conditions that may have adversely impacted the Project Site. Based on this review, the Project Site was undeveloped in 1928 with an unimproved road and a stream (Lemon Creek) traversing the northern portion from east to west. After 1938, the Project Site appeared to be used for agriculture and a small residential structure was visible in the southeast corner. Lemon Creek was visible running northeast to the southwest. After 1946, agricultural use appeared to continue. Additional small residential structures on the southeastern and northeastern portions, and additional unimproved roads were also observed. Beginning in 1989 until present day, the Project Site has been occupied by the former Brookside Equestrian Center comprised of various equestrian related structures.

Existing Land Uses

Presently onsite, there are unused facilities remaining from discontinued equestrian activities, consisting of, two stables, one of which has a second story residential addition (currently unoccupied), covered stalls,

two fenced corrals, maintenance storage shed, three feed sheds within fenced areas, one outdoor arena, one covered open-air arena, and one gazebo. All structures have been vacated and closed. Unimproved gravel and dirt roads traverse the Project Site that allow for vehicle access and irrigation systems were observed throughout. One pad-mounted electrical transformer was observed on the southern portion. The transformer appeared to be in fair condition, with no leaking or staining observed. No wells, septic systems, underground vaults, or underground storage tanks were reported or observed on the Project Site. Lemon Creek also traverses the Project Site from the northeast to the southwest. The Project Site is regularly maintained in fair condition.

ENVIRONMENTAL REGULATORY DATABASE REVIEW

The purpose of the regulatory database report review was to evaluate whether prior activities, processes, operations, or actions on the Project Site, adjoining properties, and nearby locations have the potential to adversely impact the environmental integrity of the site, are suspected sources of recognized environmental conditions (REC), or if RECs are present on the site. A REC refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

The regulatory database report provided information regarding current operations and prior regulatory listing(s). The regulatory database review included a list of government databases searched, a statistical profile listing the number of properties within the vicinity of the site, selected detailed information from environmental regulatory agency databases, and a map illustrating the identified properties, sites, or facilities of interest for that site and previous owners and/or operators on that site.

Multiple sites were listed in the Environmental Data Resources (EDR) database radius search area. The radius search area included the Project Site and a one-mile radius. Numerous properties within this search area were listed on the EDR database and were not found to pose a potentially hazardous materials or hazardous waste impact based on the evaluation criteria of the review, including type of material/waste, concentration, distance from the Project Site, and regulatory case status (e.g., completed and closed). These listings were not identified as RECs and were deemed to not require further study. A complete listing of these sites is included in the Phase I Environmental Site Assessment (Appendix G1).

Two Leaking Underground Storage Tank (LUST) sites were identified near the Project Site. Upon further review these two sites listed below were not considered a REC for the Project:

- A former LUST case was noted near the Project Site (Case Number: R-12517 (address: LA CO FD Fire Station #61 – 20011 La Puente Road)). The case documented a leak of 'aviation' impacting soil only that occurred in February 1996. This case was reported as completed and closed as of September 1996. Due to the site closure and lower relative elevation to the Project Site, this listing is not considered a REC.
- A former LUST, Statewide Environmental Evaluation and Planning System Underground Storage Tank (SWEEPS UST) case was noted near the Project Site (Exxon #7-6224 (address: 390 Lemon Avenue)). This case documented a leak of waste oil, hydraulic, and lubricating oils impacting soil only that occurred in June 1992. An assessment was conducted at the site in July 1992. This case was reported as completed and closed as of October 1996. This case was re-opened in January 2004, re-assessed in September 2021, and was eligible for closure as of December 2021. Due to site closure and lower relative elevation to the Project Site, this listing is not considered a REC.

State Water Resources Control Board (SWRCB)

The State Water Resources Quality Control Board GeoTracker database was reviewed, which provides records on Leaking Underground Storage Tanks (LUSTs) and Spills, Leaks, Investigation and Cleanup (SLIC) sites. The Project Site was not identified on the GeoTracker database to have evidence of unauthorized releases of hazardous materials to the surface, subsurface soil, or groundwater. No RECs were identified during the GeoTracker database review.

California Department of Toxic Substances Control (DTSC)

The California Department of Toxic Substances Control (DTSC) EnviroStor database was reviewed, which provides records on Federal Superfund sites (National Priority List); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. The Project Site was not listed on the database. No RECs were identified during the EnviroStor database review.

California Department of Conservation Geologic Energy Management Division (CalGEM)

A review of the California Department of Conservation, Geologic Energy Management Division website for oil and gas fields in California and Alaska did not indicate the presence of oil or gas wells on or adjacent to the Project Site (Group Delta 2022). No RECs were identified during the CalGEM database review.

National Pipeline Mapping System (NPMS)

The National Pipeline Mapping System is a Geographic Information System (GIS) database of pipeline information for the specific intent of emergency response. NPMS was reviewed for gas transmission pipelines and hazardous liquid trunk lines on or adjacent to the Project Site. The Project Site is not identified on the NPMS database. No RECs were identified as a result of the NPMS database review.

Los Angeles County Fire Department

The Los Angeles County Fire Department did not have records on file for the Project Site.

Los Angeles County Department of Public Works Environmental Programs Division Underground Storage Tanks

No environmental concerns were identified in the building permits reviewed for the Project Site.

Previous 2014 Phase I Environmental Site Assessment

A previous Phase I Environmental Site Assessment prepared in January 2014 revealed one REC, i.e., staining was observed near a metal shipping container in the northeastern portion of the Project Site. The staining was observed on the container floor and on bare soil and appeared to be associated with fuel container storage. The 2014 assessment listed this potential contamination associated with staining as a REC. During preparation of the 2022 Phase I Environmental Site Assessment (Appendix G1), a site visit conducted in August 2022 indicated the metal shipping container and soil staining was not visible. The container and staining are no longer considered a REC.

ASBESTOS CONTAINING BUILDING MATERIALS

Asbestos, a natural fiber used in the manufacturing of several different building materials, has been identified as a human carcinogen. Most friable (i.e., easily broken or crushed that can become airborne) Asbestos-Containing Material (ACM) was banned in building materials by 1978. By 1989, most major manufacturers had voluntarily removed non-friable ACM (i.e., flooring, roofing, and mastics/sealants) from the market. These materials, however, were not banned completely. In October 1995, the Federal

Occupational Safety and Health Administration (OSHA) redefined how building materials are classified in regard to asbestos and also the way these materials are to be handled. Under this ruling, "thermal system insulation and sprayed-on or troweled on or otherwise applied surfacing materials" applied before 1980 are considered presumed Asbestos-Containing Materials (PACM). Other building materials such as "floor or ceiling tiles, siding, roofing, transite panels" (i.e., non-friable) are also considered PACM unless tested. Based on the age of the existing structures, there is potential for asbestos containing materials to be present at the Project Site. As a standard requirement, hazardous material abatement during demolition of existing structures would be performed in accordance with all pertinent regulations and under the guidance of a California Occupational Safety and Health Administration (Cal/OSHA) - Certified Asbestos Consultant (CAC) and/or Lead-Related Construction Inspector/Assessor. Because standard requirements are in effect, the potential presence of ACM and PACM does not constitute a REC.

LEAD PAINT

Lead-Based Paint (LBP) is identified by Cal/OSHA, the Environmental Protection Agency (EPA), and the U.S. Department of Housing and Urban Development (HUD) as being a potential health risk to humans, particularly children, based upon its effects to the central nervous system, kidneys, and bloodstream. The risk of LBP has been classified by HUD based upon the age and condition of the painted surface. This classification includes the following:

- Maximum risk is from paint applied before 1950.
- A severe risk is present from paint applied before 1960.
- A moderate risk is present from paint applied before 1970.
- A slight risk is present from paint applied before 1977.
- Paint applied after 1977 is not expected to contain lead.

Based on the age of the existing structures, there is potential for lead-based paint containing materials to be present at the Project Site. As a standard requirement, hazardous material abatement during demolition of existing structures would be performed in accordance with all pertinent regulations and under the guidance of a California Occupational Safety and Health Administration (Cal/OSHA) - Certified Asbestos Consultant (CAC) and/or Lead-Related Construction Inspector/Assessor. Because standard requirements are in effect, the potential presence of LBP does not constitute a REC.

RADON

Radon is a colorless, odorless, and tasteless radioactive, naturally occurring gas, which results from the radiogenic decay of uranium, thorium, and radium naturally present in rocks and soils. Certain rock types, such as black (organic-rich) shales, some granitic rocks, and rhyolites can have uranium and thorium present at levels of tens to hundreds of parts per million (ppm). The average radon concentration for indoor air in American homes is about 1.3 picocuries per liter (pCi/L), based on a 1991 national survey. The average radon concentration in outdoor air is about 0.4 pCi/L. The USEPA recommends that individuals avoid long-term exposures to radon concentrations above 4.0 pCi/L. The USEPA recommends action to reduce indoor radon levels if the levels exceed 4.0 pCi/L. Sections 307 and 309 of the Indoor Radon Abatement Act of 1988 (IRAA) directed the U.S. EPA to list and identify areas within the U.S. with the potential for elevated indoor radon levels. U.S. EPA's Map of Radon Zones (EPA-402-R-93-071) assigns each of the 3,141 counties in the U.S. to one of three zones based on radon potential:

- Zone 1 counties have a predicted average indoor radon screening level greater than 4 pCi/L.
- Zone 2 counties have a predicted average indoor radon screening level between 2 and 4 pCi/L.
- Zone 3 counties have a predicted average indoor radon screening level less than 2 pCi/L.

Based on such factors as indoor radon measurements; geology; aerial radioactivity; and soil permeability, the U.S. EPA has identified the County of Los Angeles as Zone 2 (i.e., a predicted average indoor radon screening level between 2 and 4 pCi/L). In addition, the California Department of Public Health (CDPH) Radon Program collects radon test data for buildings throughout the state and maintains a radon database. According to the database, a total of 27 radon tests conducted within the zip code of 91789 were reported to CDPH. While the maximum result was reported at 3.8 pCi/L, none of the tests were at or above 4.0 pCi/L (Citadel 2024).

5.9.3 REGULATORY SETTING

FEDERAL

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 (42 USC. § 6901 et seq.) is the principal federal law that regulates the generation, management, and transportation of waste. Hazardous waste management includes the treatment, storage, or disposal of hazardous waste. The RCRA gave the U.S. Environmental Protection Agency (EPA) the authority to control hazardous waste from "cradle to grave," that is, from generation to transportation, treatment, storage, and disposal, at active and future facilities. It does not address abandoned or historical sites. The RCRA also set forth a framework for managing nonhazardous waste. Later amendments required phasing out land disposal of hazardous waste and added underground tanks storing petroleum and other hazardous substances.

Emergency Planning and Community Right-to-Know Act

Title III of Superfund Amendments and Reauthorization Act (SARA) authorized the Emergency Planning and Community Right-to-Know Act (EPCRA; 42 USC § 11001 et seq.) to inform communities and citizens of chemical hazards in their areas by requiring businesses to report the locations and quantities of chemicals stored onsite to state and local agencies; releases to the environment of more than 600 designated toxic chemicals; offsite transfers of waste; and pollution prevention measures and activities and to participate in chemical recycling. The EPA maintains and publishes an online, publicly available, national database of toxic chemical releases and other waste management activities by certain industry groups and federal facilities. To implement EPCRA, each state appointed a state emergency response commission to coordinate planning and implementation of activities associated with hazardous materials. The commissions divided their states into emergency planning districts and named a local emergency planning committee for each district. The federal EPCRA program is implemented and administered in the California Governor's Office of Emergency Services (Cal OES), a state commission, six local committees, and 81 Certified Unified Program Agencies (CUPAs). Cal OES coordinates and provides staff support for the commission and local committees.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides EPA with authority to require reporting, recordkeeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint. Title IV of the TSCA directs EPA to regulate lead-based paint hazards. TSCA's sections 402/404 requires that those engaged in lead abatements, risk assessments and inspections in homes or child-occupied facilities (such as day care centers and kindergartens) built prior to 1978 be trained and certified in specific practices to ensure accuracy and safety. TSCA Section 403, *Residential Hazard Standards for Lead in Paint, Dust and Soil*, sets standards for dangerous levels of lead in paint, household dust, and soil.

Occupational Safety and Health Act

The Federal Occupational Safety and Health Act (OSHA) of 1970 (29 USC § 651 et seq.) authorizes each state (including California) to establish their own safety and health programs with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) approval. The California Department of Industrial Relations regulates implementation of worker health and safety in California. California OSHA enforcement units conduct onsite evaluations and issue notices of violation to enforce necessary improvements to health and safety practices. California standards for workers dealing with hazardous materials are contained in Title 8 of the California Code of Regulations (CCR) and include practices for all industries (General Industrial Safety Orders), and specific practices for construction and other industries. Workers at hazardous waste sites (or working with hazardous wastes as might be encountered during excavation of contaminated soil) must receive specialized training and medical supervision, according to the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations. OSHA Regulation 29 Code of Federal Regulations Standard 1926.62 regulates the demolition, renovation, or construction of buildings involving lead materials. Federal, state, and local requirements also govern the removal of asbestos or suspected asbestos-containing materials (ACMs), including the demolition of structures where asbestos is present. All friable (i.e., easily broken or crushed and can become airborne) ACMs, or non-friable ACMs subject to damage, must be abated prior to demolition following all applicable regulations.

STATE

California Environmental Protection Agency

The California Environmental Protection Agency (Cal/EPA) was created in 1991, unifying California's environmental authority in a single cabinet-level agency and bringing the California Air Resources Board (CARB), State Water Resources Control Board, RWQCBs, California Department of Resources Recycling and Recovery (known as CalRecycle and formerly the Integrated Waste Management Board), Department of Toxic Substances Control (DTSC), Office of Environmental Health Hazard Assessment, and Department of Pesticide Regulation under one agency. These agencies were placed within the Cal/EPA "umbrella" for the protection of human health and the environment and to ensure the coordinated deployment of state resources. Its mission is to restore, protect, and enhance the environment, to ensure public health, environmental quality, and economic vitality.

Department of Toxic Substance Control

The Department of Toxic Substance Control (DTSC) is a department of Cal/EPA and is the primary agency in California that regulates hazardous waste, cleans-up existing contamination, and looks for ways to reduce the hazardous waste produced in California. The DTSC regulates hazardous waste in California primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Government Code Section 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services (DHS) lists of contaminated drinking water wells, sites listed by the State Water Resources Control Board as having underground storage tank (UST) leaks and which have had a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

Regional Water Quality Control Board

The Regional Water Quality Control Board (RWQCB) is a department of Cal/EPA that oversees investigation and cleanup of sites including underground storage tanks where wastes have been discharged to protect the water quality of the state. The RWQCB regulates wastewater discharges to surface waters and to groundwater. They also regulate storm water discharges from construction, industrial, and municipal activities.

California Health and Safety Code

Cal/EPA has established rules governing the use of hazardous materials and the management of hazardous wastes. California Health and Safety Code Sections 25531, et seq. incorporate the requirements of Superfund Amendments and Reauthorization Act and the Clean Air Act as they pertain to hazardous materials. Health and Safety Code Section 25534 directs owners or operators storing, handling, or using regulated substances exceeding threshold planning quantities to develop and implement a Risk Management Plan. The Risk Management Plans are submitted to the administering agency and possibly USEPA, depending upon the chemical and the amount, for review.

Hazardous Materials Release Response Plans and Inventory Law

The Hazardous Materials Release Response Plans and Inventory Law (Health and Safety Code Section 25500 et seq.) aims to minimize the potential for accidents involving hazardous materials and to facilitate an appropriate response to possible hazardous materials emergencies. The law requires businesses that use hazardous materials to provide inventories of those materials to designated emergency response agencies, to illustrate on a diagram where the materials are stored onsite, to prepare an emergency response plan, and to train employees to use the materials safely. Any business that handles hazardous materials in quantities equal to or greater than 55 gallons, 500 pounds, or 200 cubic feet of gas must submit a business plan.

LOCAL

City of Walnut General Plan

PUBLIC SAFETY ELEMENT

The following are relevant goals and policies from the Public Safety Element pertaining to hazards and hazardous materials:

GOAL PS-5:	A high degree of community awareness and participation in the proper storage and disposal of hazardous waste materials.
Policy PS-5.1:	Hazardous Materials Handling. Ensure the safe handling, storage, and transportation of hazardous material citywide.
Policy PS-5.3:	Proper Storage and Disposal. 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 community about the illegality and danger of dumping hazardous material and waste into the storm drain system and creeks.
Policy PS-5.5:	Monitoring. Work with appropriate authorities to ensure the safe handling of hazardous materials, including the monitoring of facilities that use, store, or handle hazardous materials.

5.9.4 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:

- HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- HAZ-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?
- HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- HAZ-4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- HAZ-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 the project result in a safety hazard or excessive noise for people residing or working in the project area?
- HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

5.9.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT HAZ-1: 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?

Temporary construction activities would involve the handling of incidental amounts of hazardous substances, such as solvents, fuels and oil. To avoid public exposure to hazardous materials, the contractor would be required to comply with local, state and federal laws and regulations regarding the handling and storage of hazardous materials. As part of other standard requirements, consistent with the State Water Board's adopted National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit, preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) with associated Best Management Practices (BMPs) to minimize the chance for release of pollutants would also be required. Example BMPs include daily inspection and routine equipment maintenance, immediate repair of detected equipment leaks, and maintaining waste fluid containers in leak proof conditions. Compliance with the applicable standard regulations and implementation of BMPs would reduce the potential for temporary construction impacts to less than significant.

Long-term operation of the Project would not involve the routine transport, use, or disposal of hazardous materials in quantities or conditions that would pose a hazard to public health and safety or the environment. Project operations would involve the use of cleaning products for general maintenance and could involve occasional use of pesticides and herbicides for landscape maintenance. The use of such materials would be typical of residential uses and would not be stored in large quantities that pose a health

hazard to the public. Residents would be required to comply with local, state, and federal laws and regulations regarding the handling and storage of hazardous materials. Compliance with standard local, state, and federal hazardous material laws and regulations would reduce the potential risk of releasing hazardous materials into the environment to less than significant.

Level of Impact Before Mitigation: Less than significant with implementation of standard conditions and based on the proposed land use.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT HAZ-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?

A Phase I Environmental Site Assessment (Appendix G1) was prepared for the Project Site to determine if any significant surface or subsurface property contamination caused by hazardous or toxic substances should be considered during the Project's construction and operational phases. The site assessment included a review of available federal and state data reported by EDR, available regulatory agency environmental records, available site history and records, available historic aerials, and a field survey. As detailed above in Section 5.9.2, *Environmental Setting*, and as summarized below, the Project Site did not identify any recognized environmental conditions (RECs) that could potentially result in a significant impact during Project construction or operations.

No Leaking Underground Storage Tank (LUST) sites were identified on the Project Site. Two nearby LUST cases, Case R-12517 (address: LA CO FD Fire Station #61 – 20011 La Puente Road) and Case Exxon #7-6224 (address: 390 Lemon Avenue), were determined not to be a REC due to their case closure status and lower relative elevation to the Project Site. A previous Phase I Environmental Site Assessment conducted in January 2014 at the Project Site identified one REC, i.e., a metal shipping container and staining that may have been associated with fuel storage. A site visit conducted in August 2022 for the 2022 Phase I Environmental Site Assessment indicated the metal shipping container and soil staining were not visible; and therefore, they are no longer considered a REC. No sources of potential contamination were identified in review of the SWRCB GeoTracker database, DTSC EnviroStor database, CalGEM oil and gas fields database, National Pipeline Mapping System, or other county or local records.

As previously discussed in the IMPACT HAZ-1 section, temporary construction activities would involve the handling of incidental amounts of hazardous substances, such as solvents, fuels and oil. Use of such materials would be less than significant while in compliance with local, state and federal laws and regulations regarding the handling and storage of hazardous materials. Although not considered a REC, there is potential for asbestos containing building materials and lead-based paint to be present at the Project Site based on the age of the existing structures. If asbestos containing building materials are present, they could inadvertently be released into the air during demolition activities. Lead-based paint could also be a potential source of contamination exposure to demolition workers. To avoid the potential release of contaminated demolition material, Mitigation Measure HAZ-1 would require an asbestos and lead paint survey for structures proposed for demolition. If asbestos containing building materials and lead paint are present, hazardous material abatement during demolition of existing structures would be performed in accordance with all pertinent regulations and under the guidance of a California Occupational Safety and Health Administration (Cal/OSHA) - Certified Asbestos Consultant (CAC) and/or Lead-Related

Construction Inspector/Assessor. With implementation of Mitigation Measure HAZ-1, potential impacts would be less than significant.

According to the Radon Analysis Letter (Appendix G2), radon is a colorless, odorless, and tasteless radioactive, naturally occurring gas, which results from the radiogenic decay of uranium, thorium, and radium naturally present in rocks and soils. Radon readily escapes from the rock or soil where it is generated and enters surrounding water or air. Radon migrates up through the soil and can enter structures through cracks and penetrations in the foundation or slab. Radon moves into buildings from the soil when air pressure inside the buildings is lower than the air pressure outside. Radon usually exists at very low levels outdoors. The primary concern for radon is not in the amount of radon emanating from the soil, but the concentrations that build up within buildings. Because radon enters buildings from adjacent soil, radon levels are typically highest in basements and ground floor rooms. Radon emanations from soil will vary considerably depending upon seasonal and other climatic conditions (such as precipitation and atmospheric pressure). The average radon concentration for indoor air in American homes is about 1.3 pCi/L, based on a 1991 national survey. The average radon concentration in outdoor air is about 0.4 pCi/L. The USEPA recommends that individuals avoid long-term exposures to radon concentrations above 4.0 pCi/L. The USEPA recommends action to reduce indoor radon levels if the levels exceed 4.0 pCi/L.

Based on such factors as indoor radon measurements; geology; aerial radioactivity; and soil permeability, the USEPA has identified the County of Los Angeles as Zone 2 (i.e., a predicted average indoor radon screening level between 2 and 4 pCi/L). In addition, the California Department of Public Health (CDPH) radon database recorded a total of 27 radon tests conducted within the Project Site's zip code of 91789. While the maximum result was reported at 3.8 pCi/L, none of the tests were at or above 4.0 pCi/L (Citadel 2024).

Since natural ventilation dilutes radon gas levels, construction employees working at open air excavation or trenching work sites are not likely to be exposed to hazardous concentrations of radon except in rare circumstances such as underground or enclosed construction work sites. In most cases, construction employers would not be expected to test for radon unless excavations are enclosed or made in geographic areas known to contain high radon levels. The Project Site is not mapped in a high radon level zone and Project construction would not require underground or enclosed construction work sites; therefore, impacts to workers during temporary construction activities are not expected, and no mitigation is required.

During operations, the risk of radon exposure to future occupants would not be unique when compared to other existing homes in the Project vicinity. As previously mentioned, 27 radon tests conducted in the Project Site's zip code measured the highest level at 3.8 pCi/L, which is below the USEPA's recommended action level of 4.0 pCi/L or more. According to the Centers for Disease Control and Prevention (CDC), building materials consisting of sandstone, concrete, brick, natural stone, gypsum, and granite contain naturally-occurring radioactive elements like radium, uranium, and thorium, that can decay into radon gas; however, these are commonly used building materials in construction and do not pose a unique or peculiar risk to the Project or its residents. Since radon concentrations generally disperse into the open environment, the Project would not exacerbate existing environmental hazards during and following development (Citadel 2024). Based on the analysis above, potential impacts to workers and future occupants associated with radon would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Potentially significant risk of asbestos and lead-based paint exposure to construction workers during temporary demolition activities.

Mitigation Measures: Mitigation Measure HAZ-1 described in Section 5.9.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The closest schools to the Project Site include Vejar Elementary School, located approximately 0.31 miles to the south; Walnut United Methodist Preschool, located approximately 0.54 miles to the east; Cyrus J. Morris Elementary School, located approximately 0.59 miles to the southwest; Stanley G. Oswald Academy, located approximately 0.69 miles to the northwest; Suzanne Middle School, located approximately 0.70 miles to the east; and Walnut High School, located approximately 0.75 miles to the southeast. None of these schools are located within 0.25 miles of the Project Site and no schools are proposed within 0.25 miles of the Project Site. In addition, no hazardous emissions or handling of acutely hazardous substances are proposed or anticipated. No impact would occur.

Level of Impact Before Mitigation: No impact based on Project location and on proposed activities.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT HAZ-4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

According to the Phase I Environmental Site Assessment (Appendix G1), which included a detailed EDR report and database review, the Project Site is not included on a list of hazardous materials sites. No sources of potential contamination were identified in review of the EDR report, SWRCB GeoTracker database, DTSC EnviroStor database, CalGEM oil and gas fields database, National Pipeline Mapping System, or other county or local records. No impacts are anticipated.

Level of Impact Before Mitigation: No impact based on Project location and Project Site evaluation.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT HAZ-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 the project result in a safety hazard or excessive noise for people residing or working in the project area?

The closest airport to the Project Site is the San Gabriel Valley Airport (formerly the El Monte Airport), located approximately 10.45 miles northwest of the Project Site. According to the Airport Land Use Compatibility Plan (ALUCP) for the San Gabriel Valley Airport, the Project Site is not located within the Airport Influence Area of the San Gabriel Valley Airport; therefore, it is not subject to the policies and programs of the San Gabriel Valley Airport ALUCP. Furthermore, the Project Site is not located within 2.0 miles of any other airport or public use airport. As such, the proposed Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. No impact would occur.

Level of Impact Before Mitigation: No impact based on Project location and Project Site evaluation.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City of Walnut's Emergency Operations Center (EOC) administers the Walnut Emergency Plan, that ensures the City's efficient and effective response to disaster and emergency situations and maintains a Local Hazard Mitigation Plan (LHMP), which allows the City to receive federal emergency relief funding.

The EOC administers the State-required Walnut Emergency Plan and ensures that the City is efficient and effectively responds to disaster and emergency situations. The EOC is responsible for both planning and implementation of emergency response efforts, and coordinates with other local jurisdictions and Los Angeles County. The City of Walnut consults with the County of Los Angeles Office of Emergency Management for all emergency planning and disaster response needs. Other major functions of the EOC include educating staff on the proper state and federal reporting procedures and on-going training on the National Incident Management System (NIMS) and the Standardized Emergency Management System (SEMS).

The LHMP identifies potential hazards within the City, reviews and assess past disaster occurrences, estimates the probability of future occurrences, and sets goals to mitigate potential risks to reduce or eliminate long-term risks to people and property from natural and human-made hazards. The plan identifies vulnerabilities, provides recommendations for prioritized mitigation actions, evaluates resources, identifies mitigation shortcomings, provides future mitigation planning, and maintenance of the existing plan.

Close coordination with both the Sheriff and Fire Departments would be included in all disaster planning efforts. In addition, the City participates in the California Standardized Emergency Management System (SEMS) Program, and Federal Emergency Management Agency's (FEMA) National Incident Management System (NIMS), to assure coordinated response at the state and federal levels. In the event evacuation is required, the Los Angeles County Sheriff's Department would identify and direct traffic to designated emergency evacuation routes to ensure that residents can leave their neighborhoods safely, which would avoid any potential conflicts with emergency response plans. Should they be needed, evacuation routes should be established based on the location and magnitude of an event.

Temporary activities associated with construction of the Project could result in temporary partial lane closures. However, the temporary lane closures would be implemented in accordance with recommendations provided in the California Temporary Traffic Control Handbook to ensure emergency access would be maintained at all times. The construction activities for the Project would be coordinated with the City of Walnut, which would ensure that traffic controls are in place to maintain emergency access to the Project Site. With compliance with the City of Walnut Traffic Control requirements, potential impacts regarding conflicts with emergency response plans during construction would be less than significant.

In the event an emergency evacuation is needed, the City's Incident Command Structure would be in place to direct traffic to specific evacuation routes, which would reduce traffic congestion, evacuation delays and enhance emergency responses to the Project area. The amount of traffic generated by the proposed Project would not result in a condition that would physically interfere with an adopted emergency response plan or emergency evacuation plans. Based on the City of Walnut's average household size of 3.29 persons per household, the Project is estimated to have 92 residents. The Project would contribute negligible amounts of new vehicle trips within the Project area if an emergency evacuation were required. Potential long-term operational impacts would be less than significant.

Level of Impact Before Mitigation: Less than significant with implementation of standard conditions and based on the proposed land use and size of development.

Mitigation Measures: No mitigation measures are required.

Level of Impact After Mitigation: Less Than Significant Impact.

IMPACT HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The City of Walnut General Plan Public Safety Element identifies certain areas within the City, mainly the northern ones, as Very High Fire Hazard Severity Zones (as defined by the state). Structures within this zone are required to follow a building code specifically designed for areas along the wildland/urban interface, where human development is intertwined with wildland and other vegetative fuels. The Project Site is not located within a High or Very High Fire Hazard Zone or State Responsibility Area (CAL FIRE 2025). Figure PS-3 *Wildfire Hazards* of the General Plan shows the Project Site is located within an area mapped as Historic Fires, specifically associated with the Winnett Fire of 1970. Review of historic aerials indicates the Project Site and Project vicinity were largely undeveloped and rural in 1970. Today, these areas are predominantly developed with residential uses and the Project Site is no longer uniquely exposed to wildland/urban interface areas.

The Project would replace existing structures and construct new structures. The Project would be required to design, construct, and maintain structures and access ways in compliance with local, city, county, and state Fire Code requirements. The proposed Project would be required to be reviewed by the Los Angeles County Fire Department (LACFD) and the City of Walnut Building Department to ensure that building construction meets the minimum standards for fire safety as defined in the City Building Codes and County Fire Codes. The City and County reviews would ensure that the Project would provide proper installation and maintenance of fire access roadways, the proper placement of hydrants, adequate water supply, and access to structures. Other potential measures by the City to reduce wildfire hazards include submitting fuel modification plans to the LACFD for review and comments prior to construction. LACFD also provides vegetation and fuel management educational programs to inform future residents of the development. Project coordination review with the City of Walnut and LACFD as well as compliance with city, county and state regulations and standards would reduce potential fire hazard impacts to less than significant.

Level of Impact Before Mitigation: Less than significant based on Project location and with implementation of standard conditions.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.9.6 CUMULATIVE IMPACTS

Hazards and hazardous waste impacts are typically unique to each site and do not usually contribute to cumulative impacts. The operation and construction of the proposed Project would involve the handling of incidental amounts of hazards substances. The amounts of hazardous substances involved would be relatively small and would pose minimal risks for public exposure. Additionally, the Project applicant/contractor would be required to comply with local, state, federal regulations, and laws regarding the storage and handling of hazardous substances. With compliance with local, state and federal regulations and laws, potential handling of hazardous materials would be less than significant, and the

proposed Project would not contribute considerably to significant cumulative impacts with regard to the release of hazardous materials into the environment.

As discussed above, Project implementation would not result in significant impacts involving hazards and hazardous materials. Other related development Projects could involve the use and handling of hazardous materials. The related development Projects would also be required to comply with local, state, and federal laws and regulations regarding the handling, storage, and transporting of hazardous materials. Compliance with all applicable federal and state laws and regulations related to the handling of hazardous materials and standard conditions of approval would reduce the likelihood and severity of accidents, thereby ensuring that a less than significant cumulative impact would result. The Project would not result in a significant impact or considerably contribute to a potential impact in this regard.

The Project was determined to have a less than significant impact on interfering with an emergency evacuation plan. Cumulative projects in the area would also be analyzed for impairment of emergency access vehicles and consistency with the City emergency response plans on a project-by-project basis and would be required to comply with all roadway design standards to ensure adequate emergency access is not impacted. Therefore, the Project would not result in a significant impact or considerably contribute to a potential impact with an emergency plan.

As discussed in the sections above, the Project is not anticipated to result in a significant impact. In consideration of the cumulative projects identified in Section 4.0 *Basis for Cumulative Analysis*, no unique or peculiar circumstances are anticipated where a cumulative impact associated with hazards or hazardous materials would occur.

Level of Impact Before Mitigation: Less than significant based on proposed activities and Project Site evaluation.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.9.7 MITIGATION MEASURES

HAZ-1: Prior to issuance of a demolition permit, demolition of buildings that are expected to contain asbestos containing building materials or lead based paint, the Applicant shall prepare an asbestos and lead paint survey and present the findings to the City Community Development Department and Building and Safety Division. In the event asbestos containing building materials or lead paint are identified, it shall be removed and disposed of in accordance with local, state and federal regulations and guidance of a California Occupational Safety and Health Administration (Cal/OSHA) - Certified Asbestos Consultant (CAC) and/or Lead-Related Construction Inspector/Assessor. If contaminated materials are identified and removed, proof of proper disposal (e.g., report, email, or receipts from the certified consultant/inspector/assessor) shall be provided to the City prior to issuance of a building permit.

5.9.8 REFERENCES

California Department of Forestry and Fire Protection (CAL FIRE), *City of Walnut Very High Fire Hazard Severity Zones in LRA*, March 2025 [https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones]. Accessed on April 22, 2025.

Citadel EHS, *Radon Analysis Letter*. April 11, 2024.

City of Walnut, *City of Walnut General Plan*. Adopted May 9, 2018.

Phase I Environmental Site Assessment Report, Group Delta Consultants, Inc. August 4, 2022.

Center for Disease Control and Prevention (CDC), *Radiation from Building Materials*, November 28, 2022 [https://www.cdc.gov/nceh/radiation/building.html#:~:text=Building%20materials%20that%20are%20made,and%20amounts%20of%20materials%20used]. Accessed April 19, 2024.

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5.10 HYDROLOGY AND WATER QUALITY

5.10.1 INTRODUCTION

This section evaluates the proposed Project's potential impacts on hydrology and water quality. The following analysis is based, in part, on information obtained from the following documents:

- *Lemon Creek Hydrology and Hydraulics*, Pacific Advanced Civil Engineering (PACE), April 2024 (Appendix H1). Referred to in this section as the "Hydrology Report".
- *Low Impact Development Plan*, Pacific Advanced Civil Engineering, April 7, 2023 (Appendix H2). Referred to in this Section as the "LID Report".

5.10.2 ENVIRONMENTAL SETTING

SAN GABRIEL RIVER WATERSHED

The Project Site is located within the San Gabriel River Watershed. The San Gabriel River Watershed is located in inland and coastal southern California consisting of 689 square miles of drainage area. It travels from the San Gabriel Mountains through the eastern portion of Los Angeles County and finally passes through parts of the bordering southwestern Orange County before meeting the Pacific Ocean. The San Gabriel River Watershed consists of the San Gabriel mountains at the northern edge, then moving into the Puente Hills and the Chino Basin before finally flowing into the coastal flood plains of eastern Los Angeles and western Orange County.

The San Gabriel River (SGR) is the most prominent hydrologic feature within the San Gabriel River Watershed. The SGR is approximately 58 miles in length and has three major tributaries with multiple storm drains entering from 19 cities along the river's length. The headwaters of the SGR are in the San Gabriel Mountains, with the western section beginning as Prairie Creek that transitions into the SGR and the east side with Bear Creek as they both meet at the San Gabriel Reservoir. The river continues into a second reservoir created by the Morris Dam before it empties into large spreading grounds used for groundwater recharge during large stormflows and early spring snowmelt. This upper area of the watershed consists of extensive areas of undisturbed riparian woodland, with areas around the reservoirs having heavy recreation. During large stormflows, the SGR is hydraulically connected to the Los Angeles River through the Whittier Narrow Reservoir, otherwise the SGR continues southward in a concrete-lined channel through heavily urbanized areas before becoming soft bottomed again in the City of Long Beach right before it drains to the Pacific Ocean.

SAN GABRIEL VALLEY GROUNDWATER BASIN/PUENTE GROUNDWATER SUBBASIN

The City of Walnut is within the San Gabriel Valley Groundwater Basin. This groundwater basin is comprised of alluvial fan deposits formed by outflow from the San Gabriel Mountains. The Project Site overlies the Puente Groundwater Subbasin. The Puente Groundwater Subbasin, as defined by the Puente Basin Water Agency, is a relatively small groundwater basin that spans approximately 20 square miles and is located in eastern Los Angeles County. The Puente Groundwater Subbasin is nestled between the San Jose and Puente Hills to the north and the south and shares a boundary with the Spadra Basin and Main San Gabriel Basin to the east and west. San Jose Creek flows through the basin from the northeast to the west and Lemon Creek runs north to south. Three water districts overlay the Puente Groundwater Subbasin boundary and oversee the management of the basin: Walnut Valley Water District, Rowland Water District, and Upper San Gabriel Valley Municipal Water District. The Groundwater Management Plan (GWP) is still in development according to the Puente Basin Water Agency.

EXISTING ONSITE CONDITIONS

In the existing condition, the Project Site is approximately 25.8 acres of privately owned, primarily undeveloped land zoned for very low density residential housing with various equestrian related structures onsite. The existing Project Site has a watershed approximately 1,541 acres in size, originating north of Meadow Pass Road.

Three public storm drain inlets along Meadow Pass Road at the northerly boundary of the Project Site currently direct offsite stormwater into and through existing public storm drain lines within the Project Site. That offsite stormwater then enters Lemon Creek through two existing outlets, which do not have onsite stormwater capture or treatment capabilities.

Lemon Creek has a natural trapezoidal shape with a low flow path created by a perennial flow even through the summer months and is almost entirely vegetated through the length of the Project Site. There are four existing engineered culverts and three storm drain inlets that convey flow from the surrounding property to Lemon Creek with flows continuing south until it empties into a catch basin leading to a double box culvert beneath La Puente Road. The land generally drains from north and northeast to the southern end of the Project Site. A description of the existing culverts associated with Lemon Creek at the Project Site is included in Table 5.10-1, *Lemon Creek Existing Culverts*, and the existing hydrological conditions including storm drains, culverts, flow paths and subarea watersheds are shown in Figure 5.10-1, *Existing Onsite Watersheds Workmap*.

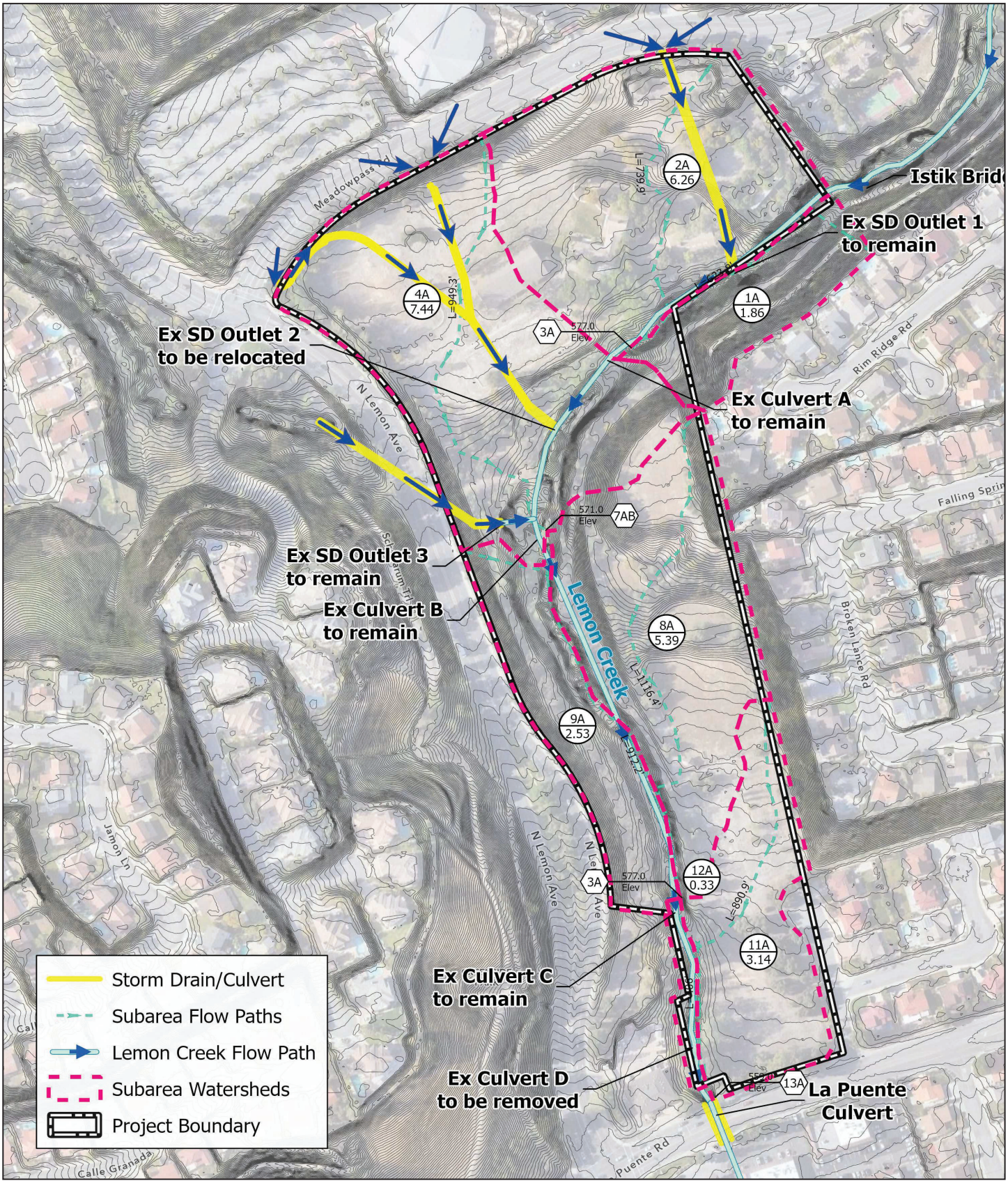
Table 5.10-1
Lemon Creek Existing Culverts

Creek Station	Culvert ID	Shape	Dimensions
29+34.17	Storm Drain Outlet 1	Circular	24-inch diameter
26+25.92	A	Circular	6.75 feet diameter/60 feet long
22+71	Lemon Avenue Storm Drain Outlet (SD Outlet 2)	Circular	81-inch diameter
22+30.01	B	Circular	6.0 feet diameter/22 feet long
14+12.68	C	Arch	13.5 feet wide x 10.25 feet high/16.5 feet Long
11+16.46	D	Circular	6.0 feet diameter/19.5 feet long
10+00	La Puente Culvert	Double RCB	10 feet wide x 5 feet high/915 feet long
Source: Pacific Advanced Civil Engineering, *Hydrology Report*; August 2023 (Appendix H1).			

Pursuant to the Hydrology Report (Appendix H1), Culverts A, B, and C have adequate capacity under the existing condition and retain a stabilizing effect for Lemon Creek; however, the existing Culvert D is grossly undersized and overtops in even the 2-year storm event. Under existing conditions, this overtopping causes undue stress and hydraulic disturbance to the natural stream through increased turbulence and velocities on the downstream side of the culvert.

FLOOD MANAGEMENT

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. FEMA also issues Flood Insurance Rate Maps (FIRMs) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection is established by FEMA. FEMA's minimum level of flood protection for new development is the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.



Source: Pacific Advanced Civil Engineering; April 2024.

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Existing Onsite Watersheds Workmap

VCS Environmental

Figure 5.10-1

According to review of Map No.06037C1725F, effective September 26, 2008, the Project Site is in Zone D, "Area of undetermined but possible flood hazards" (FEMA 2008). Because this area of Lemon Creek has not been previously mapped, neither a floodplain nor base flood elevations have been established. Additionally, Lemon Creek is not identified in the FEMA Flood Insurance Study (FIS; Study Number 06037CV001F, revised June 2, 2021) as a flooding source. Therefore, no hydrology or storm event flow rates have been identified by FEMA for the Project reach. Due to this lack of hydrology information for Lemon Creek, the Hydrology Report (Appendix H1) included a hydrology analysis to establish a 100-year design flowrate and floodplain for Lemon Creek at the Project Site. Results of this analysis are discussed below.

5.10.3 REGULATORY SETTING

FEDERAL

Clean Water Act

The objectives of the Clean Water Act are to restore and maintain the chemical, physical, and biological integrity of Waters of the United States (WoUS). The Clean Water Act establishes basic guidelines for regulating discharges of pollutants into the WoUS and requires states to adopt water quality standards to protect health, enhance the quality of water resources, and to develop plans and programs to implement the Clean Water Act. Below is a discussion of sections of the CWA that are relevant to the proposed Project.

SECTION 402

Section 402 of the Clean Water Act established the National Pollution Discharge Elimination System (NPDES) to control water pollution by regulating point sources that discharge pollutants into Waters of the United States. In the State of California, the Environmental Protection Agency (EPA) has authorized the State Water Resources Control Board (SWRCB) as the permitting authority to implement the NPDES program. The SWRCB requires stormwater discharges from construction sites with a disturbed area of one or more acres to either obtain individual NPDES permits for stormwater discharges or be covered by the Construction General Permit. Coverage under the Construction General Permit is accomplished by completing and filing a Notice of Intent (NOI) with the SWRCB and preparing and implementing a Storm Water Pollution Prevention Plan (SWPPP) prior to grading and during construction. The primary objective of the SWPPP is to identify, construct, implement, and maintain Best Management Practices (BMPs) to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site during construction. Example BMPs include programs, technologies, processes, practices, and devices that control, prevent, remove, or reduce pollution.

STATE

Sustainable Groundwater Management Act

The California Sustainable Groundwater Management Act became law on September 16, 2014. This new law provides specific authority to establish groundwater sustainability agencies and sets forth procedures and requirements to prepare and adopt Groundwater Sustainability Plans. The law establishes the Puente Basin Water Agency as the exclusive local agency to manage groundwater within the Puente groundwater basin statutory boundaries with powers to comply with the provisions of the Sustainable Groundwater Management Act and require groundwater sustainability agencies to develop and implement groundwater sustainability plans and submit the plans to the Department of Water Resources for review upon adoption. The law requires the preparation of an alternative plan that includes an analysis of basin conditions, demonstrating that the basin has operated within its sustainable yield over a period of at least 10 years.

Required elements include a description of the physical setting and characteristics of the aquifer system, measurable objectives, a planning and implementation horizon, components related to management of the basin, summary of monitoring programs, monitoring protocols, and a description of how the plan may affect other plans related to water resources. The Puente Basin Water Agency is a public agency formed joint powers authority between Walnut Valley Water District and Rowland Water District pursuant to the Puente Basin Judgment and the Puente Narrows Agreement with the Upper San Gabriel Valley Municipal Water District. The Puente Basin Water Agency is currently working on preparing a Groundwater Management Plan (GMP) that will guide management of the Puente Basin to maximize the beneficial use of the Basin.

Porter-Cologne Water Quality Control Act

Under the Porter-Cologne Water Quality Control Act (Water Code Sections 13000 et seq.), which was passed in California in 1969 and amended in 2013, the State Water Resources Control Board (SWRCB) has authority over California state water rights and water quality policy. This Act divided the state into nine regional basins, each under the jurisdiction of a Regional Water Quality Control Board (RWQCB) to oversee water quality on a day-to-day basis at the local and regional level. RWQCBs engage in a number of water quality functions in their respective regions. RWQCBs regulate all pollutant or nuisance discharges that may affect either surface water or groundwater. The Project Site is within the jurisdiction of the Los Angeles Regional Water Quality Control Board.

Los Angeles Regional Water Quality Control Board Basin Plan

The downstream receiving water bodies for the proposed Project are located within the jurisdiction of the Los Angeles Regional Water Quality Control Board. The downstream receiving waters from the Project Site include San Jose Creek Reach 2 (Thompson Wash to Temple Avenue), San Jose Creek Reach 1 (Temple Avenue to San Gabriel River Reach 3), San Gabriel River Reach 3 (San Gabriel River to Whittier Narrows Dam), San Gabriel River Reach 2 (Whittier Narrows Dam to Firestone Boulevard), San Gabriel River Reach 1 (Firestone Boulevard to Willow Street), San Gabriel River Estuary (Willow Street to San Pedro Bay Near/Offshore Zone), and San Pedro Bay Near/Offshore Zone. The Los Angeles Region Basin Plan (Basin Plan) designates beneficial uses for surface waters, coast streams and coastal waters in the region that are required to be protected. Additionally, the Basin Plan identifies impaired water bodies and environmentally sensitive areas within the region that afford additional protection.

BENEFICIAL USES

The Los Angeles Region Basin Plan (Basin Plan) designates beneficial uses that define the resources, services, and qualities of aquatic systems and the ultimate goals of protecting and achieving high water quality within the basin. Beneficial uses are designated for the following surface waters and groundwater basin that are hydrologically connected to the Project Site: San Jose Creek (Reach 1 and Reach 2), San Gabriel River (Reach 3, Reach 2, and Reach 1), San Gabriel River Estuary, San Pedro Bay Near/Offshore Zone, and the Puente Groundwater Basin. The beneficial uses include qualitative and quantitative criteria for a range of water quality parameters that are applicable to certain receiving water bodies. The general list of beneficial uses identified in the Basin Plan are described in Table 5.10-2, *Beneficial Use Descriptions*. Table 5.10-3, *Study Area Water Body Beneficial Uses*, shows the beneficial uses, identified in the Basin Plan, of downstream receiving waters from the Project Site.

Table 5.10-2
Beneficial Use Descriptions

Abbreviation	Beneficial Use
MUN	*Municipal and Domestic Supply* waters are used for community, military, municipal or individual water supply systems. These uses may include, but are not limited to, drinking water supply.
IND	*Industrial Service Supply* waters are used for industrial activities that do not depend primarily on water quality. These uses may include, but are not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection and oil well depressurization.
PROC	*Industrial Process Supply* waters are used for industrial activities that depend primarily on water quality.
AGR	*Agricultural Supply* waters are used for farming, horticulture or ranching. These uses may include, but are not limited to, irrigation, stock watering, and support of vegetation for range grazing.
GWR	*Groundwater Recharge* waters are used for natural or artificial recharge of groundwater for purposes that may include, but are not limited to, future extraction, maintaining water quality or halting saltwater intrusion into freshwater aquifers.
FRSH	*Freshwater Replenishment* includes uses of water for natural or artificial maintenance of surface water quantity or quality (e.g., salinity).
NAV	*Navigation* waters are used for shipping, travel, or other transportation by private, commercial or military vessels.
POW	*Hydropower Generation* waters are used for hydroelectric power generation.
COMM	*Commercial and Sport Fishing* waters are used for commercial or recreational collection of fish, shellfish, or other organisms including, but not limited to, uses involving organisms intended for human consumption or bait purposes
AQUA	*Aquaculture* – Uses of water for aquaculture or mariculture operations including, but not limited to, propagation, cultivation, maintenance, or harvesting of aquatic plants and animals for human consumption or bait purposes.
WARM	*Warm Freshwater Habitat* – Uses of water that support warm water ecosystems that may include, but are not limited to, preservation and enhancement of aquatic habitats, vegetation, fish, and wildlife, including invertebrates.
COLD	*Cold Freshwater Habitat* – Uses of water that support cold water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
SAL	*Inland Saline Water Habitat* – Uses of water that support inland saline water ecosystems including, but not limited to, preservation or enhancement of aquatic saline habitats, vegetation, fish, or wildlife, including invertebrates.
EST	*Estuarine Habitat* – Uses of water that support estuarine ecosystems including, but not limited to, preservation or enhancement of estuarine habitats, vegetation, fish, shellfish, or wildlife (e.g., estuarine mammals, waterfowl, shorebirds).
MAR	*Marine Habitat* – Uses of water that support marine ecosystems including, but not limited to, preservation or enhancement of marine habitats, vegetation such as kelp, fish, shellfish, or wildlife (e.g., marine mammals, shorebirds).
WILD	*Wildlife Habitat* – Uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.
BIOL	*Preservation of Biological Habitats* – Uses of water that support designated areas or habitats, such as Areas of Special Biological Significance (ASBS), established refuges, parks, sanctuaries, ecological reserves, or other areas where the preservation or enhancement of natural resources requires special protection.

Abbreviation	Beneficial Use
RARE	*Rare, Threatened or Endangered Species* – Uses of water that support habitats necessary for the survival and successful maintenance of plant or animal species designated under state or federal law as rare, threatened or endangered.
MIGR	*Migration of Aquatic Organisms* – Uses of water that support habitats necessary for migration, acclimatization between fresh and salt water, or other temporary activities by aquatic organisms, such as anadromous fish.
SPWN	*Spawning, Reproduction, and/or Early Development* – Uses of water that support high quality aquatic habitats suitable for reproduction and early development of fish.
SHELL	*Shellfish Harvesting* – Uses of water that support habitats suitable for the collection of filter-feeding shellfish (e.g., clams, oysters, and mussels) for human consumption, commercial, or sports purposes.
WET	*Wetland Habitat* – Uses pf water that support wetland ecosystems, including, but not limited to, preservation or enhancement of wetland habitats, vegetation, fish, shellfish, or wildlife, and other unique wetland functions which enhance water quality, such as providing flood and erosion control, stream bank stabilization, and filtration and purification of naturally occurring contaminants.
REC-1	*Water Contact Recreation* waters are used for recreational activities involving body contact with water where ingestion of water is reasonably possible. These uses may include, but are not limited to, swimming, wading, water skiing, skin and scuba diving, surfing, whitewater activities, fishing and use of natural hot springs.
LREC-1	*Limited Water Contact Recreation* – Uses of water for recreational activities involving body contact with water, where full REC-1 use is limited by physical conditions such as shallow water depth and restricted access and, as a result, ingestion of water is incidental and infrequent.
REC-2	*Non-Contact Water Recreation* waters are used for recreational activities involving proximity to water, but not normally body contact with water where ingestion of water would be reasonably possible. These uses may include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tide pool and marine life study, hunting, sightseeing and aesthetic enjoyment in-conjunction with the above activities.
HFS	*High Flow Suspension* shall apply to water contact recreational activities associated with the swimmable goal as expressed in the federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use, non-contact water recreation involving incidental water contact regulated under the REC-2 use, and the associated bacteriological objectives set to protect those activities. High Flow Suspension shall only apply on days with rainfall greater than or equal to .5 in and 24 hours following that. This shall only apply to engineered channels, defined as inland, flowing surface water bodies with a box, V-shaped or trapezoidal configuration that have been lined on the sides and /or bottom with concrete.
Source: SWRCB, Basin Plan; 2014.	

Table 5.10-3, *Study Area Water Body Beneficial Uses*, shows the beneficial uses, identified in the Basin Plan, of downstream receiving waters from the Project Site: San Jose Creek (Reach 1 and Reach 2), San Gabriel River (Reach 3, Reach 2, and Reach 1), San Gabriel River Estuary, and San Pedro Bay Near/Offshore Zone. The Project Site also overlays the Puente Groundwater Subbasin.

Table 5.10-3
Study Area Water Body Beneficial Uses

Beneficial Use	San Jose Creek Reach 2	San Jose Creek Reach 1	San Gabriel River Reach 3	San Gabriel River Reach 2	San Gabriel River Reach 1	San Gabriel River Estuary	San Pedro Bay Near/ Offshore Zone	Puente Ground-Water Subbasin
MUN	P	P	P	P	P			E
IND				P		E	E	E
PROC				P				E
AGR								E
GWR	I	I	I	I				
FRSH								
NAV						E	E	
POW								
COMM						E	E	
AQUA								
WARM	I	I	I	I	P			
COLD								
SAL								
EST						E	E	
MAR						E	E	
WILD	E	E	E	E	P	E	E	
BIOL								
RARE				E		Ee	E	
MIGR						Ef		
SPWN						Ef		
SHELL						P	E	
WET							E	
REC-1	Pm	Pm	Im	Em	Em	E		
LREC-1								
REC-2	I	I	I	E	E	E		
HFS	Yav	Yav	Yav	Yav	Yav			

Notes:
E: Existing beneficial use. P: Potential beneficial use. I: Intermittent beneficial use. E, P, and I shall be protected as required.
e: One or more rare species utilize all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
f: Aquatic organisms utilize all bays, estuaries, lagoons and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
m: Access prohibited by Los Angeles County Department in the concrete-channelized areas.
y: Currently dry and no plans for restoration.
av: Only applies to water contact recreational activities associated with the swimmable goal as expressed in the federal CWA section 101(a)(2) and regulated under the REC-1 use, non-contact water recreation involving incidental water contact regulated under the REC-2 use, and the associated bacteriological objectives set to protect (1) other recreational uses associated with the fishable goal as expressed in the federal CWA 101(a)(2) and regulated under the REC-1 use and (2) other REC-2 uses (e.g., uses involving the aesthetic aspects of water) shall remain in effect at all times for waters where the (av) footnote appears.
Source: SWRCB, Basin Plan; 2014.

ENVIRONMENTALLY SENSITIVE AREAS

The Los Angeles Regional Water Quality Control Board defines Environmentally Sensitive Areas (ESAs) or Significant Ecological Areas (SEAs) as those areas that include, but are not limited to:

- All Clean Water Act (CWA) Section 303(d) impaired waters (see below).
- Areas designated as Areas of Special Biological Significance by the SWRCB in the Water Quality Control Plan for the Basin Plan.
- State Water Quality Protected Areas.
- Water bodies designated with the RARE Beneficial Use category by the SWRCB in the Basin Plan.
- Areas designated as preserves or their equivalent under the Natural Communities Conservation Planning Program (NCCP).
- Any other ESAs.

According to the LID Report (Appendix H2), a review of the current Significant Ecological Areas and Coastal Resources Areas (SEA) Policy Map for the County of Los Angeles revealed that the Project Site is not located in or directly adjacent to or directly discharging to a SEA.

SECTION 303(D) IMPAIRED WATER BODIES

Under Section 303(d) of the Clean Water Act, the SWRCB is required to develop a list of impaired water bodies. Each of the individual RWQCBs are responsible for establishing priority rankings and developing action plans, referred to as total maximum daily loads (TMDLs) to improve water quality of water bodies included in the 303(d) list. Downstream receiving waters from the Project Site that are impaired for one or any of the pollutants of concern that the Project may generate need to be addressed through the Project's proposed structural and non-structural Best Management Practices (BMPs). Examples of structural BMPs include bioretention or water quality basins and other stormwater/water quality infrastructure. Examples of non-structural BMPs include regular trash collection and street sweeping. Refer to Table 5.10-4, *303(d) Listed Impaired Water Bodies*, for the applicable downstream receiving waters and their impairment and TMDL status.

Table 5.10-4
303(d) Listed Impaired Water Bodies

Receiving Water Body	Water Body Impairment	TMDL(s)
San Jose Creek (Reach 2)	E Coli and Enterococcus	None
San Jose Creek (Reach 1)	Ammonia, E Coli and Enterococcus, pH, Total Dissolved Solids	None
San Gabriel River (Reach 3)	E Coli and Enterococcus	Metals and Selenium
San Gabriel River (Reach 2)	Cyanide, E Coli and Enterococcus, Metals Screen – Lead	Metals and Selenium
San Gabriel River (Reach 1)	E Coli and Enterococcus, pH	None
San Gabriel River Estuary	Dioxin, Dissolved Oxygen, Metals Screen - Copper, Metals Screen - Nickel	None
San Pedro Bay Near/ Off-Shore Zone	PCBs (Polychlorinated biphenyls), Total chlordane (sum of isomers: cis- and trans-nonachlor, oxychlordane, alpha- and gamma-chlordane)	None
Source: SWRCB, *Industrial Stormwater General Permit Map Tool*; 2023.		

According to Chapter 7 of the Basin Plan, the San Gabriel River was included on the 1998, 2002, 2006, and 2010 California Clean Water Act (CWA) section 303(d) lists as an impaired waterbody for copper, zinc, lead, and selenium (metals). The sources of metals loading in the watershed include point sources (such as inputs from municipal, industrial and construction storm water permittees, publicly owned treatment works (POTWs), and power plants) and nonpoint sources (such as air deposition and irrigated agriculture) within the San Gabriel River Watershed.

LOCAL

City of Walnut Municipal Code 5.08.010 Title City of Walnut Stormwater Management and Discharge Control Ordinance

The City of Walnut is a permittee under Order No. R4-2012-0175, as amended. This Order is entitled:

"ORDER NO. R4-2012-0175 as amended by State Water Board Order WQ 2015-0075 and
Los Angeles Water Board Order R4-2012-0175-A01
NPDES PERMIT NO. CAS004001

WASTE DISCHARGE REQUIREMENTS
FOR MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) DISCHARGES WITHIN THE
COASTAL WATERSHEDS OF LOS ANGELES COUNTY, EXCEPT THOSE DISCHARGES
ORIGINATING FROM THE CITY OF LONG BEACH MS4"

The City also is a permittee subject to waste discharge requirements under California law (the "Municipal NPDES Permit"). The Municipal NPDES Permit requires development of a countywide Stormwater Quality Management Program (SQMP) in which the City of Walnut is co-permittee and requires implementation of water quality management programs including the elimination of illicit connections and illicit discharges, development planning, development construction, and public information and education requirements.

The provisions of the City of Walnut Stormwater Management and Discharge Control Ordinance contain requirements for construction activities and facility operations of development and redevelopment projects to comply with the current "Municipal NPDES Permit." These requirements include lessening the water quality impacts of development by using smart growth practices, and integration of Low Impact Design (LID) design principles to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest. LID is inclusive of Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. All development projects equal to one acre or greater of disturbed area that adds more than 10,000 square feet of impervious surface area are considered a Planning Priority Project (PPP). The site for every PPP is required to be designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention and/or rainfall harvest and use. A new single-family hillside home development must include measures to conserve natural areas; protect slopes and channels, provide storm drain system stenciling and signage; divert roof runoff to vegetated areas before discharge unless the diversion would result in slope instability; and direct surface flow to vegetated areas before discharge, unless the diversion would result in slope instability.

City of Walnut General Plan

LAND USE AND COMMUNITY DESIGN ELEMENT

The following are relevant goals and policies from the City of Walnut General Plan Land Use and Community Design Element pertaining to hydrology and water quality:

Goal LCD-9: A built environment with development approaches that apply sustainability principles.

Policy LCD-9.4: Building Design. Support building designs that assist with the management of stormwater runoff, preserve and enhance soil permeability, and reduce other negative effects of urban development.

Goal LCD 10: Development that respects the natural environment of Walnut and preserves the scenic quality of hills, ridgelines, and creek areas.

Policy LCD-10.1: Development that is Sensitive to the Natural Environment. Design development in a sensitive manner to complement the natural environment. The following guidelines will be considered:

a) Encourage development to be sensitive to the topography, physical context, and community character of Walnut.

b) Minimize alteration of existing topography especially in hillside areas during the development and redevelopment process.

CIRCULATION ELEMENT

The following are relevant goals and policies from the City of Walnut General Plan Circulation Element pertaining to hydrology and water quality:

Goal C-6: Reduction in total vehicle miles traveled to help improve local air quality and reduce greenhouse gas emissions.

Policy C-6.4: Green Streets. Encourage "green street" strategies to improve stormwater quality and protect the environment including local creeks.

CONSERVATION, OPEN SPACE, AND RECREATION ELEMENT

The following are relevant goals and policies from the City of Walnut General Plan Conservation, Open Space, and Recreation Element pertaining to hydrology and water quality:

GOAL COR-1: Open spaces that are protected and managed for current and future generations to enjoy.

Policy COR-1.1: Open Space Resources. Preserve and protect natural habitats, creeks, hillside areas for use by wildlife, for education, and for residents' passive enjoyment. Consider acquiring vacant parcels that can contribute to the network of open space for these purposes.

GOAL COR-3: Preserved and rehabilitated riparian areas and creeks.

Policy COR-3.1: Preserve and Enhance. Preserve and enhance existing waterways and natural riparian areas to achieve natural states that support wildlife and that provide flood control and groundwater recharge functions.

Policy COR-3.2: Green Improvements. Consult with the Los Angeles County Flood Control District to explore storm water and green infrastructure improvements, such as along Pierre Road, to remove pollutants from storm water runoff before it enters San Jose Creek.

Policy COR-3.5: Creek Cleanup. Encourage volunteer organizations to help clean creek beds to reduce pollution and help return waterways to their natural states.

Policy COR-3.6: Education for Property Owners. Provide educational materials to property owners whose properties include creeks to show them the benefits of creek restoration and proper management.

GOAL 7: Protected and healthy groundwater basins.

Policy COR-7.1: Green Infrastructure. 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.

Policy COR-7.2: Groundwater infiltration. Update Zoning and building requirements to require innovative design methods to increase pervious surfaces and maximize water infiltration into the San Gabriel Valley Groundwater basin.

COMMUNITY FACILITIES AND INFRASTRUCTURE

The following are relevant goals and policies from the City of Walnut General Plan Community Facilities and Infrastructure pertaining to hydrology and water quality:

GOAL 6: Storm water infrastructure that minimizes flood risks and achieves water quality goals.

Policy CFI-6.1: Storm Water and Drainage System. Implement best practices in storm water management to reduce demand on the drainage system to maintain low pollution impacts to the surface waters and Walnut's local creeks.

Policy CFI-6.2: Correct Deficiencies. Continue to correct any deficiencies in the City's drainage system to minimize flood damage and adequately direct rainfall and subsequent runoff.

Policy CFI-6.3: Storm Water Runoff. 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.

Policy CFI-6.4: National Pollutant Discharge Elimination System (NPDES). Encourage on-site retention of stormwater and compliance with requirements of NPDES.

Policy CFI-6.5: Local Creeks. Develop and implement management plans that provide appropriate management strategies and natural landscaping of local creeks.

PUBLIC SAFETY

The following are relevant goals and policies from the City of Walnut General Plan Public Safety Element pertaining to hydrology and water quality:

GOAL PS-6: Avoid and minimize flood risks, dam inundation, and other flood events.

Policy PS-6.2: Keeping Current with Flood Regulations. Continue to enforce, and update when necessary, the City's Floodplain Management ordinance. Periodically review maps prepared by FEMA and the State Department of Water Resources to identify changes in mapping of areas subject to flooding and amend the General Plan or Municipal Code as warranted.

5.10.4 THRESHOLDS OF SIGNIFICANCE

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

- HWQ-1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
- HWQ-2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
- HWQ-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 result in substantial erosion or siltation on- or off-site?
- HWQ-4: 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- HWQ-5: 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 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?
- HWQ-6: 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?
- HWQ-7: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
- HWQ-8: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

5.10.5 ENVIRONMENTAL IMPACT ANALYSIS

PROPOSED ONSITE CONDITIONS

The Project includes removal of the remaining structures from the previous equestrian operations and the construction of 27 single-family homes on lots created by the proposed subdivision map. The proposed 27 dwelling units would be outside of the floodplain of Lemon Creek and generally elevated above existing ground elevations. The entirety of Lemon Creek would be preserved within proposed open space areas. New internal roads would be created to provide access to 25 of the homes from Meadow Pass Road, with two homes being accessed from San Vicente.

The proposed residential development includes construction of two water quality basins designed to capture, treat, and detain all runoff from the property, including stormwater from newly developed areas. Because of the resulting delay in the new stormwater reaching the creek, it would not cause the *rate* at which stormwater passes through the La Puente culvert to exceed the peak flow rate (i.e., at the worst moment) that would have occurred in the same storm if the property had not been developed. As a result, the Project's runoff would not worsen offsite flooding conditions.

One basin would be located in the northern portion of the property and the second would be located in the southern portion. All runoff diverted to these basins would undergo treatment in accordance with the Los Angeles County Low Impact Development (LID) Standards Manual requirements. These basins are designed to treat onsite runoff up to the 85th percentile storm event, consistent with Los Angeles County regulations, after which they would detain any increase in onsite stormwater runoff resulting from the proposed development, up to a 100-year storm event. The basin in the northern portion of the Project Site would hold and gradually release stormwater into an existing public storm drain connection that enters the Project Site from Lemon Avenue and currently discharges into Lemon Creek. The basin in the southern portion of the Project Site is designed to hold and gradually release stormwater into a proposed outlet to Lemon Creek.

The water quality basins are designed to assure that Project stormwater would enter Lemon Creek onsite at a peak flow rate no greater than under existing conditions. As a result, site discharges into Lemon Creek would not increase relative to existing peak discharges. Runoff entering Lemon Creek from both onsite and offsite would then pass offsite into existing public drainage facilities located on public property adjacent to the Project Site at La Puente Road, as with existing conditions.

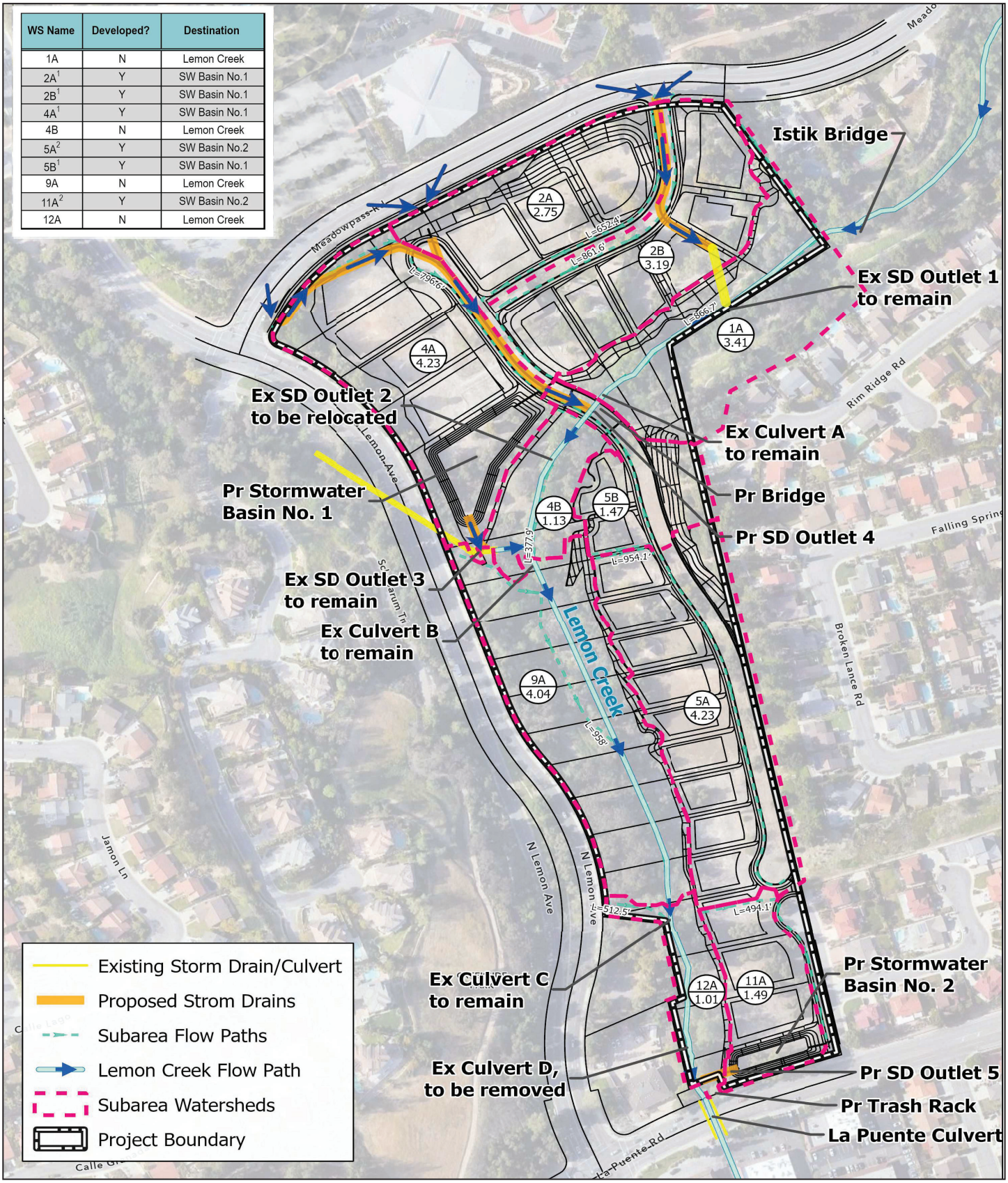
Three public storm drain inlets along Meadow Pass Road at the northerly boundary of the Project Site would be realigned under the proposed Project streets. One of the existing outlets into Lemon Creek would remain in its current location, while the second would be relocated to a point downstream of the proposed Project bridge. There are four existing culverts through which Lemon Creek passes within the Project Site. The most downstream existing culvert, Culvert D, is grossly undersized and overtops in even a 2-year event. Because the overtopping causes undue stress and hydraulic disturbance to the natural stream through increased turbulence and velocities on the downstream side of the culvert, the removal of Culvert D is proposed. Doing so would remove some existing vegetation. The Project proposes to compensate for that removal through vegetation and habitat restoration in the area. A human-made flow restriction would replace the culvert, preserving the control that the culvert previously lent to sediment transport in the creek while removing the turbulent and potentially destructive effects of overtopping. Culverts A, B, and C, however, have more capacity than Culvert D and they are not proposed to be removed due to the stabilizing effect they have on the creek, and since the trail network would utilize these points for pedestrians to cross over the creek.

As is common with existing development throughout the City's Residential Planned Development Zone, 9.5 acres of the open space area would be within privately owned residential lots. Those portions of open space, Lemon Creek, and the public trail within private lots would be subject to recorded deed restrictions prohibiting use of the restricted open space by the owners of the private lots, including prohibitions on planting vegetation, installing fencing, or otherwise developing or using the restricted natural open space areas. The restrictions would be enforceable by the City in addition to future homeowners.

The proposed hydrological conditions including depiction of storm drains, culverts, flow paths and subarea watersheds are shown in Figure 5.10-2, *Proposed Onsite Watersheds Workmap*.

IMPACT HWQ-1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. The Project Site is expected to generate pollutants associated with roads, parking areas and landscaping. Expected pollutants of concern may include bacteria, nutrients, pesticides, sediments, trash and debris, oil, and grease. The following analysis evaluates if the Project would conflict with beneficial uses or further impair any listed 303(d) Impaired Water Bodies established in the Basin Plan.



Source: Pacific Advanced Civil Engineering; April 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

Proposed Onsite Watersheds Workmap

VCS Environmental

Figure 5.10-2

During temporary construction activities, there would be the potential that degraded surface water runoff generated from the construction site could be conveyed into local and regional drainage facilities. Depending on the constituents in the surface water, the water quality of the Project area surface water bodies could be reduced, which could conflict with beneficial uses established for the applicable surface water bodies. Because the proposed Project would disturb more than one acre of area, the Project applicant/contractor would be required to obtain a National Pollutant Discharge Elimination System (NPDES) State General Construction Permit from the State Water Resources Control Board. In accordance with the State General Construction Permit, the Project applicant/contractor would be required to file a Notice of Intent (NOI) to the Storm Water Report Tracking System and obtain a waste discharger identification number from the State Water Resources Control Board. Additionally, the General Construction Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

The SWPPP would identify Best Management Practices (BMPs) to minimize degraded surface water runoff impacts. Such measures would include a site map that shows the construction site perimeter, existing and proposed buildings, parking areas, roadways, storm drain collection and discharge points before and after construction. Additionally, structural BMP placement would include use of sandbags or waddles near drainages, use of rumble racks or wheel washers or other measures to avoid sediment transport. Compliance with the NPDES short-term regulatory requirements would reduce potential short-term, construction-related impacts to water quality to less than significant. No mitigation is required.

The long-term operation of the proposed Project would generate surface water runoff that could contain pollutants, which could conflict with applicable surface water beneficial uses. The proposed Project would be regulated under NPDES Municipal Stormwater Permit issued by the Regional Water Quality Control Board and would be required to reduce the amounts of impervious areas and capture and treat or infiltrate stormwater runoff. In order to comply with the requirements of the NPDES Municipal Separate Storm Sewer System (MS4) Permit (CAS0004001, Order No. R4-2012-0175), Los Angeles County has prepared the 2014 Low Impact Development Standards Manual (LID Standards Manual), which provides guidance for the implementation of stormwater quality control measures in new development projects with the intention of improving water quality and avoiding potential water quality impacts. The Los Angeles County MS4 permit applies to the City of Walnut, as does the 2014 LID Standards Manual.

According to the LID Report (Appendix H2), the Project Site has been designed to retain and treat 150% of the 85th percentile storm runoff from developed areas through biofiltration in two proposed water quality basins, meeting the requirements of the LID Standards Manual. This design would ensure that runoff draining across the site does not contribute to an increase of pollutant loads in Lemon Creek. Due to low infiltration rates observed at the Project Site (<0.3 inches/hour), the proposed water quality basins cannot treat through infiltration, which is why the Project would satisfy the stormwater quality requirements using two biofiltration water quality basins, which would hold and treat a minimum of 1.5 times the stormwater design volume that could not be reliably contained onsite through other means of retention.

The LID Report analyzed the average annual runoff and expected loads of typical constituents of stormwater runoff: Coliform, Dissolved Solids, Suspended Solids, Phosphorus, Nitrogen, and Copper. The water quality analysis was performed in four steps: (1) calculation of annual average runoff volume from the site into Lemon Creek in both the “before project” and “after project” conditions, (2) estimation of pollutant concentration/loading in site runoff for both the “before project” and “after project” conditions, (3) estimation of the two water quality basins’ efficiency in pollutant removal in the “after project” condition, and (4) providing an estimate of the pollutant loading that may be discharged from the Project Site in the “after project” condition. The resulting pollutant loadings in the “before project” and “after project” conditions were then compared to determine potential impacts. Results of the analysis

determined the Project is anticipated to reduce pollutant loading in Lemon Creek for all pollutant constituents. The reduction would range from 23% to 95% as shown below in Table 5.10-5, *"Before Project" vs. "After Project As-Proposed" Pollutant Discharges to Lemon Creek*.

Table 5.10-5
"Before Project" vs. "After Project As-Proposed" Pollutant Discharges to Lemon Creek

Site Conditions	Volume of Water Discharged[1] (af)	Total Coliform Discharged[2]	Total Dissolved Solids Discharged (lbs)	Total Suspended Solids Discharged (lbs)	Total Phosphorus Discharged (lbs)	Total Nitrogen Discharged (lbs)	Total Copper Discharged (lbs)
Before Project Conditions (Equestrian)	6	65,047	3,771	4,014	17	108	0.3
Before Project Conditions (Vacant)	6	663	3,771	2,960	3	30	0.2
After Project Conditions	11	3,250	2,920	883	8	58	0.2
Percent Change Pre (Equestrian) vs Post		-95%	-23%	-78%	-53%	-46%	-33%

Abbreviations: af = acre feet; lbs = pounds
Notes:
1 Runoff volume calculated using annual average rainfall.
2 Total Coliform load reported in billions of MPN. MPN/100mL is "Most Probable Number of Bacteria per 100 milliliters".
Source: Pacific Advanced Civil Engineering, *Hydrology Report*, Table 4-7. August 2023 (Appendix H1).

Although a sediment transport study is included in the Hydrology Report (Appendix H1), it is worth noting that, according to the LID Manual, the Project was not required to perform a sediment transport analysis as part of the hydromodification analysis, because the capital flood flow rate is less than 5,000 cubic feet per second (cfs). A hydrology information request submitted to the Los Angeles County's Flood Control District in April of 2014 indicated that the capital flood flow rate at the La Puente culvert was 3,255 cfs. It should be noted, however, that the Hydrology Report (Appendix H1) included a stream stability, sediment transport, and erosion potential analysis. In addition, the Hydrology Report (Appendix H1) concluded that the Project would not result in streambed stability, sediment transport, or erosion issues. The proposed grading would not encroach into the main channel bed or banks and would, therefore, not disturb the natural vegetation or the associated natural sedimentation processes of Lemon Creek.

Based on the analysis above, the proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. No adverse impacts to beneficial uses of downstream receiving surface waters or groundwater are anticipated and no notable release of established TMDL pollutants would occur. The Project may improve water quality in Lemon Creek and the greater San Gabriel Valley Watershed. No mitigation is required.

Level of Impact Before Mitigation: Less than significant with implementation of standard conditions and based on the current design.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT HWQ-2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The proposed Project is designed to minimize impacts to Lemon Creek aside from essential improvements required for the proposed development and to maintain the structural integrity and water quality of the creek. These include the removal of Culvert D (which overtops during large storm events under existing conditions), construction of the proposed Street B bridge crossing, relocation of the existing storm drain outlet that only conveys offsite flows entering the Project Site, and construction of two water quality basins that would retain and treat stormwater flows prior to release into Lemon Creek. Lemon Creek would remain mostly untouched and retain its natural shape and pervious bottom.

Drainage within the newly developed and impervious surfaces at the Project Site would be routed to two water quality basins for retention quality basins for detention and treatment prior to release into Lemon Creek. As analyzed in the LID Report (Appendix H2), an infiltration test revealed that the Project Site is not suited for groundwater infiltration due to the slow infiltration rates observed. Therefore, any infiltration into the groundwater table occurring within Lemon Creek in the "before project" condition would approximately remain the same in the "after project" condition. In addition, the Project does not propose any wells or direct water extraction. No adverse impacts to groundwater recharge or the groundwater basin are anticipated, and no mitigation is required.

Level of Impact Before Mitigation: No impact based on proposed activities and on the current design.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT HWQ-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 result in substantial erosion or siltation on- or offsite?

During temporary construction earthwork activities, there would be the potential that uncovered soils on the Project Site could be exposed to water erosion and/or wind erosion impacts. There would also be the potential that construction vehicles and construction equipment could transport sediment onto local streets and into local drainage systems. The Project would disturb more than one acre of area and would be required to obtain a General Construction Permit from the State Water Resources Control Board. The General Construction Permit would require preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) detailing Best Management Practices (BMPs) to avoid erosion and sediment transfer impacts. Example BMPs include programs, technologies, processes, practices, and devices that control, prevent, remove, or reduce pollution. With implementation of the General Construction Permit as a standard requirement, including preparation and implementation of a construction SWPPP with BMPs, temporary construction activities would not substantially alter the existing drainage pattern in a manner that would significantly increase potential erosion and/or sedimentation impacts. Potential impacts would be less than significant, and no mitigation is required.

The Project would permanently alter the existing drainage pattern of the Project Site to accommodate the proposed residential pads, roads, and stormwater infrastructure; however, the overall drainage pattern of the Project Site and Lemon Creek would generally remain consistent with the existing "before project" conditions. Lemon Creek would remain mostly untouched and retain its natural shape and pervious bottom.

Drainage within the newly developed and impervious surfaces at the Project Site would be routed to two water quality basins for retention and treatment prior to release into Lemon Creek.

The potential for erosion occurs in all natural drainage systems, including in the "before project" condition, and the potential for new or novel impacts resulting from Project implementation was evaluated by determining if an increase in erosion potential would occur. An erosion potential analysis was performed for the "before project" and "after project" conditions, indicating no significant change in long-term onsite or offsite erosion potential (PACE, 2024 (Appendix H1)). A short-term erosion potential analysis showed a slight increase in the potential for erosion in the "after project" condition for one segment of Lemon Creek in the southern portion of the Project Site, during the 25-year and 50-year storm events but not in the 2-year, 5-year, or 100-year storm events. This segment is from Culvert C to the La Puente culvert entrance (identified as "Reach 5" in the Hydrology Report). Based on these results, an additional conservative analysis was prepared to analyze the maximum short term erosion potential in the 25-year and 50-year storm events. The findings of this additional analysis determined that in the event Lemon Creek were to erode in the short-term due to erosion in the 25-year or 50-year storm events, it would be localized and not significantly impact Lemon Creek or present a hazard to nearby properties or people in either the "before project" or "after project" conditions. The results of the Hydrology Report and LID Report indicate potential erosion, sedimentation, and siltation impacts would be less than significant and no mitigation is required.

Additionally, improvements would be made to the existing stormwater drainage system by removing Culvert D, which currently overtops during large storm events and creates a greater risk of erosion in the system in the "before project" condition. Therefore, the Project may reduce existing erosion and sedimentation issues in Lemon Creek. Potential impacts are considered less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant with implementation of standard conditions and based on the current design.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT HWQ-4: 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

A regional hydrology analysis was used to create a hydraulic model of Lemon Creek and compare any changes to the "before project" and "after project" projected water surface elevations and velocities during the 2-year, 5-year, 25-year, 50-year, and 100-year storm events.

The results of the comparative analysis projected minor decreases in the water surface elevations for the "after project" condition, compared to the "before project" condition, in all locations with exception to one creek cross-section in the southern portion of the Project Site (identified in the hydrology study as cross-section 1101.71) and only during the lesser 2-year and 5-year storm events. Projected surface elevation changes in this creek cross-section would primarily be due to the removal of Culvert D and the introduction of a flow restriction to the creek geometry. The flow restriction would be designed to maintain the sediment transport stabilizing benefits of the culvert without the turbulence and/or potential damage caused by overtopping under the existing "before project" condition. No increases to water surface elevations were

observed in the greater 100-year storm event "after project" proposed condition, indicating that onsite and offsite areas would not be subject to increased flooding. Changes to the 100-year floodplain associated with the Project would not create any changes offsite, as can be seen in Figure 5.10-3, *Floodplain Comparison Existing vs. Proposed*. Additionally, a minimum freeboard (elevation buffer) of 2.5 feet would be maintained between the 100-year water surface flood elevation and the proposed pad elevations. No adverse impacts are anticipated, and no mitigation is required.

Results of the comparative analysis also showed that some minor increases in velocity would occur in the "after project" condition, somewhat in the location near Culvert C but primarily in the location of Culvert D. Increases in velocity ranged between 0.1 feet per second and 0.9 feet per second. Although minor changes can be observed immediately upstream and downstream of Culvert D, the culvert removal would constitute a benefit to the creek and proposed development, stabilizing velocities in the area and reducing risk of catastrophic failure at this existing pinch point. Where these minor increases in velocity would occur, the flows would be contained within the creek banks and would not create any onsite or offsite impacts.

The increases are also not anticipated to alter the stability of Lemon Creek, due to the preservation of the existing vegetation in the creek and the stabilizing effects of the existing culverts upstream (Culvert A, Culvert B, and Culvert C). Additionally, the changes in velocity are considered relatively minor (less than 1 feet/second change for all storm events). As a result, no mitigation measures are needed or recommended with respect to flow depths or velocity. Potential impacts are considered less than significant, and no adverse onsite or offsite impacts are anticipated.

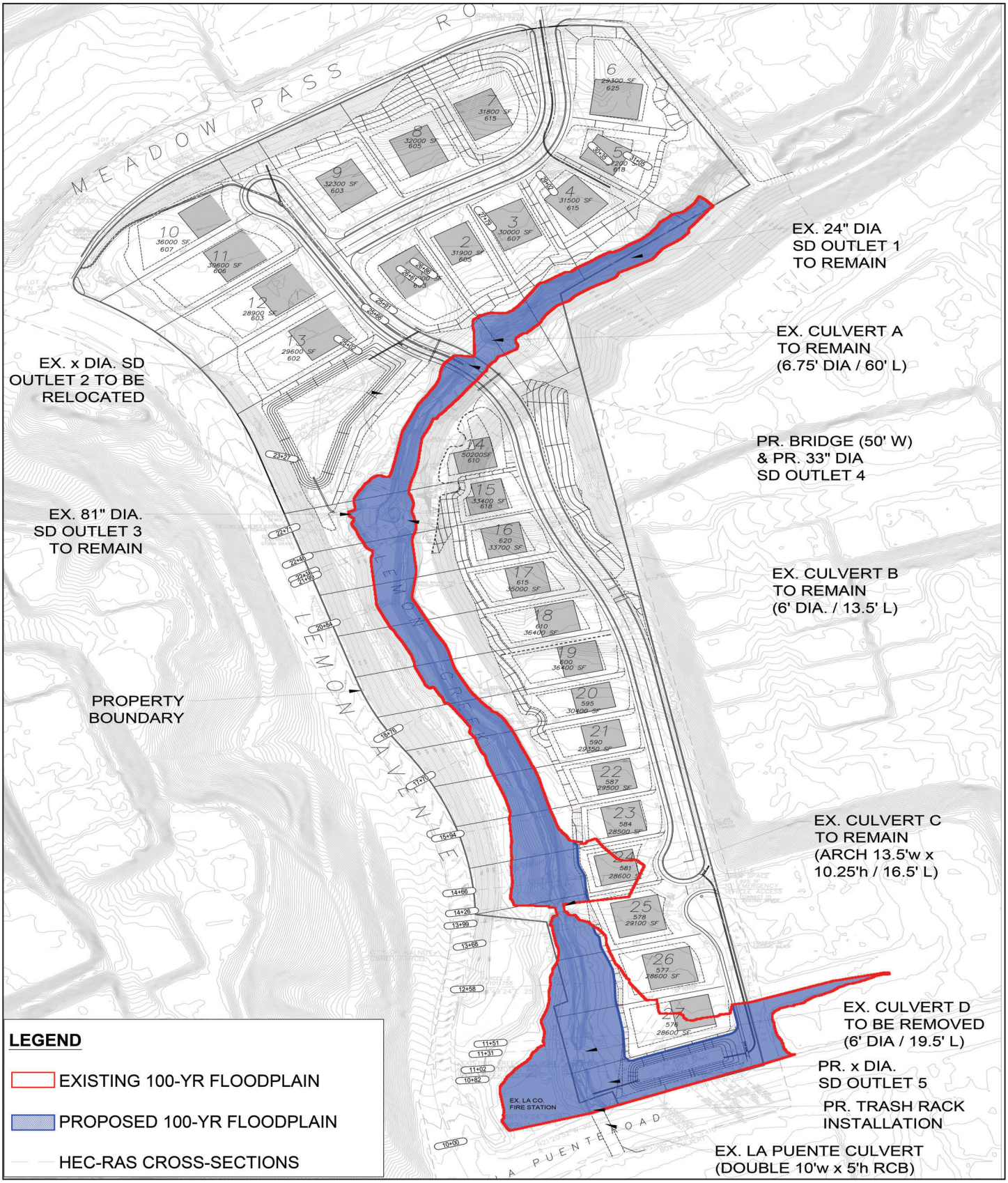
Though unrelated to the proposed Project, according to the Hydrology Report (Appendix H1), the offsite downstream area near the La Puente Road culvert entrance has experienced flooding in the past, apparently due to debris restricting flow at the entrance to the City's culvert on City property adjacent to the Project Site. It is noted that debris has been caught on a previously installed City trash rack at the culvert entrance, thus restricting flow. While the La Puente culvert is not situated on the Project Site and the Project would not contribute to this existing debris/flooding problem, the City Engineer has requested a revised trash rack design be submitted to the City to help alleviate these existing issues.

As a cooperative gesture, the Project Applicant has provided the City with a sloped trash rack design that would improve existing flow conditions at the La Puente Culvert. Whether and when that design and/or other improvements to the flow at the La Puente culvert are implemented is entirely up to the City and would be the City's responsibility. No such improvements are proposed as part of the Project.

Level of Impact Before Mitigation: Less than significant with implementation of standard conditions and based on the current design.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.



Source: Pacific Advanced Civil Engineering; April 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

Floodplain Comparison Existing vs. Proposed

VCS Environmental

Figure 5.10-3

IMPACT HWQ-5: 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 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?

As previously discussed above, the Project development is not anticipated to notably increase water surface elevations or flow velocities within Lemon Creek; therefore, adequate capacity is believed to be available for the existing and planned stormwater drainage systems. An onsite hydrology analysis was performed to determine potential impacts to water quality, runoff volume, and peak discharge rates from the Project Site to Lemon Creek during the "after project" condition. After analyzing the 85th percentile, 2-year, 5-year, 25-year, 50-year, and 100-year storm events, it was determined that increases in in peak runoff discharge rate would be eliminated for all storm events analyzed through the construction and operation of the proposed Basin 1. Water Quality Basin 1 would be designed to detain the increased runoff volume for storms up to the 100-yr storm event (2.7 acre-feet) and release the detained stormwater at a rate that does not increase the peak discharge from the site to Lemon Creek or the peak discharge within Lemon Creek. It should also be noted that the increased stormwater runoff volume reaching Lemon Creek in a 100-yr storm event is only about a 0.3% change in the regional 100-yr storm volume passing through Lemon Creek.

Additionally, both Basin 1 and Basin 2 would detain and treat the 85th percentile runoff from the development, further reducing the peak discharge from the Project Site to Lemon Creek. The analysis further concluded that there would be a decrease in pollutant loading to Lemon Creek in the "after project" condition for all pollutants analyzed. The LID Report would also require structural source control measures of storm drain messaging and signage prohibiting waste disposal into the storm drain system, preventing runoff from designated outdoor material storage areas into the storm drain system or Lemon Creek, landscaping irrigation practices to reduce irrigation runoff from the development and hillsides, and the use of alternative building materials to reduce pollutant sources and maintenance needed. As such, potential impacts with respect to hydromodification and pollutants are considered less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant with implementation of standard conditions and based on the current design.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT HWQ-6: 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?

According to review of the National Flood Hazard Map, Map No.06037C1725F, the Project Site is in Zone D, "an area of undetermined flood hazard" (FEMA 2008). Due to this, as discussed in Section 5.10.2, a flood hazard analysis was performed looking at the 2-year, 5-year, 25-year, 50-year, and 100-year storm events. The analysis concluded that the "after project" condition would not result in any onsite or offsite flooding. Additionally, a minimum freeboard (elevation buffer) of 2.5 feet would be maintained between the development pads and the 100-year water level. No adverse impacts associated with flood flows are anticipated.

The Project would permanently alter the existing drainage pattern of the Project Site to accommodate the proposed residential pads, roads, and stormwater infrastructure; however, the overall drainage pattern of the Project Site and Lemon Creek would generally remain consistent with the existing "before project" conditions. The 100-year floodplain of Lemon Creek would remain mostly untouched and retain its natural shape and pervious bottom. Drainage within the newly developed portion of the Project Site would be redirected to two water quality basins for retention and treatment prior to release into Lemon Creek. This redirection of flows would be used to maintain water elevations, flow rates, and remove pollutants. No adverse impacts associated with flood flows are anticipated.

The Project also includes the removal of the existing Culvert D due to its current inability to handle large storm flood flows without overtopping under the "before project" condition. This culvert removal would constitute a benefit to the creek and proposed development, stabilizing velocities in the area and reducing risk of catastrophic failure at this existing pinch point. No adverse impacts associated with flood flows are anticipated.

Level of Impact Before Mitigation: Less than significant with implementation of standard conditions and based on the current design.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT HWQ-7: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The Project would not be at risk for a tsunami because the Project Site is not located near the coastline. In addition, the Project Site would not be subject to inundation from the failure of nearby dams according to the City's General Plan Safety Element (City of Walnut 2018). As discussed in Section 5.10.2, the Project Site sits within "Zone D", which is a designated undetermined flood hazard zone; therefore, a flood hazard analysis was performed looking at the 2-year, 5-year, 25-year, 50-year, and 100-year storm events. As previously discussed, the analysis concluded that the "after project" condition would not result in any onsite or offsite flooding as water elevations and flow velocities would substantially remain the same. Additionally, a minimum freeboard (elevation buffer) of 2.5 feet would be maintained between the proposed development pads and the 100-year water level. As also previously shown in Figure 5.10-3, *Floodplain Comparison Existing vs. Proposed*, changes to the 100-year floodplain associated with the Project would not create any changes offsite during a 100-year storm event. Based on the results of the Hydrology Report (Appendix H1), the Project would not generate a significant risk of inundation, and no mitigation measures are required.

Level of Impact Before Mitigation: Less than significant impact based on proposed activities and on the current design.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT HWQ-8: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As previously discussed above, Project implementation would not conflict with the beneficial uses established for receiving water bodies downstream from the Project Site, would not conflict with water quality objectives, or further impair existing impaired water bodies identified in the Basin Plan. Potential short-term construction impacts would be reduced to less than significant with implementation of a Stormwater Pollution Prevention Plan (SWPPP) and Best Management Practices (BMPs) pursuant to standard National Pollutant Discharge Elimination System (NPDES) State General Construction Permit requirements. Long-term operational water quality would be maintained through the construction and operation of two water quality basins designed to retain and treat runoff prior to release into Lemon Creek. Results of the analysis determined the Project is anticipated to reduce pollutant loading in Lemon Creek for all pollutant constituents. The reduction would range from 23% to 95% as shown previously in Table 5.10-5.

The Puente Basin Water Agency is currently working on preparing a Groundwater Management Plan (GMP) that will guide management of the Puente Basin to maximize the beneficial use of the basin. The Project Site is in the City of Walnut, which receives water services from the Walnut Valley Water District (WVWD). The City's individual water demand is not accounted for in the 2010 Urban Water Management Plan (UWMP); instead, the demand for the entire system is analyzed for impacts to water supply and service capacity. According to review of Table 6-9 of the UWMP, projected water supplies would be 21,173 acre-feet in the year 2025 and 22,193 acre-feet in the year 2045. In addition, Table 7-4 of the UWMP indicates that the WVWD can meet water demands during five consecutive year drought periods over the next 25 years. Based on this analysis and because the Project is consistent with the City's land use and zoning designations, potential impacts are considered less than significant. No mitigation Is required.

Level of Impact Before Mitigation: Less than significant with implementation of standard conditions and based on the current design.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.10.6 CUMULATIVE IMPACTS

As previously discussed, temporary construction activities would have the potential to generate degraded surface water impacts, which could adversely affect downstream receiving water bodies. The proposed Project would be required to obtain coverage under the NPDES General Construction Permit to ensure that construction-related water quality impacts and flood management impacts would be less than significant, and the proposed Project would not contribute considerably to cumulative degraded stormwater impacts. Cumulative development Projects shown in Section 4.0, *Basis for Cumulative Impacts*, would also have the potential to affect water quality during the construction phase. Related cumulative development that disturbs one acre or more of soil would also be required to obtain coverage under the NPDES General Construction Permit and would avoid and/or reduce construction-related impacts to water quality through preparation of a site-specific SWPPP, which identifies applicable BMPs. Each Project would be required to comply with existing water quality standards at the time of development review and implement BMPs, as necessary. Thus, related development would not result in cumulatively considerable construction-related hydrology and/or water quality impacts.

The proposed Project would permanently increase impervious surface areas. However, due to the proposed water quality basins which are part of the proposed Project, increases in stormwater runoff volumes and peak discharges that would occur without the basins are avoided. However, the Project would be required to prepare and implement BMPs that would include provisions for the detention and treatment of runoff so that post-development runoff discharges do not exceed pre-development peak discharge rates and do not increase pollutant loads. Therefore, the proposed Project would not contribute to significant cumulative drainage impacts. Additionally, related development Projects shown in Section 4.0, *Basis for Cumulative Impacts*, would also be required to comply with City NPDES MS4 Storm Water Permit requirements. Therefore, the proposed Project, considered with the related cumulative Projects, would not result in significant cumulative hydrology or water quality impacts.

Level of Impact Before Mitigation: Less than significant with implementation of standard conditions and based on the current design.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.10.7 MITIGATION MEASURES

No mitigation measures are required for hydrology and water quality.

5.10.8 REFERENCES

City of Walnut. *Environmental Impact Report, City of Walnut General Plan Update and West Valley Specific Plan (SCH No. 2017101010)*. February 2018. Accessed on November 22, 2023 at https://www.cityofwalnut.org/for-residents/departments/community-development/planning-division/walnut-general-plan-and-zoning.

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State Water Resources Control Board (SWRCB), *Industrial Stormwater General Permit Map Tool*. Accessed on November 17, 2023 at https://gispublic.waterboards.ca.gov/portal/home/item.html?id=27fb09e76665429f915f96b 9e760f267.

Walnut Valley Water District (WVWD), *Walnut Valley Water District 2020 Urban Water Management Plan*. June 2021. Accessed on November 22, 2023 at https://walnutvalleywater.gov/wp-content/uploads/2023/03/FINAL-Walnut-Valley-Water-District-2020-UWMP.pdf.

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5.11 LAND USE AND PLANNING

5.11.1 INTRODUCTION

This section analyzes the proposed Project's potential impacts on Land Use and Planning, including potential direct physical impacts to existing land uses and Project consistency with the City of Walnut General Plan and other applicable planning documents. The analysis in this section is based on a review of the proposed Project description provided in Section 3.0, *Project Description*, within the context of the Project Site characteristics.

5.11.2 ENVIRONMENTAL SETTING

HISTORICAL ONSITE LAND USES

Aerial photographs and historical topographic maps (dating between 1928 and 2018) of the Project Site and adjoining properties were reviewed to identify historical land uses and development at the Project Site and vicinity. A summary of the findings is presented below in Table 5.11-1, *Summary of Historical Land Uses*.

Table 5.11-1
Summary of Historical Land Uses

Year	Comments
1928	The Project Site appears to have been undeveloped land, with a stream (Lemon Creek) traversing the northern portion from east to west. An unimproved road is visible on site.
1938	The Project Site appears to have been utilized as agricultural land and a small residential structure is visible in the southeast corner of the site. A stream runs from the northeast to the southwest.
1946, 1948, 1953, 1964, 1972, 1977, 1983	The Project Site appears to have been utilized as agricultural land and small residential structures are visible on the southeastern and northeastern portions of the site. Unimproved roads traverse the site.
1989, 1990, 1995, 2002, 2005, 2009, 2012, 2016	The Project Site appears to have been utilized for equestrian land activity prior to 2014. Multiple equestrian-related facilities are visible on the northwestern portion of the site. Unimproved roads traverse the site. A stream runs from the northeast to the southwest.
Source: Group Delta, *Phase I Environmental Site Assessment*; August 4, 2022 (Appendix G1).	

EXISTING ONSITE LAND USES

The Project Site consists of approximately 25.84 acres of developed/disturbed land and is located on private property within the City at 800 Meadow Pass Road. The Project Site consists of Lots 1 and 2 of Tract 45378 and Assessor's Parcels 8709-093-001, 8709-093-002, and 8709-093-003. Presently onsite, there are unused facilities remaining from discontinued equestrian activities, consisting of, two stables, one of which has a second story residential addition (currently unoccupied), covered stalls, two fenced corrals, maintenance storage shed, three feed sheds within fenced areas, one outdoor arena, one covered open-air arena, and one gazebo. All structures have been vacated and closed with the end of the equestrian uses in 2014. Lemon Creek traverses the Project Site, generally flowing from northeast to southwest/south. The Project Site is regularly maintained in fair condition.

PLANNING PROGRAMS (LAND USE AND ZONING)

General Plan

The City's General Plan designates the Project Site land use as Very Low Density Residential. The Very Low Density Residential designation applies to hillside areas with larger lots that are generally over 25,000-square-feet in size. A maximum of one detached single-dwelling unit is permitted as the primary residence. Accessory dwelling units permitted consistent with the requirements of the Walnut Municipal Code (WMC) and State Law are also allowed under the General Plan.

- Density: 0.5 to 2.0 Dwelling Units/Acre
- Building Height: 2 Stories Maximum
- Population Density: 1.71 to 6.84 Persons/Acre

Zoning

With respect to zoning standards, the Project Site is located in a Residential Planned Development (RPD) zone, with a zoning designation of RPD (28,500) - 1.3 DU. The City's RPD zoning regulations are found in Chapter 6.24 of the WMC. Despite its title, the RPD zone does not solely require the development of a *residential planned development*. Rather, the RPD Zone allows development in two different ways. Specifically, one alternative is a conventional R-1 single-family development, subject to R-1 development standards and a minimum 28,500 square foot lot size (see WMC Section 6.24.030 A1). Second is the residential planned development alternative, with no minimum lot size, but a maximum density of 1.3 dwelling units per net acre (see WMC Section 6.24.030 A2). Pursuant to WMC Section 6.24.030, this second alternative requires a Conditional Use Permit and is subject to additional requirements contained in Chapter 6.24 of the WMC that do not apply to the R-1 alternative. For example, permitted structures for a *residential planned development* are set forth in WMC Section 6.24.030 E.

PROJECT SITE SURROUNDING LAND USES

The Project Site is situated within an urbanized/suburbanized area and is generally surrounded by developed land uses. Surrounding land uses are shown previously in Figure 3-2, *Local Vicinity*. As shown in Table 5.11-2, *Surrounding Land Uses*, to the north of the Project Site are existing single-family residential neighborhoods, St. Lorenzo Ruiz Catholic Church, and Vellucci Hall; to the south are existing single-family residential neighborhoods and a small commercial center; to the east are existing single-family residential neighborhoods; and to the west are existing single-family residential neighborhoods and Fire Station No. 61.

Table 5.11-2
Surrounding Land Uses

Direction	Existing Land Use	General Plan	Zoning
North	Single-Family Residential, St. Lorenzo Ruiz Catholic Church and Vellucci Hall	Very Low Density	RPD (28,500) - 1.3 DU
South	Single-Family Residential and Commercial Center	Low Medium Density and Commercial	R-1 One-Family Residential, 7,200 C-3 Heavy Commercial Zone
East	Single-Family Residential	Very Low Density	R-1 One-Family Residential, 8,500
West	Single-Family Residential and Fire Station 61	Low Medium Density	R-1 One-Family Residential, 7,200

5.11.3 REGULATORY SETTING

FEDERAL

A total of 0.42 acres (2,229 linear feet) of non-wetland Waters of the U.S. and 0.64 acres (611 linear feet) of wetland Waters of the U.S. were delineated within the Project Site, making the Project subject to compliance with Section 404 of the Clean Water Act.

STATE

California development projects are subject to State laws pertaining to planning and land use which, in general, are addressed in Sections 65000 through 66499.58 of the California Government Code. Over the past several years, the California State Legislature has enacted a significant number of bills responding to the State's housing crisis. Among those have been the Housing Crisis Act of 2019 (Government Code Sections 66300-66301) and amendments to the Housing Accountability Act (Government Code Section 65589.5) and the Permit Streamlining Act (Government Code Sections 65920-65964.5). When applied to applications for the approval of residential development projects and under specified circumstances, these laws can, among other things, limit the local regulations which may be applied, the design standards which may be required, and the conditions of approval that may be imposed.

REGIONAL – SOUTHERN CALIFORNIA

Southern California Association of Governments (SCAG)

Southern California Association of Governments (SCAG) is a regional council of governments representing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties, which encompass over 38,000 square miles. SCAG is the federally recognized metropolitan planning organization for this region 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, the California Department of Transportation, and other agencies in preparing regional planning documents. SCAG has developed regional plans to achieve specific regional objectives.

CONNECT SOCAL

The SCAG Regional Council fully adopted Connect SoCal in September 2020. Connect SoCal, also known as the 2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health.

SCAG GROWTH FORECASTS

SCAG's Forecasting Section is responsible for producing socio-economic estimates and projections at multiple geographic levels and in multiple years. The Forecasting Section develops, refines, and maintains SCAG's regional and small area socio-economic forecasting/allocation models.

SCAG REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)

California State Housing Element Law (Government Code Sections 65580-65589.11) enacted in 1980 and subsequently amended requires SCAG and other regional councils of government in California to determine the existing and projected regional housing needs for persons at all income levels. SCAG is also required by law to determine each jurisdiction's share of the regional housing need in the six-county southern California region. The intent of Senate Bill (SB) 375 and the RHNA process is to create a better balance of jobs and housing in communities, ensure the availability of decent affordable housing for all income groups and achieve sustainability through long-term strategic land use planning. SCAG takes the lead in overseeing the assessment by identifying measures to gauge housing demand and comparing those numbers against socioeconomic factors throughout the region. The RHNA consists of two measurements: 1) existing need for housing, and 2) future need for housing.

The State's Housing Element Law requires local governments to make plans to adequately address their share of existing and projected population growth, taking into consideration affordability of available and future housing. The California Department of Housing and Community Development (HCD) enforces the State Housing Element Law by requiring Housing Elements as part of every city's General Plan. The City of Walnut was allocated a RHNA total of 1,293 residential units, including 427 for extremely low/very low income, 225 for low income, 231 for moderate income, and 410 for above moderate income households.

Los Angeles County General Plan 2035

The Los Angeles County General Plan provides the policy framework and establishes the long-range vision for how and where the unincorporated areas of Los Angeles County will grow, and establishes goals, policies, and programs to foster healthy, livable, and sustainable communities. The document represents a comprehensive effort to update the County's 1980 General Plan. The unincorporated areas of Los Angeles County are comprised of approximately 2,650 square miles, and over one million people. The Project site is located in the incorporated City of Walnut, and therefore, the applicable planning document governing the Project site is the City of Walnut General Plan.

Los Angeles Countywide Sustainability Plan (OurCounty)

The Los Angeles Countywide Sustainability Plan (OurCounty) outlines what local governments and stakeholders can do to enhance the well-being of every community in the county while reducing damage to the natural environment and adapting to the changing climate, particularly focusing on those communities that have been disproportionately burdened by environmental pollution. This plan envisions streets and parks that are accessible, safe, and welcoming to everyone; air, water, and soil that are clean and healthy; affordable housing that enables all residents to thrive in place; and a just economy that runs on renewable energy instead of fossil fuels. As a strategic plan, OurCounty does not supersede land use plans that have been adopted by the Regional Planning Commission and Board of Supervisors, including the County's General Plan and various community, neighborhood, and area plans. Instead, OurCounty is a forward-looking strategic plan that establishes a common sustainability vision for the entire county. OurCounty is not the governing planning document for the City of Walnut.

LOCAL

City of Walnut General Plan

Updated in 2018, the City of Walnut General Plan guides decision-making regarding how the City will continue to grow and how the City will preserve valued features and qualities. The General Plan includes the following Chapters or Elements: Land Use and Community Design; Circulation; Conservation, Open Space, and Recreation; Community Facilities and Infrastructure; Public Safety; Noise; and Housing. The

General Plan establishes the policy framework and contains goals, policies, and plans to guide land use and development decisions in the future.

LAND USE AND COMMUNITY DESIGN

Chapter 2 of the City's General Plan, *Land Use and Community Design*, establishes the framework for Walnut to manage strategic, targeted land use changes while preserving the predominantly low-intensity residential character of the City. The Land Use Element specifies the types of development intensities and land uses Citywide. The Community Design section within the Element complements the Land Use discussion by providing guidance as to how development will look with respect to the established community aesthetic, while also protecting natural and scenic resources, and supporting sustainable principles. Table 5.11-3, *Existing Land Use Distribution (2017)*, identifies the land use distribution within the City.

Table 5.11-3
Existing Land Use Distribution (2017)

Land Use	Acreage	Percentage
Residential	2,913.3	58.4%
Commercial	204.6	4.2%
Parks/Open Space	960.0	19.3%
Public Facilities/Institutional	607.1	12.2%
Vacant Lands	294.7	5.9%
City Total	**4,979.7**	**100.0%**
Source: City of Walnut General Plan; Update Adoption Date: May 9, 2018.		

CIRCULATION

Chapter 3, *Circulation*, plans for a functional multimodal transportation network. This chapter includes policies addressing the roadway and streetscape network, bike and trail features, and pedestrian connections, which collectively provide for the movement of persons and commerce throughout Walnut and to destinations outside the City. The primary goal of transportation planning is to provide efficient, safe travel routes for all mobility modes. Surrounding roadways near the Project Site include Meadow Pass Road, North Lemon Avenue, and La Puente Road as depicted on the General Plan Figure C-2, *Street Classification*. The Project Site also includes "Proposed/Planned Trails" identified on the General Plan Figure C-8, *Trails Plan*.

CONSERVATION, OPEN SPACE, AND RECREATION

Chapter 4, *Conservation, Open Space, and Recreation*, addresses Walnut's resources consisting of parks, trails, and recreational services. According to the General Plan, these resources are the pride of the City and are frequently cited by residents as amenities that contribute to high property values, attractive neighborhoods, and community identity. General Plan Figure COR-1, *Open Space and Natural Resources*, identifies Lemon Creek as the only mapped resource within the Project Site. General Plan Figure COR-2 and Table COR-2, *Historical and Culturally Significant Sites*, identify the Brookside Equestrian Center as a significant site; however, there is no supporting documentation within the General Plan or the Final EIR as to why and the General Plan does not identify the Project Site as being listed as a historic property under Federal, State, or City of Walnut laws. Table COR-2 only notes that the Project Site was originally part of the 2,200-acre Sentous Ranch (please refer to Section 5.5, *Cultural Resources*, for a discussion on potential impacts to historical resources). No parks or open space are mapped within the Project Site according to

the General Plan Figure COR-3, *Parks and Recreation*. The Project Site is identified as having a "Proposed/Planned Trails" that could link to a "City Trails, Improved" system if constructed in the future.

COMMUNITY FACILITIES AND INFRASTRUCTURE

Chapter 5, *Community Facilities and Infrastructure* establishes the policies that guide decisions regarding public facilities and infrastructure expenditures. This chapter addresses infrastructure, utility, and educational facilities vital to a vibrant city. According to the General Plan Figure CFI-1, *Community Facilities*, no public facilities occur on the Project Site. The Los Angeles County Fire Station Number 61 is located adjacent to the southern portion of the Project Site to the west.

PUBLIC SAFETY

The City of Walnut prides itself on being among the safest cities in Los Angeles County. Generally, people consider "public safety" to mean crime prevention along with adequate levels of law enforcement and fire services. However, in a planning context, safety also means addressing environmental conditions such as potential earthquakes, floods, and the presence of hazardous materials. Chapter 6, *Public Safety*, includes goals and policies that address the potential risks associated with all hazards, actions the City can take to reduce these risks, and ways the City and community can take more sustainable approaches for preventing or minimizing injuries to life and damages to property.

NOISE

Noise, as distinguished from "sound" generally, is commonly defined as any "unwanted sound." Excessive noise may interfere with communication, work, rest, recreation, sleep, and can impact residents' quality of life. Chapter 7, *Noise*, addresses noise that affects the broader community, rather than noise associated with site-specific conditions. This Chapter explores noise reduction and noise exposure strategies and establishes noise/land use compatibility standards that seek to minimize these effects.

HOUSING ELEMENT

The Housing Element is one of the seven elements required by the State to be included in the City's General Plan. The purpose of the Housing Element is to ensure the City establishes policies, procedures, and incentives in its land use planning and redevelopment activities that will result in the maintenance and expansion of the housing supply to adequately accommodate households currently living and expected to live in the City. It institutes policies that will guide City decision making and establishes an action program to implement housing goals.

City of Walnut Municipal Code Planning and Zoning Chapter

The Walnut Municipal Code (WMC) contains the zoning requirements and ordinances for the City. The purpose of the zoning chapter (Title 6, Planning and Zoning) is to encourage, classify, designate, and regulate the highest and best location and use of buildings, structures, and land for agriculture, residence, commerce, trade, industry, or other purposes. The General Plan designation and zoning for the Project Site are discussed above under the headings *General Plan* and *Zoning*.

5.11.4 THRESHOLDS OF SIGNIFICANCE

With respect to land use, according to Appendix G of the 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.

5.11.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT LU-1: Physically divide an established community?

The Project would not physically divide an established community. The Project Site is located within an urbanized/suburbanized area and as shown in Figure 3-2, *Local Vicinity,* is generally surrounded by developed land uses, primarily consisting of single-family residential neighborhoods, a church, a small commercial center, and a fire station.

The proposed Project would develop the site with single-family residential land uses compatible with those existing land uses. The Project would neither create barriers that would prevent access to existing communities nor would it take access through or redirect traffic through existing residential neighborhoods, with the exception of two homes, which would take access from La Puente Road through a short section of San Vicente Drive.

In addition, the existing private trail that currently traverses the Project Site would be improved to City trail standards, subject to an easement offered for dedication to the City as an officially designated trail open to the public. This trail would provide a formal trail connection between existing communities. The trail would be maintained and operated by the City, providing additional physical access opportunities within the community.

Therefore, the Project would not divide an existing community, no adverse impacts are anticipated and no mitigation is required.

Level of Impact Before Mitigation: No impact based on review of the Project Description within the context of proposed land uses at the Project Site and existing land uses in the Project vicinity.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT 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?

GENERAL PLAN AND ZONING CONSISTENCY

The City of Walnut General Plan, WMC, and zoning regulations comprise the relevant land use planning program for avoiding or mitigating environmental effects. The General Plan land use designation for the Project Site is Very Low Density Residential at a density of 0.5 to 2.0 dwelling units per acre. The Project Site is zoned Residential Planned Development Zone (RPD) – 28,500 - 1.3 DU. As noted in Section 3.0, *Project Description*, the Project has elected for the R-1 option under the zoning, with a minimum lot size of 28,500 square feet.

The Project Applicant requests approval of a Tentative Tract Map to allow for the development of a 27-unit single-family detached housing project with minimum lot sizes of 28,500 square feet. Additionally, pursuant to the WMC, the Project would also be required to comply with the RPD zone's building height, setbacks, and lot coverage standards. The Project, as designed, would be consistent with the relevant land use planning program.

The Project as proposed does not conflict with the goals and policies of the General Plan. Table 5.11-4, *General Plan Consistency Analysis* below is an analysis of the Project's consistency with the goals and policies set forth in the *Land Use and Community Design* Chapter of the General Plan. Table 5.11-4 notes when a goal or policy pertains to the adoption by the City of regulations of general application, such as zoning regulations, as opposed to those that are applicable to the approval of individual residential projects, such as the proposed Project.

Table 5.11-4
General Plan Consistency Analysis

Policy	Consistency Analysis
Land Use and Community Design Element	
GOAL LCD-1: *A balanced community with a mix of land uses that supports thriving businesses, all modes of transportation, complete neighborhoods, and healthy lifestyles.*	**Consistent.** The proposed residential development would provide an infill neighborhood consistent with existing residential neighborhoods in the Project vicinity. The Project would also create passive open space and a multi-use trail that would promote active transportation and healthy lifestyles.
Policy LCD-1.1: Zoning Consistency. Revise and update the Zoning Code, Subdivision Code, Specific Plans, and other City regulations to ensure they are consistent with and support the Walnut General Plan Land Use and Community Design Element goals, vision, and policies.	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project.
Policy LCD-1.2: Mixed-Use Zones. Create use regulations and development standards for new mixed-use Zones that correspond to the mixed-use land designations. Ensure that the Zones support goals for accommodating a variety of revenue-enhancing activities that support a sustainable combination of retail, office, professional services, residences, institutional, academic-affiliated institutions, and innovative industrial business that will sustain value added services and the maintenance of the existing infrastructure. Specifically address compatibility issues that may be associated with mixed-use projects.	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project.
Policy LCD-1.3: Residential Planned Developments and Specific Plans. Keep residential planned developments and specific plan regulations current to ensure that development proposals encourage complete neighborhoods and integrated planned developments that include revenue and employment-generating uses, diverse housing types, parks and open spaces, and active transportation/pedestrian connectivity and facilities. Additionally, continue to prohibit the further subdivision of lots in Residential Planned Development in order to preserve the rural character of existing and future Residential Planned Developments Zones.	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project.
Policy LCD-1.4: Aging-Friendly Homes. Encourage the application of universal design (such as aging-friendly and barrier-free elements) within new residential buildings.	**Consistent.** Proposed residential structures would require design review by the City's Planning Commission prior to approval of construction plans. It is noted that this policy does not consist of objective design standards and that Government Code Section 66300(b)(1)(C)

Policy	Consistency Analysis
	prohibits the imposition of certain design standards that are not objective.
Policy LCD-1.5. Sustainability. Promote land use and development projects that demonstrably reduce greenhouse gas emissions, water usage and electricity and natural gas demand.	**Consistent.** As identified in Sections 5.6, *Energy,* and 5.8, *Greenhouse Gas Emissions*, the Project would not result in inefficient consumption of energy resources, including electricity and gas and would not exceed SCAQMD's greenhouse gas emissions thresholds. Water usage would also be reduced by incorporating open space areas with native and drought tolerant landscaping.
Policy LCD-1.6: Commercial Compatibility with Residential Zones. Ensure that commercial uses are built and operated to minimize conflicts with adjacent residential uses. Operational activities to consider for compatibility include, but are not limited to: hours of operation, intensity of operations, adequacy of security infrastructure, parking and traffic impacts, and lighting.	**Not Applicable.** This policy pertains to the construction of commercial uses.
Policy LCD-1.7: Transitional Areas. Require developments in Mixed-Use areas to incorporate pedestrian walkability/connectivity and to minimize and gradually reduce structure size and scale, activity intensity, and density closer to predominantly low-density residential neighborhoods.	**Not Applicable.** The Project is not in a mixed-use area. Nonetheless, it is noted that the Project proposes a multi-use trail system that promotes pedestrian walkability/connectivity.
Policy LCD-1.8: Housing Choices. Encourage a variety of housing choices, including live-work units, courtyard housing, and mixed-use buildings with vertical and/or horizontal residential types.	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project.
Policy LCD-1.9: Neighborhood-Serving Commercial. Promote opportunities for smaller neighborhood-serving commercial uses as part of having complete neighborhoods. Such opportunities can include sit-down restaurants, local retail, public spaces within shopping centers, and neighborhood-oriented retail areas that provide goods and services to support daily life.	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project. It is noted that the Project does not propose commercial uses .
Policy LCD-1.10: Complete Neighborhoods. Encourage the creation of complete neighborhoods that place the accessibility of quality-of-life enhancing retail and commercial uses within walking and biking distance.	**Consistent.** The Project proposes a residential development with a multi-use trail and passive open space that would encourage walking and biking to nearby retail and commercial areas.
Policy LCD-1.11: Pedestrian Connections. Provide convenient and accessible pedestrian connections, through design and complete street elements, between residential areas and nearby commercial areas.	**Consistent.** The Project proposes a multi-use trail that would connect to the City's existing trail system, providing convenient access to adjacent residential and commercial areas.
Policy LCD-1.12: Gathering Spaces. 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.	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project. It is noted that the Project does not propose commercial or mixed-uses.

Policy	Consistency Analysis
Policy LCD-1.13: Community Facilities. Ensure adequate provision of community-serving facilities such as recreation facilities, child daycare facilities, places of worship, schools and other educational institutions to serve current and future residents.	**Not Applicable.** This policy pertains to the adoption by the City of community-wide planning regulations of general application to assure provision of adequate community facilities, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project.
Policy LCD-1.14: Unique Places. Promote and preserve Walnut's distinct neighborhoods, unique places, and overall rural character.	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project. It is noted that the proposed residential development would be consistent with existing residential neighborhoods in the Project vicinity. The Project would also create passive open space and a multi-use trail consistent with the City's rural character.
Policy LCD-1.15: Infill. Utilize land assembly strategies and incentives to promote compatible infill developments.	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application and specific incentives to promote infill, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project. It is noted that the proposed residential development would provide an infill neighborhood compatible with existing residential neighborhoods in the Project vicinity.
Policy LCD-1.16: Code Enforcement. Continue and strengthen current code enforcement activities to ensure vacant and underutilized properties are well-maintained and retain a high-quality exterior design.	**Not Applicable.** This policy pertains to the City's general code enforcement activities, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project. It is noted that the Project Site is functionally vacant, occupied only by unused structures from prior development, and, therefore, underutilized. However, the proposed Project would transform the Project Site so that it is no longer either vacant or underutilized.
Policy LCD-1.17: Public Participation. Ensure that land use and development decisions are being made with the participation of residents, property owners, local organizations, and neighborhood groups.	**Consistent**. The Environmental Impact Report process included public reviews on the Notice of Preparation of the EIR and on the DEIR by residents, property owners, and neighborhood groups. A public hearing on the Project's TTM would be held pursuant to the WMC.
GOAL LCD-2: *A distinctive residential character that preserves neighborhoods and open spaces.*	**Consistent.** The Project provides passive open space and a multi-use trail compatible with the existing residential character of the Project vicinity.
Policy LCD-2.1: Neighborhood Quality and Character. Ensure that Zoning regulations and design guidelines protect the character of long-established single-family neighborhoods through limitations of building heights, setbacks, and lot coverage, and through provisions requiring landscaping, architectural integrity, and property maintenance.	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project. It is noted that the Project is consistent with the General Plan Land Use Designation and Zoning Code. The Project would comply with the R-1 option under its R.P.D.-28,500- 1.3 DU (Residential Planned Development, and maintain consistency with R-1 development standards, including building height, setback, and lot coverage

Policy	Consistency Analysis
	requirements. As presented, it meets the zoning code minimum lot size of 28,500 square foot lot size.
Policy LCD-2.2: Open Space Easements. Ensure that private open space areas created during the land division process as undevelopable areas due to environmental constraints (for example, steep or unstable slopes, high-fire hazards, prime biological habitat) have enforceable, deed-recorded easements that define the use limitations.	**Consistent.** The proposed open space areas occurring on private lots would be deed-restricted with defined use-limitations to both protect Lemon Creek and preserve passive open space areas in perpetuity.
GOAL LCD-3: *Successful commercial and industrial businesses that provide opportunities for local employment and contribute to a strong local economy.*	**Not Applicable.** The Project does not propose commercial or industrial uses. This goal and its related policies pertain to the adoption by the City of planning and other regulations to attract commercial and industrial businesses, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project.
Policy LCD-3.1: Vibrant Commercial Centers. Promote the revitalization, upgrading, and beautification of commercial retail centers and the conversion of strip commercial areas to coordinated, complementary retail and service uses.	**Not Applicable.** See consistency analysis for GOAL LCD-3.
Policy LCD-3.2: Business Collaborations. Collaborate with local businesses to provide assistance in improving the physical and economic conditions of existing commercial and industrial developments.	**Not Applicable.** See consistency analysis for GOAL LCD-3.
Policy LCD-3.3: Promote Local Businesses. Work with commercial, office, and industrial business owners to promote businesses in Walnut.	**Not Applicable.** See consistency analysis for GOAL LCD-3.
Policy LCD-3.4: Pedestrian-friendly Environments. Accommodate outdoor cafes and neighborhood-serving uses as a means of promoting pedestrian activity and commercial center vitality. Ensure that access and noise considerations relative to surrounding uses are sufficiently addressed.	**Not Applicable.** See consistency analysis for GOAL LCD-3.
Policy LCD-3.5: Stay Ahead of Trends. Coordinate with large commercial center property owners and/or leasing partners to align commercial assets with the desired City vision and emerging market trends.	**Not Applicable.** See consistency analysis for GOAL LCD-3.
Policy LCD-3.6: Façade Upgrades. Target design upgrades and other façade enhancements that maintain the City's standards for high-quality and prevailing desired design 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.	**Not Applicable.** See consistency analysis for GOAL LCD-3.
Policy LCD-3.7: Diversified Businesses. Encourage a variety of businesses to locate in Walnut, including quality grocery stores, local retail stores, health and personal services, and restaurants.	**Not Applicable.** See consistency analysis for GOAL LCD-3.
Policy LCD-3.8: Industrial Business Mix. Retain attractive and functional areas for industrial businesses that	**Not Applicable.** See consistency analysis for GOAL LCD-3.

Policy	Consistency Analysis
provide jobs for highly skilled manufacturing and research and development. Encourage and create local revenue sources that further support industrial and other business sectors that will provide benefits to residents of the City.	
GOAL LCD-4: *Fiscally sustainable City government that preserves and enhances the quality of life for its residents, workers, and visitors.*	**Not Applicable.** This goal is for the City to implement.
Policy LCD-4.1: High Sales Tax Producing Retail Uses. Pursue high sales tax producing retail uses (such as lifestyle and hybrid centers) within established shopping centers, provided the development is compatible with the surrounding area in terms of building scale, design, and traffic.	**Not Applicable.** This policy pertains to the adoption by the City of planning and other regulations to attract high sales tax producing retail uses, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project.
Policy LCD-4.2: Cost Recovery. Ensure that fee schedules (such as but not limited to permit fees, development impact fees, building permit fees, and mitigation fees) are structured for full cost recovery in order to support City services.	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project. It is noted that the Project Applicant/Developer would be required to pay all applicable permit fees, development impact fees, building permit fees, and mitigation fees and other development-related, fees.
Policy LCD-4.3: Fiscal Impact of Converting Commercial Uses. Evaluate the fiscal impacts of the conversion of office/commercial uses to residential use.	**Not Applicable.** This policy pertains to the conversion of office/commercial uses to residential use. The Project does not propose such a conversion.
Policy LCD-4.4: City-owned Land and Resources. Maximize revenue from the utilization of City-owned land and resources.	**Not Applicable.** The Project Site is not on City-owned land.
Policy LCD-4.5: Efficiency in Providing City Services and Infrastructure. Accommodate a diversity of uses that create a tax base which sufficiently allows the City to maintain efficient operations in the delivery of services and maintenance of public infrastructure, including community centers, parks, roads, storm drainage and other infrastructure.	**Not Applicable.** This policy pertains to the adoption by the City of planning and other regulations of general application to create a diverse tax base, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project.
GOAL LCD-5: *Land use and development patterns that promote a healthy community.*	**Consistent.** The Project proposes a multi-use trail and passive open space that would encourage active transportation, including walking and biking.
Policy LCD-5.1: Community Health through Land Use Planning. Maintain and promote the pattern and linkage of land uses Citywide that allows Walnut residents to enjoy a healthy lifestyle.	**Consistent.** The proposed multi-use trail would provide linkages to existing trail facilities, thus encouraging healthy activity for Walnut residents.
Policy LCD-5.2: Land Uses with Potential Public Health and Safety Impacts. Limit to the greatest extent possible, the overconcentration of businesses that may contribute to adverse public health and safety conditions, such as but not limited to alcohol sales uses and cannabis production, processing, retailing, and wholesaling.	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application to avoid the overconcentration of certain businesses, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project. It is noted that the Project Site does not have or propose commercial uses.

Policy	Consistency Analysis
Policy LCD-5.3: Community Gardens. Encourage formation of community gardens, and allow urban agriculture within residential areas (for noncommercial use only).	**Consistent.** This policy encourages, but does not require, the inclusion of community gardens in all new development. More than 40% of the Project Site would be limited to passive open space uses, which do not include community gardens in order to protect the native biodiversity of the Project Site and the biological function of the Lemon Creek riparian habitat.
Policy LCD-5.4: Healthy City. Develop health-focused programs that weave together the goals, policies, and strategies in all Elements, such as complete streets policies, sustainability, and suburban greening/urban forest.	**Not Applicable.** This is a citywide policy and not Project-specific. It is noted that the Project includes the multi-use trail and passive open space areas with an extensive tree canopy that supports these policies.
Policy LCD-5.5: Aging in Place. Support and expand senior housing development and supportive in-house assisted facilities for Walnut's residents. Coordinate such senior-oriented uses with the availability or construction of multimodal and universal access facilities as described in the Circulation Element and with other aging-focused components of the General Plan.	**Not Applicable. T**his policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project.
Policy LCD-5.6: Multi-Generational Households. Ensure that Zoning regulations accommodate the needs of multi-generational households.	**Not Applicable. T**his policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project.
Policy LCD-5.7: Reduce Vehicular Trips and Miles Traveled. Coordinate land use patterns with the Circulation Element to improve and protect air quality, reduce vehicular trips, and promote walkability.	**Not Applicable. T**his policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project. It is noted that, as discussed in Section 5.17, *Transportation*, the Project would not significantly increase vehicle miles traveled (VMT). In addition, the proposed multi-use trail would promote walkability.
Policy LCD-5.8: Amenities that Promote Healthy Living. Encourage developments to provide access, facilities, and amenities that connect to trails, encourage walking, and/or other facilities that promote healthy living.	**Consistent.** The Project proposes open space along the Lemon Creek corridor. The open space area would encourage walking with a multi-use trail connecting to an existing city trail system.
GOAL LCD-6: ***Strategically located and dynamic mixed-use environments that offer neighborhood-serving amenities, new and emerging housing types, and engaging public spaces.***	**Not Applicable. T**his goal and its related policies pertain to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project. It is noted that t
Policy LCD-6.1: Mixed-Use. Encourage mixed-use development where appropriate within the City.	**Not Applicable.** See consistency analysis for GOAL LCD-6.
Policy LCD-6.2: Mixed-Use Commercial Component. Require that new mixed-use development projects include a substantial viable, commercial component. Consider innovative incentives and startup funds to help improve long-term longevity of commercial uses.	**Not Applicable.** See consistency analysis for GOAL LCD-6.
Policy LCD-6.3: Mixed-Use Street Interface. Ensure development enhances pedestrian activity by providing active uses, walkability, and connectivity within mixed-	**Not Applicable.** See consistency analysis for GOAL LCD-6.

Policy	Consistency Analysis
use districts. Include appropriate design features along a majority of the building street frontage, within residential areas. Residential developments should include architecturally enhanced main entrances, lobbies, front stoops and porches, open space and other similar features.	
Policy LCD-6.4: Mixed-Use Building Transition. Provide design and development standards that require mixed-use buildings to be remodeled to more closely approximate the scale of the surrounding area. Setbacks, landscaping, and/or building transitions should buffer abutting single-family residential areas, and all development lighting should be mitigated to not negatively affect adjacent uses.	**Not Applicable.** See consistency analysis for GOAL LCD-6.
GOAL LCD-7: *Community character that reflects Walnut's distinctive small-town identity and character.*	**Consistent.** The Project proposes residential development, passive open space, and a multi-use trail along Lemon Creek, which is compatible with the existing small-town character.
Policy LCD-7.1: Small-Town, Rural Character. Apply design requirements that maintain and enhance Walnut's small-town, rural character.	**Consistent.** The Project proposes residential development, passive open space, and a multi-use trail along Lemon Creek, which is compatible with the existing small-town character.
Policy LCD-7.2: Consistent Community Scale. Require new structures to be designed at a low-scale to reflect established residential neighborhoods, commercial centers, hillside terrain, open spaces, and natural areas.	**Consistent.** The proposed residential structures would be designed consistent with zoning requirements. In addition, the Project has been designed to complement existing slopes and natural features associated with Lemon Creek.
Policy LCD-7.3: Residential Additions. Require new residential construction, including large additions, to respect the scale and character of nearby structures by minimizing abrupt or excessive difference in appearance, size, scale and/or massing.	**Consistent.** The proposed residential structures would be designed consistent with zoning requirements and reviewed for consistency with applicable design standards by City staff prior to issuance of construction permits.
Policy LCD-7.4: Night Sky. 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.	**Consistent.** The Project would comply with all adopted and applicable development standards pertaining to lighting. In addition, this DEIR has concluded that there would be no unmitigated significant impact related to light and glare.
Policy LCD-7.5: Pedestrian Scale. Maintain a pedestrian scale for new development. Require that non-residential development provide amenities that promote pedestrian activity and community gathering.	**Consistent.** The proposed Project Site layout, multi-use trail, and open space areas provide appropriate pedestrian scale.
Policy LCD-7.6: Residential Pedestrian Scale. Require pedestrian-scale improvements for new residential developments and large additions, such as but not limited to, front porches and placement or orientation of the garage away from the street. Where feasible, the use of garage doors should not be the dominating architecture feature from a public right-of-way.	**Consistent.** The proposed residential structures would be reviewed for design consistency with applicable standards by City staff prior to issuance of construction permits.
Policy LCD-7.7: Streetscape Design. Maintain streetscape design programs for commercial and mixed-use district frontages that create vibrant places which	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for

Policy	Consistency Analysis
support walking, bicycling, transit, sustainable economic development, and overall connectivity.	a single-family project, such as the proposed Project. It is further noted that the Project Site is not located in a commercial or mixed-use area.
Policy LCD-7.8: Code Enforcement. Continue code enforcement activities to maintain, and to the greatest extent possible, enhance aesthetically attractive neighborhoods and business centers.	**Not Applicable.** This policy pertains to the adoption by the City of planning regulations of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project.
Policy LCD-7.9: Gated Communities. Discourage walled or gated communities in both new and established/existing neighborhoods.	**Consistent.** The Project does not propose a gated community.
Policy LCD-7.10: Historic Resources. Preserve, maintain, and promote Walnut's historic resources.	**Consistent.** As described in Section 5.5, *Cultural Resources*, the Project Site does not contain historic resources.
Policy LCD-7.11: Gateways. Develop and maintain gateway entry features at key locations throughout the City.	**Not Applicable.** The Project Site is not considered a key gateway location.
Policy LCD-7.12: Trails, Creeks, and Open Spaces Design. Establish design guidelines for trails, creeks, and open spaces.	**Not Applicable.** This policy pertains to the adoption by the City of design guidelines of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project. It is noted that the multi-purpose public trail would be developed according to the City's design standards and then offered for dedication (easement) to the City.
GOAL LCD-8: *High-quality and traditional design for all new development.*	**Not Applicable.** This policy pertains to the adoption by the City of design standards of general application, as opposed to the approval of a tentative tract map for a single-family project, such as the proposed Project. It is noted that the proposed residential structures would be designed and reviewed for compliance with applicable design standards by City staff prior to issuance of construction permits.
Policy LCD-8.1: Enhanced Design. 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.	**Consistent.** The City would review architectural design for compliance with applicable design standards by City staff prior to issuance of construction permits.
Policy LCD-8.2: High-quality Materials. Insist that all new development incorporate high-quality building materials, textures, and finishes that embody durability and permanence.	**Consistent.** The proposed structures would be required to meet the City's construction development standards and the design parameters of the California Uniform Building Code to ensure durability and permanence. In addition, the City would review architectural design for compliance with applicable design standards by City staff prior to issuance of construction permits.
Policy LCD-8.3: Consistent Building Themes. 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.	**Not Applicable.** The Project proposes residential development.
Policy LCD-8.4: Landscape Design. Develop specialized landscape and design treatments for entryways,	**Consistent.** The Project includes a conceptual landscape plan as described in Section 3.0, *Project Description*.

Policy	Consistency Analysis
intersections, parks, districts and neighborhoods, and public areas.	
Policy LCD-8.5: Outdoor Spaces. 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.	**Consistent.** The Project proposes passive open space and a multi-use trail along Lemon Creek. The multi-use trail would be accessible by the public.
Policy LCD-8.6: Neighborhood Character Elements. Identify positive neighborhood character elements and use these design features as design drivers for new development.	**Consistent.** The Project has been designed to retain the natural character of Lemon Creek using passive open space and multi-use trail. The City would review architectural design for compliance with applicable design standards by City staff prior to issuance of construction permits.
GOAL LCD-9: ***A built environment with development approaches that apply sustainability principles.***	**Consistent.** The Project would generally avoid making physical changes to Lemon Creek, retaining its habitat value with passive open space areas that prohibit development.
Policy LCD-9.1: Conservation. Encourage the use of building design and materials that conserve energy and material resources.	**Consistent.** The proposed structures would be required to meet the City's construction development standards and the design parameters of the California Uniform Building Code, and Title 24 to promote resilience and energy efficiency.
Policy LCD-9.2: Green Building Education. Encourage consultation with organizations, neighborhoods, developers, and businesses to offer green building educational programs.	**Not Applicable.** This policy deals with "encouraging" consultation and developing green building education programs and is not directly related to the Project.
Policy LCD-9.3: Sustainable Building Features. 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.	**Consistent.** As identified in Sections 5.6, *Energy,* and 5.8, *Greenhouse Gas Emissions*, the Project would ***not*** result in inefficient consumption of energy resources, including electricity and gas or exceed SCAQMD's greenhouse gas emissions thresholds. The Project would provide solar installations (or other sources of onsite renewable energy) to satisfy the prescribed energy design ratings from Title 24, Part 6. Water usage would also be reduced by incorporating open space areas with native and drought tolerant landscaping. Residential yards would provide opportunities for non-commercial food production and the multi-use trail would provide recreation opportunities.
Policy LCD-9.4: Building Design. Support building designs that assist with the management of stormwater runoff, preserve, and enhance soil permeability, and reduce other negative effects of urban development.	**Consistent:** The Project includes construction and maintenance of two water quality basins to manage stormwater and treat pollutants prior to release in Lemon Creek.
Policy LCD-9.5: City Sustainability. Perform energy consumption audits of City buildings and create an environment that promotes energy-efficiency within repair, construction, and operation of City buildings.	**Not Applicable.** This policy deals with City-owned buildings.
Policy LCD-9.6: Vehicle Charging Station. Encourage the implementation of programs that support electric vehicle charging readiness Citywide. Permit the	**Consistent.** Electric vehicle charging stations are permitted in the proposed residential units.

Policy	Consistency Analysis
installation of electric vehicle charging stations on private property.	
GOAL LCD-10: ***Development that respects the natural environment of Walnut and preserves the scenic quality of hills, ridgelines, and creek areas.***	**Consistent.** The Project has been designed to retain the scenic quality of Lemon Creek using passive open space, native landscaping, and multi-use trail. More than 40% of the Project Site would be preserved as passive open space.
Policy LCD-10.1: Development that is Sensitive to the Natural Environment. Design development in a sensitive manner to complement the natural environment. The following guidelines will be considered: a) Encourage development to be sensitive to the topography, physical context, and community character of Walnut. b) Minimize alteration of existing topography especially in hillside areas during the development and redevelopment process. c) Retain natural landform character by using contour grading that varies slope gradients and provides a smooth, rounded transition to existing grades. d) Promote the protection of prominent ridgelines whenever feasible. This shall be accomplished by siting development below ridgelines in such a manner that permits the ridgeline to remain visible. e) Ensure that structures are adapted to hillside topography to minimize grading and to limit visibility to all structures from community-level viewsheds. f) Avoid horizontal bands of development or long structures with unbroken facades. g) Use creative architectural design solutions to adapt the structures to the hillside topography (such as split-level design).	**Consistent.** The Project design has considered the existing topography and retains the physical context of Lemon Creek and the residential community character of the Project vicinity using passive open space, native landscaping, and a multi-use trail. Grading has been minimized and is proposed to be balanced onsite (i.e., it would not require notable import or export of soils). No ridgelines would be obstructed from view or physically altered and community-level viewsheds would not be significantly adversely altered as discussed in Section 5.1, *Aesthetics*. Horizontal bands of development and unbroken facades are not proposed. Existing topography is not anticipated to require creative design solutions within hillsides based on grading pad design and lot placement.

As analyzed in Table 5.11-4, *General Plan Consistency Analysis*, the proposed Project is not anticipated to conflict with the applicable local land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Potential impacts are considered less than significant, and no mitigation is required.

LOS ANGELES COUNTYWIDE SUSTAINABILITY PLAN (OURCOUNTY)

As previously discussed, the Los Angeles Countywide Sustainability Plan (OurCounty) outlines what local governments and stakeholders can do to enhance the well-being of every community in the County while reducing damage to the natural environment and adapting to the changing climate. As a strategic plan, OurCounty does not supersede land use plans but establishes a common sustainability vision for the entire county. This section was included for informational purposes in response to comments received on the Notice of Preparation discussed in Section 2.0, *Introduction*; but it is not the applicable planning document for the City of Walnut, and thus, is not used for determining the proposed Project's potential impact

significance on land use and planning under CEQA; refer to Table 5.11-5, *Los Angeles Countywide Sustainability Plan (OurCounty) Discussion*.

Table 5.11-5
Los Angeles Countywide Sustainability Plan (OurCounty) Discussion

Strategy	Discussion
Strategy 1A: Minimize the exposure of vulnerable populations to pollution and reduce health disparities.	**Not Applicable.** The Project proposes a residential development within an existing residential area that is not uniquely situated near industrial land uses, transportation corridors, or other potential high-pollutant emission sources.
Strategy 1B: Develop land use tools that will help minimize adverse, cumulative pollution impacts on residential and sensitive uses through rigorous community engagement.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 1C: Increase housing affordability.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 1D: Ensure household utility affordability.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 1E: Ensure access to safe, clean, affordable water.	**Consistent.** The Project Site has access to potable water through the Walnut Valley Water District.
Strategy 1F: Develop community capacity to respond to emergencies.	**Consistent.** The Project Site includes two access points, an emergency access gate, and would be reviewed by the Los Angeles County Sherriff's and Fire departments for adequate emergency access.
Strategy 2A: Integrate climate adaptation and resilience into planning, building, infrastructure, and community development decisions.	**Consistent.** The Project proposes that Lemon Creek would be protected and retained as open space, a multi-use trail would be improved to City standards to encourage active transportation, and tree replacement plan would be implemented to enhance biodiversity and maintain a tree canopy.
Strategy 2B: Require sustainable and healthy building design and construction.	**Consistent.** The proposed structures on the Project Site would be required to meet the City's construction development standards and the design parameters of the California Uniform Building Code, and Title 24 to promote resilience and energy efficiency.
Strategy 2C: Create an integrated and resilient water system.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies, and is not project-specific.
Strategy 2D: Ensure a climate-appropriate, healthy urban tree canopy that is equitably distributed.	**Consistent**. Based on the Project's *Conceptual Landscape Plan* (Figure 3-8a) and *Canopy Coverage* (Figure 3-8b) included in Section 3.0, *Project Description,* the Project would retain a significant majority of existing trees and replace trees removed during construction with approximately 520 California native trees, retaining a healthy tree canopy for the Project Site.
Strategy 3A: Increase housing density and limit urban sprawl.	**Consistent.** The Project Site is on land previously occupied by the Brookside Equestrian Center, which closed in 2014 and is no longer operating. Project

Strategy	Discussion
	implementation would develop a 27-unit single-family detached housing project on a functionally vacant site within an existing urban/suburbanized area.
Strategy 3B: Implement transit-oriented development.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 3C: Promote walkable, mixed-use neighborhoods.	**Consistent.** The Project proposes open space along the Lemon Creek corridor. The open space easement would convey to the City a multi-use public trail for operation and maintenance by the City.
Strategy 3D: Ensure that public investments do not facilitate displacement, particularly of disadvantaged communities.	**Consistent.** The public investment component of the Project would be ongoing maintenance of the multi-use trail. No displacement of existing housing or established communities would occur.
Strategy 3E: Limit development in high climate-hazard areas.	**Consistent.** The Project Site is not located in a wildland urban interface area or uniquely exposed to climate hazards.
Strategy 4A: Promote inclusive growth across the changing economy.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 4B: Support wealth-generating activities in disinvested neighborhoods.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 5A: Increase ecosystem function, habitat quality, and connectivity, and prevent the loss of native biodiversity in the region.	**Consistent.** The Project proposes maintaining an open space corridor within the Project Site and along Lemon Creek. The open space corridor would support native vegetation and ecosystem function. The Project's tree replacement plan would significantly decrease the number of non-native and invasive species on site and increase the number of native species, thus enhancing the biodiversity of the Lemon Creek riparian area.
Strategy 5B: Preserve and enhance open space, waterways, and priority ecological areas.	**Consistent.** The Project proposes open space along the Lemon Creek corridor. A natural open space easement would be placed on the lots where Lemon Creek runs through. The open space easement would restrict any development other than for the public trail and passive open space purposes.
Strategy 6A: Improve access to parks, beaches, recreational waters, public lands, and public spaces.	**Consistent.** The Project proposes open space along the Lemon Creek corridor. A natural open space easement would be placed on the lots through which Lemon Creek runs. The open space easement would restrict any development other than for the public trail and passive open space purposes.
Strategy 6B: Adopt inclusive design and programming for parks, beaches, public lands, cultural amenities, and public spaces.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 6C: Utilize sustainability best practices in the design and management of parks and recreational facilities.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies pertaining to public park and recreation facilities. It is noted that the Project includes an open space easement for a multi-use public

Strategy	Discussion
	trail that would be built to City standards and operated and maintained by the City.
Strategy 7A: Transition to a zero-carbon energy system that reduces air and climate pollution and that minimizes the dangers of a changing climate to our communities and economy.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 7B: Create a zero-emission transportation system.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 8A: Reduce vehicle miles traveled by prioritizing alternatives to single-occupancy vehicles.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 8B: Improve transportation health and safety outcomes.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 9A: Reduce waste generation.	**Consistent.** The proposed Project would be required to comply with California Department of Resources Recycling and Recovery disposal requirements and the WMC Section 3.28.040 *Mandatory Refuse and Recycling Programs* and 3.29.030 *Requirements for Single-Family Generators*.
Strategy 9B: Implement strong water conservation measures.	**Consistent.** The proposed structures on the Project Site would be required to meet current Title 24 water efficiency standards. The Project also proposes the use of native and drought-tolerant tree planting.
Strategy 9C: Reduce building energy consumption.	**Consistent.** The proposed structures on the Project Site would be required to meet the City's construction development standards and the design parameters of the California Uniform Building Code, and Title 24 to promote resilience and energy efficiency.
Strategy 9D: Capture organic waste and develop regional capacity for beneficial reuse.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 9E: Divert reusable and recyclable materials from landfills.	**Consistent.** The proposed Project would be required to comply with the WMC Section 3.28.040 *Mandatory Refuse and Recycling Programs*.
Strategy 10A: Improve access to healthy food.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 10B: Support the fair and sustainable production of food.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 11A: Create an inclusive governance structure.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 11B: Promote environmental stewardship and accessible education across different age, income, ethnicity, and language groups.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.
Strategy 12A: Improve regional collaboration and coordination.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.

Strategy	Discussion
Strategy 12B: Leverage the County's purchasing power to support organizations achieving positive social and environmental impact.	**Not Applicable.** This is a countywide programmatic strategy for planning agencies and is not project-specific.

Level of Impact Before Mitigation: Less than significant impact based on review of the Project Description within the context of the applicable local land use plan, policies, and regulations.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.11.6 CUMULATIVE IMPACTS

As discussed in the sections above, the Project is not anticipated to result in a significant impact. In consideration of the cumulative projects identified in Section 4.0, *Basis for Cumulative Impacts*, no unique or peculiar circumstances are anticipated where a cumulative impact associated with Land Use and Planning would occur.

Level of Impact Before Mitigation: No impact based on review of the Project Description within the context of the applicable cumulative projects.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

5.11.7 MITIGATION MEASURES

No mitigation measures are required for land use and planning.

5.11.8 REFERENCES

City of Walnut, *General Plan*. May 9, 2018.

City of Walnut, *General Plan 2013-2021 Housing Element*. Adopted February 12, 2014.

City of Walnut, *Municipal Code*; October 2023. Accessed on December 19, 2023 at https://www.cityofwalnut.org/my-government/municipal-code.

City of Walnut, *Zoning Map*; Updated March 2020. Accessed on December 19, 2023 at https://www.cityofwalnut.org/for-residents/departments/community-development/planning-division/walnut-general-plan-and-zoning.

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5.12 MINERAL RESOURCES

5.12.1 INTRODUCTION

This section evaluates the proposed Project's potential impacts on mineral resources. The analysis is based on the City of Walnut General Plan Conservation, Open Space, and Recreation Chapter, regarding the local presence of mineral resources within the City limits. Review of the California Department of Conservation (CDC), Division of Mine Reclamation, *Mines Online* database was also reviewed.

5.12.2 ENVIRONMENTAL SETTING

In 1975, the State adopted the Surface Mining and Reclamation Act (SMARA). The primary objectives of SMARA are the assurance of adequate supplies of mineral resources important to California's economy and the reclamation of mined lands. These objectives are implemented through land use planning and regulatory programs administered by local government with the assistance of the State. The State Department of Conservation, Division of Mines and Geology, and the State Mining and Geology Board are the agencies responsible for administering this program at the State level.

The Project Site is zoned for residential uses and is neither currently used for mining operations nor is it known to have had historic mining operations. The Project Site does not have a record of a mapped mine according to the Division of Mine Reclamation (CDC 2016).

5.12.3 REGULATORY SETTING

FEDERAL

There are no federal regulations regarding minerals that are applicable to the Project.

STATE

Surface Mining and Reclamation Act

Surface Mining and Reclamation Act (SMARA), enacted in 1975 by the State of California, provides for the management of mineral resource activities at the state and local level. The primary objectives of SMARA are the assurance of adequate supplies of mineral resources important to California's economy and the reclamation of mined lands. The act establishes mining operation and reclamation requirements and a statewide resource inventory and classification process. Implementation of SMARA promotes both the conservation and sensitive development of mineral resources, particularly sand and gravel resources.

LOCAL

City of Walnut General Plan

The Conservation, Open Space, and Recreation Chapter's Natural Resources Component sets forth a comprehensive strategy for the development, management, preservation, and conservation of resources that are necessary to meet the City's existing and future demands. The Natural Resources Component does not list any mines, mineral deposits, or other mineral resources in the City.

5.12.4 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:

- MR-1: Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- MR-2: 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?

5.12.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT MR-1: Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

According to the California Department of Conservation, Division of Mine Reclamation, the City of Walnut does not contain any mines, mineral deposits, or other mineral resources (CDC 2016). Further, the site is designated as Very Low Density and is Zoned for Residential Planned Development; no current or historic mining operations are associated with the Project Site. No impact would occur.

Level of Impact Before Mitigation: No Impact.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT MR-2: 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?

As previously discussed, the Conservation, Open Space, and Recreation Chapter's Natural Resources Component in the City's General Plan (2018) does not list any mines, mineral deposits, or other mineral resources within the City of Walnut. Because there are no locally important mineral resources on the Project Site or in the City, no impact would occur.

Level of Impact Before Mitigation: No Impact.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

5.12.6 CUMULATIVE IMPACTS

No cumulative impacts associated with the implementation of this Project would occur as the Project Site has no known mineral resources. The Project would not cumulatively contribute to a loss of mining operations or mineral resources in consideration of other Projects identified in Section 4.0, *Basis for Cumulative Impacts*. No impact would occur.

Level of Impact Before Mitigation: No Impact.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

5.12.7 MITIGATION MEASURES

No mitigation measures are required for mineral resources.

5.12.8 REFERENCES

California Department of Conservation, Division of Mine Reclamation, *Mines Online* database; 2016. Accessed on December 13, 2023 at https://maps.conservation.ca.gov/mol/index.html.

City of Walnut, *City of Walnut General Plan*. Adopted May 9, 2018.

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5.13 NOISE

5.13.1 INTRODUCTION

This section analyzes the proposed Project's potential noise and vibration impacts. The analysis in this section is based in part on the following technical report:

- *Noise Impact Analysis, Tentative Tract Map No. 72798 Residential Project*, Vista Environmental, April 17, 2024 (Appendix I). This report is herein referred to as the "Noise Impact Analysis" in this section.

5.13.2 ENVIRONMENTAL SETTING

BACKGROUND

Noise Perception

Noise is typically defined as unwanted sound. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm or when it has adverse effects on health. Noise level (or volume/loudness) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dBA level based on the lowest detectable sound pressure level that people can perceive. Typically, the human ear can barely perceive the change in noise level of 3 dBA. A change in 5 dBA is readily perceptible, and a change in 10 dBA is perceived as being twice or half as loud.

Because of the nature of the human ear, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) is equivalent to an increase of 3 dBA, which would be barely perceptible. In addition, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while a 1 to 2 dBA change is generally not perceived. In addition, a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50 to 60+ dBA range.

Noise Propagation and Attenuation

Noise levels typically attenuate (or drop off) at a rate of 6 dBA over hard ground surfaces and 7.5 dBA over soft ground surfaces per doubling of distance between a point source (e.g., condensers, generators, industrial machinery) and the receptor (e.g., residences, schools, hospitals). For line sources (e.g., transportation noise along a roadway), an attenuation rate of 3.0 dBA over hard ground surfaces and 4.5 dBA over soft ground surfaces is typically observed. Additionally, noise levels may also be reduced by intervening structures; generally, a single row of buildings between the noise source and receptor reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by approximately 7 dBA. The way older homes (approximately 30 years old or older) in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units and office buildings constructed to California Energy Code standards is generally 30 dBA or more.

Noise Metrics

One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a one-hour period. Lmax is the highest RMS (root mean squared) sound pressure level within the measuring period, and Lmin is the lowest RMS sound pressure level within the measuring period. The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than noise that occurs during the day. Community noise is usually measured using Day-Night Average Level (Ldn), which is the 24-hour average noise level with a 10 dBA penalty for noise occurring during nighttime (10:00 PM to 7:00 AM) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5 dBA penalty for noise occurring from 7:00 PM to 10:00 PM and a 10 dBA penalty for noise occurring from 10:00 PM to 7:00 AM. Noise levels described by Ldn and CNEL usually do not differ by more than one dBA. Daytime Leq levels are louder than Ldn or CNEL levels; thus, if the Leq meets noise standards, the Ldn and CNEL standards are also considered met.

Vibration Perception

There are several different methods used to quantify vibration. Human response to vibration is typically referred to in vibration decibels (VdB). VdB is used to describe absolute values of vibration velocity relative to a chosen reference level. Typically, developed areas are continuously affected by vibration velocities of 50 VdB or lower. These continuous vibrations are not noticeable to humans whose threshold of perception is around 65 VdB. Ground-borne vibration effects caused by heavy construction activities are commonly defined in terms of peak particle velocity (PPV) rather than VdB.

Vibration Propagation and Attenuation

There are three main types of vibration propagation waves: surface, compression, and shear. Surface waves (or Rayleigh waves) travel along the ground's surface and carry most of their energy along an expanding circular wavefront, similar to ripples produced by throwing a rock into a pool of water. Compression waves (or P-waves) carry their energy along an expanding spherical wavefront in a longitudinal motion (i.e., in a "push-pull" fashion), similar to airborne sound waves. Shear waves (or S-waves) carry energy along an expanding spherical wavefront in a side-to-side motion and perpendicular to the direction of propagation. As vibration waves propagate from a source, the vibration energy typically decreases by 6 VdB per doubling of the distance from the vibration source. This drop-off rate can vary greatly depending on the soil composition and characteristics but has been shown to be effective enough for screening purposes, in order to identify potential vibration impacts that may need to be studied through actual field tests.

Vibration Metrics

Ground-borne vibration effects caused by heavy construction activities are commonly defined in peak particle velocity (PPV) or the root mean square (rms) amplitude of the vibration velocity. PPV, the maximum instantaneous positive or negative peak of the vibration signal, is measured in inches per second (in/sec). Outdoor sources that may produce perceptible vibrations are usually caused by construction equipment, steel-wheeled trains, and traffic on rough roads, while smooth roads rarely produce perceptible ground-borne noise or vibration. The California Department of Transportation (Caltrans) has developed guidelines using PPV for assessing the potential for damage to buildings and human annoyance to people from vibration-caused construction sources in their *Transportation and Construction Vibration Guidance Manual*.

EXISTING NOISE ENVIRONMENT

Noise Measurements

The existing noise environment for the Project Site and surrounding vicinity was established based on noise measurement data collected on October 16 and 17, 2023. Three 24-hour noise monitoring locations were selected to establish existing ambient baseline noise conditions and based on the proximity and location of sensitive receptors (i.e., land use types considered sensitive to noise). The monitoring locations are shown in Figure 5.13-1, *Field Noise Monitoring Locations.*

Ambient noise sources during the measurement period generally consisted of vehicle traffic on the nearby roadways. The long-term noise measurement results are summarized in Table 5.13-1, *Existing (Ambient) Noise Level Measurements*. As shown in Table 5.13-1, average daytime noise levels ranged from 55.0 dBA to 63.5 dBA, while average nighttime noise levels ranged from 48.1 dBA to 54.2 dBA. The minimum noise level measured was 41.9 dBA and the maximum was 66.7 dBA. The 24-hour baseline CNEL ranged from 56.8 dBA to 64.2 dBA.

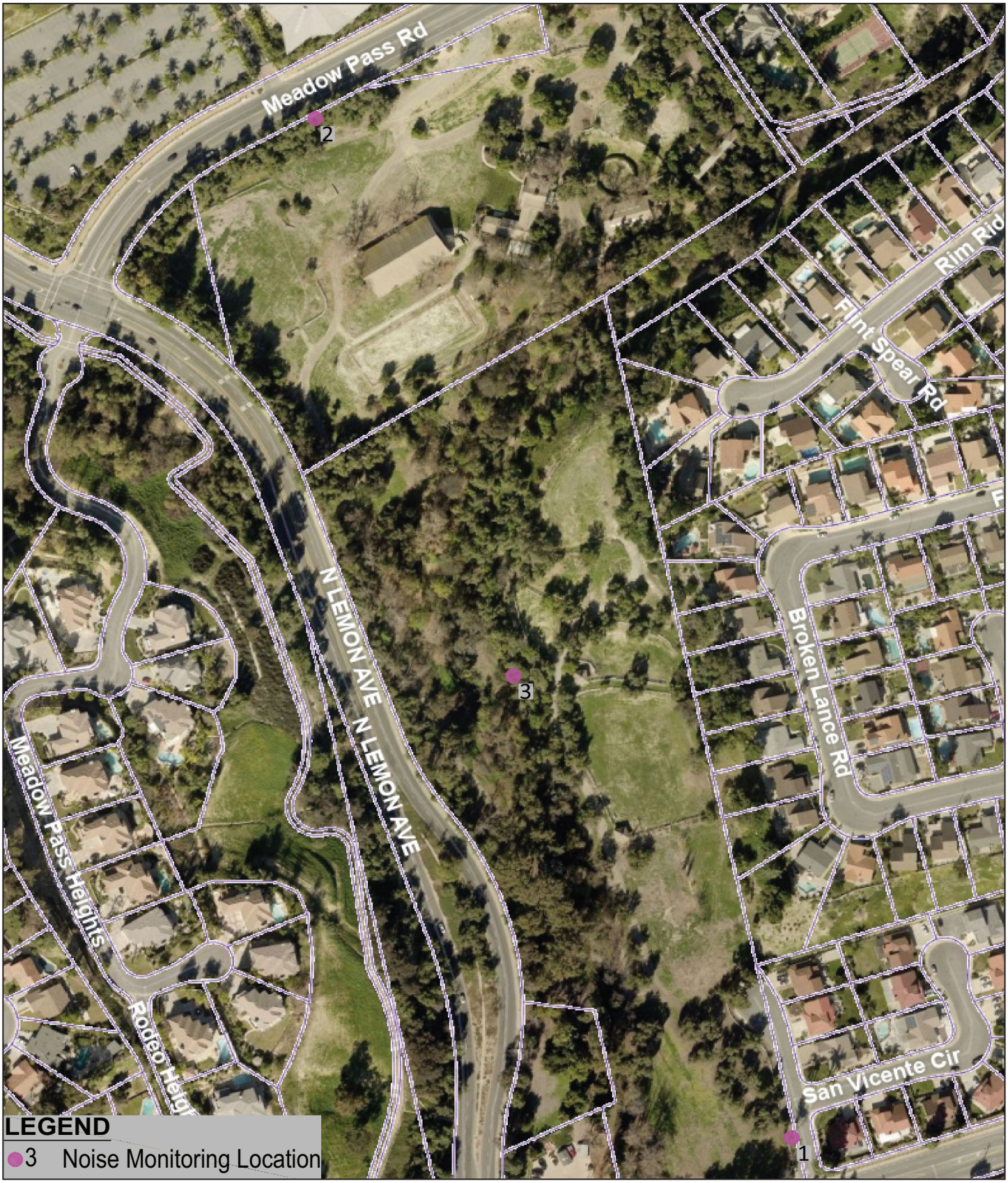
Table 5.13-1
Existing (Ambient) Noise Level Measurements

Site No.	Site Description	Average (dBA L_{eq})		1-hr Average (dBA L_{eq}/Time)		24-hour dBA CNEL
		Daytime[1]	Nighttime[2]	Minimum	Maximum	
1	Located on a fence near the southeast corner of the Project Site, approximately 25 feet west of San Vicente Road centerline and 105 feet north of La Puente Road centerline.	61.0	53.6	46.1 1:24 AM	63.9 7:54 AM	62.7
2	Located on a tree on north side of the Project Site, approximately 40 feet south of Meadow Pass Road centerline and 25 feet east of St. Lorenzo Ruiz Catholic Church west driveway centerline.	63.5	54.2	45.0 1:48 AM	66.7 7:55 AM	64.2
3	Located on a tree near the middle of the Project Site, approximately 150 feet east of Lemon Avenue centerline.	55.0	48.1	41.9 1:05 AM	59.3 9:31 AM	56.8

Notes:
[1] Daytime defined as 7:00 a.m. to 10:00 p.m. (Section 3.40.050 of the Municipal Code).
[2] Nighttime define as 10:00 p.m. to 7:00 a.m. (Section 3.40.050 of the Municipal Code).
Noise measurements taken between Monday, October 16, 2023 and Tuesday, October 17, 2023.
Source: Vista Environmental, *Noise Impact Analysis*; April 17, 2024.

Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Urban areas contain a variety of land uses and development types that are noise sensitive. A sensitive receptor is typically any area containing residences, hotels, schools, libraries, hospitals, religious institutions, convalescent care homes, senior centers, natural areas, parks and outdoor recreation areas, or any other land use deemed noise sensitive by the local jurisdiction.



Source: Vista Environmental; April 17, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

Field Noise Monitoring Locations

VCS Environmental

Figure 5.13-1

The nearest sensitive receptors to the Project Site are residents at the single-family homes on the east side of the Project Site, where the nearest home is approximately 30 feet east of the Project Site. There is also a fire station located as near as 60 feet west of the Project Site and a church located as near as 100 feet north of the Project Site. The nearest K-12 school is Vejar Elementary School, which is located approximately 0.3 miles south of the Project Site.

5.13.3 REGULATORY SETTING

FEDERAL

Federal Noise Control Act/Overview

The Federal Noise Control Act of 1972 addressed the issue of noise as a threat to human health and welfare. To implement the Federal Noise Control Act, the U.S. Environmental Protection Agency (EPA) undertook a number of studies related to community noise in the 1970s. The EPA found that 24-hour averaged noise levels less than 70 dBA would avoid measurable hearing loss, levels of less than 55 dBA outdoors and 45 dBA indoors would prevent activity interference and annoyance. The U.S. Department of Housing and Urban Development (HUD) published a Noise Guidebook for use in implementing the Department's noise policy. In general, HUD's goal is exterior noise levels that are less than or equal to 55 dBA Ldn. The goal for interior noise levels is 45 dBA Ldn.

Federal Transit Administration (FTA)

Although the Project is not under the jurisdiction of the Federal Transit Administration (FTA), the Transit Noise and Vibration Impact Assessment Manual (FTA Manual) is the only guidance document from a government agency that has defined what constitutes a significant noise impact from implementing a project (Vista 2024). The FTA standards are provided below in Table 5.13-2, *FTA Project Effects on Cumulative Noise Exposure*.

Table 5.13-2
FTA Project Effects on Cumulative Noise Exposure

Existing Noise Exposure (dBA Leq or Ldn)	Allowable Noise Impact Exposure dBA Leq or Ldn		
	Project Only	Combined	Noise Exposure Increase
45	51	52	+7
50	53	55	+5
55	55	58	+3
60	57	62	+2
65	60	66	+1
70	64	71	+1
75	65	75	0
Source: Vista Environmental, *Noise Impact Analysis*; April 17, 2024.			

As shown in Table 5.13-2, the allowable cumulative noise level increase created from a project would range from 0 to 7 dBA, which is based on the existing (ambient) noise levels in the Project vicinity. The justification for the sliding scale is that people already exposed to high levels of noise should be expected to tolerate only a small increase in the amount of noise in their community. In contrast, if the existing noise levels are

quite low, it is reasonable to allow a greater change in the community noise for the equivalent difference in annoyance.

The FTA Manual also provides specific guidance for construction noise. The FTA recommends developing construction noise criteria on a project-specific basis that utilizes local noise ordinances if possible. However, local noise ordinances usually relate to nuisance and hours of allowed activity and sometimes specify limits in terms of maximum levels but are generally not practical for assessing the noise impacts of a construction project (Vista 2024). The FTA standards for a "detailed analysis" of construction noise are provided below in Table 5.13-3, *FTA Construction Noise Criteria*. It should be noted that even though the Project has been analyzed based on the "general assessment" methodology, the more stringent detailed analysis construction noise thresholds have been utilized in this analysis.

Table 5.13-3
FTA Construction Noise Criteria

Land Use	Day (dBA Leq(8-hour))	Night (dBA Leq(8-hour))	30-day Average (dBA Ldn)
Residential	80	70	75
Commercial	85	85	80*
Industrial	90	90	85*

Notes:
*24-hour Leq not Ldn.
Source: Vista Environmental, *Noise Impact Analysis*; April 17, 2024.

STATE

Title 24 of the California Code of Regulations (CCR)

Title 24 of the California Code of Regulations (CCR) establishes standards governing interior noise levels that apply to all new single-family and multiple-family residential units in California. These standards require that acoustical studies be performed before construction at building locations where the existing Ldn exceeds 60 dBA. Such acoustical studies are required to establish mitigation measures that will limit maximum Ldn levels to 45 dBA in any habitable room. Although there are no generally applicable interior noise standards pertinent to all uses, many communities in California have adopted a Ldn of 45 as an upper limit on interior noise in all residential units.

In addition, the State of California General Plan Guidelines provides guidance for noise compatibility. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

LOCAL

City of Walnut General Plan

Chapter 7 of the City's General Plan Noise Element includes the following goals and policies applicable to the proposed Project:

GOAL N-1: Quiet Neighborhoods. Coordinate the City's land use policies promoting a small-town ambience with the appropriate measures to control, and to measure noise impacts.

Policy N-1.1: Land Use/Project Evaluation. Use the Land Use Compatibility for Community Noise Environments scale (Figure N-4), the Future Noise Contour Map (Figure N-5,) and the WMC to evaluate land use decisions to mitigate unnecessary noise impacts or discourage further unmitigated noise-inducing developments.

Policy N-1.3: Minimize Noise Impacts. Minimize noise impacts in the community to ensure that noise does not detract from Walnut's quality of life.

Policy N-1.6: Stationary Noise Sources. Minimize stationary noise impacts on sensitive receptors, and require control of noise from construction activities, private developments/residences, landscaping activities, and special events.

Policy N-1.7: Noise Mitigation. 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.

GOAL N-2: Minimize Transportation Noise and Vibration. Monitor and regulate impact of transportation-related sources of noise located within and adjacent to the City's boundaries.

Policy N-2.2: Traffic-Calming Solutions to Street Noise. Evaluate solutions to discourage through traffic in neighborhoods through noise-attenuating roadway materials and modifications to street design.

Policy N-2.3: Trucks. Designate a system of truck routes on specified arterial streets to minimize the negative impacts of trucking through the City.

City of Walnut Municipal Code

The City of Walnut Municipal Code Chapter 3.40 – Noise establishes the following applicable standards related to noise:

3.40.010 Purpose and Intent. No person shall make, or cause or suffer, or permit to be made upon any premises owned, occupied or controlled by such person, any unnecessary noises, sounds or vibrations which are physically annoying to persons of ordinary sensitiveness or which are so harsh or so prolonged or unnatural or unusual in their use, time or place as to occasion unnecessary discomfort to any person or persons within any neighborhood. Such action is determined to create a public nuisance.

3.40.030 Certain Noise Prohibited. Notwithstanding any other provisions of this chapter, the following acts and the causing or permitting thereof are declared to be a public nuisance in violation of this chapter:

A. Construction. Operating or causing the operation of any tools, equipment, impact devices, derricks or hoists used in construction, drilling, repair, alteration, demolition or earthwork, between the weekday hours of 8:00 PM and 7:00 AM the following day, or at any time on Saturdays, Sundays or holidays; except as provided in Section 3.40.040.

3.40.050 Exterior Noise Standards. Citations for violations are hereby authorized when:

A. Exterior noise levels shall apply to all receptor properties as follows, unless otherwise noted:

Receptor-Land Use	Time Interval	Noise Level
Residential Properties	22:00 – 7:00	45 dB
	7:00 – 22:00	50 dB

5.13.4 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:

- NOI-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?
- NOI-2: Generation of excessive groundborne vibration or groundborne noise levels?
- NOI-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, would the project expose people residing or working in the project area to excessive noise levels?

5.13.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT NOI-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?

The proposed Project would not generate a substantial temporary or permanent increase in ambient noise levels in the Project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

SHORT-TERM CONSTRUCTION IMPACTS

Construction Noise Analysis Methodology

The Project's temporary construction noise impacts were analyzed using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). The FTA Manual provides for two different levels of assessment of construction noise and the current state of the Project meets the definition of a "general assessment", which is defined as "projects in an early assessment stage when the equipment roster and schedule are undefined and only a rough estimate of construction noise levels is practical." As such, construction noise was analyzed based on the methodology for a "general assessment"; however, in order to provide a more conservative analysis, for each stage of construction, all construction equipment was analyzed based on being placed in the middle of the Project Site, instead of just the two nosiest pieces of equipment as detailed in the FTA Manual for a general assessment and the more stringent noise thresholds for a detailed analysis were used. The RCNM uses compiled noise measurement data that considers the noise generating characteristics of different types of construction equipment, the number of equipment, and the distance between equipment and the receptor to estimate impacts. Construction equipment anticipated to be used includes a concrete/industrial saw, excavators, a grader, rubber-tired dozers, tractors, front end loaders, backhoes, scrapers, a crane, forklifts, a generator, a welder, pavers, paving equipment, rollers and an air compressor. A detailed equipment list with construction usage factors by construction stage is included in Table D of the Noise Impact Analysis (Appendix I).

Construction Noise Impact Analysis

Project construction activities are anticipated to include demolition of the existing structures on the Project Site, site preparation and grading of the approximately 17.1 acres that would be disturbed, building construction of the 27 single-family homes, paving of the onsite public street system and driveways, and application of architectural coatings (i.e., paints and finishes). The level of short-term construction noise

impacts would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. The nearest sensitive receptors to the Project Site are residents at single-family homes, where the nearest home is approximately 30 feet east of the Project Site. There is also a fire station located as near as 60 feet west of the Project Site and a church located as near as 100 feet north of the Project Site. The nearest K-12 school is Vejar Elementary School, which is located sufficiently far (approximately 0.3 miles) from the Project Site in terms of potential noise impacts and therefore is not discussed further in this analysis.

Section 3.40.030(A) of the City's Municipal Code restricts the operation of any tools or other construction equipment between the weekday hours of 8:00 PM and 7:00 AM, or any time on Saturdays, Sundays or holidays; however, the City construction noise standards do not provide any limits to the noise levels that may be created from construction activities that occur during the allowable hours of construction. In order to determine if the proposed construction activities would create a significant substantial temporary noise increase, the FTA construction noise criteria thresholds detailed above in Section 5.13.3, *Regulatory Setting*, were used, which shows that a significant construction noise impact would occur if construction noise exceeds 80 dBA during the daytime at any of the nearby sensitive receptors. The results of the construction noise analysis are provided in Table 5.13-4, *Construction Noise Levels at the Nearby Sensitive Receptors*.

Table 5.13-4
Construction Noise Levels at the Nearby Sensitive Receptors

Construction Phase	Construction Noise Level (dBA Leq) at:		
	Church to North[1]	Homes to East[2]	Fire Station to Southwest[3]
Demolition	60	72	60
Site Preparation	60	72	60
Grading	61	73	61
Building Construction	60	72	61
Paving	55	72	60
Painting	47	59	47
FTA Construction Noise Threshold[4]	**80**	**80**	**80**
Exceed Thresholds?	**No**	**No**	**No**

Notes:
[1] The church to the north of the Project Site is located as near as 1,100 feet from the center of Project Site.
[2] The homes to the east of the Project Site are located as near as 275 feet from the center of the Project Site.
[3] The fire station to the southwest of the Project Site is located as near as 1,060 feet from the center of the Project Site.
[4] The FTA construction noise thresholds are detailed above in Section 5.13-3.
Source: Vista Environmental, *Noise Impact Analysis*; April 17, 2024.

Table 5.13-4 shows that the greatest noise impacts would occur during the grading phase, with noise levels as high as 73 dBA Leq at the nearest homes to the east of the Project Site. All calculated construction noise levels shown in Table 5.13-4 are within the FTA daytime construction noise standard of 80 dBA, averaged over eight hours. Therefore, through adherence to the allowable construction times detailed in Section 3.40.030(A) of the City's Municipal Code, Project construction activities would not create a substantial temporary increase in ambient noise levels that would exceed applicable noise standards. Impacts would be less than significant, and no mitigation is required.

LONG-TERM OPERATIONAL IMPACTS

Operational Noise Analysis Methodology

The main source of potential noise impacts associated with Project operations would be from Project-generated vehicular traffic on nearby roadways.[1] The Project's impacts to the offsite roadways were analyzed through use of the FHWA Traffic Noise Prediction Model (FHWA Model). The FHWA Model arrives at a predicted noise level accounting for the following:

- The roadway active width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway);
- The total average daily traffic (ADT) and the percentage of ADT which flows during the day, evening and night, the travel speed, the vehicle mix on the roadway, which is a percentage of the volume of automobiles, medium trucks and heavy trucks, the roadway grade, the angle of view of the observer exposed to the roadway; and
- Site conditions ("hard" or "soft" relates to the absorption of the ground, pavement or landscaping).

Operational Noise Impact Analysis

Onsite Residential Use Noise

The Project proposes development of a residential community with 27 single-family homes. The Project Site is bordered by single-family homes to the east, a fire station to the southwest and roadways on the north, south, and west. Residential land uses are typically considered compatible with other residential uses and are not generally categorized as generating loud, unnecessary, or unusual noise that disturbs the peace or quiet of a neighborhood, or that causes discomfort or annoyance to any person of normal sensitiveness. The onsite operations (i.e., occupancy) would not introduce any new noise sources (i.e., air conditioning equipment, landscape maintenance activities, trash trucks, etc.) that do not already exist in the Project vicinity. As such, less than significant onsite operational noise impacts are anticipated to occur, and no mitigation is required.

Offsite Roadway Vehicular Noise

Vehicle noise is generated by a combination of the noise produced by the engine, exhaust, and tires. The level of traffic noise depends on three primary factors: (1) the volume of traffic, (2) the speed of traffic, and (3) the number of trucks in the flow of traffic. The Project does not propose any land uses that would require a substantial number of truck trips and the Project would not alter the speed limit on any existing roadway; therefore, this analysis focused on the Project's estimated traffic volumes in the context of existing and future cumulative traffic volumes to estimate the Project's contribution to potential changes in traffic-related noise.

Neither the General Plan nor the Municipal Code defines what constitutes a "substantial permanent increase to ambient noise levels". As such, this impact analysis used guidance from the FTA detailed above in Table 5.13-2, which shows that a project's allowable contribution to the noise environment can range between 0 and 7 dBA without creating a significant impact, depending on the existing roadway noise levels.

[1] The Noise Report's operational analysis was based in part on traffic counts taken in August 2022. Consistent with the City's transportation study guidelines, additional traffic counts were taken in 2025 to update the Project's Transportation Impact Study. Because the 2025 counts showed an overall decrease in existing traffic volumes since 2022, the Noise Report was deemed adequate without the need for updated traffic counts as it represents a more conservative analysis.

The Project's potential offsite traffic noise impacts were analyzed for the existing year and future year 2027 cumulative projects scenarios that are discussed separately below.

Existing Year Conditions

The Project's potential offsite traffic noise impacts were evaluated through a comparison of the Existing scenario and the Existing With Project scenario as shown in Table 5.13-5, *Existing Year Project Traffic Noise Contributions*.

Table 5.13-5
Existing Year Project Traffic Noise Contributions

Roadway	Segment	dBA CNEL at Nearest Receptor[1]			Increase Threshold[2]
		Existing	Existing Plus Project	Project Contribution	
Proposed Project					
Amar Road	West of Lemon Avenue	67.0	67.0	+0.0	+1 dBA
Amar Road	East of Lemon Avenue	66.8	66.8	+0.0	+1 dBA
Meadow Pass Road	West of Colt Lane	54.3	54.6	+0.3	+5 dBA
Meadow Pass Road	East of Colt Lane	57.7	57.8	+0.1	+3 dBA
La Puente Road	West of Lemon Avenue	67.7	67.7	+0.0	+1 dBA
La Puente Road	East of Lemon Avenue	66.5	66.5	+0.0	+1 dBA
Valley Boulevard	West of Lemon Avenue	66.0	66.0	+0.0	+1 dBA
Lemon Avenue	North of Meadow Pass Road	62.3	62.3	+0.0	+2 dBA
Lemon Avenue	South of Meadow Pass Road	56.8	56.9	+0.1	+3 dBA
Lemon Avenue	South of La Puente Road	64.2	64.2	+0.0	+2 dBA
Alternative Project					
Meadow Pass Road (Alt)	West of Colt Lane	54.3	54.5	+0.2	+5 dBA
La Puente Road (Alt)	East of Lemon Avenue	66.5	66.5	+0.0	+1 dBA
Lemon Avenue (Alt)	South of Meadow Pass Road	56.8	56.8	+0.0	+3 dBA

Notes:
[1] Distance to nearest sensitive receptors shown in Table E of the *Noise Impact Analysis*, does not take into account existing noise barriers.
[2] Increase Threshold obtained from the FTA's allowable noise impact exposures detailed above in Table 5.13-2.
Source: Vista Environmental, *Noise Impact Analysis*; April 17, 2024.

Table 5.13-5 shows that the Project's permanent contribution to noise increases to the nearby homes from the generation of additional vehicular traffic would not exceed FTA's allowable traffic noise increase thresholds detailed above; therefore, the Project would not result in a substantial permanent increase in ambient noise levels for the existing conditions. Impacts would be less than significant, and no mitigation is required.

Future Year 2027 Cumulative Conditions

The Project's potential offsite traffic noise impacts were also evaluated through a comparison of the future year 2027 cumulative without Project scenario and the future year 2027 cumulative with Project scenario as shown in Table 5.13-6, *Future Year 2027 Project Traffic Noise Contributions*.

Table 5.13-6 shows that the Project's permanent contribution to noise increases to the nearby homes from the generation of additional vehicular traffic would not exceed FTA's allowable traffic noise increase

thresholds detailed above; therefore, the Project would not result in a substantial permanent increase in ambient noise levels for the future year 2027 cumulative conditions. Impacts would be less than significant, and no mitigation is required.

Table 5.13-6
Future Year 2027 Project Traffic Noise Contributions

Roadway	Segment	dBA CNEL at Nearest Receptor[1]			Increase Threshold[2]
		Year 2027 Without Project	Year 2027 Plus Project	Project Contribution	
Proposed Project					
Amar Road	West of Lemon Avenue	67.1	67.2	+0.1	+1 dBA
Amar Road	East of Lemon Avenue	67.0	67.0	+0.0	+1 dBA
Meadow Pass Road	West of Colt Lane	54.5	54.8	+0.3	+3 dBA
Meadow Pass Road	East of Colt Lane	57.9	58.0	+0.1	+3 dBA
La Puente Road	West of Lemon Avenue	67.9	67.9	+0.0	+1 dBA
La Puente Road	East of Lemon Avenue	66.6	66.6	+0.0	+1 dBA
Valley Boulevard	West of Lemon Avenue	66.3	66.3	+0.0	+1 dBA
Lemon Avenue	North of Meadow Pass Road	62.5	62.5	+0.0	+2 dBA
Lemon Avenue	South of Meadow Pass Road	57.1	57.1	+0.0	+3 dBA
Lemon Avenue	South of La Puente Road	64.4	64.4	+0.0	+2 dBA
Alternative Project					
Meadow Pass Road (Alt)	West of Colt Lane	54.5	54.7	+0.2	+3 dBA
La Puente Road (Alt)	East of Lemon Avenue	66.6	66.7	+0.1	+1 dBA
Lemon Avenue (Alt)	South of Meadow Pass Road	57.1	57.1	+0.0	+3 dBA

Notes:
[1] Distance to nearest sensitive receptors shown in Table E of the *Noise Impact Analysis*, does not take into account existing noise barriers.
[2] Increase Threshold obtained from the FTA's allowable noise impact exposures detailed above in Table 5.13-2.
Source: Vista Environmental, *Noise Impact Analysis*; April 17, 2024.

Level of Impact Before Mitigation: Less than significant noise impact during temporary construction activities and during long-term operations based on the noise modeling results.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT NOI-2: Generation of excessive groundborne vibration or groundborne noise levels?

Ground-borne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. The effects of ground-borne vibrations typically only cause a nuisance to people, but at extreme vibration levels, damage to buildings may occur. Although ground-borne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. Ground-borne noise is an effect of ground-borne vibration and only exists indoors since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves.

SHORT-TERM CONSTRUCTION IMPACTS

Potential sources of vibration impacts are separated into two different categories. The vibration can be transient or continuous in nature, which can result in varying degrees of ground vibration depending on the type of equipment used, proximity to the receptor, and type of receptor structure. Operation of equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Occupants and buildings respond to these vibrations with varying results, ranging from no perceptible effects at low levels (for occupants) to slight damage at the highest levels (for buildings).

Since neither the Municipal Code nor the General Plan provide a quantifiable vibration threshold for temporary construction activities, guidance from Caltrans' 2020 *Transportation and Construction Vibration Guidance Manual* was used. The Caltrans thresholds shown in Table 5.13-7, *Vibration Annoyance Potential Criteria*, provide general guidelines as to the maximum vibration limits for when vibration becomes potentially annoying to occupants. Table 5.13-8, *Vibration Damage Potential Threshold Criteria*, provides general vibration damage potential thresholds based on the structure type and condition of potentially impacted buildings. For this analysis, it is assumed that the nearest structure is approximately 30 feet away, equipment anticipated to be used would be a transient vibration source, and the receptors are considered older residential structures.

Table 5.13-7
Vibration Annoyance Potential Criteria

Human Response	PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely Perceptible	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strongly Perceptible	0.90	0.10
Severe	2.00	0.40

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.
Source: California Department of Transportation, *Transportation- and Construction Vibration Guidance Manual*, April 2020.

Table 5.13-8
Vibration Damage Potential Threshold Criteria

Structure and Condition	PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely Fragile Historic Buildings Ruin Ancient Monuments	0.12	0.08
Fragile Buildings	0.20	0.10
Historic and Some Old Buildings	0.50	0.25
Older Residential Structures	0.50	0.30
New Residential Structures	1.00	0.50
Modern Industrial/Commercial Buildings	2.00	0.50

Source: California Department of Transportation, *Transportation- and Construction Vibration Guidance Manual*, April 2020.

To determine the vibratory impacts during construction, reference construction equipment vibration levels were utilized and then extrapolated to the façade of the nearest adjacent structures. Project construction would not involve the use of substantial vibration inducing equipment or activities, such as pile drivers. In addition, no historical or fragile buildings are known to be located within the Project vicinity, which may be more susceptible to potential damage from vibration.

The main sources of vibration impact during Project construction would be the operation of larger equipment such as a large bulldozer. Larger equipment would be used during the demolition stage (20 days), site preparation stage (10 days), grading stage (20 days), and paving stage (20 days), which are collectively estimated to last a total of 70 working days. The remaining construction duration is not expected to generate notable levels of vibration.

The construction vibration assessment utilized the referenced vibration levels as shown in Table 5.13-9 *Construction Vibration Impact Analysis*. As shown in Table 5.13-9, calculated vibration levels compared to the criteria shown in Table 5.13-7 and Table 5.13-8 would result in instances of barely perceptible vibration for occupants and no potential for building damage.

Table 5.13-9
Construction Vibration Impact Analysis

Construction Activity	Equipment Vibration Level at Reference Distance (25ft) – PPV (in/sec)	Distance to Nearest Structure (ft)	Calculated Vibration Level - PPV (in/sec)	Annoyance Potential	Damage Potential
Large Bulldozer	0.089	30	0.073	Barely Perceptible	None
Source: Vista Environmental, *Noise Impact Analysis*; April 17, 2024.					

As discussed above, there is no potential for damage to existing buildings or structures based on the impact analysis. There is a potential for occupants of the closest buildings to experience occurrences of barely perceptible vibration. Neither strongly perceptible nor severely perceptible vibration occurrences are anticipated. In addition, barely perceptible vibration levels would be short-term and transient for a particular receptor as the construction equipment moves from one location to another on the Project Site. Project construction would also be restricted to the City's permitted daytime hours pursuant to the Municipal Code. Based on the analysis above, potential impacts are considered less than significant, and no mitigation is required.

LONG-TERM OPERATIONAL IMPACTS

Project operations would consist of residential occupancy and residential uses, which would not involve the operation of daily equipment (e.g., industrial/commercial machinery) associated with long-term adverse vibration impacts. No potential vibration impacts are anticipated, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant vibration impact during temporary construction activities and during long-term operations based on the vibration screening results.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT NOI-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, would the project expose people residing or working in the project area to excessive noise levels?

The Project Site is not located within an airport influence area and is not within an airport land use compatibility plan. There are no public airports or private airstrips within 2.0 miles of the Project Site. The nearest airport would be San Gabriel Valley Airport, located approximately 5.25 miles from the Project Site. The Project Site would not be exposed to excessive overhead aircraft noise impacts.

Level of Impact Before Mitigation: No impact based on proximity to the nearest airport.

Mitigation Measures: No mitigation measures are required.

LEVEL OF IMPACT: NO IMPACT.

5.13.6 CUMULATIVE IMPACTS

The Project would result in less than significant increases in noise and vibration levels during temporary construction activities, as described above. No other projects have been identified in the Project vicinity where the Project's incremental contribution to noise and vibration impacts could be considered cumulatively significant. In addition, the Project proposes residential uses within a residential area, which would not result in cumulatively adverse long-term operational noise or vibration impacts. Based on this analysis, no cumulative impacts are anticipated in consideration of the cumulative projects identified in Section 4.0, *Basis for Cumulative Impacts*.

Level of Impact Before Mitigation: No impact based on the noise and vibration analysis in consideration of cumulative projects in the area.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

5.13.7 MITIGATION MEASURES

No mitigation measures are required for noise.

5.13.8 REFERENCES

City of Walnut, *City of Walnut General Plan*. Adopted May 9, 2018.

California Department of Transportation, Transportation and Construction Vibration Guidance Manual. April 2020.

Vista Environmental, *Noise Impact Analysis Tentative Tract Map No. 72798 Residential Project*. April 17, 2024.

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5.14 POPULATION AND HOUSING

5.14.1 INTRODUCTION

This section discusses the proposed Project's potential impacts on population and housing. Information in this section is based on data from the City of Walnut Housing Element 2021-2029 and the Southern California Association of Governments Regional Growth Forecasts.

5.14.2 ENVIRONMENTAL SETTING

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

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 (MPO) for this region, which encompasses over 38,000 square miles. It serves as a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG develops, refines, and maintains SCAG's regional and small area socio-economic forecasting/allocation models. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. Additionally, SCAG publishes every two years a Local Profile Report for cities within the SCAG region. SCAG Regional Forecasts are shown in Table 5.14-1, *SCAG Regional Forecasts*.

Table 5.14-1
SCAG Regional Forecasts

Unit	2020	2030	2035	2045
Population	19,518,000	20,821,000	21,443,000	22,504,000
Households	6,333,000	6,903,000	7,170,000	7,633,000
Employment	8,695,000	9,304,000	9,566,000	10,049,000
Source: SCAG, Connect SoCal Demographics and Growth Forecast Technical Report, Table 13. Adopted September 3, 2020.				

SCAG REGIONAL HOUSING NEEDS ASSESSMENT

The California State Housing Element Law enacted in 1980 requires SCAG and other regional councils of government in California to determine the existing and projected regional housing needs for persons at all income levels. SCAG is also required by law to determine each jurisdiction's share of the regional housing need in the six-county Southern California region. The intent of Senate Bill (SB) 375 and the Regional Housing Needs Assessment (RHNA) process is to create a better balance of jobs and housing in communities, ensure the availability of decent affordable housing for all income groups and achieve sustainability through long-term strategic land use planning. SCAG takes the lead in overseeing the assessment by identifying measures to gauge housing demand and comparing those numbers against socioeconomic factors throughout the region. The RHNA consists of two measurements: 1) existing need for housing, and 2) future need for housing.

California's Housing Element law requires local governments to make plans to adequately address their share of existing and projected population growth, taking into consideration affordability of available and future housing. The California Department of Housing and Community Development (HCD) enforces the State Housing Element Law by requiring Housing Elements as part of every city's General Plan.

The City of Walnut General Plan 2021-2029 Housing Element was adopted in August of 2022 for the 2021-2029 planning period. For the 2021-2029 planning period, the City of Walnut was allocated a RHNA total of 1,293 residential units, including 427 for extremely low/very low income, 225 for low income, 231 for moderate income, and 410 for above moderate income households. Based on the projected, current, pending and approved projects in the City, a total of 518 units are underway and a total of 827 units are still needed, including 408 for extremely low/very low income, 190 for low income, 229 for moderate income, and zero (0) for above moderate income households. It is recommended that the City also include capacity to accommodate additional units above the RHNA requirement, pursuant to Senate Bill 166, also known as "No Net Loss." No net loss states that cities may not reduce potential housing capacity below the remaining RHNA requirements (RHNA – units built) through the planning period. The City of Walnut will provide at least a 10% buffer above the RHNA targets.

City of Walnut Community Profile

The Census defines a household as all persons occupying a housing unit. Families are a subset of households and include all persons living together who are related by blood, marriage, or adoption. Single households include persons living alone in housing units, but do not include persons in group quarters such as convalescent homes, dormitories, or rehabilitation facilities. As of December 2023, the average household population in the City of Walnut was 3.29 with a total of 8,908 housing units (City of Walnut 2023) as shown in Table 5.14-2, *City Household Characteristics*.

Table 5.14-2
City Household Characteristics

Total Households	Average Household Population
8,908	3.29
Source: City of Walnut, *Demographics;* 2023.	

Only 0.3% of the total population of Los Angeles County resides in the City of Walnut (SCAG 2019). As of the most recent count in January 2023, the City of Walnut's total population was 27,553 (CDF 2023). According to the California Department of Finance (CDF), the City of Walnut had a population of 27,721 in 2022 and 27,553 in 2023, representing a population decline of 0.6% (CDF 2023). The City of Walnut's population growth rate of 1.5% was also lower than the Los Angeles County growth rate of 8% between the years 2000 and 2018 (SCAG 2019). Between 2012 and 2040, the City of Walnut's population is estimated to grow by 4,000; the number of households is estimated to grow by 1,700; employment is estimated to grow by 1,500; and the employment/housing ratio is estimated to decrease marginally by 2% as shown in Table 5.14-3, *City Population, Housing and Employment Forecasts*.

Table 5.14-3
City Population, Housing and Employment Forecasts

Unit	2012	2020	2035	2040
Population	29,800	31,900	32,900	33,800
Households	8,700	9,800	10,100	10,400
Employment	8,400	9,100	9,600	9,900
Employment/Housing Ratio	0.97	0.93	0.95	0.95
Source: SCAG, *2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction,* Page 2; 2016.				

5.14.3 REGULATORY SETTING

FEDERAL

There are no federal population or housing regulations applicable to the Project.

STATE

Senate Bill 330 (SB 330) The Housing Crisis Act

Senate Bill 330 (SB 330) *The Housing Crisis Act*, which went into effect January 1, 2020 and expires in 2030, prohibits local jurisdictions from enacting new laws that would have the effect of reducing the legal limit on new housing within their borders or delaying new housing via administrative or other regulatory barriers. Key provisions of SB 330 include: (1) suspending enactment of local downzoning and housing construction moratoriums, and (2) requiring timely processing of housing permits following existing local zoning rules.

REGIONAL – SOUTHERN CALIFORNIA

Southern California Association of Governments

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 (MPO) for this region, which encompasses over 38,000 square miles. It serves as a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG develops, refines, and maintains SCAG's regional and small area socio-economic forecasting/allocation models. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law.

SCAG REGIONAL HOUSING NEEDS ASSESSMENT

The Regional Housing Needs Assessment (RHNA) process is part of the State of California's general planning process aimed at ensuring that every jurisdiction in California does its part in meeting the housing needs of the State's population. The RHNA process identifies the City's future housing needs resulting from projected growth in population, employment, and households. State law requires the update of General Plan Housing Elements every eight years.

For the City of Walnut's projection period of 2021 through 2029, the RHNA allocation is 1,293 units. Based on the projected, current, pending and approved projects in the City, a total of 518 units are underway and 827 units are still needed, including 408 for extremely low/very low income, 190 for low income, 229 for moderate income, and zero (0) for above moderate income households (City of Walnut 2022). It is recommended that the City also include capacity to accommodate additional units above the RHNA requirement, pursuant to SB 166, also known as "No Net Loss." No net loss states that cities may not reduce potential housing capacity below the remaining RHNA requirements (RHNA – units built) through the planning period. The City of Walnut will provide at least a 10% buffer above the RHNA targets. The City must also ensure the availability of residential sites at adequate densities and appropriate development standards to accommodate these units. The City's anticipated RHNA allocation and projection targets are summarized in Table 5.14-4, *Regional Housing Needs Allocation 2021-2029*.

Table 5.14-4
Regional Housing Needs Allocation 2021-2029

Income Category	RHNA Allocation	Pending/ Approved Units[1]	Remaining RHNA Allocation[2]	Percentage Met[2]
Extremely Low/Very Low Income	427	19	408	4.4%
Low Income	225	35	190	15.6%
Moderate Income	231	2	229	0.9%
Above Moderate Income	410	462	0	100%
Total	**1,293**	**518**	**827**	**36.0%**

Notes:
[1] Includes Additional Dwelling Units (ADUs).
[2] Above Moderate Income unit surplus of 52 units not accounted for in Totals because requirement met for that category.
Source: City of Walnut, *General Plan 2021-2029 Housing Element*; Adopted August 2022.

LOCAL

City of Walnut General Plan

HOUSING ELEMENT

The Housing Element is one of the seven General Plan elements mandated by the State of California. Sections 65580 to 65590 of the California Government Code contains the legislative mandate for the housing element. State law requires that the City's Housing Element consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement and development of housing (Section 65583). In addition, the housing element is required to identify adequate sites for housing, including rental housing, factory-built housing, and mobile homes, and shall make adequate provisions for the existing and projected needs of all economic segments of the community. The City of Walnut's Housing Element 2021-2029 was adopted in August 2022. Goals and policies within the Housing Element are not applicable to the proposed Project as they are relevant to higher-density residential zones (R-4 and R-5), affordable housing, existing residential neighborhoods, homebuying programs, and fair housing policies and programs.

5.14.4 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:

- PH-1: 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)?
- PH-2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

5.14.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT PH-1: Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The proposed Project would construct 27 single-family, detached housing units. Based on the City of Walnut's average household size of 3.29 persons per household, the Project is estimated to have 89 residents. The General Plan Land Use Map designates the Project area as Very Low Density. The proposed Project is consistent with the General Plan and the population increase generated by the Project would be accounted for in the City's General Plan growth projections and SCAG regional population forecasts; therefore, Project implementation would not result in unplanned population growth. Additionally, the Project would not construct any new roads or major infrastructure in locations that are not planned for growth; and therefore, would not induce substantial unplanned population growth in the Project area, either directly or indirectly.

Based on the 2023 population level of 27,553 persons, the additional population generated by the Project would be a 0.3% increase. This estimated population increase would be negligible and would be within the range of estimated future growth projections. The proposed Project would also provide housing opportunities to meet housing needs for future population growth.

The Project would also help meet the housing goals provided in California Senate Bill 330. California Senate Bill 330, "The Housing Crisis Act of 2019" establishes a statewide housing emergency to be in effect until January 2030 and acknowledges California is experiencing a housing supply crisis, with housing demand far outstripping supply. California needs an estimated 180,000 additional homes annually to keep up with population growth and includes a goal to construct 3.5 million new homes over the next seven years. Project implementation would contribute to meeting the state housing goals. Additionally, the Project is proposing housing units that could help retain a 10% buffer of single-family residential unit housing stock, consistent with the City of Walnut General Plan 2021-2029 Housing Element. Based on the analysis above, potential housing and population growth impacts associated with Project implementation would be less than significant.

Level of Impact Before Mitigation: Less than significant impact based on consistency with the General Plan, statewide planning goals, and characteristics of the proposed development.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT PH-2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The Project Site is on land previously occupied by the Brookside Equestrian Center, which closed in 2014 and is no longer operating. Currently, there are equestrian facilities such as two horse barns with stables, fenced riding rings, maintenance storage facilities, feed sheds, and a covered riding area. A single residence constructed as part of the stable is present onsite, but it is unoccupied and not constructed to current building standards. The proposed Project would remove all existing facilities and construct 27 new homes. Demolition of the existing unoccupied residence and construction of 27 new residential units would not constitute a significant impact. No homeowners or tenants would be displaced. Impacts are considered less than significant.

Level of Impact Before Mitigation: Less than significant impact based on the absence of existing occupied housing onsite and based on the proposed construction of 27 new homes.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.14.6 CUMULATIVE IMPACTS

Project implementation would not result in cumulative impacts to the community. The population increase to the area would be a negligible 0.3%. The Project would also result in a net-positive benefit to help meet the state of California's housing needs for Senate Bill 330.

Like this Project, related cumulative development Projects shown in Table 4-1, *Related Cumulative Projects*, would also be reviewed by the City of Walnut to determine if they are consistent with City of Walnut growth projections and if they are consistent with adopted state and City development standards, regulations, plans, and policies to minimize the physical effect of population growth on the environment. Therefore, the proposed Project, combined with related Projects, would not result in cumulatively considerable impacts to population and housing. Potential cumulative impacts on population and housing are considered less than significant.

Level of Impact Before Mitigation: Less than significant impact based on consistency with the General Plan, statewide planning goals, and characteristics of the proposed development.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.14.7 MITIGATION MEASURES

No mitigation measures are required for population and housing.

5.14.8 REFERENCES

California Department of Finance, Population and Housing Estimates for Cities, Counties, and the State — January 1, 2022 and 2023. May 1, 2023. Accessed December 14, 2023 at https://dof.ca.gov/forecasting/demographics/estimates-e1/.

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5.15 PUBLIC SERVICES

5.15.1 INTRODUCTION

This section provides a discussion and analysis of the proposed Project's potential impacts on public services. Existing public agencies that would provide services to the Project Site were identified and potential impacts to those agencies' facilities and operations were evaluated. Service letters received are provided in Appendix J (Public Service Correspondence).

5.12.2 ENVIRONMENTAL SETTING

EXISTING ONSITE FACILITIES

The Project Site consists of a total of 25.84 acres and is comprised of three parcels, currently occupied by the Brookside Equestrian Center, which closed in 2014 and is no longer operating. Presently onsite, there are equestrian related facilities such as three covered barns, a residence quarters, open-air stables, fenced corrals, maintenance storage facilities, feed sheds, one outdoor arena, one covered open-air arena, and one gazebo. The agencies and public services currently serving the Project Site and that would continue to serve the site with Project implementation are discussed below.

FIRE PROTECTION

The City of Walnut contracts with the Los Angeles County Fire Department (LACFD) for fire prevention, fire suppression, and emergency medical services. According to the City of Walnut General Plan Public Safety Element, the Project Site is not within a fire hazard severity zone. There are two fire stations in the City of Walnut. According to the City's Fire Station Boundaries Map, Fire Station No. 61 would continue to provide service to the Project Site. This station not only serves the City of Walnut as well as surrounding County areas, the City of Industry, and the City of Diamond Bar. Fire Station No. 61 responds to all emergencies, including accidents, fires, swift water rescues, and hazardous material spills. Fire Station No. 146 serves not only the City of Walnut, but Mt. San Antonio College, West Covina, Diamond Bar, and parts of Orange County. This station is known as a critical station and includes one fire engine and a barn-type structure to store the fire apparatus. Details about these stations are summarized in Table 5.15-1, *City of Walnut Fire Station Locations*.

Table 5.15-1
City of Walnut Fire Station Locations

Station Number	Address	Distance from Project Site	Staffing/Equipment
Station 61	20011 La Puente Road Walnut, CA 91789	Adjacent to Project Site	3-person Engine (basic life support) is staffed with a Captain, Fire Fighter Specialist, and Fire Fighter 2-person Paramedic Squad (advanced life support) is staffed with two Fire Fighter Paramedics
Station 146	20604 Loyalton Drive Walnut, CA 91789	1.5 miles	3-person Engine (basic life support) is staffed with a Captain, Fire Fighter Specialist, and Fire Fighter
Source: County of Los Angeles Fire Department, January 5, 2024.			

According to correspondence from the LACFD (2024), in 2023 there was a total of 1,399 incidents for Fire Station 61 and a total of 870 incidents for Fire Station 146. Fire Station 61 (adjacent to the Project Site) has an estimated emergency response time of less than 3:00 minutes and Fire Station 146 (approximately 1.5 miles) has an estimated emergency response time of 5:30 minutes. All new developments are subject to the Fire Department's Special Tax Assessment.

Los Angeles County Fire Department is also responsible for enforcing fire codes, providing fire inspections, implementing the Fuel Modification Plan Check Review, and assisting in planning and enforcing development standards for Very High Fire Hazard Severity Zones.

POLICE PROTECTION

According to the City of Walnut General Plan Public Safety Element, the City of Walnut contracts with the County of Los Angeles Sheriff's Department (LASD). The nearest police station is located at 21695 E. Valley Boulevard, approximately 1.9 miles away from the Project Site. This station serves the City of Walnut, City of Diamond Bar, Covina Hills, and unincorporated communities of Rowland Heights. Services from the department include patrols, criminal investigations, traffic enforcement, accident investigation, and tactical teams. Sheriff personnel provide crime prevention, bike patrol, volunteers on patrol, neighborhood watch, and substance base narcotics education.

SCHOOL SERVICES

Walnut Valley Unified School District (WVUSD) and Rowland Unified School District serve the City of Walnut. The two districts have in total one high school, one middle school, and five elementary schools. According to the City of Walnut General Plan Community Facilities and Infrastructure Element, the WVUSD would provide service to the Project Site. As shown in Table 5.15-2, *Project Area Schools*, there are six school sites within the City of Walnut that are less than two miles from the Project Site.

Table 5.15-2
Project Area Schools

Name School	Location	District	Distance from Project Site[1]	2023/2024 Enrollment	Available Capacity
Cyrus J. Morris Elementary	19875 East Calle Baja Drive	Walnut Valley Unified School District	1.7 miles	482	493
Vejar Elementary	20222 Vejar Road	Walnut Valley Unified School District	1.2 miles	643	658
Westhoff Elementary	1323 N Country Hollow Drive	Walnut Valley Unified School District	1.1 miles	661	688
Collegewood Elementary	20725 Collegewood Drive	Walnut Valley Unified School District	2.0 miles	606	640
Suzanne Middle School	525 Suzanne Road	Walnut Valley Unified School District	1.2 miles	1,169	1,200
Walnut High School	400 Pierre Road	Walnut Valley Unified School District	1.2 miles	2,140	3,000

Note: [1] Distances are approximated from vehicle travel routes between the proposed Project's and respective school's main entrance.
Source: Walnut Valley Unified School District; December 14, 2023.

Correspondence from WVUSD (2023), reported the generation rates to predict future population growth were 0.3550 students per single-family unit and 0.2 students per multi-family unit. WVUSD also reported that Cyrus J Morris Elementary, Suzanne Middle School, and Walnut High School are most likely to serve the Project Site. WVUSD is in design to add new classrooms at Cyrus J. Morris. These classrooms are expected to be paid for with development impact fees (and special reserve funds, if necessary). Additionally, WVUSD assesses fees against new development for school-related services. During preparation of this document, the District assessed $4.79 per square foot for residential and $0.78 for commercial/industrial development, subject to rate increases when the State Allocation Board adjusts those rates.

PARKS/RECREATION

The Project Site is currently unoccupied and does not contain designated parkland, open space, or active recreational facilities. According to the City of Walnut General Plan Conservation, Open Space, and Recreation Element, approximately 105.2 acres in the City are designated as public parks and 812.3 acres as open space areas. Of the 105.2 acres of parks, 76.5 acres include developed park space and 28.7 acres are undeveloped parkland in 12 public parks. The National Park and Recreation Association (NRPA) recommends a parkland acre per population standard ranging from three to five acres of parkland per 1,000 residents. According to the Conservation, Open Space, and Recreation Element, the General Plan land use policy accounts for 35,650 persons living in the City by 2040. If no additional parkland were to be acquired or developed in the future, the City of Walnut would have 2.95 parkland acres per 1,000 residents. According to the California Department of Finance (CDF), *Population Estimates for Cities, Counties, and the State* for January 1, 2022 and January 1, 2023, the City of Walnut had a population of 27,721 in 2022 and 27,553 in 2023 (CDF 2023). Based on Walnut's 2023 population, the City currently provides 3.82 parkland acres per 1,000 residents. A listing of park sites and facilities and their distance to the Project Site are shown in Table 5.15-3, *City of Walnut Park Facilities and Amenities*.

Table 5.15-3
City of Walnut Park Facilities and Amenities

No.	Parks	Park Acres	Facilities and Amenities (as of 2017)	Distance to Project Site
1	**Arroyo Park** 19891 Camino Arroyo	2.7	2 Covered picnic tables 1 Playground area 1 Barbeque grill	1.1 miles
2	**Butterfield Park** 19370 Camino Arroyo	4.4	1 Multi-purpose court 2 Covered picnic tables 1 Playground area 1 Back stop 1 Restroom 1 Barbecue grill	1.4 miles
3	**Country Hollow** Country Hollow Drive/ Parker Canyon	6.4	5 Picnic tables (2 covered) Exercise equipment	1.4 miles
4	**Creekside Park** 780 Creekside Drive	14.3	3 Baseball fields (3 lighted) 1 Restroom/snack bar 1 Playground area 8 Picnic tables 3 Barbecue grills 2 Park benches 1 Volleyball court 1 Exercise equipment area	1.0 miles

No.	Parks	Park Acres	Facilities and Amenities (as of 2017)	Distance to Project Site
5	**Heidelberg Park** 20406 Loyalton Drive	0.1	1 Covered picnic table 1 Playground area 1 Park bench	1.5 miles
6	**Lemon Creek Park** 130 Avenida Alipaz	2.8	12 Shaded picnic tables 2 Playground areas 3 Barbecue grills 1 Fire pit 1 Restroom Rowland Ranch House	1.2 miles
7	**Norm Ashley Park** 19711 Camino De Teodoro	0.4	2 Half Basketball courts 2 Covered picnic tables 1 Barbecue grill 6 Benches 1 Playground area	1.8 miles
8	**Snow Creek Park** 20633 Snow Creek Drive	9.5	1 Baseball field (lighted) 4 Covered picnic tables 2 Barbecue grills 1 Playground area 1 Restroom/snack bar	2.6 miles
9	**Suzanne Park** 625 Suzanne Road	13.7	4 Softball fields (2 lighted) 3 Restrooms 2 Snack bars 16 Picnic tables (8 covered) 6 Benches 1 Equestrian area 1 Playground area 6 Barbecue grills	1.4 miles
10	**Walnut Hills Park** 19475 Avenida Del Sol	2.0	2 Covered picnic tables 1 Playground area 1 Set volleyball poles	1.8 miles
11	**Walnut Ranch Park** 20101 Amar Road	16.9	9 Picnic tables 1 Restroom/snack bar 3 Lighted tennis courts 1 Playground area 3 Park benches 9 Bleachers 4 Lighted soccer fields	1.2 miles
11	**Walnut Ranch Park Expansion (Planned)** 20101 Amar Road	28.7	Aquatics Center Pool Community Center Outdoor amphitheater with lawn seating for 1,000 persons	1.2 miles
12	**Walnut Ridge Park** Morningside Drive Somerset Drive	3.3	Open lawn area Park benches	2.0 miles
Source: City of Walnut General Plan, *Conservation, Open Space, and Recreation Element*; Adopted May 9, 2018.				

Trails

The City's park system is supplemented by a regional network of open space and trails, specifically the Schabarum Skyline Trail, a 30-mile-long connector trail through open spaces and flood control channels extending from Covina to Whittier. The City of Walnut manages approximately 33 miles of trails. There are two general types of trails, "improved" and "wilderness" trails. Improved trails typically parallel City streets and have decomposed granite and may include protective railings. Wilderness trails contain unimproved dirt paths and typically run through open space areas and properties. As shown in the General Plan Figure C-8, *Trails Plan,* there are no existing designated trails in the Project Site, but a "proposed/planned trail" runs along Lemon Creek in the Project Site. If constructed, the proposed/planned trail would connect to existing improved trails on the northern and southern borders of the Project Site, that in-turn connect to the Schabarum Skyline Trail just west of the Project Site.

LIBRARY FACILITIES

The Los Angeles Public Library System serves the City of Walnut. The Walnut Library is 10,000 square feet and is located at 21155 La Puente Road, approximately 1.6 miles away from the Project Site. The Walnut Library underwent a one-million-dollar renovation in 2014.

5.15.3 REGULATORY SETTING

STATE

California Fire Code (Title 24, Part 9, California Code of Regulations)

The California Fire Code incorporates the Uniform Fire Code (UFC) with necessary California amendments. This Code prescribes regulations consistent with nationally recognized good practices for the safeguarding, to a reasonable degree, of life and property from the hazards of fire and explosion. It also addresses dangerous conditions arising from the storage, handling, and use of hazardous materials and devices; hazardous conditions in the use or occupancy of buildings or premises; and provisions to assist emergency response personnel.

California Building Code Title 24

Title 24 of the California Code of Regulations, also known as the California Building Code (CBC or Title 24), contains the design standards that govern the construction of buildings in California to "safeguard life or limb, health, property, and public welfare by regulation and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment." The 2022 edition of the CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance.

California Health and Safety Code (Sections 13000 et seq.)

This Code establishes State fire regulations, including regulations for building standards (also set forth in the CBC), 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.

California Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers

of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Government Code Section 65995 through 65998

California Government Code Section 65996 specifies that an acceptable method of offsetting a project's effect on the adequacy of school facilities is the payment of a school impact fee prior to the issuance of a building permit. Government Code Sections 65995 through 65998 set forth provisions for the payment of school impact fees by new development by "mitigating impacts on school facilities that occur (as a result of the planning, use, or development of real property" (Section 65996[a]). The legislation states that the payment of school impact fees "are hereby deemed to provide full and complete school facilities mitigation" under CEQA (Section 65996[b]).

Developers are required to pay a school impact fee to the school district to offset the increased demands on school facilities caused by the proposed residential development Project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

LOCAL

Walnut Municipal Code 3.16.010 County Fire Code

The City of Walnut has adopted the Los Angeles County Fire Code by reference as adopted by Ordinance No. 23-0008 of the County of Los Angeles, entitled "Fire Code, County of Los Angeles, 2023." The Fire Code is based on both the adopted sections of the 2022 California Fire Code and unadopted sections of the California Fire Code found in the 2021 International Fire Code.

City of Walnut General Plan

PUBLIC SAFETY ELEMENT

The following are relevant goals and policies from the City of Walnut General Plan Safety Element:

GOAL PS-1: Effective and comprehensive crime prevention/protection and fire services that respond to the community's safety needs.

Policy PS-1.3: Development Review. Engage the Los Angeles County Sheriff's Department in the review of development applications for security and public safety measures.

Policy PS-1.8: Environmental Design. 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.

GOAL PS-2: Minimized risks associated with wildland fires.

Policy PS-2.2: Development Review. Involve the Fire Department in the early design stage of all projects requiring public review to ensure Fire Department input and appropriate modifications and fire safe design is incorporated in future development.

Policy PS-2.12: Fire Flow. Consult with the Fire Department in reviewing new residential development projects to ensure new projects meet minimum fire-flow requirements identified under the California and Los Angeles County Fire Codes.

5.15.4 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 substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
  - PS-1: Fire protection?
  - PS-2: Police protection?
  - PS-3: Schools?
  - PS-4: Parks?
  - PS-5: Libraries?

5.15.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT PS-1: Would the project result in the need for additional fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The proposed Project would not result in the need for additional fire protection facilities. The Project would be consistent with the City's General Plan Land Use Designation as Very Low Density and the current zoning on the property is R.P.D. -28,500- 1.3 DU (Residential Planned Development, with a minimum 28,500 square foot lot size, and net acre density of 1.3 dwelling units per acre). The Project Site is currently unoccupied. Based on the City of Walnut's average household size of 3.29 persons per household, the Project would increase the population on the Project Site by an additional estimated 89 residents, as accounted for in the City's General Plan. Although the Project would be consistent with population projections in the General Plan, temporary construction activities and permanent operations (i.e., occupancy of the residences), could potentially increase the demand for fire protection and/or emergency services calls because of an increase in the number of people that would temporarily work and permanently live on the Project Site.

The City contracts with the County of Los Angeles Fire Department (LACFD) for fire prevention, fire suppression, and emergency medical services. The LACFD uses national guidelines of a 5-minue response time for the first arriving unit for fire and emergency medical response services and an 8-minute response for the advanced life support (paramedic) unit in urban areas. For non-emergency calls the response goal time is eight minutes. The Project would be located in the existing service area of LACFD and would not increase its coverage area. Fire Station 61 would be the closest fire station to the site (approximately 0.7 miles) and would provide service. Correspondence from LACFD estimated an emergency response time of less than three minutes to the Project Site from Fire Station 61 (LACFD 2024), which would be within the national guidelines.

Based on correspondence with the LACFD in January 2024, current staffing levels and department facilities are adequate at this time to serve the Project and there would be no need for construction of new fire

station facilities. In the event additional resources are needed, the property tax growth within the Project area would provide funding to meet new growth needs. All new developments are subject to the Fire Department's Special Tax assessment. Currently, the City of Walnut has an Insurance Services Office (ISO) rating of Class 2. ISO ratings are evaluated on the following four key areas using the Fire Suppression Rating Schedule: (1) emergency communication systems; (2) fire departments, covering personnel, capabilities, training, equipment, etc.; (3) water supply; and (4) community risk reduction. The ISO rating would remain the same with Project implementation (LACFD 2024).

In addition, the Project would be required to comply with applicable Los Angeles County Fire Department codes, ordinances, and regulations regarding fire prevention and suppression measures; fire hydrants and sprinkler systems; emergency access; and other similar requirements. Appropriate fire protection measures would be incorporated into the design of proposed Project buildings in accordance with the CBC and California Fire Code and the National Fire Protection Association (NFPA) standards. As part of the development review process, the City of Walnut would work with LACFD to ensure that fire safety issues are considered, including adequate street and driveway widths to provide access to sites and buildings to provide adequate sufficient clearances for fire suppression and other emergency access needs.

The LACFD also provided correspondence on August 25, 2022. The Land Development Unit reported access, water system, and final map requirements for the Project as described in the sections below.

ACCESS REQUIREMENTS:

- Access as noted on the Tentative and the Exhibit Maps shall comply with Title 21 (County of Los Angeles Subdivision Code) and Section 503 of the Title 31 (County of Los Angeles Fire Code), which requires an all-weather access surface to be clear to the sky.
- The Private Driveways required for access throughout the development shall be indicated on the Final Map as "Private Driveways and Fire Lanes". All required widths shall be clearly depicted.
- A construction bond is required for all Private Driveways within this development. Written verification of the posted construction bond shall be provided to the Fire Department prior to Final Map clearance.
- All proposed access roads within this development, such as public streets, private driveways used as private streets, cul-de-sacs, and fire lanes shall be designed to comply with the City of Walnut Department of Public Works and the Fire Department standards. Final street improvement plans shall be submitted to the Fire Department for review prior to final approval by the Department of Public Works.
- All proposed future buildings shall be placed such that a fire lane is provided to within 150 feet of all exterior walls of the first story. This measurement shall be designed to the Fire Department standards and shall be clearly depicted on the final design plans.
- Any onsite Fire Lanes shall provide a minimum paved unobstructed width of 20 feet, clear to the sky.
- Fire lanes exceeding a length of 150 feet that dead end, shall provide an approved Fire Department turnaround. All required Fire Department turnarounds shall be designed to the Fire Department standards and shall be clearly depicted on the final design plans.
- The gradient of the private driveways shall not exceed 15%. Any changes in grade shall not exceed 10% within a 10 feet distance of 5.7 degrees. Cross slopes and required Fire Department turnarounds shall not exceed 2% grades.

- Any change of direction within a Private Driveway shall provide a 32-foot centerline turning radius.
- All proposed bridges and/or elevated crossings shall be constructed and maintained in accordance with AADTHO HB-17 and designed to support a live load of 75,000 pounds as specified in the County of Los Angeles Fire Code and to the satisfaction of the City of Walnut Department of Public Works.
- All proposed vehicular gates shall be designed, constructed, and maintained in accordance with American Society for Testing Materials (ASTM) F2200 and UL 325 as specified in the County of Los Angles Fire Code. The vehicular gates shall provide an unobstructed width not less than 20 feet when fully open.

WATER SYSTEM REQUIREMENTS:

- All fire hydrants shall measure 6”x4” x 2-1/2” brass or bronze, conforming to current America Water Works Association (AWWA) standard C503 or approved equivalent, and shall be installed in accordance with the County of Los Angeles Fire Code.
- The required fire flow from the public fire hydrant for this development if the future single-family dwellings are less than 3,600 total square feet, is 1250 gallons per minute at 20 psi for a duration of 2 hours, over and above maximum daily domestic demand. If the future single-family dwellings are 3,601 total square feet or greater, the required fire flow for the public fire hydrant for this development shall be up to 4,000 gallons per minute at 20 pounds per square inch (psi) for a duration of 4 hours, over and above maximum daily domestic demand. The required fire flow may be reduced by the Fire Prevention Engineering Section during the architectural plan review process prior to building permit issuance.
- Vehicular access must be provided and maintained serviceable throughout construction to all required fire hydrants. All required fire hydrants shall be installed, tested, and accepted prior to construction.
- Install six fire hydrants as noted on the Tentative Map.
- Vehicular access must be provided and maintained serviceable throughout construction to all required fire hydrants. All required fire hydrants shall be installed, tested, and accepted prior to construction.
- Parking shall be restricted to 30 feet adjacent to any required public or private fire hydrant, 15 feet on each side measuring from the center of the fire hydrant. Adequate signage and/or stripping shall be required prior to occupancy.

FINAL MAP REQUIREMENTS:

- Access as noted on the Tentative and Exhibit Maps shall comply with Title 21 (County of Los Angeles Subdivision Code) and Section 503 of the Title 32 (County of Los Angeles Fire Code), which requires an all-weather access surface to be clear to the sky.
- The private driveways proposed as private streets for access throughout the development shall be labeled as “Private Driveway” on the Final Map. The proportion of the private driveway intended for fire apparatus access shall be identified as “Fire Land” on the Final Map. All widths and dimensions shall be clearly delineated with a reciprocal access agreement required for all private driveways. Compliance is required prior to the Final Map clearance.

- A construction bond is required for all private driveways within this development. Written verification of the posted construction bond must be provided to the Fire Department prior to Final Map clearance.
- Prior to Final Map clearance, provide written verification that the required six public fire hydrants have been bonded in lieu of installation.
- The proposed bridge and/or elevated crossing shall be constructed and maintained in accordance with American Association of State Highway and Transportation Officials (AASHTO) HB-17 and designed to support a live load of 75,000 pounds as specified in the County of Los Angeles Fire Code and to the satisfaction of the Fire Department for review prior to final approval by the City of Walnut Department of Public Works.
- Establish Covenants, Conditions, and Restrictions (CC&Rs) which grant access to the Consolidated Fire Protection District of Los Angeles County (Fire District), or other agencies as agreed to by the Fire District.

Based on the analysis above, compliance with City and LACFD codes, requirements, ordinances, regulations and payment of development impact fees would reduce potential impacts to fire protection services to less than significant. No mitigation is required.

Level of Impact Before Mitigation: Less than significant with compliance with City and LACFD codes, requirements, ordinances, regulations, and payment of development impact fees.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT PS-2: Would the project result in the need for additional police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The Project would not result in the need for additional police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Based on the City of Walnut's average household size of 3.29 persons per household, the Project is estimated to have 89 residents. The Project would increase the demand for police protection services with the additional homes and occupants. The Los Angeles County Sherriff's Department (LASD) would provide police protection services. The Project would be located in the existing service area of LASD and would not increase its service area. Correspondence with LASD on September 12, 2022, reported emergency calls have a projected ten-minute response. Additionally, priority calls are handled in a twenty-minute response time, and routine calls are handled in a sixty-minute response time. LASD reported no significant impacts are anticipated to be associated with the Project. LASD reported that additional calls for service would be generated; however, they would not impact the level of service. The nearest police station located at 21695 Valley Boulevard was recently upgraded and refurbished by Los Angeles County. LASD reported that until the number of deputies increases at the station, there would be no need for a new station. With compliance with the LASD code requirements and payment of applicable development impact fees, potential impacts associated with increased demands for law enforcement services would be less than significant. No mitigation is required.

Level of Impact Before Mitigation: Less than significant impact with compliance with the Los Angeles County Sheriff's Department Code requirements and payment of applicable development impact fees.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT PS-3: Would the project result in impacts to the availability of school facilities?

The Project Site is within the Walnut Valley Unified School District (WVUSD). As shown in Table 5.15-2, *Project Area Schools*, there are five school sites within the City of Walnut that are less than two miles from the Project Site. Pursuant to correspondence with WVUSD in December 2023, Cyrus J Morris Elementary, Suzanne Middle School, and Walnut High School are most likely to serve the Project Site. The WVUSD is in design to add new classrooms at Cyrus J. Morris. These classrooms are expected to be paid for with Developer Fees (and special reserve funds, if necessary). Based on the WVUSD student generation rates (0.3550 students per single-family home), the Project would generate an estimated 10 new students. The Project Applicant/Developer would be required to pay development impact fees prior to issuance of a building permit to offset WVUSD's cost of providing the incremental increase in demand for school services and facilities. During preparation of this document, WVUSD assessed $4.79 per square foot for residential development, subject to rate increases when the State Allocation Board adjusts those rates. The estimated costs reflect the WVUSD's estimate for land acquisition and construction costs, and also include anticipated costs for furniture, equipment, and technology. State law assumes that the developer's payment of school impact fees to the local school district, in an amount established by the school district, would address school capacity impacts. As a result, WVUSD does anticipate being able to accommodate the Project's estimated student population but the need for additional capacity is likely; however, with payment of developer impact fees and one-time funds from the state, the Project's potential incremental impacts on school services and facilities would be less than significant (WVUSD 2023). No mitigation is required.

Level of Impact Before Mitigation: Less than significant impact with payment of developer impact fees and one-time funds from the state.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT PS-4: Would the project result in impacts to the availability of parkland and recreational facilities?

The Project would not result in impacts to the availability of parkland or recreational facilities. The Project Site is currently unoccupied and does not contain designated parkland, open space, or active recreational facilities. Based on the City of Walnut's average household size of 3.29 persons per household, the Project would increase the population on the Project Site by an additional estimated 89 people, as accounted for in the City's General Plan. The Project would be consistent with the City's General Plan Land Use Designation as Very Low Density and the current zoning on the property as R.P.D. -28,500- 1.3 DU (Residential Planned Development, with a minimum 28,500 square foot lot size, and net acre density of 1.3 dwelling units per acre). Although the Project would be consistent with population projections in the General Plan, permanent operations (i.e., occupancy of the residences), could potentially increase the demand for parks and/or recreational facilities with the new occupants.

The City of Walnut maintains 12 outdoor public parks that are less than three miles from the Project Site. According to the City' General Plan, if no new parkland is created beyond the current 105.2 acres, the City would provide 2.95 parkland acres for the 35,650 residents projected to occupy the City by 2040. This ratio would be consistent with the National Park and Recreation Association (NRPA) recommendation of three

to five parkland acres per 1,000 residents. Based on Walnut's 2023 population (27,553), the City currently provides 3.82 parkland acres per 1,000 residents. The Project's additional population would not substantially reduce the City's existing parkland/open space to-resident ratio or the availability of parkland for other residents in the City. There would be adequate parkland available to serve the Project. To reduce the Project's potential cumulative impact on parklands, the Project would provide payment of applicable development impact fees (and/or parkland dedication) for parks and trails. These fees and/or parkland dedication would cover future parkland and recreation facility construction or expansion to accommodate cumulative increases in Walnut's population.

Additionally, the Project proposes construction and operation of "proposed/planned trails" within the Project Site and generally along Lemon Creek as shown in the General Plan Figure C-8, *Trails Plan*. The proposed trail would be improved per City standards at 10 feet wide and approximately 1,499 linear feet. Additionally, the Project would improve the connecting offsite trails at the northeast corner of Meadow Pass Road and the southwest corner near La Puente Road. The offsite trail would also be 10 feet wide and approximately 688 linear feet (refer to Figure 3-8, *Trails Plan*). The proposed trail improvements would be enhanced with the addition of designated passive open space along the trail system and Lemon Creek as shown previously in Figure 3-9, *Conceptual Open Space*. Based on the analysis above, potential impacts would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant based on existing and projected parkland available in the City, the size of the proposed development, payment of applicable development impact fees, and the proposed trail construction.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT PS-5: Would the project result in impacts to libraries?

The Project would not result in notable impacts to libraries. The Los Angeles Public Library System (Walnut Library) is expected to serve the proposed Project's residential population. The Project would increase the population on the Project Site by an additional 89 residents, as accounted for in the City's General Plan. This number of new residents is not anticipated to noticeably increase demand for library services. Additionally, in 2014 the 10,000 square feet Walnut Library underwent a one-million-dollar renovation. To reduce the Project's potential cumulative impact on library facilities, the Project would provide payment of development impact fees to help fund future acquisition or expansion of library facilities. With the payment of development impact fees, Project-specific and cumulative impacts on library facilities would be less than significant. No mitigation is required.

Level of Impact Before Mitigation: Less than significant based on the Project's projected number of future residents, the condition of the library serving the Project Site, and payment of applicable development impact fees.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.15.6 CUMULATIVE IMPACTS

The proposed Project and cumulative related development projects listed in Section 4.0, *Basis for Cumulative Impacts*, would receive fire protection from the Los Angeles County Fire Department

(LAFCD); police protection services from the Los Angeles County Sheriff's Department (LASD); recreational services provided by the City of Walnut's 12 parks, open space areas, and trail systems; and library services provided by the Los Angeles Public Library System, Walnut Library. As previously discussed, Project implementation would add an estimated 89 new residents to the area, which would incrementally increase the demand for these services and facilities; however, Project-specific direct and indirect impacts were determined to be less than significant based on the relatively small size of the proposed development (27 units) in the context of potentially impacted services and facilities; compliance with applicable laws, ordinances, and regulations; payment of applicable development impact fees; and design elements (i.e., proposed trail construction).

Cumulative development projects shown in Section 4.0, *Basis for Cumulative Impacts*, would also be evaluated for potential impacts to public services and be subject to all applicable agency reviews; laws, ordinances, and regulations; and payment of development impact fees. Therefore, the proposed Project, combined with related cumulative projects, would not result in cumulatively considerable impacts to public services. Impacts would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on the Project's incremental contribution to demand on public services and facilities.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.15.7 MITIGATION MEASURES

No mitigation measures are required for public services.

5.15.8 REFERENCES

City of Walnut, *City of Walnut General Plan*, adopted May 9, 2018.

City of Walnut Municipal Code, *Title 3 Public Health, Safety and Welfare, Chapter 3.16 Fire Prevention, 3.16.010 County Fire Code*. October 2023.

County of Los Angeles Fire Department, Ronald M. Durbin, Chief, Forestry Division, Prevention Services Bureau, written correspondence. August 25, 2022.

County of Los Angeles Fire Department, Ronald M. Durbin, Chief, Forestry Division, Prevention Services Bureau, written correspondence. January 5, 2024.

Los Angeles County Sherriff's Department, Sergeant Thomas Anderson, written correspondence. September 12, 2022.

State of California, Department of Finance, *E-1 Population Estimates for Cities, Counties and the State with Annual Percent Change — January 1, 2022 and 2023.* Sacramento, California. May 2023.

Walnut Valley Unified School District, Ron Thibodeaux, Director Secondary Education and Pupil Personnel Services, written correspondence. December 14, 2023.

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5.16 RECREATION

5.16.1 INTRODUCTION

This section discusses the proposed Project's potential impacts on parks and recreation. The information in this section is based on the Conservation, Open Space, and Recreation Element from the City of Walnut's General Plan. The analysis examines the existing and future parks and recreation opportunities in the Project vicinity and the Project's potential impacts on these resources.

5.16.2 ENVIRONMENTAL SETTING

The City of Walnut Department of Parks, Recreation and Community Services offers a wide range of recreational and leisure programs, services, and activities for the residents of Walnut and the surrounding communities. The City of Walnut designates approximately 105.2 acres as public parks and 812.3 acres as open space areas. The 105.2 acres includes 76.5 acres of developed park space and 28.7 acres of undeveloped parkland in 12 public parks. The parks and open spaces are distributed throughout the City and many are connected by more than 35 miles of trails. In planning for park space, many cities look to the National Park and Recreation Association (NRPA) for recommended standards. Historically, NRPA recommended a parkland acre per population standard ranging from three to five acres of parkland per 1,000 residents. With 105.2 acres of existing parkland, Walnut features approximately 3.82 parkland acres per 1,000 residents (based on a 2023 population of 27,553 according to the California Department of Finance (CDF 2023)). According to the Conservation, Open Space, and Recreation Element, the General Plan land use policy accounts for 35,650 persons living in the City of Walnut by 2040. If no additional parkland were to be acquired or developed in the future, the City of Walnut would have 2.95 parkland acres per 1,000 residents.

The Project Site is occupied by the former Brookside Equestrian Center, comprised of various equestrian related structures. The Project Site does not include any public property, parkland, or designated open space or trails according to review of the General Plan Figure COR-3 *Parks and Recreation* and Figure COR-4 *Trails Plan* (City of Walnut 2018). The nearest park to the Project Site is Arroyo Park, which is located within a 0.5-mile walk from the southern portion of the Project Site and is located at 19891 Camino Arroyo. Arroyo Park is approximately 2.7 acres and has two covered picnic tables, one playground area, and one barbeque grill. According to General Plan Figure COR-4, the Project Site is identified as having a designated "Proposed/Planned Trails" that would connect to existing "City Trails/Improved" if constructed.

5.16.3 REGULATORY SETTING

STATE

Quimby Act

The Quimby Act (Government Code Section 66477) allows local governments to require developers to dedicate land, donate conservation easements, or pay fees to fund parkland development.

LOCAL

City of Walnut General Plan

CONSERVATION, OPEN SPACE, AND RECREATION ELEMENT

The following are relevant goals and policies for the proposed Project:

GOAL COR-1:	Open spaces that are protected and managed for current and future generations to enjoy.
Policy COR-1.1:	Open Space Resources. Preserve and protect natural habitats, creeks, hillside areas for use by wildlife, for education, and for residents' passive enjoyment. Consider acquiring vacant parcels that can contribute to the network of open space for these purposes.
GOAL COR-11:	A vibrant park system that meets evolving community needs.
Policy COR-11.1:	Park System. Develop and maintain parks, recreational, and cultural facilities that reflect the broadest range of interests and that meet the needs, desires, and interests of the Walnut community.
Policy COR-11.5:	New Parks. Require that all new, large residential developments provide onsite park facilities, and ensure they provide connectivity to the existing Walnut trail system.
GOAL COR-12:	Comprehensive and connected trail system.
Policy COR-12.1:	Meeting Trail Needs. Maintain the City's extensive trail network to accommodate the diverse needs of the Walnut community.
Policy COR-12.3:	Trail Expansion. Require dedication or easements and construction of trails as part of the development review process, where appropriate.

5.16.4 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:

- REC-1: 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?
- REC-2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

5.16.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT REC-1: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The Project Site is within the vicinity of multiple park sites that provide a wide range of recreation amenities and an extensive network of existing multi-purpose/equestrian trails. Arroyo Park is the closest park (within 0.5 miles) to the Project Site. The Project Site is also centrally located within the City and within 3.0 miles of all public parks in the City. The City currently maintains a parkland/open space to resident ratio of approximately 3.82 parkland acres per 1,000 residents (based on a 2023 population of 27,553 according to the California Department of Finance (CDF 2023)). This ratio is within the National Park and Recreation Association (NRPA) recommended standard of three to five acres of parkland per 1,000 residents.

Based on the City of Walnut's average household size of 3.29 persons per household (Walnut 2023), the Project development is estimated to have 89 residents. This additional population would not notably increase the use of existing neighborhood and/or regional parks or other recreational facilities such that

substantial physical deterioration of the facility would occur or be accelerated. Due to Project location and available park and recreational resources within 3.0 miles of the Project Site, 89 additional residents would not substantially increase the demand for or use of Arroyo Park or other park facilities and open space areas in the City. The current parkland to resident ratio of approximately 3.82 parkland acres per 1,000 residents would also not change. Potential impacts would be considered less than significant.

The Project Applicant/Developer would also provide a payment of proportionate development impact fees (and/or parkland dedication, as applicable), for parks and trails to reduce the proposed Project's cumulative impact on parklands, in accordance with the Quimby Act. These fees would cover future parklands and recreation facilities construction or expansion to accommodate cumulative increases in population; therefore, the Project's incremental impact on park and trail facilities would be less than significant.

Additionally, the Project proposes a total of 12.2 acres of open space with recorded deed restrictions to preserve and maintain natural open space and Lemon Creek. Of the 12.2 acres, 9.5 acres of the open space would be owned by individual lot owners, but deed restricted to public trail and passive open space purposes. The existing unofficial trail that currently traverses the Project Site would be improved to City trail standards and offered for dedication to the City of Walnut as an officially designated trail. The trail would be maintained and operated by the City, adding more recognized recreational opportunities for residents in the area.

Level of Impact Before Mitigation: Less than significant based on the relatively small number of new residents (89), availability of existing facilities, and payment of applicable development impact fees.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT REC-2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The Project would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. As previously discussed, the Project proposes a total of 12.2 acres of open space with recorded deed restrictions to preserve and maintain natural open space along Lemon Creek. Of the 12.2 acres, 9.5 acres of the open space would be owned by individual lot owners, but deed restricted to public trail and passive open space purposes. The existing unofficial trail that currently traverses the Project Site would be improved to City trail standards and offered for dedication to the City of Walnut as an official trail. The trail would be maintained and operated by the City, adding more recognized recreational opportunities for residents in the area. This proposed expansion of recreational facilities is anticipated to improve the physical conditions of the open space areas and Lemon Creek on the Project Site with the removal of invasive plant species and the additional planting and maintenance of native species. The potential for adverse physical effects is considered less than significant.

Level of Impact Before Mitigation: Less than significant based on the nature of proposed activities.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.16.6 CUMULATIVE IMPACTS

As previously discussed, the Project development is estimated to have 89 residents, which would incrementally increase the demand for parks and trails in the City. The Project Applicant/Developer would provide a payment of proportionate development impact fees (and/or parkland dedication, as applicable), to reduce the proposed Project's cumulative impact on parklands, in accordance with the Quimby Act. These fees would cover future parklands and recreation facilities construction or expansion to accommodate cumulative increases in population; therefore, the Project's incremental impact on park and trail facilities would be less than significant.

Like the proposed Project, related cumulative development projects shown in Section 4.0, *Basis for Cumulative Impacts*, would also be evaluated for potential impacts on park and recreation facilities and would be required to meet park and open space requirements to reduce impacts. Therefore, the proposed Project, combined with related projects, would not result in cumulatively considerable park or recreation facilities impacts.

5.16.7 MITIGATION MEASURES

No mitigation measures are required for recreation.

5.16.8 REFERENCES

California Department of Finance (CDF), *Population and Housing Estimates for Cities, Counties, and the State — January 1, 2022 and 2023*. May 1, 2023. Accessed on December 14, 2023 at https://dof.ca.gov/forecasting/demographics/estimates-e1/.

City of Walnut, *City of Walnut General Plan*. Adopted May 9, 2018.

City of Walnut, *Demographics*. Accessed on December 14, 2023 at https://www.cityofwalnut.org/for-residents/city-facts/demographics.

5.17 TRANSPORTATION

5.17.1 INTRODUCTION

This section evaluates the proposed Project's potential impacts on transportation. The analysis in this section is based on the following technical reports:

- *Transportation Impact Study*, Linscott, Law & Greenspan, Engineers (LLG), April 28, 2025 (Appendix K1).
- *Collision Research Summary*, Linscott, Law & Greenspan, Engineers (LLG), February 6, 2024 (Appendix K2).

5.17.2 ENVIRONMENTAL SETTING

The Project Site is located within a well-established multi-modal transportation network maintained by the City of Walnut. The following sections provide an overview of the transportation infrastructure in the Project vicinity, including infrastructure which supports both motorized and non-motorized transportation modes.

NON-VEHICLE NETWORK

Non-vehicular transportation generally encompasses walking, biking, and other active transportation modes. Distinct facilities are often provided for these non-vehicular modes. Most prominently, paved sidewalks are typically provided to facilitate pedestrian travel outside of the roadway. In some cases, bicycle facilities such as painted bike lanes or separated bike paths are provided within the roadway in order to separate bike traffic from vehicular traffic. Roadways which are designed to prioritize non-vehicular transportation modes utilize complimentary non-vehicular infrastructure in order to promote comfortable, safe travel for both pedestrians and bicyclists. A review of the pedestrian and bicycle infrastructure provided in the vicinity of the Project Site is provided below.

Pedestrian System

Pedestrian infrastructure consists of facilities such as sidewalks, crosswalks, pedestrian signals, curb access ramps, Americans with Disabilities Act (ADA) compliant tactile warning strips, and curb extensions, among other things. Some of these pedestrian facilities are currently provided within the immediate Project study area. Sidewalks are currently provided along the north side of Meadow Pass Road, the east side of Lemon Avenue, the east side of San Vicente Road, and both sides of La Puente Road in the Project vicinity. Marked crosswalks, pedestrian signals, and curb ramps are provided at all of the signalized study intersections.

Bicycle System

Bicycle infrastructure consists of both facilities within the roadway as well as public bicycle parking spaces. The federal and state transportation systems recognize three primary bikeway facilities: Bicycle Paths (Class I), Bicycle Lanes (Class II), and Bicycle Routes (Class III). Bicycle Paths (Class I) are exclusive car free facilities that are typically not located within a roadway area. Bicycle Lanes (Class II) are part of the street design that is dedicated only for bicycles and identified by a striped lane separating vehicle lanes from bicycle lanes. Bicycle Routes (Class III) are preferably located on collector and lower volume arterial streets.

The closest existing facility in the Project vicinity is an east-west Class II bike lane on La Puente Road (from Nogales Street to Grand Avenue). The existing and proposed bicycle infrastructure in the City of Walnut and other unincorporated areas of Los Angeles County is illustrated in Figure 5.17-1, *Existing and Proposed Bikeways*.

Multi-Use Trail System

Multi-use trails for equestrians and hikers are also provided along portions of Meadow Pass Road, Lemon Avenue, San Vicente Road and La Puente Road. According to General Plan Figure COR-4, *Trails Plan*, the Project Site is identified as having a designated "Proposed/Planned Trails" that would connect to existing "City Trails/Improved" if constructed.

TRANSIT NETWORK

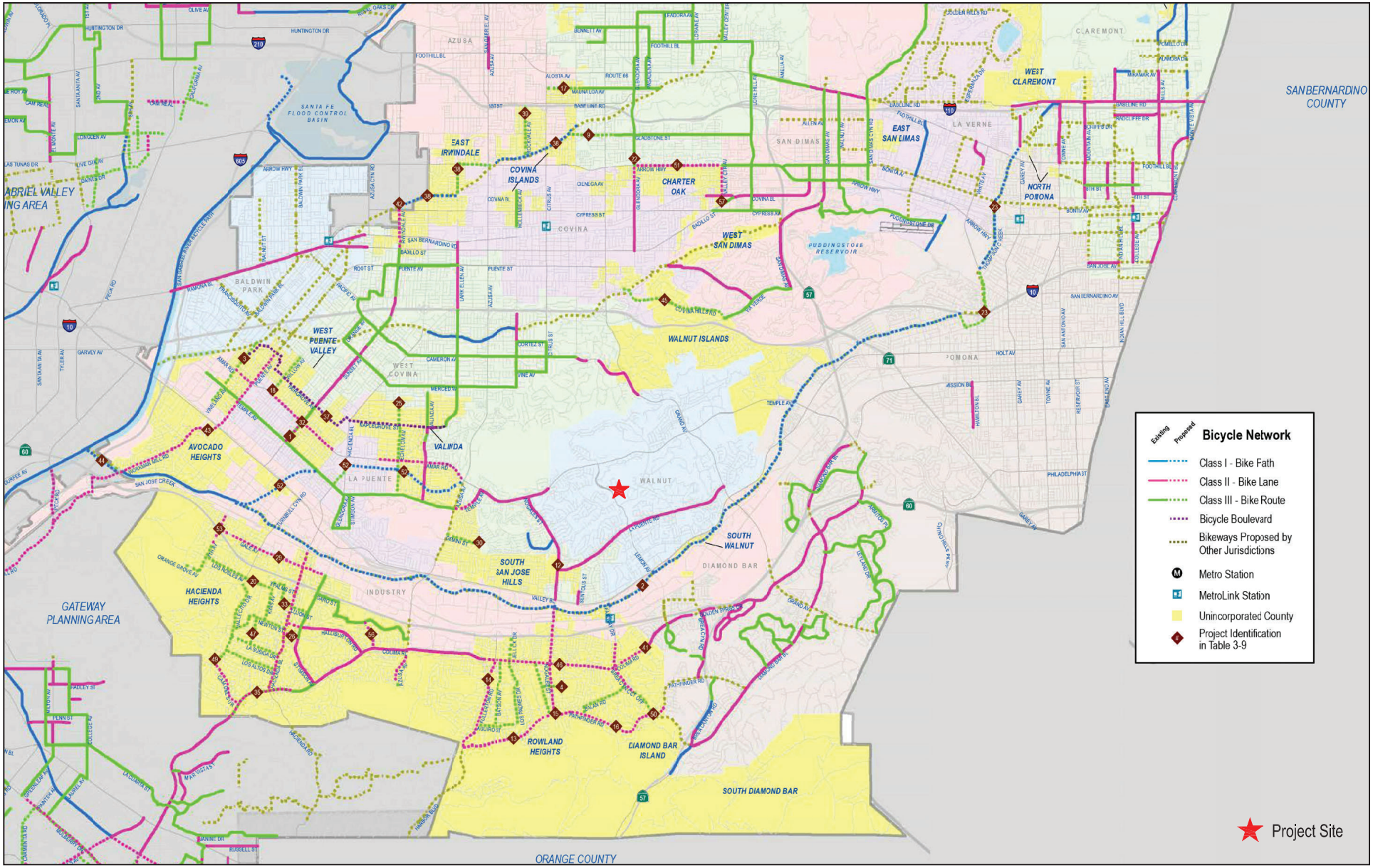
The Project Site is accommodated by Foothill Transit bus lines, which runs one line along La Puente Road and another line along Amar Road and Valley Boulevard at a frequency of approximately 15 to 60 minutes during weekday peak service and 30 to 60 minutes during Sunday mid-day service. The nearest bus stops for the Foothill Transit Lines provide signage and trash receptacles located along the north and south side of La Puente Road just west of Lemon Avenue.

VEHICLE NETWORK

Roadway Classifications

The City of Walnut utilizes the roadway categories recognized by regional, state and federal transportation agencies. There are four categories in the roadway hierarchy, ranging from freeways with the highest capacity to two-lane undivided roadways with the lowest capacity. The roadway categories are summarized as follows:

- Freeways are limited access and high-speed travel ways included in the state and federal highway systems. Their purpose is to carry regional through-traffic. Access is provided by interchanges with typical spacing of one mile or greater. No local access is provided to adjacent land uses.
- Arterial roadways are major streets that primarily serve through-traffic and provide access to abutting properties as a secondary function. Arterials are generally designed with two to six travel lanes and their major intersections are signalized. This roadway type is divided into two categories: principal and minor arterials. Principal arterials are typically four-or-more lane roadways and serve both local and regional through-traffic. Minor arterials are typically two-to-four lane streets that service local and commuter traffic.
- Collector roadways are streets that provide access and traffic circulation within residential and non-residential (e.g., commercial and industrial) areas. Collector roadways connect local streets to arterials and are typically designed with two through travel lanes (i.e., one through travel lane in each direction) that may accommodate on-street parking. They may also provide access to abutting properties.
- Local roadways distribute traffic within a neighborhood, or similar adjacent neighborhoods, and are not intended for use as a through-street or a link between higher capacity facilities such as collector or arterial roadways. Local streets are fronted by residential uses and do not typically serve commercial uses. Generally, travel lanes are not striped, and parking may be accommodated on one or both sides of the roadway.



Source: Linscott, Law & Greenspan, Engineers (LLG); January 24, 2024.

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Existing and Proposed Bikeways

VCS Environmental

Figure 5.17-1

Regional Highway System

Primary regional access to the Project Site is provided by the State Route (SR) SR-60 (Pomona) Freeway and the SR-57 (Orange) Freeway. The SR-60 is an east-west oriented freeway connecting downtown Los Angeles to the southerly San Gabriel and Pomona Valleys to the east. Located approximately 2.0 miles south of the Project Site, on- and off-ramps are provided at Lemon Avenue. The SR-57 is a north-south oriented freeway connecting the San Gabriel and Pomona Valleys to the north with Orange County to the south. Located approximately 2.0 miles south/southeast of the Project Site, on- and off-ramps are provided at Pathfinder Road.

Roadway Descriptions

The current roadway classifications and traffic control measures at each study area roadway and intersection are presented below:

Roadway Classifications

1. Amar Road – Minor Arterial
2. Lemon Avenue – Minor Arterial
3. Meadow Pass Road – Important Local Street
4. La Puente Road – Secondary Street
5. Valley Boulevard – Major Arterial
6. Colt Lane – Local Street

Intersection Traffic Control Measures

1. Lemon Avenue/Amar Road – Signalized
2. Lemon Avenue/Meadow Pass Road – Signalized
3. Lemon Avenue/La Puente Road – Signalized
4. Lemon Avenue/Valley Boulevard – Signalized
5. Colt Lane/Meadow Pass Road – Unsignalized

5.17.3 REGULATORY SETTING

FEDERAL

There are no transportation-related federal regulations applicable to the Project.

STATE

On December 28, 2018, the California Natural Resources Agency adopted revised CEQA Guidelines in accordance with SB 743, which changed the way transportation studies are conducted in CEQA documents. Vehicle miles traveled (VMT) replaced motorist delay and level of service (LOS) as the metric for determining level of impacts and significance under CEQA. Although LOS is no longer used to determine level of impacts to the circulation system under CEQA, this document includes a LOS discussion to inform interested parties.

COUNTY

Los Angeles County Congestion Management Program Status

The Los Angeles County Congestion Management Program (CMP) was previously a state-mandated program that primarily utilized a LOS performance metric. The provisions of the CMP are no longer applicable to any of the 89 local jurisdictions within Los Angeles County, and CMP traffic impact analysis is no longer required in Environmental Impact Reports.

San Gabriel Valley Council of Governments (SGVCOG)

In anticipation of the mandated change from LOS to VMT, the San Gabriel Valley Council of Governments (SGVCOG), of which the City of Walnut is a member agency, undertook the SGVCOG SB 743 Implementation Study to assist with answering important implementation questions about the methodology, thresholds, and mitigation approaches for VMT impact analysis in the member agencies. The City of Walnut utilized the information produced through the Implementation Study to adopt a methodology and significance thresholds for use in CEQA compliant transportation analyses. In alignment with the goals of SB 743, the City also requires an evaluation of a project's impact on the multi-modal pedestrian, bicycle, and transit network.

LOCAL

City of Walnut Transportation Study Guidelines

The City of Walnut has prepared the Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment (LLG, April 28, 2025). In compliance with the California Environmental Quality Act (CEQA) Sections 15064.3 and 15064.7, the City of Walnut has adopted Vehicle Miles Traveled (VMT) for the purpose of analyzing transportation impacts under CEQA. In addition, the City maintains vehicle LOS standards for local transportation infrastructure. Therefore, the Guidelines identify both CEQA based analysis requirements and non-CEQA based analysis requirements for analyzing the potential transportation impacts of proposed development projects. This DEIR includes the CEQA based analysis for determining potential impacts under CEQA. While the law specifies that VMT will be the baseline metric for future CEQA analysis, it allows local agencies to continue using LOS for purposes of long-term transportation planning. The Transportation Impact Study (Appendix K1) includes the non-CEQA based LOS analysis for informational purposes and for consistency with the General Plan.

City of Walnut General Plan

CIRCULATION ELEMENT

The City's Circulation Element of the General Plan sets forth actions and policies pertaining to active transportation, transit and public transportation, ensuring easy and convenient access to the regional facilities, bicycle routes and pedestrian facilities, among other things. Relevant adopted goals and policies from the Circulation Element include the following:

GOAL C-1:	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.
Policy C-1.1:	Complete Streets. Pursue and implement Complete Streets strategies to accommodate all users of different ages and abilities.
Policy C-1.3:	Modal Links. Use Complete Streets strategies to link residents to schools, parks, recreational facilities, important trailheads, the Walnut Civic Center, and mixed-use and commercial developments.
GOAL C-3:	Integrated and accessible trail system.
Policy C-3.1:	Increase Access and Maintain Trail System. Maintain and explore the possible expansion of the trail system as an integrated part of the transportation system that will eventually connect neighborhoods, major facilities, and new developments.

Policy C-3.2:	Identify Trail Gaps. Identify gaps in the trail system, including connections to local and regional systems. Work to develop new trails or improve existing ones to connect to other trails, neighborhoods, parks, schools, lifelong learning facilities, and major activities areas.
Policy C-3.6:	Equestrian Considerations. Continue to design trails and associated facilities for multipurpose functions, including equestrian use.
GOAL C-4:	Connected pedestrian and bicycle network.
Policy C-4.4:	Intersection Access. Strive to provide pedestrian and biking access at all intersection corners.
Policy C-4.5:	New Developments. Encourage to the greatest extent possible that new developments increase connectivity through direct and safe pedestrian and bicycling connections to the established network.
GOAL C-5:	Efficient, frequent, and convenient transit system.
Policy C-5.2:	Transit Amenities. Require that development projects include amenities to support public transit use, such as bus stop shelters, space for transit vehicles, and pedestrian amenities (trash receptacles, signage, seating, and lighting).

5.17.4 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:

- TRA-1: Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?
- TRA-2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
- TRA-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- TRA-4: Result in inadequate emergency access?

5.17.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT TRA-1: Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

IMPACT ANALYSIS PURSUANT TO CEQA

As described in Section 3.0, *Project Description*, the Project Site is planned to accommodate pedestrian, bicycle, vehicle, and equestrian access via sidewalks, multi-use trails and internal roadways, which would connect the Project Site to Meadow Pass Road and La Puente Road. The sidewalks and trails would also minimize the extent of pedestrian and bicycle interaction with vehicles at the Project Site and provide a comfortable, convenient, and safe environment, which in turn can encourage use of active transportation modes (LLG, April 28, 2025). The Project is therefore found to be consistent with the City's General Plan Chapter 3 Circulation goals and policies to promote pedestrian and bicycle safety and provide appropriate and supportive active multi-modal transportation infrastructure.

The Project is neither expected to affect access or safety at the existing bus stops, nor is it expected to hinder public transit service based on location and the relatively small scale of the development (27 homes). The Project is also not expected to preclude the City from constructing bicycle facilities or pursuing bicycle network improvements along local roadways within the study area. Project implementation would not prevent the City from completing any proposed transit, bicycle, or pedestrian facilities.

Since the Project is neither found to result in conflicts with adopted policies, plans, or programs, nor is it expected to negatively affect the performance or safety of existing or planned pedestrian, bicycle, or transit facilities, it is determined that the Project would have a less than significant impact on active transportation and public transit in the Project vicinity. The Project is also not anticipated to negatively impact or conflict with existing roadways in the Project vicinity. All internal roadways would be designed to meet City street classification and design standards for "Local Streets". In addition, the Project is anticipated to improve opportunities for multi-modal and active transportation by constructing and designating onsite trails that are open to the public and would connect to existing public trail facilities. Impacts are considered less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on review of the Project Description in the context of transportation facilities within the Project vicinity.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT TRA-2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

VEHICLE MILES TRAVELED (VMT) GUIDELINES

The State of California Governor's Office of Planning and Research (OPR) issued proposed updates to the CEQA Guidelines in November 2017 that amended the Appendix G question for transportation impacts to delete reference to vehicle delay and level of service (LOS) and instead refers to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project would result in a substantial increase in vehicle miles traveled (VMT). The California Natural Resources Agency certified and adopted the revisions to the CEQA Guidelines in December of 2018, and as of July 1, 2020, the provisions of the section were in effect statewide.

The City of Walnut is a member agency of the San Gabriel Valley Council of Governments (SGVCOG). As a member agency of the SGVCOG, the City of Walnut utilized the information produced through SGVCOG's SB 743 Implementation Study to adopt a methodology and significance thresholds for use in CEQA compliance. The City of Walnut has adopted VMT as the metric for determining environmental impacts and released its Transportation Study Guidelines on Vehicle Miles Traveled and Level of Service Assessment, dated October 2020 (LLG, April 28, 2025). The guidelines outline the specific steps for complying with CEQA VMT analysis. The guidelines have established screening criteria pertaining to project trip generation forecasts, project land use types (i.e., local serving retail, affordable housing, etc.), proximity to transit, and locality within a low VMT-generating area.

VMT SCREENING CRITERIA

The City of Walnut has adopted three (3) screening criteria that may be applied to screen proposed projects out of detailed VMT analysis. These criteria include location within a Transit Priority Area (TPA), location within Traffic Analysis Zones (TAZ) with low VMT, and project type. The Project was determined not to meet

the TPA or TAZ low VMT screening criteria. The Project was also determined to not fully meet the project type screening criteria. Therefore, a detailed VMT analysis was prepared and is summarized below.

VMT THRESHOLDS

As outlined in the City's guidelines, a project would result in a significant project-generated VMT impact if either of the following conditions are met (LLG, April 28, 2025):

- The baseline project-generated VMT per service population exceeds the City of Walnut baseline VMT per service population, or
- The cumulative project-generated VMT per service population exceeds the City of Walnut baseline VMT per service population.

The City's baseline VMT for the SGVCOG subarea as described in the Guidelines utilizes the 2016 SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Baseline VMT per service population thresholds used in the SGVCOG VMT Evaluation Tool are interpolated to be consistent with the year that the transportation study begins as outlined in the Scoping Document, which in this case is Year 2023 but is now updated to 2025. According to the SGVCOG VMT Evaluation Tool, the proposed Project is located in TAZ 22385100. The residential baseline VMT for the year 2025 is 37.02 total VMT per service population. Therefore, a significant transportation impact would result if the Project exceeds 37.02 total VMT per service population.

PROJECT BASELINE VMT ANALYSIS

The Project's total VMT per service population was forecast using the SGVCOG VMT Evaluation Tool. The Project is forecast to generate 35.27 total VMT per service population, which is below the City's significance threshold of 37.02 total VMT per service population. Therefore, the proposed Project is not expected to result in a significant VMT impact. Impacts are considered less than significant, and no mitigation is required.

PROJECT CUMULATIVE VMT ANALYSIS

A project's cumulative impacts are determined on the basis of whether the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of current projects, and the effects of probable future projects. The City's Guidelines state that short-term effects are evaluated in the detailed project-level VMT analysis, while long-term or cumulative effects are determined through consistency with SCAG's current 2020-2045 RTP/SCS, which is called Connect SoCal (LLG, April 28, 2025). Connect SoCal is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets. As such, projects that are consistent with this plan in terms of development location, density, and intensity are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Developments in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, if a project does not demonstrate a significant impact in the project impact analysis, a less than significant impact in the cumulative impact analysis can also be determined. Projects that fall under an efficiency-based impact threshold (e.g., residential VMT per capita, employment VMT per employee, or total VMT per service population) are already shown to align with the long-term VMT and greenhouse gas reduction goals. Land use projects that demonstrate a project-level impact and that are not found to be consistent with the SCAG RTP/SCS could have a significant transportation impact.

OPR's Technical Advisory provides the following additional discussion of cumulative impacts: "(m)etrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator (LLG, April 28, 2025). A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice-versa." Based on the above Project-related VMT analysis, no cumulative VMT impacts are anticipated. Impacts are considered less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on results of the VMT analysis.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT TRA-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Project proposes residential development within a residential area of the City that is zoned for Residential Planned Development. The Project's proposed multi-use trail system and roadways would connect to existing trail systems and roadway infrastructure. No incompatible uses are proposed.

SIGHT DISTANCE REVIEW

To ensure the Project would not create an unsafe design feature, the adequacy of sight distance at the Project's primary access roadway (Street "A") with Meadow Pass Road was reviewed as part of the Transportation Impact Study (Appendix K1). A sight distance review was not required for the Project Site's secondary access at San Vicente Road and La Puente Road that would provide access to three (3) proposed residences because it is an existing intersection with access to other existing single-family residential units in the area.

The sight distance analysis was prepared to determine the adequacy of motorists' lines of sight and focused on the eastbound and westbound approaching vehicles on Meadow Pass Road as well as vehicles exiting the Project Site from proposed Street "A" (i.e., intersection sight distance). Stopping sight distance is the distance that a driver of a vehicle, traveling at a certain speed, can bring the vehicle to a stop after an object on the road becomes visible. Sight distance is also provided for intersections (including private streets and driveways) to allow the drivers of stopped vehicles a sufficient view of the intersecting roadway to decide when to enter the intersecting roadway or to cross it. If available, sight distance for an entering or crossing vehicle is at least equal to the appropriate stopping sight distance for the major roadway, then drivers have sufficient sight distance to anticipate and avoid collisions.

According to the Transportation Impact Study, a design speed of 35 miles per hour would require a minimum stopping sight distance of 250 feet and an intersection sight distance of 390 feet for passenger cars. Meadow Pass Road provides one travel lane in each direction along with a two-way/left-turn lane and is posted for a speed limit of 35 miles per hour in the Project vicinity. Adjustments were made to account for the additional two-way/left-turn lane for this portion of Meadow Pass Road. As such, the minimum adjusted intersection sight distance of 412 feet for passenger cars was utilized for the sight distance analysis.

Figure 5.17-2, *Intersection Sight Distance Meadow Pass Road Project Driveway*, provides a conceptual plan of the Project Driveway/Meadow Pass Road intersection and displays the minimum required intersection sight distance (i.e., 412 feet) utilizing a design speed of 35 miles per hour on Meadow Pass Road. As illustrated in Figure 5.17-2, when an exiting motorist's vehicle (i.e., front bumper) is placed such that it is 15 feet from the edge of the travel way to the motorists' eye, a line of sight to meet the stated minimum does not currently exist for motorists exiting the Project Site from proposed Street "A". As shown in Figure 5.17-2, some of the existing shrubs and tree branches located along the south side of Meadow Pass Road, west and east of the Project driveway, currently obstruct the line of sight. The line of sight should be clear of any tall landscaping, signage, or objects (i.e., be less than 36 inches in height) to maintain a clear line of sight between exiting motorists and oncoming motorists.

Based on existing conditions, adequate site distance is not currently maintained at the Project's primary access roadway (Street "A") with Meadow Pass Road; however, adequate site distance can be achieved with landscape trimming. In addition, the installation of advance intersection/driveway warning signage on Meadow Pass Road is also recommended, subject to the review and approval of the City Public Works Department, to indicate the presence of an intersection/driveway further ahead (LLG, April 28, 2025). With the trimming of the existing vegetation, adequate intersection sight distance would exist between exiting motorists at the Project driveway and oncoming (approaching) vehicles in both the eastbound and westbound directions on Meadow Pass Road. In addition, the City Public Works Department may also determine the need for advanced intersection/driveway warning signage on Meadow Pass Road based on roadway design standards and requirements. Therefore, Mitigation Measure TRA-1 is required for the Project. No additional mitigation measures are required.

COLLISION DATA ANALYSIS

Collision data in the Project vicinity was reviewed to determine if the Project would contribute to an adverse impact regarding roadway safety. A summary of the findings is presented in this section and the full analysis is included in Appendix K2, *Collision Research Summary* (LLG, February 6, 2024). Collision data was requested from the California Highway Patrol's (CHP) Statewide Integrated Traffic Records System (SWITRS) in November 2023 for the City of Walnut. Collision data were requested for the most recent five (5) year period. According to SWITRS, data from seven (7) months prior to the date of request should be considered incomplete due to a collision records processing backlog. Therefore, for the purpose of this collision review, the most recent five-year period was assumed to include April 1, 2018 through March 31, 2023. Collisions which occurred from April 1, 2023 to the date of request were included for informational purposes.

The collision records were reviewed to identify collisions that occurred adjacent to the Project Site along Meadow Pass Road, Lemon Avenue, and La Puente Road. Collisions were also reviewed at the intersections of Lemon Avenue/Meadow Pass Road, Lemon Avenue/La Puente Road and San Vicente Road/La Puente Road. Overall, the primary collision trend documented in the Project vicinity was that of single vehicles colliding with fixed objects along Lemon Avenue. These collisions occurred during daylight and in the dark and involved vehicles traveling in both northbound and southbound directions. The secondary collision trend was that of vehicles "running a red light" at the Lemon Avenue/La Puente Road intersection, which involved vehicles traveling in the eastbound and northbound directions.



Source: Linscott, Law & Greenspan, Engineers (LLG); January 24, 2024.

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Intersection Sight Distance Meadow Pass Road Project Driveway

VCS Environmental

Figure 5.17-2

No vehicular or pedestrian access to the Project Site is proposed along Lemon Avenue. Development of the community would not change the existing roadway conditions along this roadway segment; therefore, it is anticipated that the Project would have no effect on the existing collision trends or safety on Lemon Avenue. Similarly, the Project would not change the existing intersection conditions and is therefore not expected to have any effect on the frequency of "red light running" at the Lemon Avenue/La Puente Road intersection. Based on this analysis, the Project would not create adverse roadway safety conditions or contribute to an adverse impact regarding roadway safety. Potential impacts would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Potentially significant inadequate motorist sight distance at the Project's primary access intersection (proposed Street "A"/Meadow Pass Road) based on existing vegetation.

Mitigation Measures: Mitigation Measure TRA-1 described in Section 5.17.7 is required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT TRA-4: Result in inadequate emergency access?

Temporary construction activities associated with roadway connection to Meadow Pass Road and the extension of infrastructure into the Project Site could result in temporary partial lane closures. As part of the construction coordination for the Project, the Applicant/Developer would be required to coordinate with the City of Walnut to implement traffic control measures necessary to maintain emergency vehicle access during construction. With compliance with the City of Walnut traffic control requirements, potential short-term traffic impacts associated with emergency vehicle access would be less than significant, and no mitigation is required.

Regarding operations and permanent occupation of the Project Site, the proposed residential development would not generate a substantial amount of traffic that would cause congestion or queuing along Project area roadways, which could adversely affect emergency access to the Project Site or within the Project vicinity, based on review of the Project's Transportation Impact Study (Appendix K1). The Project Site would include two access points for emergency vehicles, (1) at the intersection of Meadow Pass Road and proposed Street "A" and (2) at the intersection of La Puente Road and San Vicente Road. The Project also proposes an internal emergency access gate between proposed Street "A" and proposed Street "B" as shown on the *Tentative Tract Map* (Figure 3-6). The Project would be required to design, construct, and maintain structures and access ways in compliance with local, regional, and state requirements related to emergency vehicle access. The County of Los Angeles Fire Department and County of Los Angeles Sheriff's Department would review and ensure that adequate emergency vehicle access and adequate emergency response times are maintained. Correspondence with the Los Angels County Fire Department and Sherriff's Department conducted during preparation of this document indicated there would not be emergency access issues based on their review of the *Tentative Tract Map* (Figure 3-6). Compliance with local, regional, and state requirements related to emergency vehicle access would reduce potential operational emergency access impacts to less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on results of the Project's Transportation Impact Study and correspondence with County Fire and Sherriff's Departments.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.17.6 CUMULATIVE IMPACTS

As discussed in detail in Section 5.17.6, IMPACT TRA-2, the Project's total VMT per service population was forecast to generate 35.27 total VMT per service population, which is below the City's significance threshold of 37.02 total VMT per service population. In addition, Connect SoCal is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets. As such, projects that are consistent with this plan in terms of development location, density, and intensity are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. The proposed Project was determined consistent with Connect SoCal; therefore, impacts are considered less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on results of the VMT analysis.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.17.7 MITIGATION MEASURES

TRA-1 To maintain adequate motorist site distance, the Project Applicant/Developer or designee shall remove existing landscaping and/or install new landscaping to create a clear line of sight for vehicle movement at the proposed Street "A" and Meadow Pass Road intersection/ driveway. Prior to issuance of a building permit, the landscaping plan shall be reviewed and approved by the Community Development Department to ensure planting placement and species are appropriate to maintain a clear and unobstructed line of site at this location. The Project Applicant/Developer shall also construct or fund the construction of advance intersection/driveway warning signage on Meadow Pass Road, if determined necessary by the City Public Works Department based on City roadway design standards and requirements. If determined necessary, the signage shall be installed prior to issuance of a certificate of occupancy for any of the proposed homes.

5.17.8 REFERENCES

City of Walnut, City of Walnut General Plan. Adopted May 9, 2018.

Linscott, Law & Greenspan, Engineers (LLG), *Collision Research Summary, The Brookside (TTM 72798) Project*. February 6, 2024.

Linscott, Law & Greenspan, Engineers (LLG), *Transportation Impact Study, The Brookside (TTM 72798) Project*. April 28, 2025.

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5.18 TRIBAL CULTURAL RESOURCES

5.18.1 INTRODUCTION

This section evaluates the proposed Project's potential impacts on tribal cultural resources in the City of Walnut. Other potential impacts to cultural resources (i.e., prehistoric, historic, and disturbance of human remains) are evaluated in Section 5.5, *Cultural Resources*.

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

- *Phase 1 Cultural Resources Assessment*, VCS Environmental, September 2023 (Appendix E). Referred to in this Section as the "Cultural Report".

California Assembly Bill 52 (AB 52), Public Resources Code Section 21080.3.1, established a formal consultation process for California tribes within the CEQA process. AB 52 specifies any project that may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Public Resources Code Section 21074 of AB 52 also defines a new category of resources under CEQA called "tribal cultural resources." Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" and is either listed on or eligible for the California Register of Historical Resources (CRHR) or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.

The City of Walnut initiated tribal consultation for the purposes of AB 52 on March 26, 2024. As part of this process, the City provided formal, written notification via first class mail to each tribe requesting notification for purposes of AB 52. Notification included the opportunity to consult with the City regarding the Project's potential impacts to tribal cultural resource(s).

5.18.2 ENVIRONMENTAL SETTING

This section on environmental setting was adapted from the Cultural Report (Appendix E). At the time of European contact in 1769, when Gaspar de Portolá's expedition crossed the Los Angeles Basin, the Gabrielino Native Americans occupied the area around the Project Site. While the term Gabrielino identifies those Native Americans who were under the control of the Spanish Mission San Gabriel Archángel, the overwhelming number of people in these areas were of the same ethnic nationality and language (Takic) group. Their territory extended from northern Orange County north to the San Fernando Valley in Los Angeles County and eastward to the San Bernardino area.

This and the following ethnographic information relate to currently surviving native peoples still living in Los Angeles, Orange, San Bernardino, and Riverside Counties. They maintain their cultural practices and customs. The current Gabrielino comprise at least five bands that are recognized Tribes by the State of California (they do not enjoy Federal recognition, however). They include the Gabrieleño Band of Mission Indians – Kizh Nation; the Gabrielino Tongva Indians of California Tribal Council; the Gabrieleno-Tongva San Gabriel Band of Mission Indians; the Gabrielino-Tongva Tribe; and the Gabrielino/Tongva Nation. The terms the Native Americans in Southern California used to identify themselves have, for the most part, been lost; therefore, the names do not necessarily identify specific ethnic or Tribal groups. Some currently refer to themselves as *Tongva*, while others prefer the term *Kizh*. For the sake of clarity and consistency, the term Gabrielino will be used for the remainder of this section.

As described above, the Gabrielino arrived in the Los Angeles Basin possibly as early as 1,500 BCE as part of the so-called Shoshonean (Takic speaking) Wedge from the Great Basin region. The Gabrielino gradually displaced the indigenous peoples, who were probably Hokan speakers. Large, permanent villages were established in the fertile lowlands along rivers and streams and in sheltered areas along the coast. Eventually, Gabrielino territory encompassed the greater Los Angeles Basin, coastal regions from Topanga Canyon in the north to perhaps as far south as Aliso Creek, and the islands of San Clemente, San Nicholas, and Santa Catalina. Recent studies suggest the population may have numbered as many as 10,000 individuals at their peak in the Precontact Period. According to the Cultural Report (Appendix E), the Gabrielino are considered, ". . . to have been the most advanced group south of Tehachapi, except perhaps the Chumash. They certainly were the wealthiest and most thoughtful of all the Shoshoneans of the State, and dominated these civilizations wherever contacts occurred."

SETTLEMENT

The Gabrielino are, in many ways, one of the least known groups of California's native inhabitants. In addition to much of the Los Angeles Basin, they occupied the offshore islands of Santa Catalina, San Nicolas, and San Clemente. Gabrielino populations are difficult to reconstruct; however, at any one time, as many as 50 to 100 villages were simultaneously occupied. Like the prehistoric culture before them, the Gabrielino were a hunter/gatherer group who lived in small sedentary or semi-sedentary groups of 50 to 100 persons, termed rancherias. These rancherias were occupied by at least some of the people all of the time. Location of the encampment was determined by water availability. Houses were circular in form and constructed of sticks covered with thatch or mats. Each village had a sweat lodge as well as a sacred enclosure. Although the earliest description of the Gabrielino dates back to the Cabrillo expedition of 1542, the most important and extensive accounts were those written by Father Gerónimo Boscana about 1822 and Hugo Reid in 1852. Most of the Gabrielino villages were abandoned around 1805 due to rapid decline from European-introduced diseases.

The Project Site is located near the village of *Shevaanga*, one of four important Gabrielino communities in the north-central part of the San Gabriel Valley that shared a common Gabrielino dialect. The area was chosen as the location of the second Mission San Gabriel Archángel in 1775, likely because soils there were better suited to agricultural development. The original mission, constructed in 1771, was a short distance to the south, in the Whittier Narrows area; at the time a productive marshland formed by the confluence of the Rio Hondo and San Gabriel rivers at the north end of the Puente Hills. The peoples living in this area referred to themselves as the Kizh or Kichireños.

SUBSISTENCE

Gabrielino subsistence relied heavily on plant foods, but was supplemented with a variety of meat, especially from marine resources. Food procurement consisted of hunting and fishing by men and gathering of plant foods and shellfish by women. Hunting technology included use of bow and arrow for deer and smaller game, throwing sticks, snares, traps, and slings. Fishing was conducted with the use of shell fishhooks, bone harpoons, and nets. Seeds were gathered with beaters and baskets. Seeds and other foods were stored in baskets. Seeds were prepared with manos and metates and/or mortars and pestles. Food was cooked in baskets coated with asphaltum, in stone pots, on steatite frying pans, and by roasting in earthen ovens.

TRADE

Most trade between settlements was through reciprocity (barter), indicated by strings of Olivella shell beads used as a medium of exchange throughout Southern California. Gabrieleno and Juaneño from the mainland probably traded trade beads, game, and plant foods in exchange for shell beads and steatite, and

plant foods from the islanders. Steatite artifacts along with fish, shell money, and animal pelts were traded by the mainlander Gabrieleno into the interior for seeds and deer skin. The Gabrieleno traded with the Serrano and the Cahuilla to the east. The Gabrieleno traded goods such as shell beads, dried fish, sea otter pelts, asphaltum, and steatite for goods such as salt, obsidian, deer hides, furs, and acorns. There is evidence of trade between the Arizona Hohokam and the Gabrieleno, probably with the Mojave people as middleman. *Glycymeri*s shell bracelets, ceramics, and blankets may have been exchanged for Pacific shells and shell beads.

RELIGION

Aside from shamanistic curing rituals, principal religious activity is related to the Chinigchinich cult that emphasized correct behavior as promulgated by a mythical figure, Chinigchinich. The Chinigchinich religion developed in Gabrieleno territory and spread southeast to the Juaneño/Luiseño, Cupeño, and Ipai. It is a cult that is tied into an older creation myth. Chinigchinich is said to be the giver of laws and the punisher for those who are disobedient. Shamans were given responsibilities to oversee the cult. It was an extensive system of polar opposites (duality) that are united under higher principals (unity). Male-Female dualism found in the creation myth is also present in the origin myth. Chinigchinich cult ceremonies included boys' puberty ceremonies using *toloache,* a drug made from Jimson Weed (*Datura stramonium*). During the vision quest, a personal protector or totemic animal was acquired. Such totems could be bear, coyote, crow, or rattlesnake. Other ceremonies were to obtain vengeance on enemies; to express thanks for victory; and to commemorate the dead. The focus of the ceremonies was a circular sacred enclosure (*Wankesh*) found in each village. The emphasis on male rites of passage and war may be a response to the increasing population and resultant competition for territory and access to resources. Or it may be a response to the arrival of the Spanish since the Chinigchinich religion seems to be of later (not prehistoric) origin.

Both inhumation (burial in a grave) and cremation were practiced by the Gabrieleno. During cremations, the goods and hut of the deceased were often buried with the person. Annual mourning ceremonies were held in the late summer for all who had died during the previous year. Clothes of the deceased and an image of the deceased were often burned at this time. Eagles were sacrificed for recently deceased chiefs.

SACRED LANDS FILE SEARCH

A positive Sacred Lands File Search and Tribal contacts list was received from the NAHC on January 5, 2023. The search found that sacred lands are located on or in the vicinity of the Project Site. The NAHC recommended that the Gabrieleño Band of Mission Indians – Kizh Nation be contacted regarding the positive finding.

The NAHC also provided a Tribal contacts list of local Tribes that may wish to consult on the Project. They included the following:

- Gabrieleño Band of Mission Indians – Kizh Nation; Andrew Salas, Chairperson
- Gabrieleno/Tongva San Gabriel Band of Mission Indians; Anthony Morales, Chairperson
- Gabrielino/Tongva Nation; Sandonne Goad, Chairperson
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame; Chairperson
- Gabrielino Tongva Indians of California Tribal Council, Christina Conley, Tribal Consultant and Administrator
- Gabrielino-Tongva Tribe; Charles Alvarez
- Santa Rosa Band of Cahuilla Indians; Lovina Redner, Tribal Chair
- Soboba Band of Luiseño Indians; Isaiah Vivanco, Chairperson
- Soboba Band of Luiseño Indians; Joe Ontiveros, Cultural Resources Department

5.18.3 REGULATORY SETTING

STATE

Assembly Bill (AB) 52/California Public Resources Code Section 21080.3.1

The Project is subject to the requirements of Assembly Bill (AB) 52/California Public Resources Code Section 21080.3.1. AB 52 is applicable to projects that have filed a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) or notice of a Mitigated Negative Declaration (MND) or Negative Declaration (ND) on or after July 1, 2015. The law requires lead agencies to initiate consultation with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project area and have requested such consultation, prior to determining the type of CEQA documentation that is applicable to the project (i.e., EIR, MND, ND). Significant impacts to "tribal cultural resources" are considered significant impacts to the environment.

For "tribal cultural resources," Public Resources Code Section 21074, enacted and codified as part of a 2014 amendment to CEQA through Assembly Bill 52, provides the statutory definition as follows:

"Tribal cultural resources" are either of the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    A. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
    B. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

To determine if such resources exist, under AB 52 (PRC §21080.3.1) lead agencies must consult with tribes that request consultation and must make a reasonable and good faith effort to mitigate the impacts of a development on such resources to a less than significant level. AB 52 allows tribes 30 days after receiving notification to request consultation and the lead agency must then initiate consultation within 30 days of the request by tribes.

California Public Resources Code Section 5097.9

California Public Resources Code Section 5097.9 states that no public agency or private party on public property shall interfere with the free expression or exercise of Native American Religion.

California Public Resources Code Section 5097.9–5097.991

California Public Resources Code Sections 5097.9–5097.991 provide protection to Native American historical and cultural resources, and sacred sites and identify the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods.

California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there will be no further excavation until the coroner has determined that the remains are not subject to provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible. The coroner will make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and has reason to believe that they are those of a Native American, he or she will contact, by telephone within 24 hours, the Native American Heritage Commission.

5.18.4 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 Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?
- TCR-2: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

5.18.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT TCR-1: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Project implementation would not cause an adverse impact to a known tribal cultural resource. As described in Section 5.5, *Cultural Resources,* the Project Site is not eligible for listing in the California Register of Historical Resources (CRHR) or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). The regional area, however, is known to contain historical and tribal cultural resources. AB 52 consultation conducted between the City of Walnut and the Gabrieleño Band of Mission Indians - Kizh Nation indicated that no known tribal cultural resources exist on the Project Site but that the Project Site is within the Kizh Nation's Ancestral Tribal Territory. Therefore, there would be the

potential that unknown tribal cultural resources could be present at the Project Site that could be encountered during excavation activities. To avoid potential impacts to unknown tribal cultural resources, the Project Applicant/Developer would be required to implement Mitigation Measures TCR-1, TCR-2 and TCR-3, which would require that a Native American monitor be onsite to observe ground disturbing activities, and to monitor for and manage the discovery of any tribal cultural resources, including human remains and burial goods, if encountered. These mitigation measures were incorporated at the request of the Kizh Nation. With implementation of Mitigation Measures TCR-1, TCR-2 and TCR-3, potential impacts to tribal cultural resources would be less than significant.

Level of Impact Before Mitigation: Potentially significant impact if tribal cultural resources are discovered during construction grading or excavation activities.

Mitigation Measures: Mitigation Measures TCR-1, TCR-2, and TCR-3 described in Section 5.18.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT TRC-2: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Project implementation would not cause a substantial adverse change to a known tribal cultural resource. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. As previously indicated, a record search, pedestrian survey conducted on the Project Site, and AB 52 consultation did not identify any known archaeological or tribal cultural resources on the Project Site. Although the Project Site is not located within a general area of sensitivity for prehistorical archaeology, the Project's grading activities could encounter native soils and could have the potential to encounter unknown archaeological tribal cultural resources. The Project Site is covered mostly by Quaternary alluvial sediments. The eastern side of the site, east of Lemon Creek, is underlain by the Soquel sandstone facies of the Monterey (Puente) Formation (Tms) and may interfinger with its La Vida Shale member (Tmlv) to the west. To avoid potential adverse impacts to tribal cultural resources that could be encountered during construction, Mitigation Measures TCR-1, TCR-2 and TCR-3 are required, which includes onsite monitoring by a tribal representative during construction earthwork activities. These mitigation measures were incorporated at the request of the Kizh Nation. With implementation of Mitigation Measures TCR-1, TCR-2 and TCR-3, potential impacts to tribal cultural resources would be less than significant.

Level of Impact Before Mitigation: Potentially significant impact if tribal cultural resources are discovered during construction grading or excavation activities.

Mitigation Measures: Mitigation Measures TCR-1, TCR-2, and TCR-3 described in Section 5.18.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

5.18.6 CUMULATIVE IMPACTS

To avoid significant impacts to unknown tribal resources that may be present on the Project Site, the proposed Project would require implementation of Mitigation Measures TCR-1, TCR-2 and TCR-3, which requires monitoring by a Native American monitor during earth disturbing activities and, if needed, halting construction activities and proper consultation with the Native American Heritage Commission if subsurface tribal cultural resources are found during construction, excavation, and/or other construction activities in the area. This would eliminate any potential loss of important tribal cultural resources that may be discovered at the Project Site. Compliance with Mitigation Measures TCR-1, TCR-2 and TCR-3 would ensure that a potential cumulative loss of tribal cultural resources from the Project would not occur. Therefore, the Project would not result in a cumulatively considerable contribution to impacts related to tribal cultural resources, and impacts would be less than significant.

Related cumulative projects in the area as described in Section 4.0, *Basis for Cumulative Impacts*, would also be required to comply with the provisions of AB 52, which would also reduce potential cumulative impacts to tribal cultural resources. Therefore, the Project, considered with the related cumulative projects, would not result in significant cumulative impacts.

Level of Impact Before Mitigation: Potentially significant impact if tribal cultural resources are discovered during construction grading or excavation activities.

Mitigation Measures: Mitigation Measures TCR-1, TCR-2, and TCR-3 described in Section 5.18.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

5.18.7 MITIGATION MEASURES

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.

Prior to issuance of grading permits, the Project Applicant/Developer shall provide evidence to the Community Development Department that a certified Registered Professional Archaeologist (RPA) has been contracted to implement a Cultural Resources Monitoring Program (CRMP) that addresses the details of all activities that must be completed and procedures that must be followed regarding tribal cultural resources associated with this Project. The CRMP document shall be provided to the Community Development Director or their designee for review and approval prior to issuance of the grading permit. The CRMP provides procedures to be followed and are to ensure that impacts on tribal cultural resources will not occur without procedures that would reduce the impacts to less than significant.

These measures shall include, but shall not be limited to, the following:

A. The Project Applicant/Developer 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 onsite and any offsite 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.

B. Archaeological Monitor - An adequate number of qualified monitors shall be present to ensure that all earthmoving activities are observed and shall be onsite during all grading activities for areas to be monitored including offsite improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist, in consultation with the Native American Monitor.

C. A copy of the executed monitoring agreement shall be submitted to the Lead Agency (City) prior to the early commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

D. The Archaeological Monitor or Native American Monitor will complete daily monitoring logs that will 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. Copies of the logs completed shall be provided to the City monthly, until completion of any ground disturbing activities. Monitor logs will identify and describe any discovered TCRs, 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.

E. Onsite tribal monitoring shall conclude upon one of the following (1) written confirmation to the Kizh from a designated point of contact for the Project Applicant/Developer, and verified by the City, 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 (note: completeness is anticipated to mean all soils have been turned and/or excavated to maximum depth in all work locations. Monitoring of stockpiling or backfilling material is not anticipated unless evidence is provided to the City that such material is sensitive); or (2) a determination and written notification by the Kizh to the Project Applicant and City that no future, planned construction activity and/or development/construction phase at the Project Site possesses the potential to impact Kizh TCRs.

TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial).

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will 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.

Subsequent to the discovery of a TCR, the Applicant/Developer or any successor in interest shall comply with the following for the life of the grading permit, and shall implement the following procedures:

1. All ground disturbance activities within 50 feet of the discovered tribal cultural resource shall be halted until a meeting is convened between the developer, the Project Archaeologist, the Native American tribal representative(s) from consulting

tribes (or other appropriate ethnic/cultural group representative), and the Community Development Director or their designee to discuss the significance of the find.

2. The Applicant/Developer shall call the Community Development Director or his/her designee immediately upon discovery of the tribal cultural resource to convene the meeting.

3. At the meeting with the aforementioned parties, the significance of the discoveries shall be discussed, and a decision is to be made, with the concurrence of the Community Development Director or his/her designee, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the tribal cultural resource.

4. Further ground disturbance shall not resume within the area of the discovery until a meeting has been convened with the aforementioned parties and a decision is made, with the concurrence of the Community Development Director or their designee, as to the appropriate mitigation measures.

TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

A. Native American human remains are defined in Public Resources Code Section 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.

B. If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then Public Resource Code Section 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code Section 5097.98(d)(1) and (2).

D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

5.18.8 REFERENCES

City of Walnut, *City of Walnut General Plan*. Adopted May 9, 2018.

VCS Environmental, *Brookside Residential Project Phase I Cultural Resources Assessment.* September 2023.

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5.19 UTILITIES AND SERVICE SYSTEMS

5.19.1 INTRODUCTION

This section evaluates the proposed Project's potential impacts on utilities and service systems. Utilities addressed in this section include water, wastewater, stormwater, and solid waste. This section identifies the existing conditions, which provide the necessary baseline information, and evaluates the potential impacts on those identified utilities and service systems, if the Project were to be implemented. This section is based in-part on service letters received from various utility providers, which are included in Appendix L, *Utility Provider Service Letters*.

5.19.2 ENVIRONMENTAL SETTING

WATER SERVICE

One public and two private water distributors provide water services and infrastructure to the City of Walnut. The Walnut Valley Water District (WVWD) serves the Project Site. The City of Walnut's local water system infrastructure consists of groundwater wells, natural underground storage basins, constructed reservoirs, booster pump stations, and transmission and distribution pipelines. The water supply is derived from local sources in the underlying basins and treated imported water through a contract with the Metropolitan Water District. Information for this section on *Water Service* is based in-part on the WVWD *2020 Urban Water Management Plan* (Stetson Engineers 2021).

Water Supplies

The Walnut Valley Water District is classified as an urban water supplier because it serves more than 3,000 customers and supplies more than 3,000 acre-feet. The WVWD relies on local groundwater and imported surface water sources to meet water demand in its area. The WVWD is projected to have a population of 106,038 by 2045. Projected water supplies for the WVWD's service area are shown in Table 5.19-1, *Projected Water Supplies*. As shown in Table 5.19-1, water supplies are projected to remain relatively consistent between 2025 and 2045, with an 845 acre-feet increase in supply for purchased or imported water and a 175 acre-feet increase in supply for recycled water. Water supplies for the other listed sources are projected to remain the same. Total supply increases are projected to be 1,020 acre-feet.

Table 5.19-1
Projected Water Supplies (acre-feet per year)

Water Supply	2025	2030	2035	2040	2045
Purchased or Imported Water (VMWD/MWD)	13,559	13,774	13,1996	14,199	14,404
Purchased or Imported Water (Main Basin)	2,500	2,500	2,500	2,500	2,500
Purchased or Imported Water (Six Basins)	625	625	6215	625	625
Groundwater (Central Basin)	1,000	1,000	1,000	1,000	1,000
Groundwater (Spadra Basin)	105	105	105	105	105
Groundwater (Puente Basin)	1,291	1,291	1,291	1,291	1,291
Recycled Water (Pomona Water Reclamation Plant)	2,093	2,136	2,179	2,223	2,268
Total	**21,173**	**21,431**	**21,696**	**21,943**	**22,193**

Note: All volumes are presented in acre-feet, consistent with the Urban Water Management Plan.
Source: Stetson Engineers, Inc., *Walnut Valley Water District 2020 Urban Water Management Plan, Table 6-9*; June 2021.

Water Demands

The WVWD provides water service to an area with a current population of 99,956. The projected water demands for different land uses (and Recycled Water) in the service area are shown in Table 5.19-2, *Land Use Water Demands*. As shown in Table 5.19-2, water demands between 2025 and 2045 are expected to increase by 580 acre-feet for Single-Family Residential uses (same land use as the Project) and increase by a collective total of 1,020 acre-feet across all land uses/source categories. Total supply is projected to equal total demand across all projected years.

Table 5.19-2
Land Use Water Demands (acre-feet per year)

Land Use/Source	2025	2030	2035	2040	2045
Single-Family Residential	12,108	12,256	12,408	12,547	12,688
Multi-Family Residential	1,792	1,814	1,836	1,857	1,877
Commercial	1,794	1,816	1,838	1,859	1,880
Industrial	263	266	269	272	275
Institutional/Governmental	700	708	717	725	733
Losses	1,009	1,021	1,034	1,045	1,057
Other	18	18	19	19	19
Recycled Water (non-potable)	3,489	3,532	3,575	3,619	3,664
Total	**21,173**	**21,431**	**21,696**	**21,943**	**22,193**

Note: All volumes are presented in acre-feet, consistent with the Urban Water Management Plan.
Source: Stetson Engineers, Inc., *Walnut Valley Water District 2020 Urban Water Management Plan, Table 4-2,* and *Table 4-3*; June 2021.

The Project Site currently uses both domestic and recycled water and only vegetation along the perimeters of the site and around the unoccupied residence quarters are irrigated. The Applicant provided water usage for years 2021, 2022, and 2023, which is summarized below in Table 5.19-3, *Existing Water Usage*. Over the past three years, the average yearly water usage for domestic and recycled water was 0.09 acre-feet and 2.56 acre-feet, respectively. The average daily water usage for domestic and recycled water was 82 gallons and 2,283 gallons, respectively.

Table 5.19-3
Existing Water Usage

Year	Acre-Feet Per Year		Gallons Per Day (Average)	
	Domestic Water	Recycled Water	Domestic Water	Recycled Water
2021 (12 Months)	0.07	4.27	66	3,808
2022 (12 Months)	0.06	2.25	55	2,004
2023 (12 Months)	0.14	1.16	127	1,037
Average	**0.09**	**2.56**	**82**	**2,283**

Source: Applicant (February 2024).

Urban Water Management Plan

Urban Water Management Plans (UWMP)s are required by the State of California Urban Water Management Planning Act of 1983 and the California State Water Code. The UWMPs provide water agencies with long-term planning efforts to meet future demands and track progress toward achieving state-mandated water conservation targets. In addition, the UMWP incorporates water supply reliability determinations resulting from potential prolonged drought, regulatory revisions, and/or changing climatic conditions. The UWMP provides the WVWD with a reliable management action plan for long-term resource planning to ensure adequate water supplies are available to meet existing and future water supply needs.

The UWMP includes a water supply and demand assessment that compares the total water supply sources available to the water supplier with the long-term total projected water use over the next 20 years, in five-year increments: for a normal water year, a single dry water year, and a drought lasting multiple consecutive water years. The water service reliability assessment is based on regional and local planning programs that provide population projections within the service area of the urban water supplier. The most recent UWMP for the WVWD was prepared in 2020 and subsequently adopted in 2021. Below is a comparison between the supply and demand within the WVWD's service area for the projected years between 2025 and 2045 under a normal water year, single dry year, and multiple dry years; refer to Table 5.19-4, *Normal Year Supply and Demand Comparison*, Table 5.19-5, *Single Dry Year Supply and Demand Comparison*, and Table 5.19-6, *Multiple Dry Years Supply and Demand Comparison*.

Table 5.19-4
Normal Year Supply and Demand Comparison (acre-feet per year)

Unit	2025	2030	2035	2040	2045
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

Note: All volumes are presented in acre-feet, consistent with the Urban Water Management Plan.
Source: Stetson Engineers, Inc., *Walnut Valley Water District 2020 Urban Water Management Plan, Table 7-2*; June 2021.

Table 5.19-5
Single Dry Year Supply and Demand Comparison (acre-feet per year)

Unit	2025	2030	2035	2040	2045
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

Source: Stetson Engineers, Inc., *Walnut Valley Water District 2020 Urban Water Management Plan, Table 7-3*; June 2021.
Note: All volumes are presented in acre-feet, consistent with the Urban Water Management Plan.

Table 5.19-6
Multiple Dry Years Supply and Demand Comparison (acre-feet per year)

Unit	2025	2030	2035	2040	2045
First Year					
Supply Totals	22,300	22,574	22,853	23,113	23,377
Demand Totals	22,300	22,574	22,853	23,113	23,277
Difference	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
Difference	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
Difference	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
Difference	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
Difference	0	0	0	0	0

Note: All volumes are presented in acre-feet, consistent with the Urban Water Management Plan.
Source: Stetson Engineers, Inc., *Walnut Valley Water District 2020 Urban Water Management Plan, Table 7-4*; June 2021.

As shown in the Tables above, the WVWD would have 100% water reliability in normal year, single dry year, and multiple dry years for years 2025 to 2045, because of diversified supply and conservation measures.

Water System Infrastructure

The Project Site is mostly undeveloped with domestic and recycled water facilities and distribution lines present onsite. There is an existing 8-inch water main along San Vicente Drive and La Puente Road and an existing 16-inch water main in Meadow Pass Road.

WASTEWATER SERVICE

Los Angeles County Sanitation District (LACSD) facilities provide sewer system services to the City of Walnut. Local sewer lines collect wastewater from indoor plumbing and convey it to larger regional pipes and ultimately to regional sewage treatment plants. The collection system consists of 91.3 miles of gravity sewer lines that discharge into the LACSD facilities for treatment and disposal. Wastewater generated in the City of Walnut is conveyed to the San Jose Creek Water Reclamation Facility in unincorporated Los Angeles County. According to the LACSD, the San Jose Creek Water Reclamation Plant consists of two hydraulically interconnected facilities that are situated on the east and west sides of the San Gabriel River. It currently provides primary, secondary, and tertiary treatment for a design capacity of 100 million gallons of wastewater per day (mgd) and serves a large residential population of approximately 1,000,000.

STORMWATER MANAGEMENT

Three public storm drain inlets along Meadow Pass Road at the northerly boundary of the Project Site currently direct offsite stormwater into and through existing public storm drain lines within the Project Site. The offsite stormwater then enters Lemon Creek through two existing outlets. These public storm drains, which do not capture onsite stormwater now and would not do so when the Project is complete, would be realigned under the Project streets. One of the existing outlets into Lemon Creek would remain in its current location, while the second would be relocated to a point downstream of the proposed Project bridge. Refer to Section 5.10, *Hydrology and Water Quality*, Figure 5.10-1, *Existing Onsite Watersheds Workmap*, which shows the existing hydrologic "Before Project" site conditions.

SOLID WASTE DISPOSAL

The City contracts with Valley Vista Services for solid waste pickup and recycling services. According to the California Department of Resources Recycling and Recovery Disposal Reporting System, the City of Walnut disposed of 26,532 tons of solid waste in 2020, 24,209 tons of solid waste in 2021, and 24,462 tons of solid waste in 2022 (CalRecycle 2024). Solid waste disposal for the Project Site would be provided at the El Sobrante Landfill or Lamb Canyon Sanitary Landfill.

UTILITY SERVICE SYSTEMS

Electricity

Southern California Edison (SCE) provides electricity to the City of Walnut, including the Project Site. SCE maintains substations and distribution lines in the region. In addition, Edison facilities include the Big Creek Hydroelectric Plant, the San Onofre Nuclear Generating Station, and the Mojave Generating Station. The nuclear plant has been permanently retired.

Natural Gas

Southern California Gas Company (SoCalGas) provides natural gas service to the City of Walnut and Project Site. As the nation's largest natural gas distribution utility, SoCalGas provides service to 21.1 million consumers through 5.9 million meters in more than 500 communities. Their service territory encompasses approximately 24,000 square miles in diverse terrain throughout Central and Southern California, from Visalia to the Mexican border.

Telecommunications

Numerous private local, wireless, and cellular phone service providers serve the area and the Project Site, though Frontier and AT&T are the primary telecommunications service providers.

5.19.3 REGULATORY SETTING

FEDERAL

Clean Water Act

The Federal Clean Water Act (CWA), enacted by Congress in 1972 and amended several times since is the primary Federal law regulating water quality in the United States and forms the basis for several state and local laws throughout the country. The CWA established the basic structure for regulating discharges of pollutants into the waters of the United States. The CWA gave the U.S. Environmental Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for

various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. Under the CWA, the USEPA is authorized to set wastewater standards and runs the National Pollutant Discharge Elimination System (NPDES) permit program. Under the NPDES program, permits are required for all new developments that discharge directly into Waters of the United States. The CWA requires wastewater treatment of all effluent before it is discharged into surface waters. As a part of the NPDES, the Municipal Storm Water Permitting Program (MS4) regulates storm water discharges from municipal separate storm sewer (drain) systems. Most of these permits are issued to a group of co-permittees (e.g., cities, counties, flood control districts) encompassing an entire metropolitan area. Water reclamation plants must also comply with their current NPDES Permit. At the federal level, the CWA is administered by the USEPA and the U.S. Army Corps of Engineers (USACE). At the state and regional levels in California, the CWA is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs).

Safe Drinking Water

The Safe Drinking Water Act (SDWA), administered by the USEPA in coordination with the California Department of Public Health (CDPH), is the main Federal Law that ensures the quality of drinking water. Under SDWA, EPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards. The primary objective of the federal SDWA is to ensure that water from the tap is potable (safe and satisfactory for drinking, cooking, and hygiene). The main components of the federal SDWA are to:

- Ensure that water from the tap is potable.
- Prevent contamination of groundwater aquifers that are the main source of drinking water for a community.
- Regulate the discharge of waste into underground injection wells pursuant to the Underground Injection Control program (see 40 CFR Section 144).
- Regulate distribution systems.

Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. Congress enacted RCRA to address the increasing problems the nation faced from its growing volume of municipal and industrial waste. RCRA was an amendment of the Solid Waste Disposal Act of 1965, which set national goals for:

- Protecting human health and the natural environment from the potential hazards of waste disposal.
- Energy conservation and natural resources.
- Reducing the amount of waste generated through source reduction and recycling.
- Maintaining environmental health standards.
- Ensuring the management of waste in an environmentally sound manner.

The RCRA program is a joint federal and state endeavor, with the USEPA providing basic requirements that states then adopt, adapt, and enforce. RCRA is now most widely known for the regulations promulgated under it that set standards for the treatment, storage, and disposal of hazardous waste in the U.S.

STATE

Urban Water Management Plan Act

The Urban Water Management Plan (UWMP) Act was passed in 1983 and codified as California Water Code Sections 10610 through 10657. Since its passage in 1983, the UWMP Act has been amended on several occasions. In 2004, the UWMP Act was amended to require additional discussion of transfer and exchange opportunities, non-implemented demand management measures, and planned water supply projects. In 2005, the UWMP Act was amended to require water use projections (required by California Water Code Section 10631) to include projected water use for single-family and multi-family residential housing needed for lower income households. In addition, Government Code Section 65589.7 was amended to require local governments to provide a copy of the adopted housing element to water and sewer providers. The UWMP Act requires "every urban water supplier providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually, to prepare and adopt, in accordance with prescribed requirements, an urban water management plan." Urban water suppliers must file these plans with the California Department of Water Resources every five (5) years describing and evaluating reasonable and practical efficient water uses, reclamation, and conservation activities. As required by the Memorandum of Understanding Regarding Urban Water Conservation in California and Assembly Bill 11, the 2005 UWMP Act, incorporated water conservation initiatives, and a Water Shortage Contingency Plan.

Sustainable Groundwater Management Act

In September 2014, the Governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act (SGMA) gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans (GSPs) to be developed for medium- and high-priority groundwater basins, as defined by the Department of Water Resources (DWR). The Walnut Valley Water District (WVWD) uses groundwater produced from the Spadra Basin. As a subbasin to the San Gabriel Valley Basin, DWR identifies the Spadra Basin as a very low-priority groundwater basin (Stetson 2021).

Senate Bills 221 and 610

Senate Bills (SB) 221 and 610 were signed into law in 2001 and took effect January 1, 2002. The two bills amended state law to better link information on water supply availability to certain land use decisions by cities and counties. The two companion bills provide a regulatory forum that requires more collaborative planning between local water suppliers and cities and counties. SB 221 and SB 610 reports are generated and adopted by the public water supplier. SB 610 requires a detailed report, or "Water Supply Assessment (WSA)", regarding water availability and planning for additional water suppliers that is included with the environmental document for specified projects that meet one or more of the following criteria:

- A proposed residential development of more than 500 dwelling units;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A mixed-use project that includes one or more of the projects specified above; or
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

The Project does not meet any of the above criteria triggering the need for a WSA.

California Safe Drinking Water Act

The California SDWA (Health & Safety Code Section 116270 et seq.; CCR Title 22 Section 64400 et seq.) regulates drinking water more rigorously than the federal law. Like the federal SDWA, California requires that primary and secondary maximum contaminant levels (MCLs) be established for pollutants in drinking water; however, some California MCLs are more protective of health. The California SDWA also requires the SWRCB to issue domestic water supply permits to public water systems. Implementation of the federal SDWA is delegated to California, and the SWRCB enforces the federal and state SDWAs and regulates more than 7,500 public water systems. The SWRCB's Division of Drinking Water oversees the state's comprehensive Drinking Water Program (DWP). The DWP is authorized to issue public water system permits.

State of California Water Recycling Act

Enacted in 1991, the Water Recycling Act established water recycling as a State priority. The Water Recycling Act encourages municipal wastewater treatment districts to implement recycling programs to reduce local water demands.

Statewide Water Conservation Act of 2009

In November 2009, the California State legislature passed, and the Governor approved, a comprehensive package of water legislation, including SB X7-7 addressing water conservation. In general, SB X7-7 requires a 20% reduction in per capita urban water use by 2020, with an interim 10% target in 2015. The legislation requires urban water users to develop consistent water use targets and to use those targets in their UWMPs. SB X7-7 also requires certain agricultural water supplies to implement a variety of water conservation and management practices and to submit the Agricultural Water Management Plans.

Executive Order B-29-15

In response to the ongoing drought in California, Executive Order (EO) B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the EO was extended through February 28, 2016, although many of the directives have since become permanent water efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources has modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

State of California Efficiency Standards

The California Code of Regulations (CCR) Title 24 contains the California Building Standards, including the California Plumbing Code (Part 5), which promotes water conservation. CCR Title 20 addresses Public Utilities and Energy and includes appliance efficiency standards that promote water plumbing fixtures in structures:

- CCR Title 20 Section 1604(g) establishes efficiency standards that give the maximum flow rate of all new showerheads, lavatory faucets, sink faucets, and tub spout diverters;
- CCR Title 20 Section 1606 prohibits the sale of fixtures that do not comply with established efficiency regulations;

- CCR Title 24 Sections 25352(i) and (j) address pipe insulation requirements, which can reduce water used before hot water reaches equipment or fixtures. Insulation of water-heating systems is also required; and
- Health and Safety Code Section 17921.3 requires low-flush toilets and urinals in virtually all buildings.

State Water Resources Control Board

The State Water Resources Control Board (SWRCB), in coordination with nine RWQCBs, performs functions related to water quality, including issuance and oversight of wastewater discharge permits (e.g., NPDES), other programs regulating stormwater runoff, and underground and above-ground storage tanks. The SWRCB has also issued statewide waste discharge requirements for sanitary sewer systems, which include requirements for the development of a Sewer System Management Plan (SSMP).

Title 22 of California Code of Regulations

Title 22 regulates the use of reclaimed wastewater. In most cases, only disinfected tertiary water may be used on food crops where the recycled water would come into contact with the edible portion of the crop. Standards are also prescribed for the use of treated wastewater for irrigation of parks, playgrounds, landscaping, and other non-agricultural irrigation. Regulation of reclaimed water is governed by the nine RWQCBs and the CDPH.

California Green Building Standards Code Section

The standards included in the 2022 California Green Building Standards Code (CALGreen Code) (Title 24, Part 11 of the California Code of Regulations) became effective on January 1, 2023. The CALGreen Code was developed to enhance the design and construction of buildings, and the use of sustainable construction practices, through planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental air quality.

Chapters 4 and 5 of the 2022 CALGreen Code require residential and nonresidential developments to comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance, whichever is more stringent. Both chapters require all residential and nonresidential construction contractors to reduce construction waste and demolition debris by 65%. Code requirements include preparing a construction waste management plan that identifies the materials to be diverted from disposal by efficient usage, recycling, reuse on the project, or salvage for future use or sale; determining whether materials will be sorted onsite or mixed; and identifying diversion facilities where the materials collected will be taken. The code also specifies that the amount of materials diverted should be calculated by weight or volume, but not by both. In addition, the 2022 CALGreen Code requires that 100% of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing be reused or recycled.

Senate Bill 1601 (Disposal Management System Act of 2008)

The legislature amended the California Integrated Waste Management Act in 2007 through SB 1016. SB 1016 maintains the 50% diversion rate requirement established by AB 939 but established a per capita disposal measurement system to make the process of goal measurement, as established by AB 939, simpler, timelier, and more accurate. The new disposal-based indicator—the per capita disposal rate—uses only two factors: a jurisdiction's population (or in some cases employment) and its disposal, as reported by disposal facilities.

SB 1016 also requires CalRecycle to issue an order of compliance if it finds that the jurisdiction has failed to make a good faith effort to implement its source reduction and recycling element or its household hazardous waste element pursuant to a specified procedure. CalRecycle is required to comply with certain requirements in making this determination, including considering the extent to which the jurisdiction has maintained its per capita disposal rate.

Assembly Bill 341

Assembly Bill 341 (AB 341) (Chapter 476) increased the statewide solid waste diversion goal to 75% by 2020. The law, passed in 2011, mandates recycling for businesses producing four or more cubic yards of solid waste per week. This commercial recycling law took effect July 1, 2012.

Assembly Bill 939

Assembly Bill 939 (AB 939) (California Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.) established an integrated waste-management system that focused on source reduction, recycling, composting, and land disposal of waste. AB 939 required every California city and county to divert 50% of its waste from landfills by the year 2000. Compliance with AB 939 is measured in part by comparing solid waste disposal rates for a jurisdiction with target disposal rates; actual rates at or below target rates are consistent with AB 939. AB 939 also requires California counties to show 15 years of disposal capacity for all jurisdictions in the county or show a plan to transform or divert its waste.

Assembly Bill 1327

Assembly Bill 1327 (AB 1327) (California Solid Waste Reuse and Recycling Access Act, Public Resources Code §§ 42900 et seq.) 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.

California Code of Regulations (CCR) Title 20

On November 3, 1976, the California Energy Commission (CEC) adopted the Regulations for Appliance Efficiency Standards Relating to Refrigerators, Refrigerator-Freezers and Freezers and Air Conditioners, which were the first energy-efficiency standards for appliances. The appliance efficiency regulations have been updated several times by the CEC and the most current version is the 2016 Appliance Efficiency Regulations, adopted January 2017, and now includes almost all types of appliances and lamps that use electricity, natural gas as well as plumbing fixtures. The authority for the CEC to control the energy-efficiency of appliances is detailed in California Code of Regulations (CCR), Title 20, Division 2, Chapter 4, Article 4, Sections 1601-1609.

California Code of Regulations (CCR) Title 24, Part 6

The CEC is responsible for implementing the CCR Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24 Part 6) that were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. In 2008 the state set an energy-use reduction goal of zero-net-energy use of all new homes by 2020 and the CEC was mandated to meet this goal through revisions to the Title 24, Part 6 regulations.

The Title 24 standards are updated on a three-year schedule and since 2008 the standards have been incrementally moving to the 2020 goal of the zero-net-energy use. The 2022 Title 24 standards are the current standards that went into effect on January 1, 2023.

According to the Title 24 Part 6 Fact Sheet, the CEC estimates that over 30 years the 2022 Title 24 standards will reduce 10 million metric tons of CO2 equivalent gases (MMTCO2e) of greenhouse gas (GHG) emissions, which is equivalent to taking nearly 2.2 million cars off the road for a year. For single-family homes, the CEC estimates that the 2022 Title 24 changes from using natural gas furnaces to electric heat pumps to heat new homes and would reduce net CO2 emissions by 16,230 MTCO2e per year, when compared to the 2019 Title 24 standards, which is equivalent of taking 3,641 gas cars off the road each year. The 2022 Title 24 standards will: (1) Increase onsite renewable energy generation; (2) Increase electric load flexibility to support grid reliability; (3) Reduce emissions from newly constructed buildings; (4) Reduce air pollution for improved public health; and (5) Encourage adoption of environmentally beneficial efficient electric technologies.

Senate Bill 1016

Senate Bill (SB 1016) requires that the 50% solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's Integrated Waste Management Plan (IWMP). The CalRecycle Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. Beginning January 1, 2018, the CalRecycle Board is required to review a jurisdiction's Source Reduction and Recycling Element and Hazardous Waste Element every two years.

California Department of Resources Recycling and Recovery

The California Department of Resources Recycling and Recovery (CalRecycle) oversees, manages, and monitors waste generated in California. It provides limited grants and loans to help California cities, counties, businesses, and organizations meet the state waste reduction, reuse, and recycling goals. It also provides funds to clean up solid waste disposal sites and co-disposal sites, including facilities that accept hazardous waste substances and non-hazardous waste. CalRecycle develops, manages, and enforces waste disposal and recycling regulations, including AB 939 and SB 1016.

California Public Utilities Commission

The California Public Utilities Commission develops and implements policies for the telecommunication industry. The Communications Division is responsible for licensing, registration and the processing tariffs of local exchange carriers, competitive local carriers, and non-dominant interexchange carriers. It is also responsible for registration of wireless service providers and franchising of video service providers. The Communications Division tracks compliance with commission decisions and monitors consumer protection and service issues and Commission reliability standards for safe and adequate service.

REGIONAL

Countywide Integrated Waste Management Plan

The County of Los Angeles Countywide Integrated Waste Management Plan (CIWMP) was prepared in accordance with the California Integrated Waste Management Act of 1989, Chapter 1095 (AB 939). The CIWMP's components include the Countywide Summary Plan, the Countywide Siting Element, the Source Reduction and Recycling Element (SRRE), the Household Hazardous Waste Element (HHWE) and Non-Disposal Facility Element (NDFE).

The Summary Plan summarizes the steps needed to cooperatively implement programs among the County's jurisdictions to meet and maintain the 50% diversion mandates. The Siting Element demonstrates that there are at least 15 years of remaining solid waste disposal capacity to serve all the jurisdictions within the County. If there is not adequate capacity, a discussion of alternative disposal sites and additional

diversion programs must be included in the Siting Element. The SRRE was developed separately by each Los Angeles County jurisdiction to analyze the local waste stream to determine where to focus diversion efforts, including programs and funding. The HHWE was developed by jurisdictions and provides a framework for recycling, treatment, and disposal practices for Household Hazardous Waste programs. The NDFE identifies and describes existing and proposed facilities, other than landfills and transformation facilities, requiring a solid waste permit to operate. Non-disposal facilities are also those facilities that will be used by a jurisdiction to meet its diversion goals. The Los Angeles County NDFE identifies and describes those non-disposal facilities that will be needed to implement the Los Angeles County SRRE.

LOCAL

Walnut Valley Water District 2020 Urban Water Management Plan

The California Water Code, Division 6, Part 2.6, Section 10610 et. seq. (California Urban Water Management Planning Act) requires any municipal water supplier serving over 3,000 connections or 3,000 acre-feet/year (AFY) to prepare a UWMP. The Walnut Valley Water District (WVWD) 2020 Urban Water Management Plan (UWMP) characterizes historical water supplies and use, projects future demand and supply through 2045, and identifies supply augmentation projects and programs, cumulative water demand projections, and water shortage contingency plans. Supply and demand projections are included for normal, single-dry, and multiple-dry year scenarios.

City of Walnut Sewer System Management Plan

On May 2, 2006, the California State Water Resources Control Board adopted Order No. 2006-0003, Statewide General Waste Discharge Requirements (WDR) for Wastewater Collection Agencies. The order applies to all federal and state agencies, municipalities, counties, and other public agencies that own or operate sanitary sewer systems greater than one mile in length that collect or convey untreated or partially treated wastewater to a publicly owned treatment facility in the State of California.

The City of Walnut City Council adopted its original Sewer System Management Plan (SSMP) in 2009 and revised it in 2020. The SSMP was prepared in compliance with State Order 2006-0003 issued May 2, 2006, to all publicly owned wastewater collection agencies owning more than one mile of pipeline. Included in the State Order is a requirement that all agencies audit their SSMPs every two years to evaluate the effectiveness of the plan and staff member's compliance with the State Order.

City of Walnut Municipal Code

The following City of Walnut Municipal Code (WMC) Sections would apply to the Project:

- 3.28.040 Mandatory Refuse and Recycling Programs. This section outlines the requirements for all persons occupying or having charge of or control of any place, land or premises to be required to pay the City or its designated agent or contractor a fee for the collection of garbage, waste, refuse, trash, and recyclable materials.
- 3.29.030 Requirements for Single-Family Generators. This section specifies the requirements for single-family organic waste generators. Single-family generators shall participate in the City's organic waste collection service by placing designated materials in designated containers.
- 5.04.010 County Sewer Ordinance. This section applies to the design and construction of all sewer systems within the City. This section adopted as a sanitary sewer and industrial waste ordinance of the City, except as amended, Division 2 of Title 20 of the Los Angeles County Code as contained in Ordinance No. 90-0067, as amended, and in full force and effect on May 24, 1990, known as the "Sanitary Sewer and Industrial Waste Ordinance."

- 5.08.080 Good Housekeeping Provisions. This section outlines the requirements owners and occupants must comply with such as: use of water, storage of materials, removal and disposal of debris, food wastes, and best management practices.
- 5.08.130 Stormwater Pollution Control Measures for Development Planning and Construction Activities. This section outlines the requirements for construction activities and facility operations of development and redevelopment Projects to comply with the current Municipal NPDES Permit.
- 5.16.320 Operational Standards. This section outlines the standards the Grantee must maintain such as necessary facilities, equipment, and personnel to comply with consumer protection and service standards.
- 5.16.330 Service Standards. This section ensures Grantee will provide efficient service, make repairs promptly, and interrupt service only for good cause.
- 6.52.50 Landscape Water Use Standards. (A) For applicable landscape installation or rehabilitation projects subject to Section 6.52.020(A) of this chapter, the estimated applied water (EAW) use allowed for the landscaped area shall not exceed the maximum applied water allowance (MAWA) calculated using an evapotranspiration (ET) adjustment factor of 0.55 for residential areas and 0.45 for nonresidential areas, except for special landscaped areas where the MAWA is calculated using an ET adjustment factor of 1.0; or the design of the landscaped area shall otherwise be shown to be equivalently water-efficient in a manner acceptable to the City; as provided in the Guidelines; (B) Irrigation of all landscaped areas shall be conducted in a manner conforming to the rules and requirements for water conservation and water waste prevention as determined and implemented by the local water purveyor or as mutually agreed by the local water purveyor and the local agency.
- 6.52.190 General Requirements (Recycling Locations for Development Projects). Any new development project for which an application of a building permit is submitted on or after September 1, 1993, shall include adequate, accessible and convenient areas for collecting and loading recyclable materials.

City of Walnut General Plan

The following are relevant goals and policies from City of Walnut's General Plan Land Use Element, and Community Facilities and Infrastructure Element that would apply to the Project:

GOAL LCD-9:	A built environment with development approaches that apply sustainability principles.
Policy LCD-9.4:	Building Design: Support building designs that assist with the management of stormwater runoff, preserve, and enhance soil permeability, and reduce other negative effects of urban development.
GOAL CFI-4:	Sustained supply of potable water through planning and conservation.
Policy CFI-4.3:	Coordination with Water Providers. Coordinate with water service agencies in their planning and infrastructure process to ensure that the City continues to have adequate supply for current needs and future growth.
GOAL CFI-5:	Wastewater system that meets current and future needs.
Policy CFI-5.2:	Development Require developers to pay their fair share of costs for localized wastewater infrastructure upgrades to ensure that service levels are met.

GOAL CFI-6: Storm water infrastructure that minimizes flood risks and achieves water quality goals.

Policy CFI-6.3: Storm Water Runoff: Minimize the impact of development on the City's drainage system by reducing the amount of impervious surface associated with the new development and encouraging low impact design features or landscaping that capture runoff.

5.19.4 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:

- USS-1: Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- USS-2: Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?
- USS-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?
- USS-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?
- USS-5: Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

5.19.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT USS-1: Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities that are not otherwise disclosed and analyzed in this document. Utility improvements and connections would be completed within the Project Site and adjacent streets.

WATER SERVICE

The Walnut Valley Water District (WVWD) would provide water service to the Project. According to correspondence with WVWD (2022), the WVWD is prepared to provide water service for the Project; however, water service is subject to availability. The WVWD is reliant upon the Metropolitan Water District of Southern California as its sole supplier of water. While there is currently no prohibition against additional connections, the WVWD has the authority to reduce and restrict service connections. To provide domestic water service to the Project Site, the Project would construct an onsite 8-inch water line system that would connect to an existing 8-inch water main along San Vicente Drive and La Puente Road and construct a second line with connection to an existing 16-inch water main in Meadow Pass Road. Construction

connections to offsite water service utility systems would involve minor trenching. Potential impacts would be short-term, and construction best management practices (BMPs) would be in place to minimize construction-related impacts. The construction of the water utility service systems would be coordinated with the City of Walnut and the WVWD to ensure that water service systems comply with construction standards and that adverse impacts to the environment are avoided. Therefore, less than significant impacts associated with water service would occur, and no mitigation is required.

WASTEWATER SERVICE

The Los Angeles County Sanitation District (LACSD) would provide wastewater service to the Project. According to correspondence with the LACSD (2022), the wastewater flow originating from the Project would discharge to a local sewer line, located in Lemon Avenue at Valley Boulevard, which has a capacity of 7.8 million gallons per day (mgd). The Project's wastewater would be treated at the San Jose Creek Water Reclamation Plant located adjacent to the City of Industry, which has a capacity of 100 mgd. The proposed Project is expected to increase an average wastewater flow of 7,020 gallons per day. Construction connections to offsite wastewater service systems would involve excavation and minor trenching. Potential impacts would be short-term and construction BMPs would be in place to minimize construction-related impacts. The construction of the sewer utility service systems would be coordinated with the City of Walnut to ensure that wastewater service systems comply with construction standards and that adverse impacts to the environment are avoided. Therefore, less than significant impacts associated with wastewater service would occur, and no mitigation is required.

STORMWATER MANAGEMENT

Stormwater management is provided by the Los Angeles County Flood Control District. The proposed stormwater management improvements would connect to existing stormwater management facilities within the Project area. Three public storm drain inlets along Meadow Pass Road at the northerly boundary of the Project Site currently direct offsite stormwater into and through existing public storm drain lines within the Project Site. That offsite stormwater then enters Lemon Creek through two existing outlets, which do not have onsite stormwater capture or treatment capabilities. The change in land use from an equestrian center to a residential community would require construction of two water quality basins to treat runoff leaving the proposed development before it enters Lemon Creek and to avoid increases in peak stormwater runoff flow rates and volumes from the development. It should be noted that no flow is proposed to flow directly from developed areas into Lemon Creek. All runoff from the proposed development areas would undergo treatment in the water quality basins first. The proposed improvements would be constructed pursuant to regulatory requirements and applicable permits regulating water quality. Therefore, less than significant impacts associated with stormwater management would occur, and no mitigation is required.

ELECTRICAL SERVICE

Southern California Edison (SCE) would provide electrical service to the Project. The Project's addition of 27 residential homes is not expected to notably impact SCE's service capabilities. The Project would comply with all federal, state, and county requirements related to the consumption of electricity, which includes CCR Title 24, Part 6 *Building Energy Efficiency Standards* and CCR Title 24, Part 11: *California Green Building Standards.* The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed residences, including enhanced insulation, use of energy efficient lighting and appliances as well as requiring a variety of other energy-efficiency measures to be incorporated into the development. Therefore, the Project would be designed and built to minimize electricity use and so that existing and planned electricity capacity and electricity supplies would be sufficient to support the

Project's electricity demand. Thus, potential impacts associated with electrical supply and infrastructure capacity would be less than significant, and no mitigation is required.

NATURAL GAS

The Southern California Gas Company (SoCalGas) would provide natural gas service to the Project. The Project's addition of 27 residential homes is not expected to notably impact SoCalGas' service capabilities. The Project would comply with all federal, state, and county requirements related to the consumption of natural gas, which includes CCR Title 24, Part 6 *Building Energy Efficiency Standards* and CCR Title 24, Part 11: *California Green Building Standards.* The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed structures, including enhanced insulation as well as use of efficient natural gas appliances and heating-ventilation-air-conditioning (HVAC) units. Therefore, the Project would be designed and built to minimize natural gas use and so that existing and planned natural gas capacity and natural gas supplies would be sufficient to support the Project's natural gas demand. Thus, potential impacts associated with natural gas supply and infrastructure capacity would be less than significant and no mitigation is required.

COMMUNICATION SYSTEMS

Numerous private local, wireless, and cellular phone service providers serve the City of Walnut and could provide communication service to the Project. New onsite utility service systems would be constructed/installed that would connect to existing utility systems currently provided in the Project area. The relocation, routing and sizing of the communication system would be coordinated with the communication provider to ensure the long-term operational needs of the Project are met. The onsite utilities would be exposed during the trenching/grading activities and would not result in additional impacts beyond those associated with the temporary grading stage. Connections to offsite utility systems/lines within adjacent streets would involve minor trenching. Potential impacts would be short-term and construction BMPs would be required to minimize construction related impacts. Each utility service provider would coordinate on the design installation and would ensure that utility service would comply with construction standards and that adverse impacts to the environment would be avoided. Potential impacts would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on review of proposed activities and the relatively small size of the proposed development (27 units) in the context of existing utility service providers' operations.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT USS-2: Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

The Project Site would have sufficient water supplies available to serve the proposed development and reasonably foreseeable future development during normal, dry, and multiple dry years. The Walnut Valley Water District (WVWD) provides water service to the Project Site. Table 5.19-4, *Normal Year Supply and Demand Comparison*, Table 5.19-5, *Single Dry Year Supply and Demand Comparison*, and Table 5.19-6, *Multiple Dry Years Supply and Demand Comparison*, demonstrate that the WVWD would have sufficient supplies to meet water demands from 2025 to 2045 under all conditions.

The Project would construct 27 single-family detached housing units. Based on the City of Walnut's average household size of 3.29 persons per household, the Project is estimated to have 89 residents. The General Plan Land Use Map designates the Project area as Very Low Density. The Project would be consistent with the General Plan and the population increase generated by the Project would be accounted for in the City's General Plan growth projections. In addition, based on the Project's consistency with the development density of the General Plan land use, the Project's projected water demand would also be within the WVWD's water demand assumptions.

To help reduce water demand, the Project would comply with the requirements of CAL Green. Proposed residences would also include individual unit water-use monitoring. Additionally, the Project would be required to comply with the principles of the State Model Water Efficient Landscape Ordinance, which requires improvements in the efficiency of water use in existing and new urban irrigated landscapes in California. The Project would be subject to this ordinance and would be required to implement water-efficient landscaping design and water-conserving irrigation features within the Project Site. Additionally, the Project would be required to coordinate with the City of Walnut and secure a "Will Serve" letter, which would indicate that the WVWD would have the ability to provide adequate water service to the Project.

The City of Walnut Urban Water Management Plan (UWMP) identifies that there would be adequate water supplies for the proposed Project and 100% reliability during normal wet year, single dry year, and multiple dry years between 2025 and 2045. The Project would also reduce water demand by complying with the requirements of CAL Green and the WMC. Potential impacts associated with providing adequate water supplies to the Project would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant based on the relatively small size of the proposed development (27 units), WVWD's water supply/demand projections in their UWMP, Project consistency with the current land use/zoning, and compliance with standard building efficiency regulations.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT USS-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?

Los Angeles County Sanitation District (LACSD) facilities provide sewer system services to the City of Walnut. According to correspondence with LACSD (2022), the wastewater flow originating from the Project would discharge to a local sewer line, located in Lemon Avenue at Valley Boulevard, which has a capacity of 7.8 million gallons per day (mgd). The Project's wastewater would be treated at the San Jose Creek Water Reclamation Plant located adjacent to the City of Industry, which has a capacity of 100 mgd. The Project is expected to increase an average wastewater flow of 7,020 gallons per day. The Project's addition of 27 residential homes and the average additional 7,020 gallons per day of wastewater is not expected to notably impact LACSD's service capabilities. In September 2022, LACSD issued a "Will Serve" letter for the proposed Project, indicating adequate wastewater service would be available. Potential impacts associated with wastewater treatment and facilities would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant based on the relatively small size of the proposed development (27 units), and input provided by LACSD.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT USS-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?

The City of Walnut relies on Valley Vista Services to pick up solid waste directly from homes. Solid waste disposal for the Project Site would be provided at the El Sobrante Landfill or Lamb Canyon Sanitary Landfill. The El Sobrante Landfill is permitted to receive 16,054 tons of solid waste per day and has a maximum permitted capacity of 209,910,000 cubic yards with a remaining capacity of 143,977,170 cubic yards as of 2018 (CalRecycle 2018). The El Sobrante Landfill is projected to close in 2051. The Lamb Canyon Landfill is permitted to receive 5,000 tons of solid waste per day and has a maximum permitted capacity of 39,681,513 cubic yards with a remaining capacity of 19,242,950 cubic yards as of 2015 (CalRecycle 2018). The Lamb Canyon Landfill is projected to close in 2032.

The Project would generate an estimated 63 tons of solid waste per year (Vista 2024) or approximately 345 pounds per day on average. The Project's anticipated annual solid waste generation amount would account for less than one percent (0.003%) of the El Sobrante Landfill's and Lamb Canyon Landfill's total daily amount of solid waste they are collectively permitted to receive. Both landfills would have available capacity for the Project. Potential impacts would be less than significant.

To ensure that Project implementation would not result in temporary solid waste generation in exceedance of daily throughput landfill capacity during the Project's construction and demolition phases and to help meet countywide and local waste diversion goals, Mitigation Measures USS-1 and USS-2 would be implemented to manage the Project's construction waste stream.

Level of Impact Before Mitigation: Potentially significant temporary impact to waste disposal services and/or to countywide and local waste reduction goals if the construction waste stream is not managed.

Mitigation Measures: Mitigation Measures USS-1 and USS-2 described in Section 5.19.7 would be required.

Level of Impact After Mitigation: Less Than Significant Impact With Mitigation Incorporated.

IMPACT USS-5: Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The Project would produce solid waste during the demolition and construction stages as well as during operations (i.e., occupancy of the homes). Solid waste would be provided by Valley Vista Services. The Project would be required to comply with federal, state, and local statutes and regulations related to solid waste. For operational waste, AB 939 requires all cities and counties to divert a minimum of 50% of all solid waste from landfills. Additionally, the Project would comply with the following sections from the WMC, which regulates waste, storage, collection, transfer, and disposal:

- 3.28.040 Mandatory Refuse and Recycling Programs. This section outlines the requirements for all persons occupying or having charge of or control of any place, land or premises to be required to pay the City or its designated agent or contractor a fee for the collection of garbage, waste, refuse, trash, and recyclable materials.
- 3.29.030 Requirements for Single-Family Generators. This section specifies the requirements for single-family organic waste generators. Single-family generators shall participate in the City's organic waste collection service by placing designated materials in designated containers.

The Project would be required to comply with California Department of Resources Recycling and Recovery disposal requirements. The Project would also employ Best Management Practices (BMPs) to reduce solid

waste disposal such as the recycling of all plastic bags, containers, and green waste composting, chipping, and shredding. Project implementation would not conflict with the ability to comply with federal, state, or local regulations related to solid waste. Potential impacts would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant impact based on the nature of proposed activities and compliance with standard laws and regulations.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.19.6 CUMULATIVE IMPACTS

The proposed Project and cumulative related development projects listed in Section 4.0, *Basis for Cumulative Impacts*, would receive water service from the Walnut Valley Water District (WVWD); wastewater service from the Los Angeles County Sanitation District (LACSD); solid waste disposal service from Valley Vista Services; electrical service from Southern California Edison (SCE); natural gas service from Southern California Gas Company (SoCalGas); and telecommunications services from the various providers in the area. As previously discussed, Project implementation would add an estimated 89 new residents to the area, which would incrementally increase the demand for these utilities and services; however, Project-specific direct and indirect impacts were determined to be less than significant based on the relatively small size of the proposed development (27 units) in the context of potentially impacted utilities and services; compliance with applicable laws, ordinances, and regulations; and payment of applicable connection and service fees.

Cumulative development projects shown in Section 4.0, *Basis for Cumulative Impacts*, would also be evaluated for potential impacts to utilities and service systems; be subject to all applicable agency reviews and laws, ordinances, and regulations; and be required to pay connection and service fees. Therefore, the proposed Project, combined with related cumulative projects, would not result in cumulatively considerable impacts to utilities. Impacts would be less than significant, and no mitigation is required.

Level of Impact Before Mitigation: Less than significant based on the relatively small size of the proposed development (27 units) in the context of potentially impacted utilities and services; compliance with applicable laws, ordinances, and regulations; and payment of applicable connection and service fees.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

5.19.7 MITIGATION MEASURES

USS-1 Prior to the issuance of a demolition or grading permit, the Project Applicant/Developer or designee shall prepare and submit a construction debris reduction/recycling plan designed to minimize the volume of construction debris requiring landfill disposal and incorporating measures for the separation and short-term onsite storage of construction waste materials in a manner conducive to collection and recycling/diversion efforts. The plan shall include a fire component so that reclamation activities are conducted in a fire safe manner.

USS-2 Any hazardous waste that is generated onsite, or is found on site during demolition, rehabilitation, or new construction activities shall be remediated, stored, handled, and transported in compliance per appropriate local, County, State, and Federal laws.

5.19.8 REFERENCES

CalRecycle, *RDRS Report 1: Overall Jurisdiction Tons for Disposal and Disposal Related Uses* [RDRS Report 1: Overall Jurisdiction Tons for Disposal and Disposal Related Uses (ca.gov)]. 2024. Accessed on April 2, 2024 at https://www2.calrecycle.ca.gov/RecyclingDisposalReporting/Reports/OverallJurisdictionTonsForDisposal.

CalRecycle, *Solid Waste Information System (SWIS) Facility/Site Search, El Sobrante Landfill (33-AA-0217) and Lamb Canyon Sanitary Landfill (33-AA-0007)*. 2018. Accessed on April 2, 2024 at https://www2.calrecycle.ca.gov/SolidWaste/Site/Search/.

City of Walnut, *City of Walnut General Plan*. Adopted May 9, 2018.

City of Walnut, Walnut Municipal Code. Accessed on March 29, 2024 at https://www.cityofwalnut.org/my-government/municipal-code.

Los Angeles County Sanitation District (LACSD), Donna Curry, Customer Service Specialist, written correspondence. September 12, 2022.

Los Angeles County Sanitation Districts, San Jose Creek Water Reclamation Plant [San Jose Creek Water Reclamation Plant, Los Angeles County Sanitation Districts (lacsd.org)]. Accessed on April 2, 2024 at https://www.lacsd.org/services/wastewater-sewage/facilities/san-jose-creek-water-reclamation-plant.

Stetson Engineers, Inc., *Walnut Valley Water District 2020 Urban Water Management Plan.* June 2021.

Vista Environmental, *Air Quality, Energy, and Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis*, February 25, 2024.

Walnut Valley Water District (WVWD), Sheryl L. Shaw, Director of Engineering, written correspondence. August 2, 2022.

5.20 WILDFIRE

5.20.1 INTRODUCTION

The following analysis addresses existing wildfire hazard conditions at the Project Site and surroundings, considers applicable goals and policies, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts, as applicable.

5.20.2 ENVIRONMENTAL SETTING

A wildland fire is a non-structural fire that occurs in vegetative fuels. Wildland fires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition resistant. The potential for wildland fires represents a hazard where development is adjacent to open space or within proximity to wildland fuels or designated Fire Hazard Safety Zones.

The California Department of Forestry and Fire Protection (CAL FIRE) periodically maps fire hazard areas in California. In so doing, CAL FIRE identifies "Fire Hazard Severity Zones" and then places those zones in one of three classifications: Moderate (new as of 2024), High, and Very High. On March 24, 2025, CAL FIRE released updated fire hazard severity zone maps for, among other places, the County of Los Angeles. The updated maps identify a portion of the Project Site as being within a Moderate Fire Severity Zone. None of the Project Site is located within a High or Very High Fire Severity Zone. The Project Site is located in a "Local Responsibility Area," meaning that the local fire department is responsible for wildfire protection.

According to the City's General Plan, in 2016, the City adopted the designation of certain areas of Walnut as a Very High Fire Hazard Severity Zone, specifically the northern portions of Walnut as shown in the General Plan Figure PS-3, *Wildfire Hazards* (Walnut 2018). The Project Site is not within those designated areas. Figure PS-3, *Wildfire Hazards*, also shows the Project Site is located within an area mapped as Historic Fires, specifically associated with the Winnett Fire of 1970. Review of historic aerials indicates the Project Site and Project vicinity were largely undeveloped and rural in 1970 when the Winnett Fire occurred. Today, these areas are predominantly developed with residential uses and the Project Site is no longer uniquely exposed to wildland/urban interface areas.

There are two fire stations in the City of Walnut that are both operated by the Los Angeles County Fire Department (LACFD). According to the General Plan Figure PS-2, *Fire Station Boundaries Map*, Fire Station No. 61 would provide service to the Project Site. This station serves the City of Walnut as well as surrounding County areas, the City of Industry, and the City of Diamond Bar. Fire Station No. 61 responds to all emergencies, including accidents, fire, swift water rescues, and hazardous material spills. Fire Station No. 146 serves not only the City of Walnut, but Mt. San Antonio College, West Covina, Diamond Bar, and parts of Orange County. This station is known as a critical station and includes one fire engine and a barn-type structure to store the fire apparatus. Details about these stations are provided below in Table 5.20-1, *City of Walnut Fire Station Locations*.

Table 5.20-1
City of Walnut Fire Station Locations

Station Number	Address	Distance from Project Site (miles)	Staffing/Equipment
Station 61	20011 La Puente Road	Adjacent	1 Paramedic Unit and 1-Three Person Type 1 Engine
Station 146	20604 Loyalton Drive	1.5	1-Three Person Type 1 Engine
Source: City of Walnut General Plan; May 2018.			

Los Angeles County Fire Department is also responsible for enforcing fire codes, providing fire inspections, implementing the Fuel Modification Plan Check Review, and assisting in planning and enforcing development standards for Very High Fire Hazard Severity Zones.

5.20.3 REGULATORY SETTING

STATE

2022 California Building and Fire Codes

The 2022 California Building and Fire Code Chapter 7A establishes minimum standards to protect life and property for a building located in a Wildland-Urban Interface Fire Area by increasing its ability to resist the intrusion of flames or burning embers. Chapter 7A requirements, however, do not apply to properties located within a Moderate Fire Severity Zone. In addition to state regulations and adopted model codes, the Project Site would follow the Los Angeles County Code of Ordinances, Title 32 – Fire Code (fire alarm systems, architectural review, Fire Master Plan, fire sprinkler systems, underground installations, clearance of brush and vegetative growth, and any other applicable standards).

California Health and Safety Code

Sections 13000 et seq. of the California Health and Safety Code include fire 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.

California Occupational Safety and Health Administration

In accordance with the California Code of Regulations, Title 8 Sections 1270 "Fire Prevention" and 6773 "Fire Protection and Fire Fighting Equipment," California Occupational Safety and Health Administration (Cal/OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire house sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

California Public Resources Code Section 4290

The California Public Resources Code, Section 4290, requires the Board of Forestry and Fire Protection to "adopt regulations implementing minimum fire safety standards related to defensible spaces which are applicable to state responsibility area lands under the authority of the department." The requirements for protection from wildfire are further clarified and made specific in regulations in accordance with California Code of Regulations, Title 14 Natural Resources, Division 1.5 Department of Forestry, Chapter 7 - Fire Protection, Subchapter 2 entitled, "SRA Fire Safe Regulations."

California Public Resource Code Sections 4290 and 4291

California Public Resource Code Sections 4290 and 4291 require property owners to conduct maintenance to reduce fire danger. Required fire maintenance includes, but is not limited to, maintaining 100 feet of defensible space along all sides of a structure or up to the property line; removing dead or dying vegetative materials, trees, and/or shrubs; constructing fire breaks or other appropriate vegetation management techniques around fire-sensitive land uses (i.e., hospitals, adult residential care facilities, schools, storage tanks, and hazardous materials facilities); and maintaining vegetative clearings near electrical transmission or distribution lines.

LOCAL

City of Walnut General Plan

PUBLIC SAFETY ELEMENT

The City contracts with the Los Angeles County Fire Department (LACFD) for fire prevention, fire suppression, and emergency medical services. Two fire stations serve the City of Walnut, operated by Division VII of the County Fire Station:

- Fire Station No. 61
- Fire State No. 146

Fire Station 61, immediately adjacent to the Project Site, would serve the Project area, as well as the cities of Industry and Diamond Bar. This station has one fire engine and a barn-type structure to store the fire apparatus.

The City of Walnut General Plan put forth a comprehensive strategy for the development, management, preservation, and conservation of resources that are necessary to meet the City's existing and future demands. This strategy is expressed as an integrated framework of resource goals, policies, and programs. The following are applicable goals and policies from the Public Safety Element:

GOAL PS-1:	Effective and comprehensive crime prevention/protection and fire services that respond to the community's safety needs.
Policy PS-1.1:	Law Enforcement and Fire Services. Maintain law enforcement and fire protection services that maximize protection of life and property.
Policy PS-1.2:	Los Angeles County Contracting. Continue to contract with Los Angeles County Fire Department to provide fire services and the Los Angeles County Sheriffs' Department to provide law enforcement services.
GOAL PS-2:	Minimized risks associated with wildland fires.
Policy PS-2.1:	Wildfire Hazards. Minimize the intensity of new residential development in the Very High Fire Hazard Severity Zone. Require fire protection plans for any new development located within the Very High Fire Hazard Severity Zone.
Policy PS-2.2:	Development Review. Involve the Fire Department in the early design stage of all projects requiring public review to ensure Fire Department input and appropriate modifications and fire safe design is incorporated in future development.
Policy PS-2.8:	Agency Consultation. Consult regularly and cooperatively with public agencies responsible for fire protection. Coordinate wildland fire prevention efforts with adjacent jurisdictions and fire agencies.
Policy PS-2.12:	Fire Flow. Consult with the Fire Department in reviewing new residential development projects to ensure new projects meet minimum fire-flow requirements identified under the California and Los Angeles County Fire Codes.
Policy PS-2.15:	Address and Signage. Require all newly constructed or approved roads, streets, and buildings to be designated by names or numbers, posted on signs clearly visible and legible from the roadway to facilitate emergency response personnel and to avoid delays in response.

5.20.4 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:

- WF-1: Substantially impair an adopted emergency response plan or emergency evacuation plan?
- WF-2: 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?
- WF-3: 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?
- WF-4: 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?

5.20.5 ENVIRONMENTAL IMPACT ANALYSIS

IMPACT WF-1: Substantially impair an adopted emergency response plan or emergency evacuation plan?

Project implementation would not substantially impair an adopted emergency response plan or emergency evacuation plan. The Project Site is not identified within a High or Very High Fire Hazard Zone, is not within a State Responsibility Area, has a fire station immediately adjacent, and is located in an urbanized setting providing multiple routes of ingress and egress.

Temporary activities associated with construction of the Project could result in temporary partial lane closures adjacent to the Project Site. However, the temporary lane closures would be implemented in accordance with recommendations provided in the California Temporary Traffic Control Handbook to ensure emergency access would be maintained at all times. The construction activities for the Project would be coordinated with the City of Walnut, which would ensure that traffic controls are in place to maintain emergency access to the Project Site. With compliance with the City of Walnut Traffic Control requirements, potential impacts regarding conflicts with emergency response plans during construction would be less than significant.

In the event an emergency evacuation is needed, the City's Incident Command Structure would be in place to direct traffic to specific evacuation routes, which would reduce traffic congestion, evacuation delays and enhance emergency responses to the Project area. The amount of traffic generated by the proposed Project would not result in a condition that would physically interfere with an adopted emergency response plan or emergency evacuation plans. Based on the City of Walnut's average household size of 3.29 persons per household, the Project is estimated to have 89 residents. The Project would contribute negligible amounts of new vehicle trips within the Project area if an emergency evacuation were required. The Project Site is also located in an urbanized setting with multiple available ingress and egress routes of access. Potential long-term operational impacts would be less than significant.

Level of Impact Before Mitigation: Less than significant with implementation of standard conditions and based on the proposed land use and size of development.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT WF-2: Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The Project Site grade varies from an elevation of approximately 640 feet on the north boundary adjacent to Meadow Pass Road down to an elevation of approximately 572 feet on the southern boundary adjacent to La Puente Road. The general topography of the Project Site and vicinity is characterized by rolling foothills. The Project Site is largely undeveloped and landscaped with native and non-native species typical of equestrian and urbanized residential areas. Vegetation communities on the Project Site include Eucalyptus/Shamel Ash/Pepper tree Groves, non-native ornamentals, annual brome grasslands and ruderal forbs, disturbed/developed areas, and southern sycamore alder riparian woodland areas near Lemon Creek. Surrounding land uses are developed and urbanized/suburbanized. The Project would develop the site with residential uses consistent with development in the Project vicinity and retain the general topography and open space areas near Lemon Creek similar to existing conditions.

Topography influences the movement of air and the direction of a fire course. Additionally, wind events can magnify the risks of wildfire and can have the potential to expose inhabitants to elevated pollutant concentrations. Based on the Project Site's location and proposed residential uses, no unique or peculiar conditions are present that would exacerbate potential exposure to fire or pollutants. The Project Site is not identified within a High or Very High Fire Hazard Zone or State Responsibility Area (CAL FIRE 2025).

Because the Project Site is not identified within a High or Very High Fire Hazard Zone, is not within a State Responsibility Area, has a fire station immediately adjacent, and is located in an urbanized setting providing multiple routes of ingress and egress, potential impacts are considered less than significant.

Level of Impact Before Mitigation: Less than significant based on Project location and the proposed land uses.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

IMPACT WF-3: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The Project proposes construction and occupancy of a residential development located within an urbanized/suburbanized location. Proposed infrastructure required to support the residential development would include internal streets, stormwater infrastructure (including water quality basins), City trail, and utility connections to existing utility lines in nearby and adjacent roadways. No new infrastructure is required or proposed for construction within High or Very High Fire Hazard Severity Zones. Fuel modification breaks are not anticipated to be required. All proposed improvements and maintenance of the Project Site infrastructure would be done by the Homeowners Association, City, and/or flood control district. None of the proposed improvements would increase fire risk. In addition, the Project includes the construction of water infrastructure and other utility improvements that would aid in fire suppression in the event of a fire. Therefore, the proposed Project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment.

Level of Impact Before Mitigation: No impact based on Project location and the proposed land uses.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

IMPACT WF-4: 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?

Flooding and landslides, including mud flows and debris flows, can be triggered by erosion and downslope runoff caused by rain following a fire that removes vegetative cover. As previously discussed, the Project Site is not located within a High or Very High Fire Hazard Zone or State Responsibility Area (CAL FIRE 2025). The surrounding area is developed, so, the risk of post-fire slope instability or drainage changes is considered absent. Lemon Creek does travel through the Project Site, but the creek would largely remain unchanged. Implementation of the proposed Project would not 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.

Level of Impact Before Mitigation: No impact based on Project location and the proposed land uses.

Mitigation Measures: No mitigation measures are required.

Level of Impact: Less Than Significant Impact.

5.20.6 CUMULATIVE IMPACTS

Wildfire impacts are typically unique to each project site and each project's proposed activities; they do not usually contribute to cumulative impacts. As previously discussed, the Project Site is not located within a High or Very High Fire Hazard Zone or State Responsibility Area (CAL FIRE 2025). The related development projects would also be required to comply with local, state, and federal laws and regulations regarding wildfire planning and prevention, thereby ensuring that a less than significant cumulative impact would result. As discussed in the sections above, Project implementation is not anticipated to result in a significant impact. In consideration of the cumulative projects identified in Section 4.0, *Basis for Cumulative Impacts*, no unique or peculiar circumstances are anticipated where a cumulative impact associated with wildfire would occur.

Level of Impact Before Mitigation: No impact based on Project location and the proposed land uses.

Mitigation Measures: No mitigation measures are required.

Level of Impact: No Impact.

5.20.7 MITIGATION MEASURES

No mitigation measures are required for wildfire.

5.20.8 REFERENCES

California Department of Forestry and Fire Protection (CAL FIRE), *City of Walnut Very High Fire Hazard Severity Zones in LRA*, March 2025. Accessed on April 22, 2025 at https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones

City of Walnut, *City of Walnut General Plan, Public Safety Element,* May 2018.

SECTION 6.0 ALTERNATIVES ANALYSIS

6.1 INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines require EIRs to describe a range of alternatives to a project, or to the location of a project (i.e., alternative project site), which would feasibly achieve most of the basic project objectives but would avoid or substantially lessen any of the significant effects identified in the analysis. Additionally, an EIR may only consider alternatives that are feasible. An EIR is not required to consider every conceivable alternative to a project; however, alternatives may be considered even if they would impede, to some degree, the attainment of project objectives or be more costly (provided that they remain economically feasible).

The analysis contained in this section compares each of the alternatives to the proposed Project and includes an analysis of each alternative with respect to each of the environmental issues evaluated. In addition, the analysis of alternatives includes the assumption that all mitigation measures associated with the Project would be implemented with an alternative, where applicable. However, applicable mitigation measures may be scaled to reduce or avoid the potential impacts of the alternative under consideration and may not precisely match those identified for the Project.

CEQA provides that a project for which a certified EIR has identified one or more significant effects on the environment cannot be approved unless specific findings are made (see PRC §21081(a) and (b)), one of which may be that there are no feasible alternatives that would substantially lessen the project's environmental effects.

6.2 REQUIREMENTS OF ALTERNATIVES ANALYSIS

SELECTION OF PROJECT ALTERNATIVES

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key considerations in selecting suitable alternatives to the Project or its location include whether a possible alternative:

- Is capable of avoiding or substantially lessening any significant effects of the Project;
- Can attain most of the Project Objectives, even if it cannot attain all Project Objectives;
- Is potentially feasible; and
- Is reasonable.

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 and feasibly obtain most of the project objectives. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.

ALTERNATIVE SITES

CEQA specifically allows but does not expressly require a discussion of alternative sites. The courts have not yet provided direction on what criteria are required for the analysis if the lead agency does include an alternative site analysis in an EIR. If the agency does so, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered and the EIR should evaluate whether the project proponent can reasonably acquire, control, or otherwise have access to an alternative site (or if the site is already owned by the proponent).

"NO PROJECT" ALTERNATIVE

CEQA requires consideration of a "No Project" alternative, which reflects the conditions existing at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced. In evaluating the potential impacts of the "No Project" alternative, the EIR should project what would be reasonably expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The "Environmentally Superior Alternative" must be identified. If the Environmentally Superior Alternative is the "No Project " alternative, the EIR shall also identify an Environmentally Superior Alternative among the other alternatives. Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed Project.

6.3 CONSIDERATION OF SIGNIFICANT ENVIRONMENTAL IMPACTS

In discussing the selected range of reasonable alternatives to a project, the EIR must evaluate the comparative merits of the alternatives when compared to the project. If an alternative would cause one or more significant effects in addition to 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 itself. With respect to the Project evaluated by this DEIR, based on the analysis provided within Section 5.0, *Environmental Analysis*, the proposed Project would not result in a significant unavoidable adverse impact.

6.4 SUMMARY OF PROJECT OBJECTIVES

The "Project Objectives" used in the alternative analysis are intended to aid decision makers in their comparison of the alternatives to the Project, most specifically with respect to each alternative's ability to feasibly attain most of the Project Objectives. For the Project, the Project Objectives are to create a residential project that:

1. Maintains consistency with the Project Site's Very Low Density General Plan and RPD (28,500) – 1.3 zoning designation.
2. Respects and enhances the health, biological function, and water quality of Lemon Creek, while assuring that the development does not increase flood risk for downstream properties.
3. Provides a multi-use trail dedicated to the City of Walnut, open to the public and provides a connection to other public trails at the Project boundaries.
4. Preserves the walnut and oak trees on the Project Site, retaining their significant historical, aesthetic, and environmental value.
5. Minimizes landform alteration by generally limiting grading to previously disturbed and/or developed areas of the Project Site and grading onsite without import or export.

6.5 FEASIBILITY OF ALTERNATIVES

According to Section 15126.6(f)(1) of the CEQA Guidelines, factors that may be considered when evaluating the feasibility of an alternative include:

- Site suitability.
- Economic viability.
- Availability of infrastructure.
- General Plan consistency.
- Other plans and regulatory limitations.
- Jurisdictional boundaries (projects with a regionally significant impact should consider the regional context).
- Whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site or offsite areas.

6.6 ALTERNATIVES CONSIDERED BUT NOT ADVANCED DURING THE PLANNING PROCESS

Many alternatives were considered but not included within the range of reasonable alternatives evaluated by this Section 6. Those rejected alternatives are listed below along with the reasons for which they were rejected. Generally, those reasons consisted of the following:

- The alternative would not feasibly attain most of the Project Objectives;
- The alternative was not feasible or was not reasonable;
- The alternative has regulatory limitations; and/or
- The alternative is not suitable for the Project Site based on current zoning and/or community context.

The potential alternatives considered but not advanced during the planning process are described below. In reviewing these rejected potential alternatives as well as the selected alternatives, the manner in which the Project Site's RPD (28,500) – 1.3 zoning functions has significant implications for the evaluations. Those functions are described in greater detail in Section 3.3, *Environmental Setting*, but can be summarized as follows:

- Property within the RPD zone may be developed either (i) consistent with conventional R-1 zoning and specified minimum lot sizes or (ii) as a "residential planned development" through approval of a Conditional Use Permit (CUP).
- Under the R-1 development scenario, the first number following the RPD designation (e.g., 28,500) refers to the minimum lot size that would be required if the land is *not* developed as a residential planned development, but rather subject to generally applicable R-1 development standards.
- The second number following the RPD designation (e.g., 1.3) is a density factor that applies to the property only if it is developed as a residential planned development, which generally provides for creative and imaginative planning principles, practice, techniques, and regulations such as clustering of development and reservation of large contiguous open space areas, none of which is required under R-1 development standards.

PREVIOUSLY DENIED 2021 PROJECT (SCH NO. 2016051030)

Prior to the landowner's application for the Project, a different residential development was proposed for the Project Site (Prior Project). That Prior Project was denied by the City Council on July 14, 2021. That Prior Project is described in detail in the May 26, 2021, City Council Staff Report, but is summarized as follows:

> The Prior Project proposed the approval of a CUP for a residential planned development of 28 single-family detached home lots, 11 open space lots comprising approximately 40% of the Project Site, one internal public street and one internal private street, and a single access point at Meadow Pass Road. Lot sizes ranged from 14,476 square feet to 32,900 square feet. The Prior Project included a Development Agreement, which would have required the dedication of an open space lot (Lot K) as a public park with turnkey improvements for the retrofit/reconstruction of the Main Barn/Residence on Lot K. While the public trail and open space areas of the Prior Project were very similar in size and location to those proposed by the Project, they would have been in separate open space lots rather than predominantly within private residential lots subject to open space restrictions. With the exception of the retrofitted/reconstructed Main Barn/Residence, all other existing equestrian related structures on the Project Site would have been eliminated. An Environmental Impact Report, State Clearinghouse Number (SCH NO.) 2016051030, was prepared for that Prior Project.

This alternative has been rejected for consideration in this DEIR for the Project. It was determined to be infeasible because (i) it was previously denied by the City Council, (ii) the Applicant has indicated that it is no longer willing to enter into a similar development agreement to dedicate land for a public park with the same turnkey improvements and other public benefits, and (iii) under the State's Housing Accountability Act and Housing Crisis Act the City cannot require the landowner to enter into a development agreement to provide those improvements and public benefits.

REDUCED DENSITY ALTERNATIVES

Several Reduced Density Alternatives were considered but rejected as conflicting with the Housing Crisis Act (Government Code Section 65589.5). The Walnut General Plan allows up to two homes per acre for homes with the Very Low Residential land use designation. The Project, as proposed, has a density of 1.04 units per acre, already below the General Plan maximum density. The Housing Crisis Act (Government Code Section 65589.5) prohibits a city's requiring a project to reduce the number of homes below what can be built on a project site below the maximum allowed under its general plan and consistent zoning designations. Evaluating reduced density alternatives to the Project (i) would require such a reduction, (ii) the landowner is not agreeable to further density reductions below the maximum permitted under the City's General Plan and consistent zoning regulations, and (iii) such reductions would, therefore, violate the Housing Crisis Act.

As a result of these considerations, Reduced Density Alternatives were considered infeasible and rejected.

Two examples of Reduced Density Alternatives, which were considered but rejected because they would require a density reduction are:

- Prior Project EIR (SCH No. 2016051030) Alternative 1 – R-1 Reduced Density. This alternative was previously reviewed as a CEQA project alternative in the EIR (SCH NO. 2016051030) for the Prior Project discussed above. This R-1 alternative would provide 24 dwelling units with a minimum lot size of 28,500 square feet, for a density of 0.93 dwelling units per acre. 9.55 acres would be preserved as open space. Under this alternative, two of the Winnett Farm's San Vicente Ranch and Brookside Equestrian Center structures (Main Barn/Residence and Minor Barn) would be retained.

- Prior Project EIR (SCH No. 2016051030) Alternative 2 – R-1 Greater Reduced Density. This alternative also was previously reviewed as a CEQA project alternative in the EIR (SCH NO. 2016051030) for the Prior Project discussed above. This alternative would provide 15 residential lots for dwelling units on 12.29 acres with a minimum lot size of 28,500 square feet at a maximum density of 1.3 dwelling units per acre. This alternative also assumed that two (2) of the Winnett Farm's San Vicente Ranch and Brookside Equestrian Center structures (Main Barn/Residence and Minor Barn) and one residential dwelling unit would be retained.

OPEN SPACE OR PUBLIC PARK ALTERNATIVE

Under the Open Space or Public Park Alternative, the Project Site would not be developed with residential uses, but rather rezoned for open space and/or park uses, requiring a General Plan amendment. To avoid a compensable taking under the U.S. and California Constitutions, this alternative would require either (i) the landowner to donate the Project Site to the City or (ii) the City to acquire the property through direct purchase at a cost based on the fair market value of this property at its highest and best use under its current general plan and zoning designations. In addition to the cost of acquiring the land, adequate funding would be needed for design, improvements, and ongoing management and maintenance in perpetuity (note, the City attempted to purchase the property prior to 2014, but was outbid by the current owner). Conversion of the Project Site to open space or park uses would not fulfill key housing-related Project Objectives identified above. Furthermore, this alternative also would violate the Housing Crisis Act by requiring a prohibited density reduction. For these reasons, the Open Space or Public Park Alternative was determined infeasible and rejected.

HIGH DENSITY OR CLUSTER DEVELOPMENT ALTERNATIVE

An alternative that groups all development into a single area was considered; however, this alternative would require a General Plan amendment to cluster the housing units into a smaller area with smaller lot sizes and would not be consistent with the Project Applicant's elected R-1 zoning option. The Project Site is not located in an area close to transit-oriented development and higher-density units clustered on the Project Site would potentially conflict with the existing single-family community character of the Project vicinity. In addition, and as currently planned, the proposed Project has been designed to minimize the amount of grading on the Project Site and avoid impacts to Lemon Creek. As currently proposed, the proposed Project would also retain approximately 47% of the Project Site as open space, in effect, achieving the environmental benefits of a clustered development by retaining a sizable percentage of the Project Site as open space. Consequently, the Project Site was not considered suitable for the High Density or Cluster Development Alternative; and was therefore, not advanced during the planning process.

ALTERNATIVE PROJECT SITE

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that can avoid, or substantially lessen any significant effects of the project (note: no significant unavoidable environmental effects have been identified for the proposed Project). An alternative site does not need to be considered when implementation is "remote and speculative," such as when the alternative site is beyond the control of a project applicant. Presently, there are no suitable alternative sites within the control of the Project Applicant. In addition, no other properties of similar size and residential zoning appear to be available for development in the City when comparing Figure 3 *Sites Inventory* of the most recent 2022 City of Walnut General Plan Housing Element and the most recent 2020 City of Walnut Zoning Map. Inventoried properties with potential for development described in the Housing Element are either zoned for commercial, industrial, specific-plan, or higher density residential uses. Consequently, the Alternative Project Site was determined infeasible and not advanced during the planning process.

6.7 PROPOSED PROJECT ALTERNATIVES

As noted earlier, 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 (CEQA Guidelines §15126.6(f)). With the historical and regulatory context as a backdrop, a review can proceed if alternatives to a project that minimize impacts brought about by the project are not addressed in other CEQA documents. This DEIR evaluates three alternatives to the proposed Project, including:

- Alternative 1: No Project, Current General Plan and Zoning
- Alternative 2: R-1 Zoning, 27 Units, No Bridge
- Alternative 3: RPD Zoning, 34 Units, No Bridge

6.8 ALTERNATIVE 1: NO PROJECT, CURRENT GENERAL PLAN AND ZONING

Under Alternative 1: *No Project, Current General Plan and Zoning*, no development would take place on the Project Site in the immediate future. The site would remain in its current condition for an unknown period of time, retaining onsite structures associated with previous uses, including the Winnett Farm's San Vicente Ranch and Brookside Equestrian Center structures (Main Barn/Residence and Minor Barn). The level of care required to ensure the Project Site does not pose a public safety or health risk would be less stringent compared to that required for an actively occupied site. If left unoccupied, the reduced site security may not be able to completely control potential vandalism or homeless occupation. In addition, the existing structures would likely continue to deteriorate, ultimately requiring the structures to be demolished or substantially modified.

If the proposed Project is denied and Alternative 1 is selected, it is unreasonable to expect that the Project Site would remain vacant and preserved in its existing environmental condition for the distant future because the Project Site is zoned for residential development. It would be reasonable to expect that another housing development, consistent with the Project Site's current zoning, would be proposed either by the current owner or another owner if the Project Site is sold. Pursuant to CEQA Section 15126.6(e)(3)(B) "…where failure to proceed with the project will not result in preservation of existing environmental conditions the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment." To that effect, potential environmental effects for Alternative 1 are anticipated to be substantially the same or similar to those analyzed for the proposed Project because of the existing zoning. Therefore, no additional environmental analysis is required for Alternative 1.

In addition, retention of the Project Site in its existing condition would fulfill only two of the basic Project Objectives identified above. Furthermore, Alternative 1 could conflict with *The Housing Crisis Act*, which prohibits local jurisdictions from enacting new laws that would have the effect of reducing the legal limit on new housing within their borders or delaying new housing via administrative or other regulatory barriers.

6.9 ALTERNATIVE 2: R-1 ZONING, 27 UNITS, NO BRIDGE

Under Alternative 2, the City approved R-1 Zoning would allow for 27 units, the same number of units as the proposed Project. The site plan, development area, and open space area would be substantially the same as the proposed Project; however, Alternative 2 would eliminate the proposed internal vehicle/pedestrian bridge over Lemon Creek, resulting in greater avoidance of Lemon Creek and a more restricted circulation system within the Project Site. Resident and emergency vehicle access would be provided to 13 homes from Meadow Pass Road and to 14 homes from La Puente Road/San Vicente Drive. Alternative 2 is shown in Figure 6-1, *Alternative 2*.

6.9.1 AESTHETICS

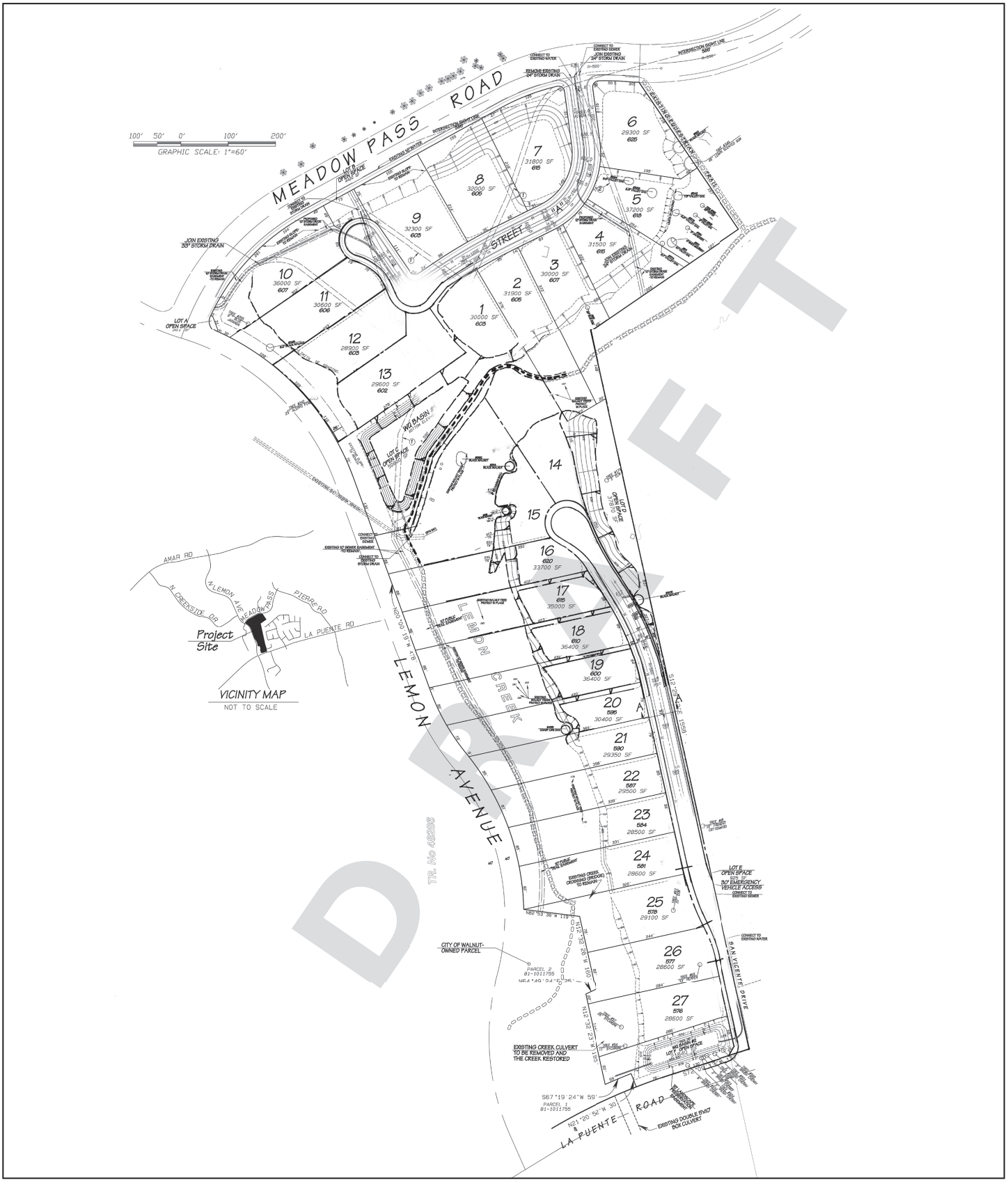
Both the proposed Project and Alternative 2 would construct a public trail along Lemon Creek that would provide public views of Lemon Creek and passive open space areas consistent with the area's community character. There are no designated State Scenic Highways within the viewshed of the Project Site. Neither the proposed Project nor Alternative 2 would obstruct or modify any scenic resources within a State Scenic Highway. The Project Site is situated within a suburbanized/urbanized environment and Alternative 2 is consistent with the City's General Plan and Zoning Code for planned residential development. Proposed levels of lighting and glare at the Project Site would be similar for both the proposed Project and Alternative 2. Neither the proposed Project nor Alternative 2 would have significant impacts on designated scenic resources, scenic vistas, a state scenic highway, or scenic quality regulations of the City. Proposed Project mitigation required under AES-1 would be the same for Alternative 2. Potential impacts would also be less than significant with mitigation incorporated.

6.9.2 AGRICULTURE AND FORESTRY RESOURCES

There is no designated Farmland (Prime, Unique, or Farmland of Statewide Importance) or forestry resources within the Project area, and no lands under a Williamson Act contract. Neither the proposed Project nor Alternative 2 would have an impact on designated Farmland, forestry resources, or conflict with Williamson Act contract lands. No mitigation would be required for the proposed Project or Alternative 2. There would also be no impacts.

6.9.3 AIR QUALITY

The proposed Project and Alternative 2 would construct the same number of residential units and similar associated infrastructure. Site design, grading operations and construction methods would be substantially the same; therefore, construction related pollutant emissions would be substantially the same. Operational air quality emissions from resident vehicles and occupied single-family homes would also be substantially the same. No mitigation would be required for the proposed Project or Alternative 2. Impacts would also be less than significant.



Source: PlaceWorks; July 11, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

Alternative 2

VCS Environmental

Figure 6-1

6.9.4 BIOLOGICAL RESOURCES

Alternative 2 would construct the same number of residential units and provide a similar amount of designated open space as the proposed Project. The proposed Project and Alternative 2 site plans would also be substantially the same. Neither the proposed Project nor Alternative 2 would have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Since Alternative 2 would not include the construction of the proposed internal vehicle/pedestrian bridge, potential impacts to jurisdictional waters would be less for Alternative 2 compared to the proposed Project. Neither the proposed Project nor Alternative 2 would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Neither the proposed Project nor Alternative 2 would conflict with the provisions of the City of Walnut General Plan Conservation, Open Space, and Recreation Element.

Compared to the proposed Project, Alternative 2 would have less potential impacts to biological resources due to the lack of construction of the vehicle/pedestrian bridge across Lemon Creek. Proposed Project mitigation required under BIO-1 through BIO-9 would be the same for Alternative 2. Potential impacts would also be less than significant with mitigation incorporated.

6.9.5 CULTURAL RESOURCES

The proposed Project is not anticipated to have any impacts to known cultural resources; however, grading and excavation activities always have the potential to discover unknown buried cultural resources. Alternative 2 would have the same potential to discover unknown buried cultural resources since proposed grading and excavations would be substantially the same. Proposed Project mitigation required under CR-1 through CR-7 would be the same for Alternative 2. Potential impacts would also be less than significant with mitigation incorporated.

6.9.6 ENERGY

Alternative 2 proposes the construction and occupancy of the same number of residential units as the proposed Project. Both the proposed Project and Alternative 2 would increase demands for electricity, natural gas, and petroleum fuels. Neither the proposed Project nor Alternative 2 are predicted to result in significant energy impacts due to wasteful, inefficient, or unnecessary consumption of energy resources. No mitigation would be required for the proposed Project or Alternative 2. Impacts would also be less than significant.

6.9.7 GEOLOGY AND SOILS

Alternative 2 would be subject to the same level of seismic risks and geologic constraints as the proposed Project since they propose the same land uses that would occur on the same Project Site. Alternative 2 would also be required to comply with Building Code seismic safety standards and implement design recommendations from site specific geotechnical reports to ensure the geologic stability of the site. Neither the proposed Project nor Alternative 2 would have significant impacts related to erosion, sedimentation and/or siltation. Both the proposed Project and Alternative 2 would involve substantially similar site preparation and grading and would therefore have similar potential impacts to discovering unknown buried paleontological resources. Proposed Project mitigation required under GEO-1 and PALEO-1 through PALEO-2 would be the same for Alternative 2. Potential impacts would also be less than significant with mitigation incorporated.

6.9.8 GREENHOUSE GAS EMISSIONS

Alternative 2 proposes the construction and occupancy of the same number of residential units as the proposed Project. Neither the proposed Project nor Alternative 2 would exceed the greenhouse gas emissions significance threshold or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the GHG emissions. Compared to the proposed Project, Alternative 2 would have similar impacts on greenhouse gas emissions. No mitigation would be required for the proposed Project or Alternative 2. Impacts would also be less than significant.

6.9.9 HAZARDS AND HAZARDOUS MATERIALS

Neither the proposed Project nor Alternative 2 would be developed on a hazardous materials site. Both construction of the proposed Project and Alternative 2 would involve the use of small amounts of hazardous substances that would not pose a risk to the environment. Alternative 2 would also be required to comply with local, state, and federal laws and regulations involving the handling, storage, and transportation of hazardous materials, which would minimize the risk of hazardous materials being released into the environment. Alternative 2 may have a greater potential impact on emergency vehicle access due to the lack of an internal vehicle/pedestrian bridge over Lemon Creek; however, emergency vehicle access would still be available from Meadow Pass Road and La Puente Road/San Vicente Drive. For this reason, Alternative 2 would result in a greater level of potential impacts to hazards and hazardous materials but remain less than significant with no additional mitigation required. Proposed project mitigation required under HAZ-1 would be the same for Alternative 2. Potential impacts would also be less than significant with mitigation incorporated.

6.9.10 HYDROLOGY AND WATER QUALITY

Both the proposed Project and Alternative 2 would drain into the same downstream water bodies and would be required to implement a water quality management plan and construct water quality retention basins that reduces rates of surface water runoff and treats pollutants to avoid conflict with the RWQCB Basin Plan. Both the proposed Project and Alternative 2 would permanently increase impervious surface areas and increase stormwater runoff rates, but with the implementation of best management practices (BMPs), would not contribute to significant water quality or hydrology impacts. Alternative 2 would have substantially similar potential effects on hydrology and water quality compared to the proposed Project. No mitigation would be required for the proposed Project or Alternative 2. Impacts would also be less than significant.

6.9.11 LAND USE AND PLANNING

Neither the proposed Project nor Alternative 2 would physically divide an established community or cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation. Both the proposed Project and Alternative 2 would be consistent with the City's General Plan and Zoning Code and provide a designated multi-use public trail connecting to existing City trail systems. Alternative 2 would have a more restricted internal circulation system within the Project Site because it would eliminate the proposed Project's vehicle/pedestrian bridge over Lemon Creek. Alternative 2's more restricted internal circulation system may not be as desirable from a land use planning perspective, but it would not physically divide an established community; therefore, this would not constitute a significant environmental impact under CEQA. No mitigation would be required for the proposed Project or Alternative 2. Impacts would also be less than significant.

6.9.12 MINERAL RESOURCES

According to the California Department of Conservation, Division of Mine Reclamation, the Project Site does not contain mines, mineral deposits, or other mineral resources. Additionally, there are no current or historic mining operations associated with the Project Site. Because of this, Alternative 2 would be similar to the proposed Project, with no impact to mineral resources. No mitigation would be required for the proposed Project or Alternative 2.

6.9.13 NOISE

Alternative 2 proposes the construction and occupancy of the same number of residential units as the proposed Project. Site design, grading operations and construction methods would be substantially the same; therefore, construction related noise would be substantially the same. Operational noise from resident vehicles and occupied single-family homes would also be substantially the same. No mitigation would be required for the proposed Project or Alternative 2. Impacts would also be less than significant.

6.9.14 POPULATION AND HOUSING

Both the proposed Project and Alternative 2 would increase the Project Site's population by a projected additional 89 persons and housing by 27 units. The estimated population increase would be in the range of estimated future growth projections identified in the City's General Plan; therefore, potential impacts to population and housing for the proposed Project and Alternative 2 would be less than significant. No mitigation would be required for the proposed Project or Alternative 2.

6.9.15 PUBLIC SERVICES

The proposed Project and Alternative 2 would involve the construction and occupancy of the same number of residential units within a similar site plan. Alternative 2's public service demands would be substantially the same compared to the proposed Project. No mitigation would be required for the proposed Project or Alternative 2. Impacts would also be less than significant.

6.9.16 RECREATION

Alternative 2 would involve the construction and occupancy of the same number of residential units and would have the same demand for recreational facilities as the proposed Project. Alternative 2 would also construct a designated multi-use public trail connecting to existing City trail systems that would provide for active recreation. No mitigation would be required for the proposed Project or Alternative 2. Impacts would also be less than significant.

6.9.17 TRANSPORTATION

Alternative 2 would involve the construction and occupancy of the same number of residential units. Both the proposed Project and Alternative 2 are forecast to generate 38.8 total Vehicle Miles Traveled (VMT) per service population, which is below the City's significance threshold of 43.42 total VMT per service population. Both the proposed Project and Alternative 2 would construct a designated multi-use public trail connecting to existing City trail systems; however, Alternative 2 would have a more restricted internal circulation system within the Project Site because it would eliminate the proposed Project's vehicle/pedestrian bridge over Lemon Creek. Alternative 2's more restricted internal circulation system may not be as desirable from a transportation planning perspective, but it would not result in a significant environmental impact under CEQA. Proposed Project mitigation required under TRA-1 would be the same for Alternative 2. Potential impacts would also be less than significant with mitigation incorporated.

6.9.18 TRIBAL CULTURAL RESOURCES

The proposed Project is not anticipated to have any impacts to known tribal cultural resources; however, grading and excavation activities always have the potential to discover unknown buried tribal cultural resources. Alternative 2 would have the same potential to discover unknown buried tribal cultural resources since proposed grading and excavations would be substantially the same. Proposed Project mitigation required under TCR-1 would be the same for Alternative 2. Potential impacts would also be less than significant with mitigation incorporated.

6.9.19 UTILITIES AND SERVICE SYSTEMS

The proposed Project and Alternative 2 would involve the construction and occupancy of the same number of residential units and would have substantially the same demand for utilities and service systems. Proposed Project mitigation required under USS-1 and USS-2 would be the same for Alternative 2. Potential impacts would also be less than significant with mitigation incorporated.

6.9.20 WILDFIRE

The Project Site is not located in a Very High Fire Hazard Severity Zone. The Project Site is also considered sufficiently far away (approximately 2.0 miles) from such designated fire zones and is located in a suburbanized/urbanized setting with multiple available ingress and egress routes of access. Both the proposed Project and Alternative 2 would be located in the same Project Site and have a substantially similar site plan. Alternative 2 may not be as desirable from an emergency vehicle access planning perspective, because elimination of the proposed Project vehicle/pedestrian bridge would prohibit vehicle access between the northern and southern portions of the Project Site; however, emergency vehicle access would still be available from Meadow Pass Road and La Puente Road/San Vicente Drive; therefore, this would not be considered a significant impact under CEQA. No mitigation would be required for the proposed Project or Alternative 2. Impacts would also be less than significant.

6.9.21 ALTERNATIVE 2 CONCLUSION

ABILITY TO REDUCE IMPACTS

Compared to the proposed Project, Alternative 2 would have a substantially similar impact on aesthetics, agriculture/forestry resources, air quality, cultural resources, energy, geology/soils, greenhouse gas emissions, hydrology/water quality, mineral resources, noise, population/housing, public services, recreation, tribal cultural resources, and utilities/service systems. Alternative 2 would have a lesser impact on biological resources resulting from avoidance of Lemon Creek by eliminating the proposed Project's internal vehicle/pedestrian bridge. Alternative 2 would have a greater impact on hazards/hazardous materials, land use/planning, transportation, and wildfire resulting from bifurcation of the Project Site's internal circulation system from eliminating the proposed Project's internal vehicle/pedestrian bridge. Proposed Project mitigation would be the same for Alternative 2. Potential impacts would also be less than significant with mitigation incorporated.

ABILITY TO ACHIEVE PROJECT OBJECTIVES

1. *Maintains consistency with the Project Site's Very Low Density General Plan and RPD (28,500) – 1.3 zoning designation.*

   Yes. Alternative 2 would provide the maximum number of housing units allowed under the R1 Zoning scenario, consistent with the current general plan and zoning. It should be noted that the Project Site would also allow development under the RPD Zoning, which would allow the development of 34 units

on the Project Site (Alternative 3). Additional units could potentially be increased above 34 units using a density bonus.

2. *Respects and enhances the health, biological function, and water quality of Lemon Creek, while assuring that the development does not increase flood risk for downstream properties.*

   Yes. Alternative 2, would minimize the amount of grading on the Project Site and minimize impacts to Lemon Creek with permanent open space areas. Elimination of the internal vehicle/pedestrian bridge would further reduce impacts to Lemon Creek although elimination of the bridge would result in a more restricted internal circulation system.

3. *Provides a multi-use trail dedicated to the City of Walnut, open to the public and provides a connection to other public trails at the Project boundaries.*

   Yes. Alternative 2 would provide a dedicated multi-use public trail with connections to existing public trails.

4. *Preserves the walnut and oak trees on the Project Site, retaining their significant historical, aesthetic, and environmental value*.

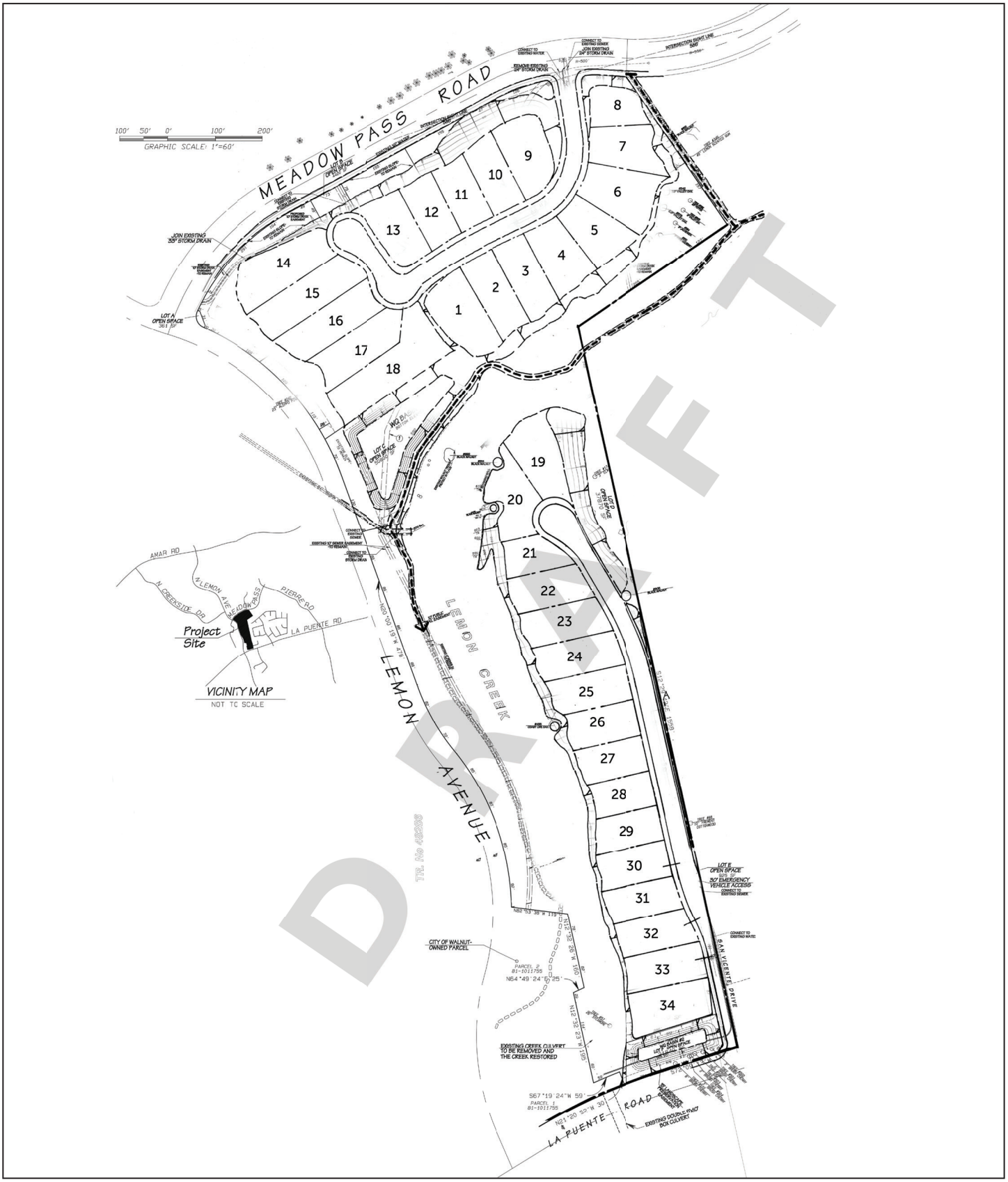
   Yes. Alternative 2 would preserve the walnut and oak trees on the Project Site, retaining their significant historical, aesthetic, and environmental value.

5. *Minimizes landform alteration by generally limiting grading to previously disturbed and/or developed areas of the Project Site and grading onsite without import or export.*

   Yes. Alternative 2 would limit grading to previously disturbed and/or developed areas of the Project Site and grading onsite without import or export.

6.10 ALTERNATIVE 3: RPD ZONING, 34 UNITS, NO BRIDGE

Alternative 3 would provide for 34 units under the residential planned development option of the RPD (28,500) – 1.3 zoning district. This alternative would maximize the number of units allowed using the 1.3du/acre density with no minimum lot sizes and would require a CUP. The site plan, development area, and open space area would be substantially the same as the proposed Project; however, Alternative 3 would eliminate the proposed internal vehicle/pedestrian bridge over Lemon Creek, resulting in greater avoidance of Lemon Creek and a more restricted circulation system within the Project Site. Resident and emergency vehicle access would be provided to 18 homes from Meadow Pass Road and to 16 homes from La Puente Road/San Vicente Drive. The designated open space areas would also be confined to their own lettered lots rather than located partially within residential property lots and deed restricted from development. Alternative 3 is shown in Figure 6-2, *Alternative 3*.



Source: PlaceWorks; July 11, 2024.

THE BROOKSIDE PROJECT
Environmental Impact Report

Alternative 3

VCS Environmental

Figure 6-2

6.10.1 AESTHETICS

Both the proposed Project and Alternative 3 would construct a public trail along Lemon Creek that would provide public views of Lemon Creek and passive open space areas consistent with the area's community character. There are no designated State Scenic Highways within the viewshed of the Project Site. Neither the proposed Project nor Alternative 3 would obstruct or modify any scenic resources within a State Scenic Highway. The Project Site is situated within a suburbanized/urbanized environment and Alternative 3 is consistent with the City's General Plan and Zoning Code for planned residential development. Proposed levels of lighting and glare at the Project Site would be similar for both the proposed Project and Alternative 3. Neither the proposed Project nor Alternative 3 would have significant impacts on designated scenic resources, scenic vistas, a state scenic highway, or scenic quality regulations of the City. Proposed Project mitigation required under AES-1 would be the same for Alternative 3. Potential impacts would also be less than significant with mitigation incorporated.

6.10.2 AGRICULTURE AND FORESTRY RESOURCES

There is no designated Farmland (Prime, Unique, or Farmland of Statewide Importance) or forestry resources within the Project area, and no lands under a Williamson Act contract. Neither the proposed Project nor Alternative 3 would have an impact on designated Farmland, forestry resources, or conflict with Williamson Act contract lands. No mitigation would be required for the proposed Project or Alternative 3. There would also be no impacts.

6.10.3 AIR QUALITY

Alternative 3 would construct an additional seven residential units and similar associated infrastructure. Site design, grading operations and construction methods would be substantially the same; therefore, construction related pollutant emissions would be substantially the same. Pollutants such as PM_{10} and $PM_{2.5}$ are predominantly associated with diesel exhaust and fugitive dust generated during site preparation and grading operations. Because site preparation and grading operations would be substantially equivalent for the proposed Project and Alternative 3, no increase in daily emissions that would exceed daily regional or localized emissions thresholds would be anticipated. A nominal increase in construction schedule may be required during the building construction phase to complete the seven additional homes; however, this would not be anticipated to increase daily emissions that would exceed daily regional or localized emissions thresholds. Operational air quality emissions from resident vehicles and occupied single-family homes would also be substantially the same but would be nominally greater because of the additional seven homes. Based on a 21% increase in the number of homes proposed under Alternative 3, the very low operational localized significance threshold of 2 pounds per day for PM_{10} could potentially be exceeded resulting predominantly from additional vehicle trips (mobile sources). The proposed Project's projected pounds per day of PM_{10} emissions is 1.72. A 21% increase in emissions would result in 2.08 pounds per day of PM_{10} under Alternative 3. No mitigation would be required for the proposed Project but Alternative 3 could potentially result in a significant unavoidable impact pending a more refined air quality analysis and/or implementation of mitigation measures. Impacts would be potentially significant.

6.10.4 BIOLOGICAL RESOURCES

Alternative 3 would construct seven additional residential units but would provide a similar amount of designated open space as the proposed Project. The proposed Project and Alternative 3 site plans would also be substantially the same. Neither the proposed Project nor Alternative 3 would have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and

Wildlife Service. Since Alternative 3 would not include the construction of the proposed internal vehicle/pedestrian bridge, potential impacts to jurisdictional waters would be less for Alternative 3 compared to the proposed Project. Neither the proposed Project nor Alternative 3 would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Neither the proposed Project nor Alternative 3 would conflict with the provisions of the City of Walnut General Plan Conservation, Open Space, and Recreation Element.

Compared to the proposed Project, Alternative 3 would have less potential impacts to biological resources due to the lack of construction of a vehicle/pedestrian bridge across Lemon Creek. Proposed Project mitigation required under BIO-1 through BIO-9 would be the same for Alternative 3. Potential impacts would also be less than significant with mitigation incorporated.

6.10.5 CULTURAL RESOURCES

The proposed Project is not anticipated to have any impacts to known cultural resources; however, grading and excavation activities always have the potential to discover unknown buried cultural resources. Alternative 3 would have the same potential to discover unknown buried cultural resources since proposed grading and excavations would be substantially the same. Proposed Project mitigation required under CR-1 through CR-7 would be the same for Alternative 3. Potential impacts would also be less than significant with mitigation incorporated.

6.10.6 ENERGY

Alternative 3 proposes the construction and occupancy of seven more residential units than the proposed Project. Both the proposed Project and Alternative 3 would increase demands for electricity, natural gas, and petroleum fuels. Neither the proposed Project nor Alternative 3 are predicted to result in significant energy impacts due to wasteful, inefficient, or unnecessary consumption of energy resources. No mitigation would be required for the proposed Project or Alternative 3. Impacts would also be less than significant; however, compared to the proposed Project, Alternative 3 would have nominally greater impacts to energy resources due to the additional seven units.

6.10.7 GEOLOGY AND SOILS

Alternative 3 would be subject to the same level of seismic risks and geologic constraints as the proposed Project since they propose the same land uses that would occur on the same Project Site. Alternative 3 would also be required to comply with Building Code seismic safety standards and implement design recommendations from site specific geotechnical reports to ensure the geologic stability of the site. Neither the proposed Project nor Alternative 3 would have significant impacts related to erosion, sedimentation and/or siltation. Both the proposed Project and Alternative 3 would involve substantially similar site preparation and grading and would therefore have similar potential impacts to discovering unknown buried paleontological resources. Proposed Project mitigation required under GEO-1 and PALEO-1 through PALEO-2 would be the same for Alternative 3. Potential impacts would also be less than significant with mitigation incorporated.

6.10.8 GREENHOUSE GAS EMISSIONS

Neither the proposed Project nor Alternative 3 would exceed the greenhouse gas emissions significance threshold or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Compared to the proposed Project, Alternative 3 would have nominally greater impacts on greenhouse gas emissions due to the additional seven units. The proposed Project's projected greenhouse

gas emissions would be 377 metric tons of CO_2e per year. Assuming a 21% increase in emissions resulting from the seven additional units, Alternative 3's projected greenhouse gas emissions would be 456 metric tons of CO_2e per year, which is below the SCAQMD Working Group's 3,000 metric tons of CO_2e per year threshold. No mitigation would be required for the proposed Project or Alternative 3. Impacts would also be less than significant.

6.10.9 HAZARDS AND HAZARDOUS MATERIALS

Neither the proposed Project nor Alternative 3 would be developed on a hazardous materials site. Both construction of the proposed Project and Alternative 3 would involve the use of small amounts of hazardous substances that would not pose a risk to the environment. Alternative 3 would also be required to comply with local, state, and federal laws and regulations involving the handling, storage, and transportation of hazardous materials, which would minimize the risk of hazardous materials being released into the environment. Alternative 3 may have a greater potential impact on emergency vehicle access due to the lack of an internal vehicle/pedestrian bridge over Lemon Creek; however, emergency vehicle access would still be available from Meadow Pass Road and La Puente Road/San Vicente Drive. For this reason, Alternative 3 would result in a greater level of potential impacts to hazards and hazardous materials but remain less than significant with no additional mitigation required. Proposed Project mitigation required under HAZ-1 would be the same for Alternative 3. Potential impacts would also be less than significant with mitigation incorporated.

6.10.10 HYDROLOGY AND WATER QUALITY

Both the proposed Project and Alternative 3 would drain into the same downstream water bodies and would be required to implement a water quality management plan and construct water quality retention basins that reduces rates of surface water runoff and treats pollutants to avoid conflict with the RWQCB Basin Plan. Both the proposed Project and Alternative 3 would permanently increase impervious surface areas and increase stormwater runoff rates, but with the implementation of best management practices (BMPs), would not contribute to significant water quality or hydrology impacts. Alternative 3 would have substantially similar potential effects on hydrology and water quality compared to the proposed Project. No mitigation would be required for the proposed Project or Alternative 3. Impacts would also be less than significant.

6.10.11 LAND USE AND PLANNING

Neither the proposed Project nor Alternative 3 would physically divide an established community or cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation. Both the proposed Project and Alternative 3 would be consistent with the City's General Plan and Zoning Code and provide a designated multi-use public trail connecting to existing City trail systems. Alternative 3 would have a more restricted internal circulation system within the Project Site because it would eliminate the proposed Project's vehicle/pedestrian bridge over Lemon Creek. Alternative 3's more restricted internal circulation system may not be as desirable from a land use planning perspective, but it would not physically divide an established community; therefore, this would not constitute a significant environmental impact under CEQA. No mitigation would be required for the proposed Project or Alternative 3. Impacts would also be less than significant.

6.10.12 MINERAL RESOURCES

According to the California Department of Conservation, Division of Mine Reclamation, the Project Site does not contain mines, mineral deposits, or other mineral resources. Additionally, there are no current or historic mining operations associated with the Project Site. Because of this, Alternative 3 would be similar

to the proposed Project, with no impact to mineral resources. No mitigation would be required for the proposed Project or Alternative 3.

6.10.13 NOISE

Alternative 3 would construct an additional seven residential units and similar associated infrastructure. Site design, grading operations and construction methods would be substantially the same; therefore, construction related noise would be substantially the same. A nominal increase in construction schedule may be required during the building construction phase to complete the seven additional homes; however, this would not be anticipated to increase daily construction noise levels that would exceed the Federal Transit Administration's Construction Noise Threshold. Operational noise from resident vehicles would also be substantially the same but would be nominally greater because of the additional seven homes and associated increased vehicle trips. Based on a 21% increase in the number of homes proposed under Alternative 3 and the proposed Project's maximum projected contribution to operational roadway noise (+0.3 dBA), potential impacts would be less than significant. The proposed Project's maximum projected contribution to operational roadway noise would be +0.3 dBA. A 21% increase in operational roadway noise would result in a +0.4 dBA increase, which is below the Federal Transit Administration's lowest allowable increase threshold of +1 dBA. No mitigation would be required for the proposed Project or Alternative 3. Impacts would also be less than significant.

6.10.14 POPULATION AND HOUSING

The proposed Project would increase the Project Site's population by a projected additional 89 persons and housing by 27 units. Alternative 3 would further increase the population on the Project Site by an additional 23 persons and seven units. The estimated population increase would be in the future growth projections identified in the City's General Plan; therefore, impacts to population and housing would be less than significant. No mitigation would be required for the proposed Project or Alternative 3. In addition, because Alternative 3 involves the construction of seven more units than the proposed Project, it would better meet the Project Objective of maximizing housing opportunities under the existing General Plan and zoning.

6.10.15 PUBLIC SERVICES

Alternative 3 would involve the construction of seven more residential units than the proposed Project and would therefore have nominally greater public services demands. Alternative 3's public service demands would still be substantially the same compared to the proposed Project. No mitigation would be required for the proposed Project or Alternative 3. Impacts would also be less than significant.

6.10.16 RECREATION

Alternative 3 would involve the construction of seven more residential units than the proposed Project and would therefore have nominally greater demand for recreational facilities. Alternative 3 would also construct a designated multi-use public trail connecting to existing City trail systems that would provide for active recreation. No mitigation would be required for the proposed Project or Alternative 3. Impacts would also be less than significant.

6.10.17 TRANSPORTATION

Alternative 3 would involve the construction and occupancy of seven additional residential units compared to the proposed Project. Alternative 3 is forecast to generate 35.27 total Vehicle Miles Traveled (VMT) per service population, which is below the City's significance threshold of 37.02 total VMT per service population. Both the proposed Project and Alternative 3 would construct a designated multi-use public trail

connecting to existing City trail systems; however, Alternative 3 would have a more restricted internal circulation system within the Project Site because it would eliminate the proposed Project's vehicle/pedestrian bridge over Lemon Creek. Alternative 3's more restricted internal circulation system may not be as desirable from a transportation planning perspective, but it would not result in a significant environmental impact under CEQA. Proposed Project mitigation required under TRA-1 would be the same for Alternative 3. Potential impacts would also be less than significant with mitigation incorporated.

6.10.18 TRIBAL CULTURAL RESOURCES

The proposed Project is not anticipated to have any impacts to known tribal cultural resources; however, grading and excavation activities always have the potential to discover unknown buried tribal cultural resources. Alternative 3 would have the same potential to discover unknown buried tribal cultural resources since proposed grading and excavations would be substantially the same. Proposed Project mitigation required under TCR-1 would be the same for Alternative 3. Potential impacts would also be less than significant with mitigation incorporated.

6.10.19 UTILITIES AND SERVICE SYSTEMS

Alternative 3 would involve the construction of seven more residential units than the proposed Project and would therefore have a nominally greater demand for utilities and service systems. Proposed Project mitigation required under USS-1 and USS-2 would be the same for Alternative 3. Potential impacts would also be less than significant with mitigation incorporated.

6.10.20 WILDFIRE

The Project Site is not located in a Very High Fire Hazard Severity Zone. The Project Site is also considered sufficiently far away (approximately 2.0 miles) from such designated fire zones and is located in a suburbanized/urbanized setting with multiple available ingress and egress routes of access. Both the proposed Project and Alternative 3 would be located in the same Project Site and have a substantially similar site plan. Alternative 3 may not be as desirable from an emergency vehicle access planning perspective, because elimination of the proposed Project vehicle/pedestrian bridge would prohibit vehicle access between the northern and southern portions of the Project Site; however, emergency vehicle access would still be available from Meadow Pass Road and La Puente Road/San Vicente Drive; therefore, this would not be considered a significant impact under CEQA. No mitigation would be required for the proposed Project or Alternative 3. Impacts would also be less than significant.

6.10.21 ALTERNATIVE 3 CONCLUSION

ABILITY TO REDUCE IMPACTS

Compared to the proposed Project, Alternative 3 would have a substantially similar impact on aesthetics, agriculture/forestry resources, cultural resources, geology/soils, hydrology/water quality, mineral resources, population/housing, and tribal cultural resources. Alternative 3 would have a lesser impact on biological resources resulting from avoidance of Lemon Creek by eliminating the proposed Project's internal vehicle/pedestrian bridge. Alternative 3 would have a greater impact on air quality, energy, greenhouse gas emissions, hazards/hazardous materials, land use/planning, public services, recreation, transportation, utilities/service systems, and wildfire resulting from bifurcation of the Project Site's internal circulation system from eliminating the proposed Project's internal vehicle/pedestrian bridge and from the additional 7 units. Proposed Project mitigation would be the same for Alternative 3 and potential impacts would also be less than significant with mitigation incorporated except potentially for air quality. As discussed above, operational air quality emissions from resident vehicles and occupied single-family homes

would be substantially the same but would be nominally greater because of the additional seven homes. Based on a 21% increase in the number of homes proposed under Alternative 3, the very low operational localized significance threshold of 2 pounds per day for PM_{10} could potentially be exceeded (2.08 pounds per day). Alternative 3 could potentially result in a significant unavoidable impact to air quality pending a more refined air quality analysis and/or implementation of mitigation measures. Impacts would be potentially significant.

ABILITY TO ACHIEVE PROPOSED PROJECT OBJECTIVES

1. *Maintains consistency with the Project Site's Very Low Density General Plan and RPD (28,500) – 1.3 zoning designation.*

   Yes. Alternative 3 would provide the maximum number of housing units allowed under the RPD Zoning scenario, consistent with the current general plan and zoning. Additional units could potentially be increased above 34 units using a density bonus.

2. *Respects and enhances the health, biological function, and water quality of Lemon Creek, while assuring that the development does not increase flood risk for downstream properties.*

   Yes. Alternative 3, would minimize the amount of grading on the Project Site and minimize impacts to Lemon Creek with permanent open space areas. Elimination of the internal vehicle/pedestrian bridge would further reduce impacts to Lemon Creek.

3. *Provides a multi-use trail dedicated to the City of Walnut, open to the public and provides a connection to other public trails at the Project boundaries.*

   Yes. Alternative 3 would provide a dedicated multi-use public trail with connections to existing public trails.

4. *Preserves the walnut and oak trees on the Project Site, retaining their significant historical, aesthetic, and environmental value*.

   Yes. Alternative 2 would preserve the walnut and oak trees on the Project Site, retaining their significant historical, aesthetic, and environmental value.

5. *Minimizes landform alteration by generally limiting grading to previously disturbed and/or developed areas of the Project Site and grading onsite without import or export.*

   Yes. Alternative 2 would limit grading to previously disturbed and/or developed areas of the Project Site and grading onsite without import or export.

6.11 SUMMARY OF PROJECT ALTERNATIVE IMPACTS

Table 6-1, *Project Alternatives Impact Comparison Summary*, provides a comparison of the level of impact between the proposed Project and the Project alternatives by environmental issue area. The proposed Project's most potentially severe impact finding for each environmental issue area is provided. The alternatives' level of impact is compared to the proposed Project's level of impact, identified as either similar, greater, or lesser. These identifiers are used to distinguish between alternatives but do not constitute an impact finding for that alternative. Where an alternative may have a potentially significant impact, it is also indicated in the table in parenthesis. More detailed comparisons and impact findings are provided for the alternatives in their respective environmental issue area sections above.

Table 6-1
Project Alternatives Impact Comparison Summary

Environmental Issue Area	Proposed Project Impact Finding	Alternative 1: No Project, Current General Plan and Zoning	Alternative 2: R-1 Zoning, 27 Units, No Bridge	Alternative 3 RPD Zoning, 34 Units, No Bridge
Aesthetics	Less Than Significant with Mitigation Incorporated	Similar	Similar	Similar
Agriculture/Forestry Resources	No Impact	Similar	Similar	Similar
Air Quality	Less Than Significant Impact	Similar	Similar	Greater (Potentially Significant)
Biological Resources	Less Than Significant with Mitigation Incorporated	Similar	Lesser	Lesser
Cultural Resources	Less Than Significant with Mitigation Incorporated	Similar	Similar	Similar
Energy	Less Than Significant Impact	Similar	Similar	Greater
Geology/Soils	Less Than Significant with Mitigation Incorporated	Similar	Similar	Similar
Greenhouse Gas Emissions	Less Than Significant Impact	Similar	Similar	Greater
Hazards/Hazardous Materials	Less Than Significant with Mitigation Incorporated	Similar	Greater	Greater
Hydrology/Water Quality	Less Than Significant Impact	Similar	Similar	Similar
Land Use and Planning	Less Than Significant Impact	Similar	Greater	Greater
Mineral Resources	No Impact	Similar	Similar	Similar
Noise	Less Than Significant Impact	Similar	Similar	Greater
Population/Housing	Less Than Significant Impact	Similar	Similar	Similar
Public Services	Less Than Significant Impact	Similar	Similar	Greater
Recreation	Less Than Significant Impact	Similar	Similar	Greater
Transportation	Less Than Significant with Mitigation Incorporated	Similar	Greater	Greater
Tribal Cultural Resources	Less Than Significant with Mitigation Incorporated	Similar	Similar	Similar
Utilities/Service Systems	Less Than Significant with Mitigation Incorporated	Similar	Similar	Greater
Wildfire	Less Than Significant Impact	Similar	Greater	Greater

Table 6-2, *Project Alternatives Compliance with Project Objectives Summary*, identifies whether the proposed Project or alternatives achieve the Project Objectives. More detailed discussions are provided for the alternatives in their respective environmental issue area sections above.

Table 6-2
Project Alternatives Compliance with Project Objectives Summary

Project Objectives	Proposed Project	Alternative 1: No Project, Current General Plan and Zoning	Alternative 2: R-1 Zoning, 27 Units, No Bridge	Alternative 3 RPD Zoning, 34 Units, No Bridge
1. Maintains consistency with the Project Site's Very Low Density General Plan and RPD (28,500) – 1.3 zoning designation.	Yes	No	Yes	Yes
2. Respects and enhances the health, biological function, and water quality of Lemon Creek, while assuring that the development does not increase flood risk for downstream properties.	Yes	Yes	Yes	Yes
3. Provides a multi-use trail dedicated to the City of Walnut, open to the public and provides a connection to other public trails at the Project boundaries.	Yes	No	Yes	Yes
4. Preserves the walnut and oak trees on the Project Site, retaining their significant historical, aesthetic, and environmental value.	Yes	No	Yes	Yes
5. Minimizes landform alteration by generally limiting grading to previously disturbed and/or developed areas of the Project Site and grading onsite without import or export.	Yes	Yes	Yes	Yes

6.12 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

While neither the CEQA statute nor the CEQA Guidelines expressly state that an EIR must in all cases identify the "Environmentally Superior Alternative," CEQA Guidelines §15126.6(e)(2) states that if the No Project alternative is the Environmentally Superior Alternative, the EIR must also identify "an Environmentally Superior Alternative" from among the other alternatives.

The Lead Agency is not, however, obligated to select the Environmentally Superior Alternative for implementation if it would not accomplish the basic Project Objectives and/or is infeasible. Selection of the Environmentally Superior Alternative can be difficult, especially when the differences between the impacts of the alternatives involve trade-offs between types of impacts.

The proposed Project would result in no impacts, less than significant impacts, and less than significant impacts with mitigation incorporated across all 20 environmental issue areas. No significant unavoidable adverse impact would occur. The proposed Project would meet all five Project Objectives.

Compared to the proposed Project, Alternative 1 would result in similar impacts across all 20 environmental issue areas. As indicated above, Alternative 1 would only meet two Project Objectives.

Compared to the proposed Project, Alternative 2 would result in reduced impacts for one issue area (biological resources), increased impacts for four issue areas (hazards/hazardous materials, land use/planning, transportation, and wildfire), similar impacts for 15 issue areas (aesthetics, air quality, agriculture/forestry resources, cultural resources, energy, geology/soils, greenhouse gas emissions, hydrology/water quality, mineral resources, noise, population/housing, public services, recreation, tribal cultural resources, and utilities/service systems). As indicated above, Alternative 2 would meet all five Project Objectives.

Compared to the proposed Project, Alternative 3 would result in reduced impacts for one issue area (biological resources), increase impacts for 11 issue areas (air quality, energy, greenhouse gas emissions, hazards/hazardous materials, land use/planning, public services, recreation, transportation, utilities/service systems, and wildfire), and have a similar level of impacts for eight issue areas (aesthetics, agriculture/forestry resources, cultural resources, geology/soils, hydrology/water quality, mineral resources, population/housing, and tribal cultural resources). Alternative 3 could potentially result in a significant unavoidable impact to air quality pending a more refined air quality analysis and/or implementation of mitigation measures. Impacts would be potentially significant. Alternative 3 would meet all five Project Objectives.

The proposed Project and alternatives involve trade-offs between types of impacts.

The "Environmentally Superior Alternative" is chosen from among the alternatives only. That selection does not include the proposed Project. As shown previously in Table 6-1, *Project Alternatives Impact Comparison Summary*, Alternatives 2 and 3 are each environmentally superior to the Project in one respect (Biological Resources), although they also are environmentally inferior to the Project in several respects. On the other hand, the No Project alternative is "Similar" to the Project in *all* respects and, therefore, is environmentally superior to Alternatives 2 and 3. As a result, the No Project Alternative is the Environmentally Superior Alternative.

As between Alternative 2 and Alternative 3, Table 6-1 shows that Alternative 3 has "Greater" impacts than the Project in several respects more than does Alternative 2. As a result, in compliance with Guidelines §15126.6(e)(2), Alternative 2 is identified as the Environmentally Superior Alternative from among the alternatives other than the No Project alternative.

As discussed in this Section and shown in Table 6-1, Alternatives 2 and 3 were environmentally superior to the Project only with respect to Biological Resources, but none of the Alternatives were environmentally superior to the Project on an overall basis. Overall, the proposed Project would have fewer environmental impacts than any of the Alternatives and meet the Project Objectives.

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SECTION 7.0 OTHER CEQA CONSIDERATIONS

7.1 THE SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

Pursuant to *CEQA Guidelines* Section 15126.2(a), this EIR analyzes the proposed Project's potential significant direct and indirect effects on the environment, considering both the short-term and long-term effects. This section provides a summary of potential effects. A detailed analysis is provided for each topic area in Section 5.0, *Environmental Analysis*.

During construction, surrounding land uses could be temporarily impacted by air pollutants (e.g., dust and equipment exhaust) and noise. Construction activities could potentially disturb biological resources (e.g., riparian habitat, Lemon Creek, trees, species) and/or contribute to degraded surface water quality (e.g., equipment fuels and erosion). Excavation and grading activities could potentially discover a buried cultural or paleontological resource. The construction waste stream would also require proper management. These short-term effects would be temporary and would be avoided, minimized, or mitigated to a less than significant level through implementation of mitigation measures and/or compliance with regulatory requirements identified in this EIR.

Long-term Project operations (i.e., occupancy) would change the physical appearance of the Project Site and would contribute to increased vehicle miles traveled, increased residential noise, increased amounts of impervious surfaces, and increased energy and natural resource consumption. Project operations would also incrementally increase demand for public services and utilities. These long-term operational effects would be reduced to a less than significant level through implementation of mitigation measures, Project design, and/or compliance with regulatory requirements identified in this EIR.

7.2 GROWTH-INDUCING IMPACTS

Pursuant to Sections 15126(d) and 15126.2(e) of the CEQA Guidelines, this section is provided to examine ways in which the 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 could foster other activities which could affect the environment, individually or cumulatively. To address this issue, potential growth-inducing effects would 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 foster economic expansion or growth (e.g., changes in revenue base and employment expansion) or foster population growth (e.g., construction of additional housing), either directly or indirectly?
- Would approval of this Project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Should a project meet any one of the above-listed criteria, it may be considered growth-inducing. Generally, growth-inducing projects are either located in isolated or underdeveloped areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways, or encourage premature or unplanned growth. Note that the *CEQA Guidelines* require an EIR to "discuss the ways" a project could

be growth-inducing and to "discuss the characteristics of some projects that may encourage … activities that could significantly affect the environment." In accordance with the *CEQA Guidelines* and based on the above-listed criteria, the Project's potential growth-inducing impacts are evaluated below.

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 Project would not remove obstacles to growth. The elimination of a physical obstacle to growth, such as the construction or extension of major infrastructure facilities that are not presently in the area, would be considered a growth-inducing impact. The growth-inducing potential of the Project would also be considered significant if it fosters growth more than what is assumed in the local master plans and land use plans (e.g., General Plan), or in projections made by regional planning agencies.

The Project Site is currently developed/disturbed with existing infrastructure. The area surrounding the Project Site is urbanized/suburbanized with existing infrastructure as well. Utilities and service systems would require minor expansion and/or extension from the Project Site to existing lines in adjacent roadways. Additionally, the Project would take access from existing roadways and would not need to construct new offsite roadways. Therefore, the Project would not remove an impediment to growth that would facilitate growth in the Project area.

The proposed Project would require Tentative Tract Map and Site Plan approval, to allow for the development of a 27-unit single-family detached housing Project to help meet Walnut's regional housing needs. Project approval would not establish a precedent for other parcels in the City. The City makes these types of determinations on a case-by-case basis.

Would this project foster economic expansion or growth (e.g., changes in revenue base and employment expansion) or fostering population growth (e.g., construction of additional housing), either directly or indirectly?

The Project would not foster economic expansion or growth, or population growth. A project could induce population growth in an area either directly, through the development of new residences or businesses that induce population growth directly, or indirectly, through the extension of roads or other infrastructure that induce population growth indirectly.

The Project would construct 27 single-family detached housing units. Based on the City of Walnut's average household size of 3.29 persons per household, the Project is estimated to have 89 residents. The General Plan Land Use Map designates the Project Site as Very Low Density. The proposed Project is consistent with the General Plan and the population increase generated by the Project would be accounted for in the City's General Plan growth projections and Southern California Association of Governments (SCAG) regional population forecasts. Therefore, Project implementation would not result in unplanned population growth. Additionally, the Project would not construct any new roads or major infrastructure in locations that are not planned for growth; therefore, the Project would not induce substantial unplanned population growth in the Project area, either directly or indirectly.

Project operations would also not generate substantial new employment opportunities in the City. Project construction would generate short-term employment opportunities. It is anticipated that the short-term employment opportunities would be filled from local labor forces and would not be growth-inducing in this regard. The Project could generate the need for household services for the maintenance and upkeep of the

new residential homes. It is anticipated that these household services would be provided from existing business. The Project's potential growth-inducing impacts would be considered less than significant.

Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

The Project would not involve a precedent-setting action that could encourage or facilitate other activities that could significantly affect the environment. The Project Applicant requests approval of a Tentative Tract Map and Site Plan Approval to allow for the development of 27 single-family detached homes on approximately 25.84 acres of land. The City's General Plan designates the Project Site as Very Low Density. The current zoning is R.P.D. -28,500- 1.3 DU (Residential Planned Development, with a minimum 28,500 square foot lot size, and net acre density of 1.3 dwelling units per acre). The Project would be consistent with the Project Site's land use and zoning designations.

The Project would not change land use density in the City. In this regard, the Project would not be considered a precedent-setting action. Incentives to increase density on other land in the City would result from regional economic conditions and market demands for housing and would not be directly or indirectly influenced by proposed actions at the Project Site. Future actions that may increase densities in the City would be evaluated for potential impacts to the environment and may require its own mitigation. Therefore, Project approval would not involve a precedent-setting action that could be applied to other properties and thereby encourage or facilitate growth that would not otherwise occur.

SUMMARY ENVIRONMENTAL IMPACTS OF INDUCED GROWTH

Overall, Project implementation would not generate substantial population growth. The Project is considered an in-fill development surrounded by existing urban/suburban land uses with already improved infrastructure. The minor utility expansion and/or extension from the Project Site to connect with existing lines in adjacent roadways would not facilitate additional growth in the Project area. All potential effects to the environment associated with the construction and operation of the Project have been analyzed in this EIR and potential impacts have been reduced to less than significant through the implementation of mitigation measures or compliance with regulatory requirements. Therefore, potential growth-inducing impacts would be less than significant, and no additional compliance steps or mitigation is required.

7.3 IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD OCCUR WITH PROJECT IMPLEMENTATION

According to *CEQA Guidelines* Sections 15126(c) and 15126.2(d), an EIR is required to address any significant irreversible environmental changes that would occur should the Project be implemented.

The Project would consume limited, slowly-renewable, and non-renewable resources. This consumption would occur during the Project's construction phase and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Project Site.

Project construction would require the consumption of resources that are not renewable, or which may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: lumber and other forest products, aggregate materials used in concrete and asphalt, metals, and water. Fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment.

Project operations would require a commitment to renewable and non-renewable resources. Resources would include energy such as electricity and natural gas, petroleum-based fuels required for vehicle trips, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the Project and the existing, finite supplies of these natural resources would be incrementally reduced. The use of nonrenewable resources required for construction and operation of the proposed Project would be typical for this size of residential development and would not result in overconsumption or wasteful use of nonrenewable resources. However, the energy requirements associated with the Project would, nonetheless, represent a long-term commitment of essentially non-renewable resources. To minimize the commitment of non-renewable resources, the Project would be constructed in accordance with Title 24, Part 6 of the *California Code of Regulations*, which sets forth conservation practices that would limit the amount of energy consumed by the Project.

In summary, Project construction and operations would result in the irretrievable commitment of limited, slowly-renewable, and nonrenewable resources, which would limit the availability of these specific resource quantities for future generations or for other uses during the life of the Project. The Project would involve the use of building materials and energy, some of which are non-renewable resources. Consumption of these resources would occur with any development in the region and are not unique to the Project. Additionally, increasingly efficient building fixtures and automobile engines are expected to offset this demand to some degree. Continued use of such resources would also be on a relatively small scale and consistent with regional and local growth forecasts in the area. As such, although irreversible environmental changes would result from Project implementation, such changes would not be considered significant. No additional compliance steps or mitigation measures are required.

7.4 UNAVOIDABLE ADVERSE IMPACTS

According to *CEQA Guidelines* Sections 15126(b) and 15126.2(c), an EIR must identify any significant environmental effects that would result from the Project (Public Resources Code, §21100, Subdivision (b)(2)(B)). The Project would have no significant unavoidable adverse environmental effects.

SECTION 8.0 ORGANIZATIONS AND PERSONS CONSULTED

8.1 LEAD AGENCY

CITY OF WALNUT

Community Development Department
21201 La Puente Road
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Chris Vasquez, Director of Community Planning
Joelle Guerra, Planning and Code Enforcement Manager

8.2 APPLICANT

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8.3 PREPARERS OF THE ENVIRONMENTAL IMPACT REPORT

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Cody Fees, Environmental Analyst
Jose Gonzalez, Environmental Analyst
Ana Canning, Project Coordinator
Linda Bo, Production Coordinator
Wade Caffrey, Director of Biological/Regulatory Resources
Vanessa Tucker, Wildlife Biologist
Nathalie Munoz, Biologist
Pat Maxon, RPA, Director of Cultural Resources
Willa Sumer, GIS Specialist

8.4 TECHNICAL CONSULTANTS

AIR QUALITY, ENERGY AND GREENHOUSE GAS ANALYSIS | HEALTH RISK ASSESSMENT | NOISE IMPACT ANALYSIS

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FIRE SERVICES

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Ronald Durbin, Chief, Forestry Division – Prevention Services Bureau

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POLICE SERVICES

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Walnut, California 91789

Sergeant Thomas Anderson

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