

Draft Environmental Impact Report

SCH No. 2023120051

701 S. MYRTLE SPECIFIC PLAN AND DEVELOPMENT PROJECT

City of Monrovia, California

Lead Agency

City of Monrovia - Community Development Department
Attn: John Mayer, Senior Planner
415 South Ivy Avenue
Monrovia, CA 91016

Lead Agency Discretionary Permits

General Plan Amendment
Specific Plan
Zoning Code Amendment
Vesting Tentative Parcel Map
Conditional Use Permit

Date: July 2, 2025

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Lead Agency Discretionary Permits
General Plan Amendment
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ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
§	Section
§§	Sections
>	greater than
≥	greater than or equal to
24/7	24 hours per day, 7 days per week
a.m.	Ante Meridiem (between the hours of midnight and noon)
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
AC or A/C	air conditioning
ACCMs	Asbestos Containing Construction Materials
ACMs	Asbestos Containing Materials
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AFY	Acre Feet per Year
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
AMI	Average Median Income
AMSL	Above Mean Sea Level
ANSI	American National Standards Institute
A-P Act	Alquist-Priolo Earthquake Fault Zoning Act
APE	Area of Potential Effect
APN	Assessor Parcel Number
AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ASTM	American Society of Testing and Materials
ASTs	Above ground storage tanks
Av.	Avenue
BAAQMD	Bay Area Air Quality Management District
BACT	Best Available Control Technology
BAU	Business as Usual
BFSA	Brian F. Smith and Associates
bgs	Below ground surface
Blvd.	Boulevard
BMPs	Best Management Practices
BSC	Building Standards Commission

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
C&D	construction and demolition
C_2Cl_4	perchloroethylene
C_2F_6	Hexafluoroethane
C_2H_6	Ethane
CA	California
CA MUTCD	California Manual on Uniform Traffic Control Devices
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CadnaA	Computer Aided Noise Abatement
CalEEMod™	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalFire	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal OES	California Governor's Office of Emergency Services
Cal/OSHA	California Department of Industrial Relations Division of Occupational Safety and Health
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPP	Community Air Protection Program
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CBSC	California Building Standards Code
CBSC	California Building Standards Commission
CCAA	California Clear Air Act
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFA	California Department of Food and Agriculture
CDFW	California Department of Fish and Wildlife
CDPH	California Department of Public Health
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
cf	cubic feet
CFCs	Chlorofluorocarbons
CFR	Code of Federal Regulations
cfs	cubic feet per second

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
CH_4	Methane
CHP	California Highway Patrol
CHRIS	California Historic Resources Information System
CIWMB	California Integrated Waste Management Board
CNEL	Community Noise Equivalent Level
CNMP	Construction Noise Management Plan
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
COG	Council of Governments
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
COHb	carboxyhemoglobin
CPA	Clean Power Alliance
CPEP	Clean Power and Electrification Pathway
CPT	cone penetration test
CPUC	California Public Utilities Commission
CREC	controlled recognized environmental condition
CRHR	California Register of Historical Resources
CRNA	California Natural Resources Agency
CSU	California State University
CUP	Conditional Use Permit
CUPA	California Unified Program Agency
CVC	California Vehicle Code
CWA	Clean Water Act
dBA	A-weighted Decibels
DEIR	Draft Environmental Impact Report
DF	Design Features
DMV	Department of Motor Vehicles
DOE	Determination of Eligibility
DOSH	Division of Occupational Safety and Health
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substances Control
DU	Dwelling Unit
DWR	Department of Water Resources
EA	Energy Analysis

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
EAP	Energy Action Plan
EECAP	electricity efficiency chapter of a climate action plan
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
EMFAC	Emission Factor Model
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-To-Know Act
ESA	Environmental Site Assessment
EV	Electric Vehicle
F	Fahrenheit
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
GCC	Global Climate Change
Gg	Gigagrams
GHG	Greenhouse Gas
GHGA	Greenhouse Gas Analysis
GIS	Geographic Information System
g/L	grams per liter
GP	General Plan
GPA	General Plan Amendment
gpcd	gallons per capita per day
GPI	Geotechnical Professionals, Inc.
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plans
GW	Gigawatts
GWP	Global Warming Potential
HCA	Housing Crisis Act
HCD	Department of Housing and Community Development
HFCs	Hydrofluorocarbons
HFC-23	Fluoroform
HFC-134a	1,1,1,2-tetrafluoroethane

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
HFC-152a	1,1-difluoroethane
HHMD	Health Hazardous Materials Division
HHW	Household Hazardous Waste
HMMD	Hazardous Materials Management Division
HMTA	Hazardous Materials Transportation Act
HMTUSA	Hazardous Materials Transportation Uniform Safety Act
HRA	Health Risk Assessment
HREC	historical recognized environmental condition
HSC	Health and Safety Code
HSWA	Hazardous and Solid Waste Amendments
HWCL	Hazardous Waste Control Law
I	Interstate
IEPR	Integrated Energy Policy Report
IPCC	Intergovernmental Panel on Climate Change
ISO	International Organization for Standardization
ITS	intelligent transportation systems
JPA	Joint Powers Authority
KSF	Thousand Square Feet
L_{50}	measured median noise level
LACSD	Los Angeles County Sanitation District
LACFD	Lose Angeles County Fire Department
LAWQCB	Los Angeles Regional Water Quality Control Board
LBP	Lead-based paint
lbs/day	pounds per day
LCA	Life-cycle analysis
LCD	liquid crystal display
LCFS	low carbon fuel standard
LEA	Lead Enforcement Agency
LEED	Leadership in Energy and Environmental Design
Leq	equivalent continuous sound level
LID	low impact development
LM	Light Manufacturing
Lmax	Maximum level measured over the time interval
LOS	Level of Service

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
LRA	local responsibility area
LSTs	localized significance thresholds
MBTA	Migratory Bird Treaty Act
MFR	Monrovia Fire and Rescue
MGD	million gallons per day
MMC	Monrovia Municipal Code
MMRP	Mitigation Monitoring and Reporting Program
MPD	Monrovia Police Department
MPO	Metropolitan Planning Organization
MRRA	Market Rate Residential Alternative
MRZ-4	Mineral Resource Zone 4
MTCO2e	Metric Tons of Carbon Dioxide Equivalent
MUSD	Monrovia Unified School District
MUTCD	Manual on Uniform Traffic Control Devices
MWD	Metropolitan Water District
N_2	Nitrogen
N_2O	Nitrous Oxide
NA	Noise Analysis
NB	Northbound
NAHC	Native American Heritage Commission
NAAQS	National Ambient Air Quality Standards
NF_3	nitrogen trifluoride
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NIOSH	National Institute for Occupational Safety and Health
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
NO_X	Nitrogen Oxides
NOP	Notice of Preparation
NPA	No Project Alternative
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
O	Office

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
O_3	Ozone
O/RD/LM	Office/Research and Development/Light Manufacturing
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OHP	Office of Historic Preservation
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	Lead
PCBs	Polychlorinated biphenyls
PCE	perchloroethylene
PD	Planned Development
PFCs	Perfluorocarbons
PLSS	Public Land Survey System
p.m.	Post Meridiem (between the hours of noon and midnight)
PM	Particulate Matter
$PM_{2.5}$	Fine Particulate Matter (2.5 microns or smaller)
PM_{10}	Fine Particulate Matter (10 microns or smaller)
PPV	peak particle velocity
PRC	Public Resources Code
PV	photovoltaic
RA	Redevelopment Alternative
RCP	Reinforced Concrete Pipe
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
Rd.	Road
RD	Research and Development
REC	recognized environmental condition
RECLAIM	Regional Clean Air Incentives Market
REMEL	Reference Mean Emission Level
RH	Residential High
RHNA	The SCAG Regional Housing Needs Assessment
RMS	root mean square
ROG	reactive organic gases
ROW	Right of Way
RPS	Renewable Portfolio Standards
RR	Regulatory Requirement

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	Southern Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCH	California State Clearinghouse (Office of Planning and Research)
SCS	Sustainable Communities Strategy
SDWA	Safe Drinking Water Act
SF_6	Sulfur Hexafluoride
SF/s.f.	square-foot, square foot, square footage, or square feet
SGMA	Sustainable Groundwater Management Act
SGVA	San Gabriel Valley Airport
SGVCOG	San Gabriel Valley Council of Governments
SHMA	Seismic Hazards Mapping Act
SHRC	State Historical Resources Commission
SIP	State Implementation Plan
SLF	Sacred Lands File
SO_2	Sulfur Dioxide
SO_X	Sulfur Oxides
SOC	Statement of Overriding Considerations
SoCal	Southern California
SoCal Gas	Southern California Gas Company
SORE	small off-road engines
SP	Specific Plan
SR	State Route
SRA	Source Receptor Area
SWCA	SWCA Environmental Consultants
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Regional Control Board

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
TA	Traffic Analysis
TAC	Toxic Air Contaminants
TAZ	traffic analysis zone
TCRs	Tribal Cultural Resources
TDM	transportation demand management
TPA	Transit Priority Area
TPD	tons per day
TSCA	Toxic Substances Control Act
µg	microgram
µg/m^3	microgram per cubic meter
UXC	Urban Crossroads
USCB	United States Census Bureau
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGVMWD	Upper San Gabriel Valley Municipal Water District
USTs	Underground storage tanks
UWMP	Urban Water Management Plan
UXR	Urban Crossroads, Inc.
VdB	vibration decibel notation
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
VTPM	Vesting Tentative Parcel Map
WBA	Wrap Building Alternative
WDRs	Waste Discharge Requirements
WRI	World Resources Institute
WRP	Water Reclamation Plan
WRRA	Water Reuse and Recycle Act
ZC	Zone Change
ZCA	Zoning Code Amendment
ZEV	zero-emission vehicles
ZORI	Zones of Required Investigation

S.0 EXECUTIVE SUMMARY

S.1 INTRODUCTION

The California Environmental Quality Act (CEQA), Public Resources Code Section 21000, *et seq.* requires that before a public agency decides to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about the project's potential environmental impacts, give the public an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment. This Executive Summary complies with State CEQA Guidelines Section 15123, "Summary." Included are a concise description of the proposed 701 S. Myrtle Specific Plan and Development Project, a summary of the physical environmental effects that could result from its implementation, a list of the mitigation measures that would be imposed by the City of Monrovia with resulting significance conclusions regarding environmental effects, and a summary of alternatives to the Project that would avoid or lessen the significant environmental effects.

This Environmental Impact Report (EIR), having California State Clearinghouse (SCH) No. 2023120051 was prepared in accordance with State CEQA Guidelines Article 9, Sections 15120-15132 to evaluate the potential environmental impacts associated with planning, constructing, and operating the proposed Project. The Project entails the proposed demolition and removal of the existing "Myrtle & Olive Business Park" development and redevelopment of the 1.61-acre Project Site located immediately south of West Olive Avenue and west of South Myrtle Avenue, approximately 0.6 miles north of Interstate 210 (I-210).

As more fully described in Section 3.0, *Project Description*, the entitlement applications filed by the Project Applicant with the City of Monrovia pertaining to the proposed Project include a General Plan Amendment (GPA), Zone Change (ZC), Specific Plan (SP), Vesting Tentative Parcel Map (VTPM), and Conditional Use Permit (CUP). These applications involve the proposed entitlement of a 1.61-acre property for the demolition and removal of the existing "Myrtle & Olive Business Park" development and redevelopment of the site with a proposed mixed-use five-story building. The building is designed with a maximum height of 65 feet measured from average ground plane with architectural projections permitted to a maximum height of 80 feet measured from average ground plane. The building is proposed to include 204 multi-family residential apartment units, 2,370-square feet (s.f.) of commercial retail space, 2,782-s.f. of fitness center space, 2,470-s.f. of leasing office/lobby/mail room space on the ground floor, and 1½ levels of subterranean parking, as well as ground level parking. Of the 204 residential units, 17 of the units are proposed to be restricted for low-income households and three of the units are proposed to be restricted to moderate-income households. Residential units are designed to vary in size from 490 to 1,070 s.f., consisting of 20 studio, 147 one-bedroom, and 37 two-bedroom units. Various recreational facilities and amenities are included in the building design for the residents, including but not limited to a resort-style pool, rooftop deck, and courtyard gathering areas. An outdoor private dog park is proposed on the west side of the building, an outdoor public plaza is proposed at the site's northeastern corner at the intersection of West Olive Avenue and South Myrtle Avenue, and an outdoor arcade for public use is proposed along the site's frontage with South Myrtle Avenue. Vehicular access to the Project's ground floor parking and subterranean parking would be provided from one driveway along

West Olive Avenue. A total of 323 parking spaces are planned inside the building, and six spaces are planned in the alley south of the building, for a total of 329 parking spaces.

The City of Monrovia determined that the scope of this EIR should cover 15 subject areas. The scope includes all of the subject areas listed in Appendix G to the State CEQA Guidelines that the City determined could be significantly and adversely affected by the Project, taking into consideration public comment received by the City in response to this EIR's Notice of Preparation (NOP) and comments made at the EIR's Scoping Meeting. The 15 environmental subject areas that could be reasonably and significantly affected by planning, constructing, and/or operating the proposed Project are analyzed herein, including:

1. Aesthetics
2. Air Quality
3. Cultural Resources
4. Energy
5. Geology / Soils
6. Greenhouse Gas Emissions
7. Hazards and Hazardous Materials
8. Land Use and Planning
9. Noise
10. Population and Housing
11. Public Services
12. Recreation
13. Transportation
14. Tribal Cultural Resources
15. Utilities / Service Systems

Refer to EIR Section 4.0, *Environmental Analysis*, for a full account and analysis of the subject matters listed above. For each of the aforementioned subject areas, this EIR: 1) describes the physical conditions that existed at the approximate time this EIR's NOP was filed with the California State Clearinghouse (December 4, 2023); 2) discloses the type and magnitude of potential environmental impacts resulting from Project planning, construction, and operation; and 3) if warranted, recommends feasible mitigation measures that would reduce or avoid significant adverse environmental impacts that the proposed Project may cause. A summary of the proposed Project's significant environmental impacts and the mitigation measures that the City of Monrovia would impose on the Project to lessen or avoid those impacts is included in this Executive Summary as Table S-1. The City of Monrovia applies mitigation measures that it determines: 1) are feasible and practical for project applicants to implement; 2) are feasible and practical for the City of Monrovia to monitor and enforce; 3) are legal for the City of Monrovia to impose; 4) have an essential nexus to the Project's impacts; and 5) would result in a benefit to the physical environment. CEQA does not require the Lead Agency to impose mitigation measures that are duplicative of project design features or mandatory regulatory requirements.

S.2 PROJECT SITE LOCATION AND REGIONAL SETTING

The Project Site encompasses 1.61 acres of developed land located within the south-central portion of the City of Monrovia, California, which is located in Los Angeles County. Los Angeles County abuts Ventura County to the west, Kern County to the north, San Bernardino County to the east, and Orange County to the south.

The Project site is located at the existing physical address of 701 South Myrtle Avenue and 112-136 West Olive Avenue; encompasses Assessor Parcel Numbers (APNs) 8516-033-030 and 8516-033-031; and is located in Section 00, Township 01 North, Range 11 West, San Bernardino Baseline and Meridian. The Project site is located at the southwest corner of the intersection of West Olive Avenue at South Myrtle Avenue. The

site is located in a portion of the City's historic downtown main street area known as the Old Town Extension District. The Old Town Extension District is one of three districts of the City of Monrovia General Plan's South Myrtle Avenue Corridor planning area and it is intended to promote urban design and land uses more compatible with Old Town Monrovia to the north than the commercial, office, and industrial uses along Myrtle Avenue to the south.

S.3 PROJECT OBJECTIVES

The Project Applicant's underlying purpose for the Project is to redevelop an underutilized property within a portion of the Old Town Extension District area with multi-family residential units located within walking distance to employment, shopping, entertainment, recreation, and public transit. The following objectives are intended to achieve the underlying purpose:

A. Provide needed new market rate and affordable housing units to help meet the City's Regional Housing Needs Assessment (RHNA) obligations.

B. Provide a variety of housing options with different price points by providing market rate and affordable housing units in a variety of unit sizes and configurations.

C. Reduce vehicle trips and vehicle miles traveled by locating new housing within walking and biking distance of, and with pedestrian connections to, employment, shopping, entertainment, public services, recreation, and public transit.

D. Redevelop an urban infill site with a project that makes efficient use of existing infrastructure.

E. Promote walkability by locating parking underground and including active uses at street level.

F. Maintain high-quality architectural design in the City of Monrovia by developing a building that has a recognizable architectural style and that complements existing architectural styles of buildings within and surrounding the Old Town Extension District.

G. Provide on-site amenities for residents to offset demand on public parks and recreation facilities.

S.4 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

CEQA Guidelines Section 15123(b)(2) requires the Lead Agency (City of Monrovia) to identify any known issues of controversy in the Executive Summary. The Lead Agency has not identified any issues of controversy associated with the Project after consideration of all comments received in response to the NOP. Notwithstanding, the Lead Agency has identified several issues of local concern including, but not limited to, the size and height of the proposed building (related to the topic of aesthetics), appropriateness of the building considering its locational context to Old Town Monrovia (related to the topic of historic resources), and increases in the number of people, cars, and noise (related to the topics of population and housing, transportation, and noise).

Regarding issues to be resolved, this EIR addresses the environmental issues that are known by the City, and that were identified in the comment letters that the City of Monrovia received on this EIR's NOP (refer to *Technical Appendix A*), and comments received during the EIR scoping meeting. Items raised in written comment to the NOP are summarized in Table 1-1, *Summary of NOP and Scoping Meeting Comments*, in Section 1.0 of this EIR.

S.5 PROJECT ALTERNATIVES

The following scenarios are identified by the City of Monrovia as potential alternatives to implementation of the proposed Project. The Reduced Project Alternative is considered the Environmentally Superior Alternative pursuant to CEQA Guidelines Section 15126.6.

S.5.1 NO PROJECT/NO REDEVELOPMENT ALTERNATIVE (NPA)

CEQA Guidelines § 15126.6(e) requires that an alternative be included that describes what would reasonably be expected to occur on the property in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services (i.e., "no project" alternative). For development projects that include a revision to an existing land use plan, the "no project" alternative is considered to be the continuation of the existing land use plan into the future. For projects other than a land use plan, such as a development project on an identifiable property, the "no project" alternative is considered to be a circumstance under which the project does not proceed (CEQA Guidelines Section 15126.6(e)(3)(A-B). Accordingly, the No Project Alternative (NPA) considers no development on the Project site beyond that which occurs under existing conditions. Under the NPA, there would be no demolition of the existing building on-site, there would be no construction activities, and the existing 25,191-s.f. single-story multi-tenant commercial/industrial office building would continue to operate with multiple tenants, similar to what occurs under existing conditions.

S.5.2 REDEVELOPMENT ALTERNATIVE (RA)

Similar to the NPA and based on CEQA Guidelines Section 15126.6(e) that requires that an alternative be included that describes what would reasonably be expected to occur on the property in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services (i.e., "no project" alternative), the Redevelopment Alternative (RA) assumes redevelopment of the Project site consistent with the site's current General Plan designation and zoning classification. The Project site is designated by the General Plan for Office/Research and Development/Light Manufacturing (O/RD/LM) land uses with a Specific Plan/Planned Development Overlay (SP/PD Overlay). The O/RD/LM land use designation is intended to encourage high quality development of office, research and development uses, and support uses. Support uses may include restaurants, hotels, health clubs, and banks. The maximum floor-area ratio (FAR) for this designation is 0.75:1. Accordingly, the RA considers redevelopment of the Project site with up to 52,925 s.f. of office space supported by surface parking.

S.5.3 Reduced Project Market Rate Residential Alternative (MRRA)

The Reduced Project Market Rate Residential Alternative (MRRA) considers development of the Project site with a project similar to the proposed Project, but with a smaller building and without any affordable dwelling units. Specifically, the MRRA would entail the construction and operation of a four-story, 156-unit market-rate apartment building with 2,370 s.f. of ground floor commercial space. Under the MRRA, there would be no affordable dwelling units accommodated on-site and all of the proposed units would consist of market rate units. The reduction in the number of dwelling units would result from the elimination of the fifth floor of the building, which would eliminate 48 dwelling units and would reduce the size of the proposed building by 41,570-s.f., from 201,571-s.f. under the proposed Project to 160,001-s.f. under the MRRA. Due to the elimination of the fifth floor of the building, the MRRA would result in a building that is approximately 52.5 feet in height and would have 1½ subterranean parking levels and four above-ground levels. Additionally, due to the elimination of the 48 apartment units, there would be a demand for 53 fewer parking spaces, and as such the lower level of the parking garage would be reduced in size by approximately half.[1] The architectural style of the building would be similar to the proposed Project with a modern interpretation of prevalent features found in Old Town Monrovia. As with the proposed Project, approximately 19,205 s.f. of outdoor common open space would be provided, of which the 1,660-s.f. plaza would be accessible to the general public. Other common open space areas would be private for Project residents and guests, including but not limited to a dog park, pool, pool deck, clubroom, al fresco deck, outdoor dining, and barbeque area.

S.5.4 Wrap Building Alternative (WBA)

The Wrap Building Alternative (WBA) considers development of the Project site with a six-story, mixed-use 204-unit apartment building served by aboveground structured parking in the center of the building, with the residential units wrapping around the structured parking on the east, west, north, and south sides of the structured parking (a 'wrap' building design). The building would be 80 feet tall as measured from the average grade plane to the middle of the sloped roof of an architectural tower element proposed on the building at the corner of West Olive Avenue and South Myrtle Avenue. Architectural projections on small portions of the roof would be permitted to extend up to 95 feet in height, primarily for architectural interest and to screen rooftop mechanical equipment. The same mix of studio, one-bedroom, two-bedroom, and affordable units would occur as compared to the Project. Amenity spaces would be reconfigured in location and would be located along the building's exterior edges and on the roof, instead of on a podium level. The pool would occur on the building's roof, leaving less space for PV solar panels as compared to the Project design. No subterranean parking would occur. A six-story wrap building would require concrete or podium construction for the lower two levels, Type I or Type III construction under the International Building Code (IBC) and fire-rating separation between the garage and residential units.

S.6 EIR Process

This EIR has been prepared as a Project EIR pursuant to State CEQA Guidelines Section 15161. As described by State CEQA Guidelines Section 15161, a Project EIR is the most common type of EIR that: 1) examines the environmental impacts of a specific development project; 2) focuses primarily on the changes in the

[1] Assumes a required parking ratio of 1.0 for studio and one-bedroom apartments, 2.0 for two-bedroom apartments.

environment that would result from the development of the project; and 3) examines all phases of the project, including planning, construction, and operation.

This Draft EIR will be available for public review and comment for a minimum of 45 days. Following public review, the City of Monrovia will prepare responses to written comments concerning environmental topics and publish a Final EIR. Before taking action to approve the Project, the City of Monrovia (serving as the CEQA Lead Agency) has the obligation to: 1) ensure this EIR has been completed in accordance with CEQA; 2) review and consider the information contained in this EIR as part of its decision-making processes; 3) make a statement that this EIR reflects the City of Monrovia's independent judgment; 4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary 5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (State CEQA Guidelines Sections 15090-15093).

S.7 Summary of Impacts, Mitigation Measures and Conclusions

S.7.1 Effects Found Not to be Significant

The scope of detailed analysis in this EIR includes 15 subject areas prepared pursuant to State CEQA Guidelines Section 15063 and State CEQA Statute Section 21002(e). An Initial Study was not prepared for the proposed Project because the City determined that an EIR was required, although the Project's NOP did scope out certain issue areas from detailed environmental review. The NOP and public comments received in response to the NOP and scoping meetings, are attached to this EIR as *Technical Appendix A*. Subject areas for which the City concluded that impacts clearly would be less than significant and that do not warrant detailed analysis in this EIR include: agriculture and forestry resources; biological resources; hydrology/water quality, mineral resources; and wildfire. This EIR addresses these five topics in EIR Subsection 5.0, *Other CEQA Considerations*.

S.7.2 Impacts of the Proposed Project

Table S-1, *Summary of Impacts, Mitigation Measures*, *and Conclusions*, provides a summary of the proposed Project's environmental impacts, as required by CEQA Guidelines Section 15123(a). Also presented are the mitigation measures recommended by the City of Monrovia to further avoid adverse environmental impacts or to reduce their level of significance. After the application of all feasible mitigation measures within the City of Monrovia's jurisdictional authority, and based on the extensive analysis presented in EIR Section 4.0, *Environmental Analysis*, the Project would not result in any significant environmental impacts that cannot be mitigated to below a level of significance.

Table S-1 Summary of Impacts and Mitigation Monitoring Requirements

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
4.1 Aesthetics				
Summary of Impacts				
Threshold a: Less-than-Significant Impact. The Project would not adversely affect views of the San Gabriel Mountains as viewed from South Myrtle Avenue, West Olive Avenue, or other public reviewing areas. Impacts to scenic vistas would be less than significant.	No mitigation is required.	N/A	N/A	N/A
Threshold b: No Impact The Project site is not located within the viewshed of a scenic highway and the Project has no potential to adversely affect scenic resources visible from a State scenic highway; therefore, no impact would occur.	No mitigation is required.	N/A	N/A	N/A
Threshold c: No Impact. The Project site is located in an urbanized area and would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, no impact would occur.	No mitigation is required.	N/A	N/A	N/A
Threshold d: Less-than-Significant Impact The Project is required to comply with MMC Sections 17.32.080 and 17.32.090, which set standards for lighting and glare. Compliance with the applicable provisions of the MMC would ensure that light and glare resulting from the Project would be less than significant.	No mitigation is required.	N/A	N/A	N/A
4.2 Air Quality				
Summary of Impacts				
Threshold a: Less-than-Significant Impact The Project's construction and long-term operational emissions would not exceed any of the SCAQMD Regional Thresholds or LSTs, and the Project would be consistent with SCAG's growth projections for the City. Accordingly, the Project would not conflict with or obstruct implementation of the SCAQMD 2022 AQMP, and impacts would be less than significant.	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
Threshold b: Less-than-Significant Impact Project construction and operational activities would not exceed the applicable SCAQMD Regional Threshold for any criteria pollutant. Thus, the Project would not result in a cumulatively-considerable net increase of any criteria air pollutant for which the SCAB is considered non-attainment under applicable federal and State air quality standards, and impacts would be less than significant.	No mitigation is required.	N/A	N/A	N/A
Threshold c: Less-than-Significant Impact Implementation of the Project would not exceed any of the applicable SCAQMD LSTs during construction or operation, and impacts would be less than significant. In addition, the Project, even when considered in the context of cumulative developments, would not produce the level of traffic volumes necessary to create a CO "hot spot;" thus, impacts due to CO "hot spots" would be less than significant. The Project construction activities, including generation of TACs, also would not expose sensitive receptors to substantial pollutant concentrations; thus, Project-related TAC impacts during construction would be less than significant. Additionally, the Project has no potential to result in TAC impacts to nearby sensitive receptors during long-term operation, and no impact would occur.	No mitigation is required.	N/A	N/A	N/A
Threshold d: Less than Significant Impact The Project does not propose land uses typically associated with emitting objectionable odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. Additionally, it is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations. The Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the Project construction and operations would be less than significant and no mitigation is required.	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
4.3 Cultural Resources				
Summary of Impacts				
Threshold a: Less-than-Significant Impact No historical resources, as defined by CEQA Guidelines Section 15064.5, are present on the Project site that could be affected by Project-related construction activities. As such, no direct impacts to historical resources would occur. One presumed historical resource, the Downtown Commercial Historic District, is located adjacent to the north side of the Project site; however, the proposed Project would comply with the Secretary's Standards, as well as its associated updated guidelines and recommendations and the development standards and guidelines proposed in the 701 S. Myrtle Avenue Specific Plan, which would ensure compatibility with the character of the presumed historic district. Therefore, no historical resources would be adversely indirectly affected by construction or operation of the Project, and impacts to historical resources would be less than significant.	No mitigation is required.	N/A	N/A	N/A
Threshold b: Potentially Significant Direct and Cumulative Impact No known prehistoric resources are present on the Project site, and the likelihood of uncovering buried prehistoric resources on the Project site is low because the Project site is fully developed and past ground disturbance has occurred on the Project site. Nonetheless, the remote potential exists for Project-related construction activities to result in direct and cumulative impacts to significant subsurface prehistoric archaeological resources should such resources be discovered during Project-related construction activities. Therefore, without mitigation, Project-level and cumulative impacts to archaeological resources would be potentially significant.	**CUL MM-1** Prior to the issuance of a demolition permit or any permit authorizing ground-disturbing construction activities, evidence shall be provided to the City of Monrovia that the construction contractors have been trained on how to identify potential cultural, tribal cultural, and archaeological resources. Construction personnel in charge of supervising ground-disturbing activities must have received cultural resource awareness training within 60 days of commencing work on the Project site. **CUL MM-2** Upon discovery of any suspected cultural, tribal cultural, or archaeological resources, construction activities within 100 feet of the find shall pause until the find can be assessed by a Qualified Archaeologist meeting the U.S. Secretary of the Interior Standards for archaeology and a tribal monitor/consultant (if such tribal monitor chooses to participate in monitoring following adequate written notice to the Tribe). If a resource is discovered that	Project Construction Contractor, City of Monrovia Project Construction Contractor, Qualified Archaeologist, City of Monrovia	Prior to the issuance of a demolition permit or any permit authorizing ground-disturbing construction activities During Project construction	Less-than-Significant Impact

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
	the Qualified Archaeologist determines to be significant pursuant to the definition given in CEQA Guidelines Section 15064.5, mitigation shall occur following the guidance given in CEQA Guidelines Section 15126.4(b) and as approved by the City Community Development Director or her designee to reduce impacts to less than significant. Mitigation methods include, but are not limited, to data recovery, documentation, preservation in place, and removal for laboratory processing and analysis followed by either curation at a non-profit institution or conveyance to a culturally affiliated Native American Tribe. Work may continue on other parts of the construction site while the evaluation takes place. **CUL MM-3** Archaeological and Native American monitoring, if determined necessary upon the discovery of any significant resource(s), and excavation during construction shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel shall meet the Secretary of the Interior standards for archaeology and have a minimum of 10 years' experience as a principal investigator working with Native American archaeological sites in Southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.	Project Construction Contractor, Qualified Archaeologist, Native American Monitor	During Project construction	
Threshold c: Less-than-Significant Impact In the unlikely event that human remains are discovered during Project grading or other ground disturbing activities, the Project's construction contractors would be required to comply with the applicable provisions of HSC Section 7050.5 and PRC Section 5097 et seq. Mandatory compliance with State law would ensure that any discovered human remains are appropriately treated and that impacts are reduced to a less than significant.	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
4.4 Energy				
Summary of Impacts				
Threshold a: Less-than-Significant Impact Project construction and operation would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would, therefore, not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.	No mitigation is required.	N/A	N/A	N/A
Threshold b: Less-than-Significant Impact The Project would not conflict with or obstruct a federal or State plan for renewable energy or energy efficiency. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.	No mitigation is required.	N/A	N/A	N/A
4.5 Geology and Soils				
Summary of Impacts				
Threshold a: Less-than-Significant Impact The Project site is not located within an Alquist-Priolo Earthquake Fault Zone, is not located on a geologic fault, and has no potential to be impacted by ground rupture, but would be subject to ground shaking hazards from a seismic event. Although the Project site is located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project, mandatory compliance with the CBSC, the City Building Code, and recommendations contained in the Project's geotechnical evaluation report (*Technical Appendix F*) would ensure that potential effects associated with strong seismic ground shaking would be less than significant.	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
Threshold b: Less-than-Significant Impact The Project would not result in substantial soil erosion or loss of topsoil. With mandatory compliance to the Project's SWPPP which is a regulatory requirement under the applicable NPDES Permit to address water erosion, and mandatory compliance to SCAQMD Rule 403 to address wind erosion, the potential for water and wind erosion impacts during construction would be less than significant. Following development, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be covered with impervious surfaces or landscaping. Impacts would be less than significant.	No mitigation is required.	N/A	N/A	N/A
Threshold c: Potentially Significant Direct Impact. The Project site and its immediate surrounding areas are developed and exhibit little topographic variation, indicating that there is no potential for the Project to be impacted by or cause landslides. Given the geotechnical conditions of the Project site, there is no potential for liquefaction to occur. Based on the presence of undocumented fill and the variability of the depth to dense soils, on-site soils were found to be susceptible to caving in open cuts and excavations. Accordingly, the Project has the potential to be located on a geologic unit or soil that is unstable or has the potential to become unstable, and, as such, impacts may be potentially significant.	**GEO MM-1** Prior to the issuance of grading permits, the Public Works Director for the City of Monrovia (or his/her designee) shall verify that all of the recommendations given in the Project's November 3, 2022 Geotechnical Design-Level Investigation, prepared by Geotechnical Professionals, Inc. are incorporated into the construction and grading plans. The recommendations shall include, but not be limited to, the following. a) Earthwork Undocumented fills or debris buried from the current commercial structure that is present and encountered during demolition shall be removed within the building footprint. These undocumented fills and debris shall be removed during excavation of the subterranean parking levels. Removals within the building footprint shall extend to the bottom of the footings. The bottom of the excavation shall be compacted with heavy vibratory equipment in order to densify soils directly beneath the footing bottoms. Recommendations for removals may be modified by the Project's geotechnical engineer when more field and laboratory data are obtained at the site or in the field based on conditions observed in the bottom of the excavations. Granular soils under the building footprint shall be compacted to at least 95 percent of	Public Works Director for the City of Monrovia, Geotechnical Professionals	Prior to the issuance of grading permits.	Less-than-Significant Impact

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
	maximum dry density in accordance with ASTM D-1557. b) Foundations and Slab-On-Grade Floors Spread footings and a slab-on-grade floor shall be used to support the proposed building (4 stories of wood framed apartments over 2 levels of above-grade concrete podium over 1 to 2 subterranean concrete levels). The footings shall be supported on natural soils or a layer of engineered fill derived from natural soils. The footings shall be designed for an allowable net bearing capacity on the order of 4,000 to 5,000 pounds per square foot (psf). These preliminary recommendations will limit the total settlement (static and seismic) to approximately 1.5 inches. Soil resistance to lateral loads shall be provided by a combination of frictional resistance between the bottom of footings and underlying soils and by passive soil pressures acting against the embedded sides of the footings. For preliminary design of footings, a coefficient of friction of 0.35 shall be used for frictional resistance. In addition, an allowable lateral bearing pressure equal to an equivalent fluid weight of 300 pounds per cubic foot shall be used for the preliminary design of footings. The slab-on-grade floors shall be supported on engineered fill derived from natural soils. For concrete floors for the subterranean parking level, a vapor retarder is not necessary from a geotechnical standpoint except where moisture sensitive flooring such as at lobby areas near the elevators. c) Shoring			

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
	Since there is not sufficient space for sloped embankments along the property limits, shoring shall be required. One method of shoring would consist of steel soldier piles placed in drilled holes, backfilled with concrete. Driven or vibrated soldier piles may be a feasible and more economical alternative to drilled holes, however vibrating piles adjacent to the existing building at the property line to the west shall not be permitted. The shoring contractor shall evaluate the potential drilling conditions when planning the installation methods and shall note that caving of drilled holes is likely due to the presence of medium dense clean sands. Due to the proximity to the adjacent streets, and buildings, an additional surcharge load shall be added to the recommended earth pressure to account for structure and traffic surcharge loading. Excavations deeper than approximately 15 to 17 feet shall require tied-back earth anchors or rakers to support the temporary shoring. Due to anticipated caving soil conditions, the voids between the lagging and retained earth shall be backfilled with lean-mix sand-cement slurry prior to continuing the excavation deeper.			
Threshold d: No Impact The Project site does not contain expansive soils; therefore, the Project has no potential to create substantial direct or indirect risks to life or property associated with the presence of expansive soils. No impact would occur.	No mitigation is required.	N/A	N/A	N/A
Threshold e: No Impact	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
No septic tanks or alternative wastewater disposal systems are proposed as part of the Project. Accordingly, there is no potential for the Project to cause impacts associated with soil compatibility for these systems.				
Threshold f: No Impact The Project site's subsurface does not contain formations that have potential to contain significant or unique paleontological resources. Accordingly, no impact to paleontological resources would occur.	No mitigation is required.	N/A	N/A	N/A
4.6 Greenhouse Gas Emissions				
Summary of Impacts				
Threshold a: Less-than-Significant Impact The Project would result in emissions of approximately 1,283.83 MTCO2e per year, which would not exceed SCAQMD's screening threshold of 3,000 MTCO2e per year. Thus, the Project's GHG emissions impact would be less than significant.	No mitigation is required.	N/A	N/A	N/A
Threshold b: Less-than-Significant Impact The Project would be consistent with or otherwise would not conflict with the CARB 2022 Scoping Plan, the City of Monrovia EAP, and the 2024-2050 RTP/SCS, which are the applicable plans adopted for the purpose of reducing the emissions of GHGs. As such, Project impacts due to a conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases would be less than significant.	No mitigation is required.	N/A	N/A	N/A
4.7 Hazards and Hazardous Materials				
Summary of Impacts				
Thresholds a and b: Potentially Significant Direct Impact Because there are no available records to verify that the former gas station's UST was removed from the property, there is a potential for accidental upset of a subsurface UST and the potential need to transport and dispose of a UST during the Project's construction activities, which is concluded to be a potentially significant impact requiring mitigation. During Project construction and operation, the	**HAZ MM-1** During demolition and ground excavation activities, the construction contractors shall be advised about the potential presence of a UST in the location of the former fuel station that existed on the Project site. The contractors shall be required by their contracts to ensure that all underground storage tanks (USTs) discovered on site are identified, assessed, and removed in accordance	N/A	N/A	Less-than-Significant Impact

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
transport, storage, use, and disposal of hazardous materials and risk of upset would be addressed through mandatory compliance with applicable and mandatory hazardous materials regulations that would ensure that the Project would not create a significant hazard to the public or environment.	with all applicable federal, state, and local regulations, including but not limited to Title 23 of the California Code of Regulations, Division 3, Chapter 16 (Underground Storage Tank Regulations), and oversight requirements of the State Water Resources Control Board and Monrovia Fire and Rescue, the local Certified Unified Program Agency (CUPA). The following actions shall be implemented: a) <u>UST Assessment and Permitting:</u> If a UST is discovered, construction activities around the UST shall pause and a qualified environmental professional shall evaluate the UST to determine its contents, structural integrity, and potential contamination. Prior to removal, appropriate permits must be obtained from the Monrovia Fire and Rescue (the local CUPA). b) <u>UST Removal and Decommissioning:</u> The UST shall be removed by a licensed contractor in accordance with regulatory protocols. Removal activities shall include safe evacuation of any residual contents, purging of vapors, and appropriate decontamination of the tank and associated piping. c) <u>Sampling and Remediation (if necessary):</u> After UST removal, the area around the UST shall be assessed for contamination. Soil and, if necessary, groundwater sampling shall be conducted to determine whether petroleum hydrocarbons or other hazardous substances have been released. If contamination is detected, a site-specific remediation plan shall be prepared and approved by the oversight agency. Cleanup activities shall be implemented prior to commencement of construction activities in the impacted area.			

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
	d) Documentation and Disposal: All USTs, residual materials, and contaminated media shall be transported and disposed of at facilities licensed to handle such waste. Waste manifests and disposal documentation shall be retained on file and made available to regulatory authorities upon request.			
Threshold c: Less-than-Significant Impact The Project site is located within 0.25 miles of an existing school (Calvary Road Baptist Academy). The use, storage, and transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations. With adherence to mandatory regulatory requirements, the Project would result in a less-than-significant impact to nearby schools, including the Calvary Road Baptist Academy.	No mitigation is required.	N/A	N/A	N/A
Threshold d: No Impact The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As such, the Project would not create a significant hazard to the public or the environment due to the Project site's inclusion on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and no impact would occur.	No mitigation is required.	N/A	N/A	N/A
Threshold e: No Impact The Project site is not located within two miles of a public airport or within an airport land use plan. Thus, the Project would not result in an airport-related safety hazard or excessive noise for people residing or working in the Project area, and no impacts would occur.	No mitigation is required.	N/A	N/A	N/A
Threshold f: No Impact The Project would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. Thus, no impacts would occur.	No mitigation is required.	N/A	N/A	N/A
Threshold g: No Impact. The Project site is not located in a portion of the City that is subject to wildland fire hazards. Furthermore, the proposed new building would be in compliance with all applicable Building and Fire Codes	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
and include installation of on-site and off-site improvements to provide fire access. As such, the Project would not expose people or structures, directly or indirectly, to significant risk of loss, injury or death involving wildland fires, and no impact would occur.				
4.8 Land Use and Planning				
Summary of Impacts				
Threshold a: No Impact The Project would not physically divide an established community; no impact would occur.	No mitigation is required.	N/A	N/A	N/A
Threshold b: No Impact Although the Project proposes to change the General Plan land use designation and the zoning classification of the Project site, if approved, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including the City of Monrovia General Plan, and the 2024-2050 RTP/SCS. Accordingly, no impacts would occur.	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
4.9 Noise				
Summary of Impacts				
Threshold a: Significant Direct Impact Project-related highest construction noise levels (during demolition) are expected to range from 62.2 to 70.9 dBA Leq at the nearest sensitive receivers and would not exceed the reasonable daytime 80 dBA Leq significance threshold. However, the Project would contribute construction noise increases ranging from 5.9 to 14.1 dBA Leq during the daytime hours during the demolition and grading phases of construction at the nearest receiver locations, which would exceed the 12-dBA Leq noise level increase significance threshold of 12.0 dBA at Receiver R3, resulting in a significant direct impact. The Project's operational noise level increases during the daytime and nighttime and the Project's traffic noise level increases would be less than significant.	**NOISE MM-1** Prior to issuance of demolition, grading or building permits, the Project Applicant shall prepare a detailed Construction Noise Management Plan (CNMP) for review and approval by the City of Monrovia. The required CNMP shall include measures that would serve to reduce the level of noise experienced at nearby residential properties to the maximum feasible extent. Measures that may be identified as part of the required CNMP include, but are not necessarily limited to, the following: a) Construction activities should be scheduled to avoid the simultaneous operation of construction equipment so as to minimize noise levels resulting from operating several pieces of high noise level emitting equipment. b) All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Enforcement shall be accomplished by random field inspections by applicant personnel during construction activities, to the satisfaction of the City of Monrovia Building and Safety Division. c) Construction noise reduction methods such as shutting off idling equipment, construction of a temporary noise barrier, maximizing the distance between construction equipment staging areas and adjacent residences, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible. d) During construction, stationary construction equipment shall be placed such that emitted noise	Project Applicant, City of Monrovia	Prior to issuance of grading and building permits	Less-than-Significant Impact

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
	is directed away from or shielded from sensitive receptors. e) Construction hours, allowed workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City of Monrovia receives a complaint, appropriate corrective actions shall be implemented and a report of the action provided to the reporting party.			
	NOISE MM-2 Noise monitoring during Project demolition and grading activities shall be required of the Project Applicant or construction contractor(s) to demonstrate that noise levels at nearby residential receptors do not exceed 80 dBA Leq or an increase over ambient noise levels by 12dBA or more. Should either of these exceedances occur, measures shall immediately be implemented to reduce noise levels below these performance standards. If noise levels cannot be reduced below these levels by methods outlined in the CNMP, the contractor shall install an 8-foot-high temporary noise barrier or comparable noise attenuation method at the eastern, northern, and western Project site boundary for the duration of construction activities occurring at the ground level. The noise control barrier shall include the following: a) The noise control barriers must present a solid face from top to bottom. b) The noise barriers shall be maintained, and any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired. c) The temporary noise barrier shall be constructed using one of the following materials with no decorative cutouts or line-of-sight openings between	Project Applicant, City of Monrovia	During construction activities	

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
	shielded areas and the noise source: Masonry block; Glass (1/4-inch-thick), or other transparent material with sufficient weight per square foot; Earthen berm; Any combination of these construction materials.			
Threshold b: Less-than-Significant Impact There is no reasonable potential for the Project to cause a significant vibration impact during Project operation because the Project does not entail the use of substantive vibration sources or activities. During the Project's construction, at receiver distances ranging from 80 to 260 feet, construction vibration levels are estimated to range from 0.006 to 0.037 PPV (in/sec) and would not exceed the maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec). As such, the Project's ground-borne vibration impacts would be less than significant.	No mitigation is required.	N/A	N/A	N/A
Threshold c: No Impact The Project has no potential to contribute to or cause increased airport-related noise in the local area; thus, no airport-related noise impacts would occur.	No mitigation is required.	N/A	N/A	N/A
4.10 Population and Housing				
Summary of Impacts				
Threshold a: Less-than-Significant Impact The Project and other cumulative development projects are within SCAG's growth projections for the City. The Project's anticipated population increase would comprise 10.88 percent of the anticipated population growth within the City between 2023 and 2050, while the Project plus cumulative developments would represent 53.37 percent of the anticipated population growth between 2023 and 2050. Additionally, the planned housing from the Project and other cumulative developments is a requirement of State Housing Law and in response to an existing unmet need for affordable housing. Furthermore, the Project's land uses would improve the City's jobs-housing ratio from 1.61 to 1.59, while the Project and other cumulative developments would improve the City's jobs-to-housing ratio from	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
1.61 to 1.47; thus, the addition of jobs and dwelling units from the Project and other cumulative developments would be expected to beneficially affect the City's jobs-housing balance by providing more new households than jobs. Therefore, implementation of the Project would not result in direct or cumulative substantial unplanned population growth, and impacts would be less than significant.				
Threshold b: Less-than-Significant Impact The Project site does not contain housing under existing conditions and therefore would not displace people in existing housing and would therefore not trigger the construction of replacement housing. The Project would eliminate approximately 52 jobs associated with the existing uses at the Project site, and add six jobs, resulting in a net decrease of 46 job opportunities on the site. The displacement of employees to locations off the Project has no reasonable potential to necessitate the construction of replacement housing, as the displacement of people is associated with their place of employment and not their home. As such, the impact would be less than significant.	No mitigation is required.	N/A	N/A	N/A
4.11 Public Services				
Summary of Impacts				
Threshold a: Less-than-Significant Impact Although the Project would increase the demand for fire protection services provided by Monrovia Fire and Rescue, the Project Applicant would be required to pay impact fees pursuant to MMC Chapter 3.21 (Fire Service Impact Fee) in addition to the fees required pursuant to MMC Chapter 3.32 (Dwelling Unit Tax). Payment of fees pursuant to MMC Chapter 3.21 would address the Project's incremental demand for new or expanded fire protection facilities. Because Monrovia Fire and Rescue has no specific plans to physically alter existing fire stations or to build a new fire station to meet the demand created by the Project, potential environmental impacts from fire protection facility construction would be too speculative for analysis under CEQA Guidelines Section 15145. Thus, a less than significant impact would occur. The Project would not result in physical environmental effects due to the need for new or physically altered fire protection facilities.	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
Threshold b: Less-than-Significant Impact Although the Project would increase the demand for police protection services provided by the City of Monrovia, the Project Applicant would be required to pay impact fees pursuant to MMC Chapter 3.32 (Dwelling Unit Tax), which the City may use in part to develop, improve, and expand police protection facilities and equipment. Payment of the required dwelling unit tax as well as increased standard property tax revenues that would result from development of the Project would ensure that the Project provides fair share funds that may be applied to police facilities and/or equipment to offset the incremental increase in the demand for police protection services that would be created by the Project. Because the City of Monrovia has no specific plans to physically alter existing police stations or to build a new police station to meet the demand created by the Project, potential environmental impacts from police protection facility construction would be too speculative for analysis under CEQA Guidelines Section 15145. Thus, a less than significant impact would occur. The Project would not result in physical environmental effects due to the need for new or physically altered police protection facilities.	No mitigation is required.	N/A	N/A	N/A
Threshold c: Less-than-Significant Impact The Project is anticipated to result in the future net increase of approximately 137 school-age children on an annual basis. However, the schools that would serve the Project all have excess capacity under existing conditions, with a combined total remaining capacity of 2,005 students, which is adequate to serve students generated by the Project as well as students anticipated from known cumulative developments. The Project Applicant would be required to pay developer fees to the Monrovia Unified School District pursuant to pursuant to the Leroy F. Greene School Facilities Act. Payment of school impact fees constitutes full and complete mitigation for any Project-related indirect effects to school services. Accordingly, Project impacts to school facilities would be less than significant.	No mitigation is required.	N/A	N/A	N/A
Threshold d: Less-than-Significant Impact Impacts associated with the construction of on-site recreational amenities are inherent to the Project's construction phase, and	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
impacts associated with Project implementation are addressed under the relevant environmental analysis subsections identified throughout this EIR. Under each relevant topic, the Project's impacts are determined to be less than significant, or mitigation measures are identified to reduce impacts to less than significant. Additionally, although the Project would generate a demand for approximately 1.1 acres of new or expanded parkland within the City of Monrovia, there is no specific plan or proposal for off-site park improvements, and any potential environmental impacts from future park construction would be too speculative for analysis under CEQA Guidelines Section 15145. Thus, a less than significant impact would occur.				
Threshold e: No Impact The Project would result in population growth that would incrementally affect library services provided by Monrovia Public Library. Pursuant to MMC Chapter 3.43 (Monrovia Library and Children's Reading Improvement Act Special Tax), the City of Monrovia imposes a fee for all new dwelling units in the City, which the City will use to help fund the on-going enhancements to the City of Monrovia Library. Payment of the required fee as well as increased standard property tax revenues that would result from development of the Project would ensure that the Project provides fair share funds that may be applied to library facilities and/or materials to offset the incremental increase in the demand for library services that would be created by the Project. Although implementation of the Project would place demand on library facilities and services, it would not result in the need for new or physically altered library facilities beyond enhancements already underway at Library Park. Because implementation of the Project would not result in environmental impacts associated with new or expanded library facilities and would contribute its fair share of fees towards library facilities and services, no impacts would occur.	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
4.12 Recreation				
Summary of Impacts				
Threshold a: Less-than-Significant Impact The Project would accommodate approximately 0.57-acre of on-site recreational amenities. Although the Project design would not meet the City's parkland standard of 3.0 acres of parkland per 1,000 residents (1.72 acres), the City would collect a fee from the Project Applicant to be used for recreational programs, park maintenance, development, and improvement, which would reduce the potential impact to less than significant.	No mitigation is required.	N/A	N/A	N/A
Threshold b: Less-than-Significant Impact The physical construction of the on-site recreational facilities has been addressed under the relevant environmental topics analyzed throughout this EIR (e.g., air quality, cultural resources). Under each of these topics, Project impacts are determined to be less than significant, or mitigation measures have been identified to reduce impacts to reduce impacts to less than significant.	No mitigation is required.	N/A	N/A	N/A
4.13 Transportation				
Summary of Impacts				
Threshold a: No Impact The Project would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including the City of Monrovia General Plan Circulation Element and SCAG's RTP/SCS; therefore, no impact would occur.	No mitigation is required.	N/A	N/A	N/A
Threshold b: Less-than-Significant Impact The Project meets the City's Low VMT Area screening criterion; therefore, pursuant to City VMT & LOS Guidelines, Project impacts would be less than significant.	No mitigation is required.	N/A	N/A	N/A
Threshold c: Less-than-Significant Impact	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
The Project would not introduce any significant transportation safety hazards due to a design feature or incompatible use; thus, impacts would be less than significant.				
Threshold d: Less-than-Significant Impact Adequate emergency access would be provided to the Project site during construction and long-term operation. The Project would not result in inadequate emergency access to the site or surrounding properties; therefore, a less than significant impact would occur.	No mitigation is required.	N/A	N/A	N/A
4.14 Tribal Cultural Resources				
Summary of Impacts				
Threshold a: Potentially Significant Direct Impact. The Project site does not contain any known tribal cultural resources. However, there is a potential for tribal cultural resources to be located beneath the surface of the site and discovered and impacted during the Project's excavation activities; as such, a potentially significant impact could occur.	Mitigation Measures **CUL MM-1 through CUL MM-3** shall apply.	Refer to CUL MM-1 through CUL MM-3	Refer to CUL MM-1 through CUL MM-3	Less-than-Significant Impact
4.15 Utilities and Service Systems				
Summary of Impacts				
Threshold a: Less-than-Significant Impact The Project would not result in or require the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities beyond the Project's proposed site-adjacent connections to existing utilities and facilities in the local area. The physical environmental effects associated with installing and operating the Project's utilities and service systems are evaluated throughout Section 4.0 this EIR and would result in impacts that are less than significant.	No mitigation is required.	N/A	N/A	N/A
Threshold b: Less-than-Significant Impact The Project is within the growth assumptions identified by the Monrovia 2020 UWMP, and because the UWMP demonstrates that there would be adequate water supplies within the City to serve	No mitigation is required.	N/A	N/A	N/A

Summary of Impact	Mitigation Measures (MM)	Responsible Parties	Implementation Stage	Level of Significance After Mitigation
reasonably foreseeable future development through at least year 2040 during normal, dry, and multiple dry years, it is concluded that adequate water supplies are available to serve the Project without the need for new or expanded entitlements or resources. Impacts would be less than significant.				
Threshold c: Less-than-Significant Impact Wastewater generated by the Project would be treated at the San Jose Creek Water Reclamation Plant. The San Jose Creek Water Reclamation Plant has sufficient treatment capacity to accommodate the Project and planned growth within its service territory. Accordingly, the Project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments, and impacts would be less than significant.	No mitigation is required.	N/A	N/A	N/A
Threshold d: Less-than-Significant Impact The Project's increase in solid waste generation represents 0.02 percent of the maximum permitted throughput at the Olinda Alpha Sanitary Landfill, which has a maximum daily permitted throughput of 8,000 tpd. The amount of solid waste expected to be generated by the Project would neither exceed State or local disposal standards nor exceed the local infrastructure capacity to handle the waste disposal; therefore, impacts to landfill capacity associated with the Project's construction and operational activities would be less than significant.	No mitigation is required.	N/A	N/A	N/A
Threshold e: No Impact The Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. During construction, solid waste would be appropriately sorted and recycled, when feasible, per CALGreen Building Standards. Operational waste from both residences and commercial uses would meet local standards of solid waste and recycling policies as defined in Chapter 8.08 of the City's Municipal Code. In addition, organic waste would be recycled in accordance with AB 1826. Accordingly, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, and no impact would occur.	No mitigation is required.	N/A	N/A	N/A

1.0 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that all public agencies within the State of California having land use approval over activities with the potential to adversely affect the quality of the environment, regulate such activities so that impacts to the environment can be prevented to the extent feasible. Such activities are reviewed and monitored through the CEQA compliance process, as provided in the CEQA Statute (Public Resources Code (PRC) Sections 21000-21177, as amended) and Guidelines (California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, Sections 15000-15387, as amended).

Under CEQA, if there is substantial evidence that a project may have a significant effect on the physical environment, an Environmental Impact Report (EIR) must be prepared (CEQA Guidelines Section 15064(a)(1)). The purpose of an EIR is to inform public agency decision-makers and the public of the potentially significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (CEQA Guidelines Section 15121(a)).

This document is an EIR for the proposed 701 S. Myrtle Specific Plan and Development Project, which consists of entitlement applications for a General Plan Amendment (GPA), Zone Change (ZC), Specific Plan, Vesting Tentative Parcel Map (VTPM), and Conditional Use Permit (CUP). For purposes of this EIR, the term "Project" refers to all actions associated with implementing the Project, including planning, construction, and ongoing operations.

The term "Project Applicant" used herein refers to Blake Griggs Properties, LLC, which is the entity that submitted discretionary applications for the proposed GPA, ZC, Specific Plan, VTPM, and CUP to the City of Monrovia (City) to entitle the Project. The term "Project site" refers to the property on which the Project is proposed. The public agency with the principal responsibility for carrying out or approving a project is the Lead Agency pursuant to CEQA Guidelines Section 15050. The term "Lead Agency" used herein refers to the City of Monrovia. Throughout this document, the terms "Draft EIR" and "Final EIR" may be used interchangeably since both are part of the ultimate EIR record; however, "Draft EIR" may be used specifically when referring to information provided in the volume made available for the CEQA-required 45-day public review period.

1.1 PURPOSES OF CEQA AND THIS EIR

As stated in CEQA Guidelines Section 15002(a), the basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities (including the discretionary approval of land entitlement applications submitted by private parties);

- Identify the ways that environmental damage can be avoided or significantly reduced;

- Prevent significant avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and

- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

In conformance with CEQA Guidelines Section 15121(a), the purposes of this EIR are (1) to inform public agency decision-makers and the general public about the potentially significant environmental effects of the Project, (2) to identify possible ways to minimize the significant effects, and (3) to describe reasonable alternatives to the Project that would feasibly attain most of the basic Project objectives but would avoid or substantially lessen its significant environmental effects. This EIR is an informational document that represents the independent judgment of the City, and a good faith effort at full disclosure of the environmental impacts of the Project. The City reviewed and, as necessary, directed revisions to all submitted drafts, technical studies, and reports supporting this EIR for consistency with City policies and requirements, to ensure that this EIR reflects the City's independent judgment.

1.2 SUMMARY OF THE PROJECT EVALUATED BY THIS EIR

The Project site comprises approximately 1.61 acres of developed land located within the City of Monrovia, Los Angeles County, California. The Project site is located at the existing physical address of 701 South Myrtle Avenue and 112-136 West Olive Avenue at the southwestern corner of the intersection of West Olive Avenue and South Myrtle Avenue. Interstate 210 (I-210) is located approximately 0.6 miles south of the Project site. The site is located in an area known as the Old Town Extension District, which is one of three districts designated by the City of Monrovia's General Plan South Myrtle Avenue Corridor planning area. The Old Town Extension District is intended to promote urban design and land uses more compatible with Old Town Monrovia.

The Project entails legislative and discretionary applications for a GPA, ZC, Specific Plan, VTPM, and CUP. These applications involve the proposed entitlement of an approximately 1.61-acre Project site for the demolition and removal of the existing "Myrtle and Olive Business Park" development and redevelopment of the site with a proposed, mixed-use building. The building is designed with a height of 65 feet measured from average grade plane, encompassing five above-ground levels and 1.5 subterranean levels. Architectural projections on small portions of the roof would be permitted to extend up to 80 feet in height, primarily for architectural interest and to screen rooftop mechanical equipment. The building is proposed to include 204 multi-family residential apartment units, 2,370 square feet (s.f.) of commercial retail space, 2,782 s.f. of fitness center space, 2,470 s.f. of leasing office/lobby/mail room space on the ground floor, parking on a portion of the ground floor, and 1.5 levels of subterranean parking. Of the 204 residential apartment units, 17 of the units are proposed to be restricted for low-income households and three of the units are proposed to be restricted for moderate-income households. Residential units are designed to vary in size from 490 to 1,070 s.f., consisting of 20 studio, 147 one-bedroom, and 37 two-bedroom units. Various recreational facilities and amenities are included in the building design for the residents, including a resort-style pool, rooftop deck, and courtyard gathering areas. An outdoor private dog park is proposed on the west side of the building and an outdoor public

plaza is proposed at the site's northeastern corner at the intersection of West Olive Avenue and South Myrtle Avenue. Vehicular access to the Project's ground floor parking and subterranean parking would be provided from one driveway connecting with West Olive Avenue.

1.3 CEQA Compliance Process

Under CEQA, the "scope" of an EIR may be determined through the preparation of an Initial Study and a public scoping process. Instead of preparing an Initial Study, the Lead Agency may instead to decide to prepare an EIR covering the full scope of a project's potential environmental effects, as the City selected to do in the case of the Project and this EIR. The EIR must consider both the potential project-specific (direct and indirect) and cumulative environmental impacts that could result from implementation of the Project.

As a first step in the CEQA compliance process and pursuant to the procedural requirements of CEQA, on December 4, 2023, the City filed a Notice of Preparation (NOP) with the State Clearinghouse (SCH), a division of the Governor's Office of Planning and Research (OPR), to indicate that an EIR would be prepared to evaluate the Project's potential to impact the environment.[1] The NOP was also distributed to potential responsible and trustee agencies and other interested parties for a 30-day public review period that commenced on December 4, 2023. The purpose of distributing the NOP was to provide information describing the Project and solicit input to assist the City in identifying the full scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR.

In addition, the City held a publicly-noticed EIR Scoping Meeting on January 3, 2024, using an internet-based virtual platform (Microsoft Teams). At the Scoping Meeting, the City provided information about the Project, the intended scope of the EIR, and provided opportunity for agencies and members of the general public to comment on the scope of environmental issues to be addressed in this EIR.

An Initial Study was not prepared for the Project because the City determined that most of the environmental issue areas specified in the CEQA Guidelines would be fully analyzed in this EIR. Given the developed condition of the Project site and the developed nature of surrounding land uses, the Project's NOP scoped out certain issue areas from detailed environmental review, including Agriculture and Forest Resources, Biological Resources, Hydrology/Water Quality, Mineral Resources, and Wildfire. The NOP, public review distribution list, and written comments received by the City during the NOP public review period are provided in *Technical Appendix A* to this EIR. Please refer to Table 1-1, *Summary of NOP and Scoping Meeting Comments*, for summarized comments received by the City during the NOP public review period and Scoping Meeting. The purpose of this table is to present a summary of the environmental topics that were expressed by public agencies and interested parties to be of primary interest. Table 1-1 is a summary and does not list every comment received by the City during the NOP review period. Regardless of whether or not an environmental or CEQA-

[1] The NOP described a Project design that included 200 multi-family residential uses, inclusive of 17 low-income units, whereas the Project evaluated in this EIR includes 204 multi-family residential units, inclusive of 17 low-income units and 3 moderate income units. The addition of four residential units in the same building envelope is not significant new information that would materially change the Project's environmental effects, and, as such, recirculation of the NOP was not required.

related comment is listed in the table, all relevant comments regarding CEQA issues the City received in response to the NOP and during the EIR Scoping Meeting are addressed in this EIR.

Table 1-1 Summary of NOP and Scoping Meeting Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
State			
California Department of Transportation (Caltrans)	1/2/2024	• Requests discussion of multi-modal transportation elements that promote alternatives to car use and prioritize efficient modes of travel.	3.0, Project Description; 4.8, Land Use and Planning; 4.13, Transportation
		• Suggests traffic calming measures to reduce single occupancy vehicle trips, greenhouse gas emissions, and vehicle miles traveled (VMT).	3.0, Project Description; 4.13, Transportation
		• Recommends evaluating Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications.	4.13, Transportation
		• Requests VMT analysis in the DEIR and recommends including a queuing analysis with actual signal timing for existing traffic conditions plus project trips at off-ramps on I-210 at S. Myrtle Ave., Huntington Dr., and Mountain Ave.	4.13, Transportation Technical Appendix J1 Technical Appendix J2
Native American Heritage Commission (NAHC)	12/4/2023	• States that Assembly Bill 52 (AB 52) applies to the Project and provides a summary of AB 52 requirements.	4.14, Tribal Cultural Resources
		• States that Senate Bill 18 (SB 18) may be applicable and provides a summary of SB 18 requirements.	4.14, Tribal Cultural Resources
		• Recommends consultations with Native American tribes that are affiliated with the Project's geographic area.	4.3, Cultural Resources; 4.14, Tribal Cultural Resources
		• Recommends the following actions: conduct a California Historical Research Information System (CHRIS) records search; prepare a report detailing the findings and recommendations of the records search and field survey; contact the NAHC for a Sacred Lands File (SLF) search and a Tribal consultation list.	4.3, Cultural Resources
		• Requests that the mitigation and monitoring reporting program (MMRP) include measures for inadvertently discovered archaeological resources and monitoring of	4.3, Cultural Resources

Table 1-1 Summary of NOP and Scoping Meeting Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		ground-disturbing activities by a certified archaeologist and culturally affiliated Native American.	
		• Requests that the MMRP include provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.	4.3, Cultural Resources
		• Requests that the MMRP include provisions for inadvertently discovered human remain and associated grave goods.	4.3, Cultural Resources
Local			
Los Angeles County Sanitation District (LACSD)	12/27/2023	• Notes that the wastewater flow from the Project will discharge to a local sewer line, not maintained by LACSD, for conveyance to the LACSD's Monrovia Outfall Trunk.	3.0, Project Description; 4.15, Utilities and Service Systems
		• States that the LACSD's 24-inch diameter trunk sewer has a capacity of 18 million gallons per day (mgd) and conveyed a peak flow of 3.1 mgd when last measured in 2013.	3.0, Project Description; 4.15, Utilities and Service Systems
		• Provides a calculation for the Project's average wastewater flow.	4.15, Utilities and Service Systems
		• Notes that the wastewater generated by the Project will be treated at the San Jose Creek Water Reclamation Plant (WRP), which has a capacity of 100 mgd and processes an average recycled flow of 62.7 mgd; states that flows that exceed capacity at Jose Creek WRP are diverted to A.K. Warren Water Resource Facility.	2.0, Environmental Setting; 4.15, Utilities and Service Systems
		• States that payment of a connection fee may be required before the Project is permitted to discharge to the LACSD's Sewerage System.	4.15, Utilities and Service Systems
		• States that the comment letter is to advise the developer that the District intends to provide service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the LACSD's facilities.	4.15, Utilities and Service Systems
Interested Parties			
Nladner1 (Email)	12/1/2023	• Expresses the concern of losing the "small-town" feel with implementation of the	4.1, Aesthetics

Table 1-1 Summary of NOP and Scoping Meeting Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		Project and expresses opposition to the Project.	
Lozeau Drury LLP	12/6/2023	• On behalf of Supporters Alliance for Environmental Responsibility (SAFER), requests to be included on the notification list for all public notices and hearings pertaining to the Project.	1.0, Introduction
Richard Hogge	12/7/2023	• Expresses support for the Project and states that more affordable housing is needed.	4.10, Population and Housing
Genevieve Sheehan	12/9/2023	• Expresses concern that the Project only allocates 17 units for low-income housing and states that this does not appear aligned with Monrovia's Regional Housing Needs Assessment published in the City's Housing Element.	4.10, Population and Housing
		• Provides data regarding Monrovia's housing scorecard published by the Southern California News Group which shows that Monrovia is in the D and F category for very-low and low income housing supply.	4.10, Population and Housing
Elizabeth Andres	12/20/2023	• Expresses concern for losing the "small-town" feel of the City.	4.1, Aesthetics
		• Expresses concern for the additional traffic and associated parking issues the Project could bring to Myrtle Avenue; and expresses environmental concern regarding additional air pollution due to extra vehicles.	4.13, Transportation; 4.2, Air Quality; 4.6, Greenhouse Gas Emissions
		• Suggests decreasing the scope of the Project to a 2- or 3-story building, allowing it to blend in better with the existing buildings on Myrtle Avenue.	4.1, Aesthetics; 6.0, Project Alternatives
Louise Haubner	12/20/2023	• Expresses concern for losing the quaint feel of the City.	4.1, Aesthetics
Jim Wigton	12/31/2023	• Expresses concern for the impact of the Project on historic downtown resources and historic districts; concerned with parking needs of residents of the complex being met.	4.1, Aesthetics; 4.3, Cultural Resources
Eva Koo	1/2/2024	• Expresses the need for more trees, more recreation, and less construction.	3.0, Project Description; 4.1, Aesthetics; 4.12, Recreation
Jamie Carrillo	1/4/2024	• Expresses concerns regarding parking, noise and traffic on Primrose Avenue and due to	3.0, Project Description; 4.1, Aesthetics; 4.9, Noise;

Table 1-1 Summary of NOP and Scoping Meeting Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		trash collection, and the architectural design of the building.	4.13, Transportation
Fred Wasson	1/4/2024	• Expresses general support for the Project, but expresses concern that the massing and building height is perhaps excessive for the location.	3.0, Project Description; 4.1, Aesthetics
Scoping Meeting Comments			
Jim Wigton	1/3/2024	• Inquired about whether additional parking has been considered and about the Project's impact on the historic character of the neighborhood.	3.0, Project Description; 4.1, Aesthetics; 4.3, Cultural Resources; 4.13, Transportation
Edie	1/3/2024	• Inquired about the parking spaces in the alley and the number of low-income units.	3.0, Project Description; 4.13, Transportation
Jamie Carrillo	1/3/2024	• Expressed concern about noise, traffic, and truck traffic.	4.9, Noise; 4.13, Transportation
Steven Lord	1/3/2024	• Expressed concern about views from existing residential units.	4.1, Aesthetics
Peter Hulit	1/3/2024	• Expressed concern regarding environmental impact from pets and impacts from light pollution.	4.1, Aesthetics; 4.7, Hazards and Hazardous Materials
Genevieve Sheehan	1/3/2024	• Expresses concern regarding the need for affordable housing and the need for more units than the current number identified for the Project.	4.10, Population and Housing
Anonymous Chat Question	1/3/2024	• Questions if the existing pine trees would be preserved and stated that the north side of the Project would be a good location for tree wells. Also asks whether a green roof design was being considered.	3.0, Project Description; 4.1, Aesthetics

Based on public comments made on the NOP in writing (see *Technical Appendix A*) and verbally at the Scoping Meeting, and upon consideration of the Project Applicant's proposal and the Project's geographic location, the City determined that the Project would result in no impacts or less than significant impacts to the following environmental topics: Agriculture and Forestry Resources; Biological Resources; Hydrology and Water Quality; Mineral Resources; and Wildfire. Potential effects associated with these environmental topics and an analysis of the Project's potential to be growth-inducing are summarized in Section 5.0, *Other CEQA Considerations*.

Based on Appendix G to the CEQA Guidelines, and in consideration of all comments received by the City on the NOP and during the EIR Scoping Meeting, Section 4.0, *Environmental Analysis*, of this EIR evaluates the Project's potential to cause adverse impacts under the following environmental topics:

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

The City determined that implementation of the Project has the potential to result in significant environmental effects, and a Project EIR, as defined by CEQA Guidelines Section 15161, is required. As stated in CEQA Guidelines Section 15161, a Project EIR should "…focus primarily on the changes in the environment that would result from the development project" and "…examine all phases of the project including planning, construction, and operation." This EIR represents the independent judgment of the City (as the Lead Agency) and evaluates the physical environmental effects that could result from constructing and operating the Project. Acting as Lead Agency, the City considers the following items regarding the Project and this EIR: (a) evaluation of this EIR to determine if the physical environmental impacts of the Project are adequately disclosed; (b) assessment of the adequacy and feasibility of identified mitigation measures; (c) consideration of alternatives to the Project that could reduce or eliminate significant environmental effects of the Project; and, if necessary, (d) consideration of Project benefits that override the Project's unavoidable and unmitigable significant effects on the environment.

In accordance with CEQA Guidelines Section 15105, the City releases the Draft EIR for a minimum 45-day public review period and makes the Draft EIR and its supporting technical appendices available for review in electronic format on the City's website; in paper copy at the City's Community Development Department, 415 South Ivy Avenue, Monrovia, CA 91016, during the City's regular business hours; and in paper copy at the Monrovia Public Library, 321 South Myrtle Avenue, Monrovia, CA 91016, during the library's regular business hours.

During the 45-day review period, comments on the content of the Draft EIR can be submitted to:

City of Monrovia
Community Development Department
Attn: John Mayer, Principal Planner
415 South Ivy Avenue
Monrovia, CA 91016
Email: jmayer@monroviaca.gov

Public comments should be focused "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided

or mitigated" (CEQA Guidelines Section 15204(a)). Comments regarding the merits of the Project are not appropriate during the CEQA process and will not be responded to in the Final EIR.

Following the receipt of any comments during the Draft EIR's 45-day public review period, the City will then respond in writing to all submitted comments pertaining to an environmental effect and publish a Final EIR. The City is not required to respond to comments that are received after the comment period closes. Before taking action to approve the Project, the City Council must (1) certify this EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision making process; (3) make a statement that this EIR reflects the independent judgment of the City; (4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible, and citing the specific benefits of the Project that outweigh its unavoidable adverse effects (CEQA Guidelines Sections 15090-15093).

A Project-related decision-making process will be subject to noticed public hearings held before the City's Planning Commission and City Council. The Planning Commission will make recommendations to the City Council, and the City Council will decide whether to certify the Final EIR and whether the Project should be approved, approved with changes, or denied. During the public hearing process, the Project and its design features, objectives, merits, environmental consequences, and socioeconomic factors, among other information contained in the Project's administrative record, will be considered by the City. If the Final EIR is certified and the Project is approved by the City Council, the City and other public agencies with permitting authority over all, or over portions of the Project, would be able to rely on the Final EIR as part of their permitting and approval processes. The Final EIR will allow those responsible agencies to evaluate the environmental effects of the Project as they pertain to the approval or denial of applicable permits. City staff would also rely on the certified Final EIR to subsequently conduct administrative level reviews for implementing permits and approvals, and impose any mitigation measures identified in the Final EIR as conditions of approval of the Project.

1.3.1 Content And Organization Of This EIR

This EIR contains all of the information required to be included in an EIR as specified by the CEQA Statute and Guidelines. This EIR is organized in the following manner:

- **Section S.0, Executive Summary**, provides an overview of the EIR document and CEQA process. The Project, including its objectives, is described, and the location and regional setting of the Project site is documented. In addition, the Executive Summary discloses potential areas of controversy related to the Project that are known to the City[2], including those issues identified by other agencies and the public, and identifies potential alternatives to the Project that would reduce or avoid significant environmental impacts, as required by CEQA. Finally, the Executive Summary provides a summary

[2] CEQA Guidelines Section 15123.

of the Project's impacts, mitigation measures, and conclusions, in a table that forms the basis of the EIR's Mitigation Monitoring and Reporting Program (MMRP).

- **Section 1.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of the City serving as the Lead Agency for this EIR, a brief description of the Project, the purpose of this EIR, discretionary applications proposed by the Project Applicant that would require discretionary City approvals, permits and approvals required by other agencies, and an overview of the EIR format.

- **Section 2.0, Environmental Setting**, describes the environmental setting, including an overview of the regional and local setting and descriptions of the Project site's physical conditions and surrounding context. The existing setting is defined as the condition of the Project site and surrounding area at the approximate date this EIR's NOP was released for public review on December 4, 2023. The setting discussion also addresses the relevant regional planning documents that apply to the Project.

- **Section 3.0, Project Description**, serves as the EIR's Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project, including the summary requirements pursuant to CEQA Guidelines Section 15123. This section provides a detailed description of the Project, including its purpose and main objectives, design features, landscaping, site drainage, utilities, grading and construction characteristics, and operational characteristics expected over the Project's lifetime. In addition, the discretionary actions required of the City and other government agencies to implement the Project are identified.

- **Section 4.0, Environmental Analysis**, provides an analysis of the environmental effects that may occur from implementing the Project. The topics analyzed in this section include the topics for environmental review listed above under Subsection 1.3. A conclusion concerning significance is reached for each discussion, and mitigation measures are presented as warranted. The environmental changes identified in Section 4.0 and throughout this EIR are referred to as "effects" or "impacts" interchangeably. The CEQA Guidelines also describe the terms "effects" and "impacts" as being synonymous (CEQA Guidelines Section 15358). In the environmental analysis subsections of Section 4.0, the existing conditions are disclosed that are pertinent to the subject area being analyzed, accompanied by a specific analysis of physical impacts that may be caused by implementing the Project. Impacts are evaluated on a direct, indirect, and cumulative basis. Direct impacts are those that would occur directly as a result of the Project. Indirect impacts represent secondary effects that would result from Project implementation. Cumulative effects are defined in CEQA Guidelines Section 15355 as "…two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."

  The analyses in Section 4.0 are based in part upon technical reports that are appended to this EIR. Information is also drawn from other sources of analytical materials that directly or indirectly relate to the Project and that are cited in Section 7.0, *References*. Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation measures are recommended to reduce or avoid the significant effect. Mitigation measures

must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be "roughly proportional" to the impacts of the Project. The discussion then indicates whether the identified mitigation measures would reduce impacts to below a level of significance. In most cases, implementation of the mitigation measures would reduce the adverse environmental impacts to below a level of significance. If mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable adverse impact, for which a Statement of Overriding Considerations (SOC) would need to be adopted by the City pursuant to CEQA Guidelines Section 15093.

- **Section 5.0, Other CEQA Considerations**, includes specific topics that are required by CEQA. These include a summary of the Project's significant and unavoidable environmental effects, a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented, potential growth-inducing impacts of the Project, and a summary of effects determined to be less than significant.

- **Section 6.0, Alternatives**, describes and evaluates alternatives to the Project that could reduce or avoid the Project's adverse environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives that will foster informed decision making and public participation. A range of three alternatives is presented in Section 6.0.

- **Section 7.0, References**, cites all reference sources used in preparing this EIR and lists the agencies and persons that were consulted during preparation of this EIR. Section 7.0 also lists the persons who authored or participated in preparing this EIR.

CEQA requires that an EIR contain, at a minimum, certain specified content. Table 1-2, *Location of CEQA Required Topics*, provides a quick reference in locating the CEQA-required sections within this document.

Table 1-2 Location of CEQA Required Topics

CEQA Required Topic	CEQA Guidelines Reference	Location in this EIR
Table of Contents	Section 15122	Table of Contents
Summary	Section 15123	Section S.0
Project Description	Section 15124	Section 3.0
Environmental Setting	Section 15125	Section 2.0
Consideration and Discussion of Environmental Impacts	Section 15126	Section 4.0
Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented	Section 15126.2(c)	Section 4.0 & Subsection 5.1
Significant Irreversible Environmental Impacts Which Would be Involved in the Proposed Action Should it be Implemented	Section 15126.2(d)	Subsection 5.2
Growth-Inducing Impact of the Proposed Project	Section 15126.2(e)	Subsection 5.3
Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects	Section 15126.4	Section 4.0 & Table S-1

Table 1-2 Location of CEQA Required Topics

CEQA Required Topic	CEQA Guidelines Reference	Location in this EIR
Consideration and Discussion of Alternatives to the Proposed Project	Section 15126.6	Section 6.0
Effects Not Found to be Significant	Section 15128	Subsection 5.4
Organizations and Persons Consulted	Section 15129	Section 7.0 & Technical Appendices
Discussion of Cumulative Impacts	Section 15130	Section 4.0
Energy Conservation	Appendices F and G	Subsection 4.5

1.3.2 Incorporation By Reference

CEQA Guidelines Section 15147 states that the "information contained in an EIR shall include summarized… information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public," and that the "placement of highly technical and specialized analysis and data in the body of an EIR should be avoided." CEQA Guidelines Section 15150 allows for the incorporation "by reference all or portions of another document… [and is] most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand." The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this EIR. Where this EIR incorporates a document by reference, the document is identified in the body of the EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this EIR.

The detailed technical studies, reports, and supporting documentation that were used in preparing this EIR are bound separately as Technical Appendices. The Technical Appendices are available for review at the City of Monrovia, Community Development Department, 415 South Ivy Avenue, Monrovia, CA 91016, during the City's regular business hours or in electronic format on the City's website. The technical studies, reports, and supporting documentation that comprise the Technical Appendices are as follows:

A. Notice of Preparation (NOP) and Written Comments on the NOP
B. Shadow Study
C. Air Quality Impact Analysis
D1. Cultural Resources Records Search (*confidential*)
D2. Historical Resources Technical Report
E. Energy Analysis
F. Geotechnical Investigation
G. Greenhouse Gas Emissions
H1. Phase I Environmental Site Assessment
H2. Phase II Subsurface Investigation
I. Noise Analysis
J1. Traffic Analysis
J2. Traffic Analysis Supplemental Memo
K. VMT Screening Evaluation

Other reference sources that were cited in this EIR are listed in Section 7.0, *References*, of this EIR. In most cases, documents or websites not included in the EIR's Technical Appendices are cited by a link to the online location where the document/website can be viewed by the public for convenience. All references relied upon by this EIR are included as part of the City's Administrative Record pertaining to the Project.

1.4 Responsible and Trustee Agencies

The PRC Section 21153 requires that all EIRs be reviewed by responsible and trustee agencies (see also CEQA Guidelines Section 15082 and Section 15086(a)). As defined by CEQA Guidelines Section 15381, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project." A Trustee Agency is defined in CEQA Guidelines Section 15386 as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California." The known Responsible and Trustee Agencies for the Project are listed below. Regardless, this EIR can be used by any Trustee Agency or Responsible Agency, whether identified in this EIR or not, as part of their decision-making processes in relation to the Project.

- **Los Angeles Regional Water Quality Control Board (LAWQCB)** is a Responsible Agency and would be responsible for issuing a Construction Activity General Construction Permit, ensuring compliance with the National Pollutant Discharge Elimination System (NPDES) Permit, and issuing a Waste Discharge Requirements (WDR) permit.

In addition, approvals may be required of other agencies and entities, such as the South Coast Air Quality Management District (SCAQMD) should any equipment be proposed as part of operation of the commercial uses that requires a SCAQMD permit to construct or permit to operate.

1.5 Areas of Controversy

Based on comments received during the NOP review period, concerns were raised regarding potential impacts to aesthetics, cultural resources, noise, population and housing, and transportation. No areas of controversy were identified as part of the NOP process beyond comments regarding the Project's potential environmental effects.

1.6 Issues To Be Resolved by the Decision-Making Body

Based on the analysis presented in Section 4.0 of this EIR, the Project would not result in any significant impacts to the environment that cannot be mitigated to below a level of significance. Therefore, there are no known issues that would need to be resolved by the City beyond considering the Project's application materials and determining whether to approve, conditionally approve, or deny approval of the Project and whether to certify this EIR.

2.0 Environmental Setting

This section was prepared pursuant to CEQA Guidelines Section 15125(a) and includes a description of the physical environmental conditions in the vicinity of the Project site and the maximum extent of the Project's potential off-site improvement areas from both a local and regional perspective as they existed at the approximate time the Notice of Preparation (NOP) was published for this EIR (December 4, 2023). This section provides a brief overview of environmental resources on and surrounding the Project site. Additional details regarding existing conditions for individual environmental issues are provided within the appropriate subsection headings within Section 4.0, *Environmental Analysis*, of this EIR.

2.1 Regional Setting and Location

The Project site is comprised of approximately 1.61 acres of developed land and is located in the San Gabriel Valley within the City of Monrovia, California, which is located with the central portion of Los Angeles County. Los Angeles County abuts Ventura County to the west, Kern County to the north, San Bernardino County to the east, and Orange County to the south. Figure 3-1, *Regional Map*, depicts the Project site's location within the regional vicinity. As shown in Figure 3-1, the developed approximately 1.61-acre Project site is located within the south-central portion of the City of Monrovia. Communities surrounding the City include the City of Bradbury to the east; the City of Duarte to the south and east; the City of Arcadia to the west, and unincorporated lands within Los Angeles County to the north and south.

2.2 Local Setting and Location

As depicted on Figure 3-2, *Vicinity Map*, the Project site is located approximately 0.6 miles north of Interstate 210 (I-210). The Project site is located at the existing physical address of 701 South Myrtle Avenue and 112-136 West Olive Avenue; it encompasses Assessor Parcel Numbers (APNs) 8516-033-030 and 8516-033-031; and it is located in Section 00, Township 01 North, Range 11 West, San Bernardino Baseline and Meridian in the Public Land Survey System (PLSS). The Project site is located at the southwestern corner of the intersection of West Olive Avenue at South Myrtle Avenue. The site is located in the City of Monrovia's General Plan South Myrtle Avenue Corridor planning area and within the Old Town Extension District, which is intended to promote urban design and land uses more compatible with Old Town Monrovia to the north, than the commercial, office, and industrial uses located along Myrtle Avenue to the south.

Under existing conditions, the Project site is developed with an approximately 25,191-square-foot (s.f.) single-story multi-tenant commercial/industrial office building that was constructed in 1979. The single-story building includes 15 tenant suites occupied by 11 tenants (two tenant spaces were vacant and two tenants occupied two spaces at the time the NOP for this EIR was published (December 2023)). The primary site access is from West Olive Avenue that abuts the Project site to the north. Two private driveways connect the site with West Olive Avenue that lead to an asphalt-paved surface parking area in the northern portion of the Project site. An additional access to the Project site is available from the alley located south of the Project site, which connects to South Myrtle Avenue and leads to an additional asphalt-paved surface parking area behind the existing building. Landscaping occurs along the western, northern and eastern perimeters of the Project site.

2.3 SURROUNDING LAND USE AND DEVELOPMENT

Land uses in the immediate vicinity of the Project site are illustrated on Figure 2-1, *Surrounding Land Uses and Development*, and described below. The Project site is located in an urban area and all of the land surrounding the Project site is developed.

- North: West Olive Avenue forms the northern boundary of the Project site. To the north and northeast of West Olive Avenue across the street from the Project site is a mix of residential and commercial uses, including, but not limited to, apartments, restaurants, and service commercial businesses with building heights ranging from one story to three stories. North of West Olive Avenue is the heart of Old Town Monrovia, which contains an array of boutique shops, restaurants, and historic buildings with a north-facing view of the San Gabriel Mountains.

- East: South Myrtle Avenue forms the eastern boundary of the Project site. To the immediate east of South Myrtle Avenue across the street from the Project site is a three- and four-story mixed-use structure (Paragon at Old Town) with ground floor retail and residential apartment units, upper floor apartment units, and structured parking including rooftop parking. Beyond this building are lower-profile, one-, two-, and three-story structures containing a variety of residential, commercial, and service commercial uses with a few historic-character structures located farther north along South Myrtle Avenue north of West Olive Avenue.

- South: To the south of the Project site is an alley, beyond which are one- and two-story commercial, office, and industrial uses. To the south of these uses is West Walnut Avenue and a five-story apartment building (Avalon) with some ground floor retail and structured parking.

- West: To the west of the Project site is a one-story light industrial building, beyond which is South Primrose Avenue. To the west of South Primrose Avenue are one- and two-story single-family and multi-family residential structures.

2.4 PLANNING CONTEXT

CEQA Guidelines Section 15125(d) requires that EIRs identify the general plans and regional plans that are applicable to the project under evaluation, and recognize potential inconsistencies. Plans that are applicable to the Project and evaluated in this EIR are summarized below, with additional information provided in the applicable environmental issue topics in Section 4.0, *Environmental Analysis*.

2.4.1 SCAG REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY (RTP/SCS)

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. The Project site is within SCAG's regional authority. In April 2024, SCAG's Regional Council adopted the *2024-2050 Regional Transportation Plan/Sustainable Communities*

Strategy (RTP/SCS). The 2024-2050 RTP/SCS is the applicable plan for the region, inclusive of the Project site. The 2024-2050 RTP/SCS plans for a large number of transportation projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs, and replacement bridges. The goals of the 2024-2050 RTP/SCS are to (1) build and maintain an integrated multimodal transportation network; (2) develop, connect, and sustain communities that are livable and thriving; (3) create a healthy region for the people of today and tomorrow; and (4) support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the region. Regional planning policies focus on addressing the challenges related to four core categories—mobility, communities, environment, and economy. The key mobility challenges relate to the limited reliable forms of travel besides driving and transportation safety. The key community challenges relate to housing affordability, unhoused population, out-migration, and sustainable growth. The key environmental challenges relate to climate change, poor air quality and associated health impacts, and loss of open space. The key economic challenges relate to the lack of economic opportunity, population aging, and increasing supply-chain complexities (SCAG, 2024a).

2.4.2 South Coast Air Quality Management District Air Quality Management Plan (AQMP)

The Project site is located within the South Coast Air Basin (SCAB) and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD's 2022 AQMP is a plan for the improvement of regional air quality and is based on the assumption that development associated with general plans, specific plans, residential projects, and wastewater facilities will be constructed in accordance with population growth projections identified by SCAG in its 2020-2045 RTP/SCS. The 2022 AQMP also assumes that such development projects will implement strategies to reduce air pollutant emissions generated during the construction and operational phases of development (SCAQMD, 2022).

2.4.3 City of Monrovia General Plan

The City of Monrovia's prevailing planning document is its General Plan. The City of Monrovia General Plan was updated in 2022 to include focused updates to three elements: Housing, Safety, and Environmental Justice. As shown on Figure 2-2, *Existing General Plan Land Use Designations*, the Project site is designated by the General Plan for Office/Research and Development/Light Manufacturing (O/RD/LM) land uses with a Specific Plan/Planned Development Overlay (SP/PD Overlay). The O/RD/LM land use designation is intended to encourage high quality development of office, research and development uses, and support uses. Support uses may include restaurants, hotels, health clubs, and banks. The maximum floor area ratio (FAR) for this designation is 0.75:1. The intent of the SP/PD Overlay is to continue the pedestrian orientation of South Myrtle Avenue south from Old Town and to create new housing opportunities and compatible office uses between Olive and Maple Avenues (City of Monrovia, 2021).

2.4.4 Zoning

The City's Zoning Code, Title 17 of the Monrovia Municipal Code (MMC), establishes zoning classifications within the City. As shown on Figure 2-3, *Existing Zoning Classifications*, the Project site is currently zoned Office/Research and Development/Light Manufacturing (O/RD/LM). The O/RD/LM zone is intended to facilitate the development of a variety of commercial land uses, including administrative/professional services, athletic clubs/health spas, business support services, communication services, financial institutions,

instructional services, medical laboratory services, light manufacturing, research and development, warehousing/wholesaling, and utility distribution facilities (City of Monrovia, 2023a).

2.5 EXISTING PHYSICAL SITE CONDITIONS

Pursuant to CEQA Guidelines Section 15125, the physical environmental condition for purposes of establishing the setting of an EIR is the environment as it existed at the time the EIR's NOP was published (December 4, 2023). The following subsections provide a description of the Project site's physical environmental conditions ("existing conditions") as of that approximate date. The site's physical conditions and immediate surrounding areas are shown on Figure 2-4, *Aerial Photograph*. More detailed information regarding the Project's site's environmental setting as it relates to specific environmental issue topics is provided in the various subsections of EIR Section 4.0, *Environmental Analysis*.

2.5.1 LAND USE

As depicted on Figure 2-4, the approximately 1.61-acre Project site is developed with one 25,191-s.f. commercial/industrial office building, the Myrtle and Olive Business Park, constructed in 1979, and associated parking, drive aisles, and landscaping. The Myrtle and Olive Business Park is a single-story, multi-tenant building with 15 suites currently occupied by 11 tenants (two tenant spaces were vacant and two tenants occupied two spaces at the time the NOP for this EIR was released for public review (December 2023)).

2.5.2 AESTHETICS AND TOPOGRAPHIC FEATURES

As described in the City's General Plan EIR, the City of Monrovia does not have any identified scenic vista, scenic resources, or scenic highways. Topographic features visible from the City include the San Gabriel Mountains to the immediate the north and the Hacienda Hills located in the distance in the City of Hacienda Heights to the south. The base of the San Gabriel Mountains are located approximately 1.7 miles north of the Project site and are partially visible from the Project site; views of the San Gabriel Mountains are partially obstructed by intervening development and landscaping. The Hacienda Hills, located approximately 8.1 miles south of the Project site, are faintly visible under clear weather conditions looking due south along South Myrtle Avenue and mostly obstructed from view by intervening development and topography (Google Earth, 2023).

The Project site contains sources of artificial, exterior lighting under existing conditions since it is currently developed and operating as a business park with multiple tenants. Artificial lighting sources include interior building lighting, building mounted fixtures, streetlights along West Olive Avenue and South Myrtle Avenue, and lighting associated with existing developed properties surrounding the Project site.

The Project site is generally flat with a slight downward slope to the southwest. Elevations on the Project site range from approximately 524 feet above mean sea level (amsl) in the southwestern corner of the site to 536 feet amsl in the northeastern corner of the site. Elevations in the surrounding areas generally decrease in elevation from northeast to southwest. To the northeast of the Project site, elevations gradually increase.

2.5.3 Air Quality and Climate

The City of Monrovia is located in the 6,745-square-mile SCAB, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, the San Jacinto Mountains to the north and east; and San Diego County to the south. The SCAB is within the jurisdiction of the SCAQMD, the agency charged with bringing air quality in the SCAB into conformity with federal and State air quality standards. As documented in the Project's Air Quality Impact Analysis ("AQIA"; *Technical Appendix C* to this EIR), although the climate of the SCAB is characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. More than 90 percent of the SCAB's rainfall occurs from November through April. Temperatures during the year range from an average minimum of 36 degrees Fahrenheit (°F) in January to over 100°F maximum in the summer. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to 10 periods of strong, dry offshore winds, locally termed "Santa Anas" each year (UXR, 2025a, pp. 9-10).

2.5.4 Biological Resources

The Project site is located in an urban, developed area within the City of Monrovia and is fully developed with one 25,191-s.f. building, associated parking, and drive aisles. Vegetation on the Project site is limited to landscaping, including ornamental trees, shrubs, and grasses, with most of the vegetation on-site occurring along the Project site's frontages on West Olive Avenue and South Myrtle Avenue, with accent landscaping provided along the north side of the existing building. Because the Project site is fully developed, no natural vegetation communities are present on the Project site.

2.5.5 Geology and Soils

The Project site is located in the San Gabriel Valley, an alluvial-filled valley bordered by the San Gabriel Mountains on the north, the San Jose Hills to the east, the Puente Hills on the south, and on the west by the San Rafael and Repetto Hills. The Project site is underlain by interbedded layers of sands, silty sands, and sandy silts, with a layer of clayey silt extending from about 30 to 35 feet below existing grades in portions of the site. Although located in a seismically active region, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone, and there are no known active faults crossing or trending towards the Project site. Based on preliminary explorations performed by GPI, the on-site soils in the upper 25 feet of the soil profile are suitable for use as compacted fill, including use as fill below footings and as non-expansive fill directly beneath slab-on-grade floors/hardscape or behind retaining walls (GPI, 2022, pp. 2-4).

2.5.6 Hydrology

Rainfall on the Project site currently flows on the surface as stormwater runoff to the alley on the south side of the Project site. From there, runoff flows west to South Primrose Avenue and is collected in a catch basin at the northeastern corner of South Primrose Avenue and West Walnut Avenue, where it connects to a 72-inch reinforced concrete pipe in South Primrose Avenue. The 72-inch pipe drains southerly and connects to the Peck Road Channel, south of Duarte Road. From there, stormwater runoff is conveyed southeasterly to the

Sawpit Wash. The Sawpit Wash outfalls into a stormwater basin that drains to the Rio Hondo Channel, which then drains to the Los Angeles River and out to the Pacific Ocean.

2.5.7 NOISE

Primary noise sources in the vicinity of the Project site include transportation-related noise associated with vehicles using West Olive Avenue, South Myrtle Avenue, and other nearby streets. To determine the baseline noise environment, 24-hour noise measurements were collected at six locations in the Project site's vicinity (see Figure 4.9-4 for a map of the six locations). Measured daytime noise levels ranged from 54.0 equivalent level decibels (dBA L_{eq}) to 62.8 dBA L_{eq} and nighttime noise levels ranged from 46.8 dBA L_{eq} to 57.7 dBA L_{eq} (UXR, 2025d, p. 20). Refer to EIR Subsection 4.9, *Noise*, for a more detailed discussion of the existing noise setting in the Project area.

2.5.8 TRANSPORTATION

According to the San Gabriel Valley Council of Governments (SGVCOG) Vehicle Miles Traveled (VMT) Screening Tool, the City of Monrovia has an estimated 15.53 VMT per service population (SGVCOG, n.d.). The primary regional travel route serving the Project site is I-210, which is located approximately 0.6 miles south of the Project site (Google Earth, 2023). Local access to the Project site is provided by West Olive Avenue, which abuts the northern boundary of the Project site, and South Myrtle Avenue, which abuts the eastern boundary of the Project site. South Myrtle Avenue is classified as a collector street, designed to accommodate two travel lanes with a center turn-lane, within a 60- to 84-foot right of way. West Olive Avenue, west of South Myrtle Avenue, also is classified as a collector street. Under existing conditions, there are two private driveway connections from the Project site to West Olive Avenue, and one private driveway connection from the Project site to South Myrtle Avenue. Sidewalks are located along Primrose Avenue, Olive Avenue, Walnut Avenue, and Myrtle Avenue including along the segments that abut the Project site. A Class III bikeway (a bikeway that shares the travel lane with vehicles) is located on West Olive Avenue.

2.5.9 PUBLIC FACILITIES

Monrovia Fire & Rescue provides fire protection services to the Project site. The nearest fire station to the Project site is Station 101 (Headquarters) located approximately 0.2 miles northeast of the Project site at 141 East Lemon Avenue. The Monrovia Police Department provides police services to the Project site. The nearest police station is located approximately 0.2 miles northeast of the Project site at 140 East Lime Avenue.

The Project site is located within the service area of the Monrovia Unified School District. The nearest public schools to the Project site are Monroe Elementary School, located approximately 0.3 miles northwest of the Project site at 402 West Colorado Boulevard; Canyon Early Learning Center, located approximately 0.3 miles southeast of the Project site at 1000 South Canyon Boulevard; and Clifton Middle School, located approximately 0.3 miles northeast of the Project site at 226 South Ivy Avenue.

Seven public parks are located within a 2-mile radius of the Project site, including Library Park, Lucinda Garcia Park, Julian Fisher Park, Recreation Park, Rotary Park, Station Square Park, and Kiwanis Park at Grand Avenue. These City parks offer a variety of facilities and/or public amenities at the various sites.

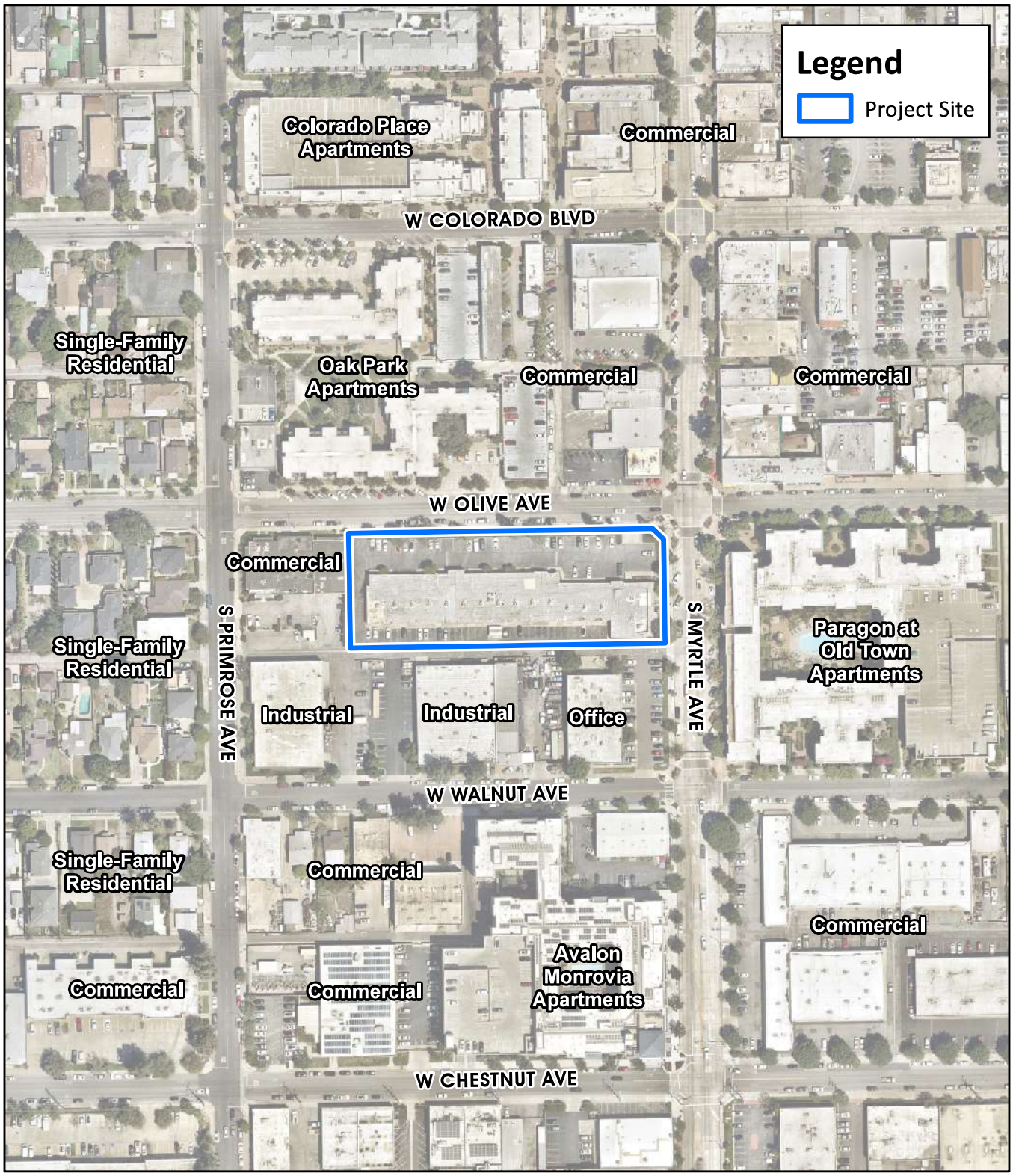
The Monrovia Public Library is located at 321 South Myrtle Avenue, approximately 0.2 miles north of the Project site. The library is open Monday through Saturday.

2.5.10 Utilities and Service Systems

The City of Monrovia provides water and wastewater conveyance services to the Project site. Under existing conditions, water and sewer lines are located beneath West Olive Avenue, South Myrtle Avenue, and beneath the alley along the southern boundary of the Project site. The City operates the wastewater collection system but does not own or operate a wastewater treatment plant. The City contracts with Los Angeles County Sanitation District No. 15 for the treatment of wastewater transmitted through the City's sewer system. Wastewater from the City is conveyed to the San Jose Creek Water Reclamation Plant located at 1965 Workman Mill Road in the City of Whittier (City of Monrovia, 2016, p. 42). The San Jose Creek Water Reclamation Plant consists of two hydraulically interconnected facilities that are situated on the east and west side of the San Gabriel River (I-605) freeway; it currently provides primary, secondary, and tertiary treatment for a design capacity of 100 million gallons of wastewater per day (MGD) (LACSD, n.d.). Solid waste from the Project site is collected by Athens Trash Services. In 2024, solid waste collected in the City of Monrovia requiring landfill disposal was sent to the Olinda Alpha Sanitary Landfill in Brea and the Chiquita Canyon Landfill in Castaic (Calrecycle, 2025).

2.5.11 Rare and Unique Resources

As required by CEQA Guidelines Section 15125(c), the environmental setting should place special emphasis on resources that are rare or unique to that region and would be affected by a project. Based on the existing developed conditions of the Project site and surrounding area described above and discussed in more detail in Section 4.0, *Environmental Analysis*, the Project site is not known to contain any resources that are rare or unique to the region.

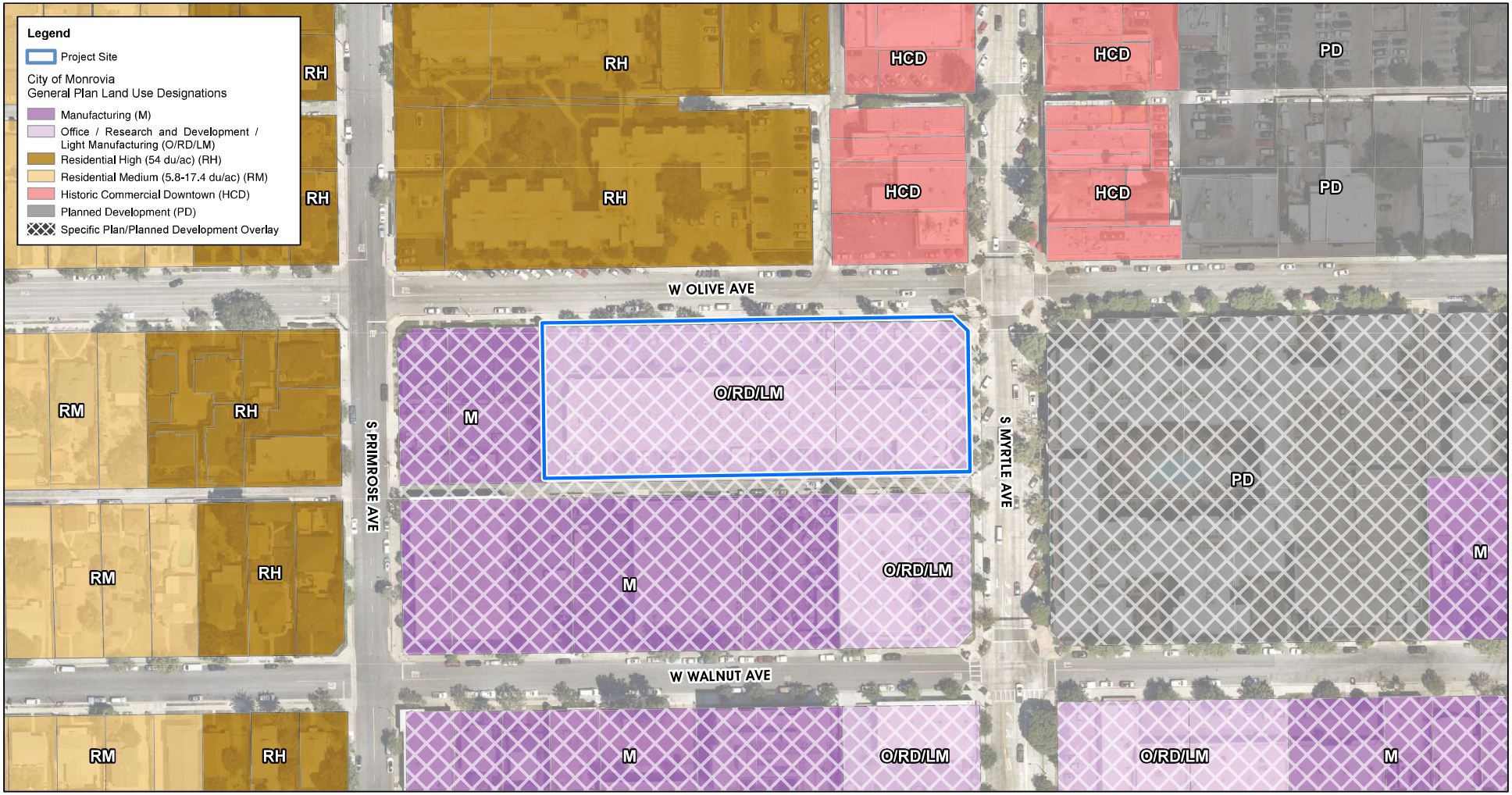


Source(s): Esri, Nearmap Imagery (April 2025)

0 50 100 200 Feet

Figure 2-1

Vicinity Map and Surrounding Land Uses

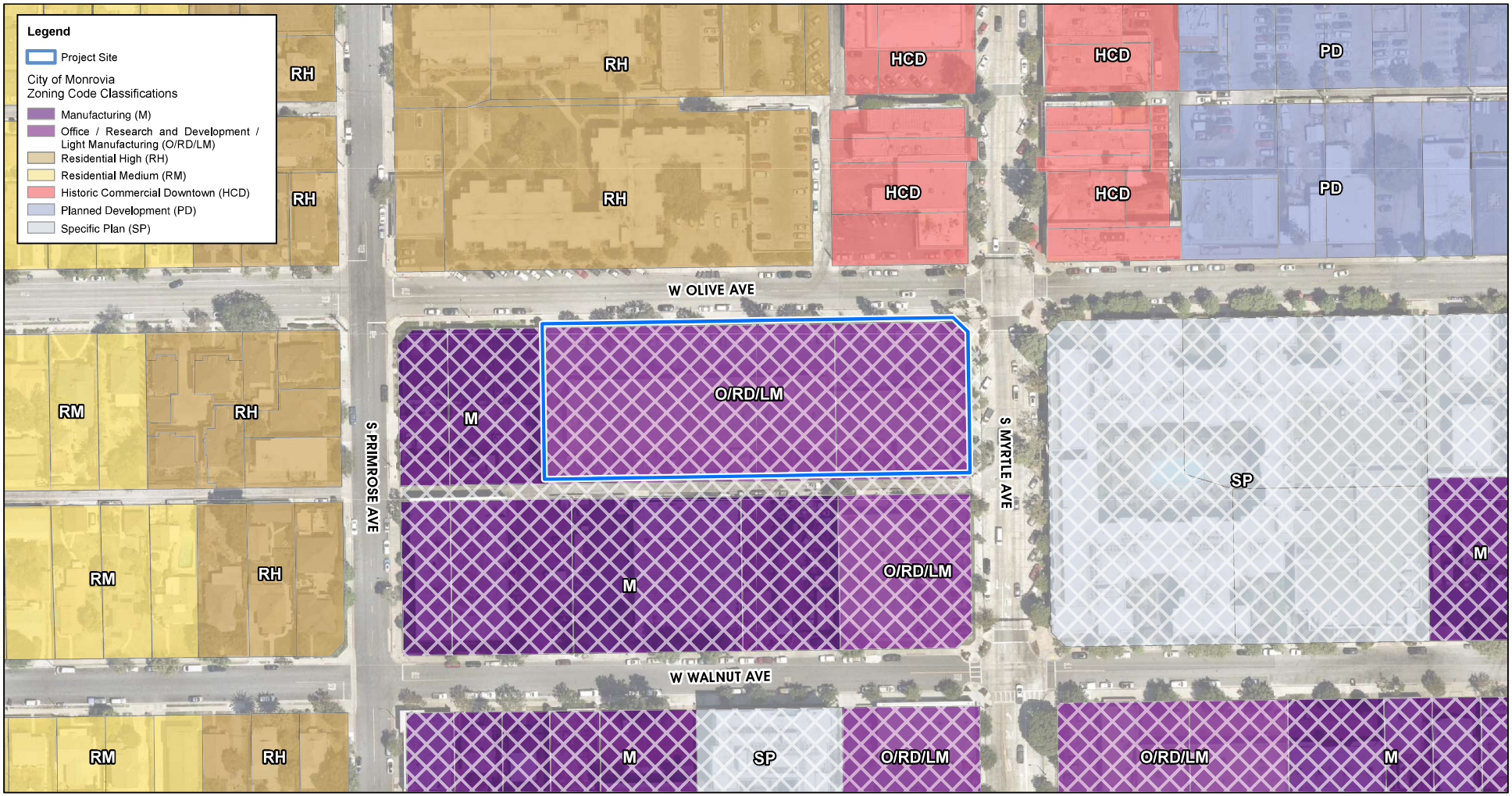


Source(s): ESRI, NearMap Imagery (April 2025), LA County (2023), City of Monrovia (2021)

0 25 50 100 Feet

Figure 2-2

Existing General Plan Land Use Designations

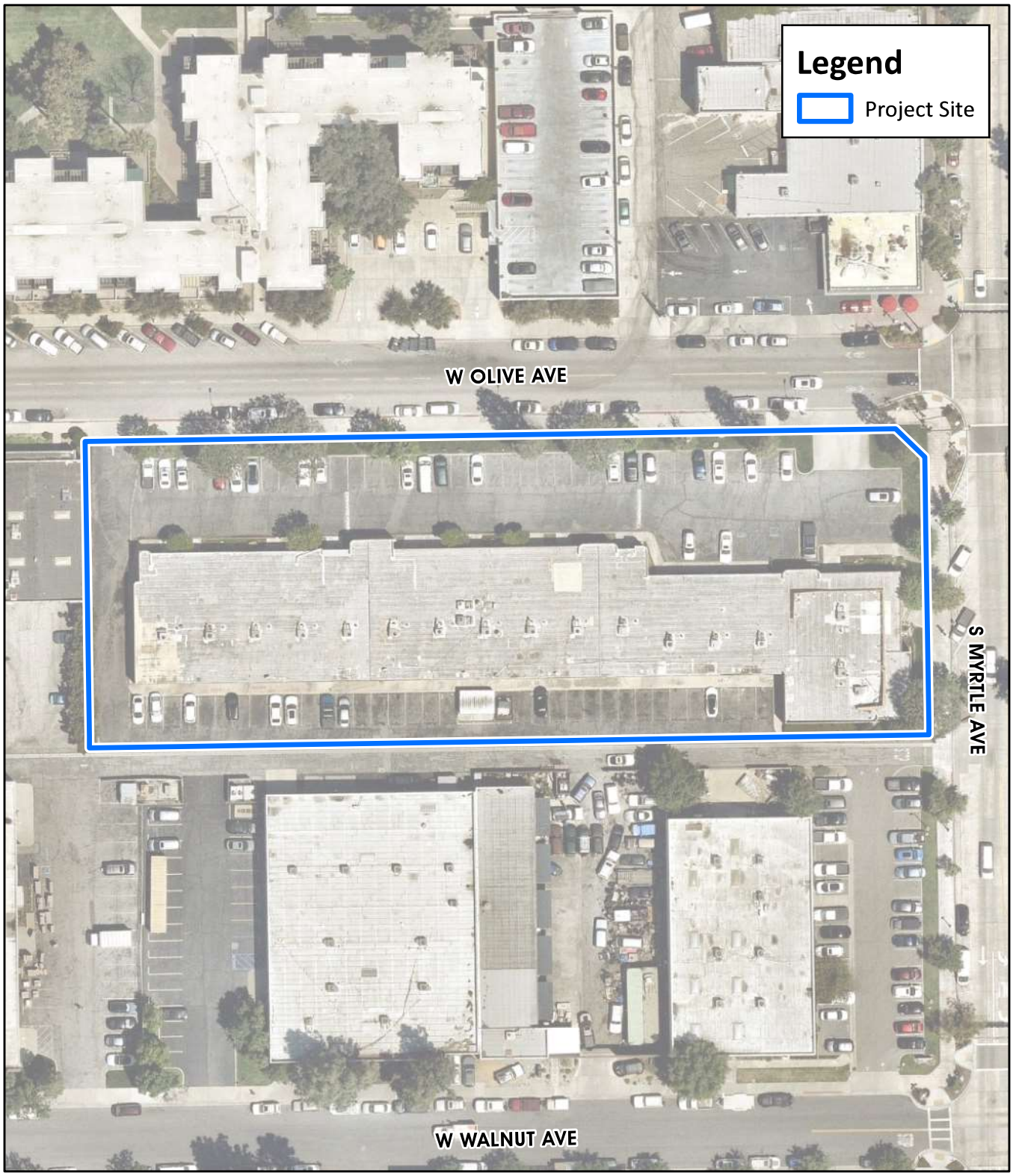


Source(s): ESRI, NearMap Imagery (April 2025), LA County (2023), City of Monrovia (2019)

0 25 50 100 Feet

Figure 2-3

Existing Zoning Classifications



Source(s): Esri, Nearmap Imagery (April 2025)

0 18.75 37.5 75 Feet

Figure 2-4

Aerial Photograph

3.0 PROJECT DESCRIPTION

This section provides all of the information required of an EIR Project Description pursuant to CEQA Guidelines Section 15124, including:

a) a description of the Project's precise location and boundaries;

b) a statement of the Project's objectives;

c) a description of the Project's technical, economic, and environmental characteristics; and

d) a description of the intended uses of this EIR, including: a list of the governmental agencies that are expected to use this EIR in their decision-making processes; a list of the permits and approvals that are required to implement the Project; and a list of related environmental review and consultation requirements.

3.1 PROJECT SCOPE

The Project Applicant (Blake Griggs Properties, LLC) submitted applications to the City of Monrovia for a GPA, ZC, Specific Plan, VTPM, and CUP (hereafter Project or the 701 S. Myrtle Specific Plan and Development Project). These applications involve the proposed entitlement of an approximately 1.61-acre property for the demolition and removal of the existing Myrtle and Olive Business Park development and redevelopment of the site with a proposed mixed-use building having five above-ground levels and 1.5 levels of subterranean parking. The building is designed with a height of 65 feet measured from average grade plane, with architectural projections on small portions of the roof extending up to 80 feet in height, primarily for architectural interest and to screen rooftop mechanical equipment. The building is proposed to include 204 multi-family residential apartment units, 2,370 square feet (s.f.) of commercial retail space, 2,782 s.f. of fitness center space, 2,470 s.f. of leasing office/lobby/mail room space on the ground floor, parking on a portion of the ground floor, and 1.5 levels of subterranean parking. Of the 204 residential apartment units, 17 of the units are proposed to be restricted for low-income households and three of the units are proposed to be restricted for moderate-income households. Residential units are designed to vary in size from 490 to 1,070 s.f., consisting of 20 studio, 147 one-bedroom, and 37 two-bedroom units. Various recreational facilities and amenities are included in the building design for the residents, including, but not limited to, a resort-style pool, rooftop deck, and courtyard gathering areas. An outdoor private dog park is proposed on the west side of the building, an outdoor public plaza is proposed at the site's northeastern corner at the intersection of West Olive Avenue and South Myrtle Avenue, and an outdoor arcade for public use is proposed along the site's frontage with South Myrtle Avenue. Vehicular access to the Project's ground floor parking and subterranean parking would be provided from one driveway along West Olive Avenue. A total of 323 parking spaces are planned inside the building, and six spaces are planned in the alley south of the building, for a total of 329 parking spaces.

3.2 PROJECT LOCATION

The Project site is located in the City of Monrovia, Los Angeles County, approximately 0.6 miles north of Interstate 210 (I-210) and approximately 0.7 miles north of the Los Angeles County Metropolitan Transportation Authority (Metro) A Line Monrovia Station. Refer to Figure 3-1, *Regional Map.* The

approximately 1.61-acre Project site is located on APNs 8516-033-030 and 8516-033-031 at the existing physical addresses of 701 South Myrtle Avenue and 112-136 West Olive Avenue (hereafter Project site). As shown previously on Figure 2-1, *Vicinity Map and Surrounding Land Uses,* the Project site abuts West Olive Avenue to the north, South Myrtle Avenue to the east, an alley to the south beyond which are industrial and office buildings and private property containing commercial and industrial buildings to the west and southwest. South Primrose Avenue is approximately 165 feet to the west, while West Walnut Avenue is approximately 180 feet to the south of the Project site. Refer to EIR Section 2.0, *Environmental Setting*, for more information related to the regional and local setting of the Project site.

The Project site is located in a portion of the City's historic downtown main street area known as the Old Town Extension District. The Old Town Extension District is one of three districts of the City of Monrovia General Plan's South Myrtle Avenue Corridor planning area and is intended to promote urban design and land uses more compatible with Old Town Monrovia to the north than the commercial, office, and industrial uses along Myrtle Avenue to the south. According to the City's General Plan Land Use Element Figure 1, *General Plan Land Use Map,* and Figure 2-2, *Existing General Plan Land Use Designations*, the Project site is within the City of Monrovia's Specific Plan/Planned Development Overlay and designated for Office/Research and Development/Light Manufacturing (O/RD/LM) uses. The Project site is also zoned O/RD/LM.

3.3 STATEMENT OF OBJECTIVES

The Project Applicant's underlying purpose for the Project is to redevelop an underutilized property within a portion of the Old Town Extension District area with multi-family residential units located within walking distance to employment, shopping, entertainment, recreation, and public transit. The following objectives, provided by the Project Applicant, are intended to achieve the underlying purpose:

A. Provide needed new market rate and affordable housing units to help meet the City's Regional Housing Needs Assessment (RHNA) obligations.

B. Provide a variety of housing options with different price points by providing market rate and affordable housing units in a variety of unit sizes and configurations.

C. Reduce vehicle trips and vehicle miles traveled by locating new housing within walking and biking distance of, and with pedestrian connections to, employment, shopping, entertainment, public services, recreation, and public transit.

D. Redevelop an urban infill site with a project that makes efficient use of existing infrastructure.

E. Promote walkability by locating parking underground and including active uses at street level.

F. Maintain high-quality architectural design in the City of Monrovia by developing a building that has a recognizable architectural style and that complements existing architectural styles of buildings within and surrounding the Old Town Extension District.

G. Provide on-site amenities for residents to offset demand on public parks and recreation facilities.

3.4 PROPOSED DISCRETIONARY APPROVALS

The Project involves applications for a GPA, ZC, Specific Plan, VTPM, and CUP as described below and that are under the approval purview of the City of Monrovia. Additional discretionary actions necessary to implement the Project by other public agencies are listed in Subsection 3.8.

3.4.1 GENERAL PLAN AMENDMENT

The City of Monrovia General Plan assigns a land use designation to all properties within the City's boundaries. Development is required by law to be consistent with the general intent of the goals and policies of the City's General Plan. As shown on Figure 3-2, *Proposed General Plan Amendment Exhibit*, the Project Applicant is proposing a GPA to change the Project site's land use designation from O/RD/LM to Planned Development Area (PD) and to allow a base density of up to 105 dwelling units per acre. As stated in the General Plan, the existing O/RD/LM land use designation is intended to encourage high quality development of office, research and development uses, and supporting uses (City of Monrovia, 2021, p. 17). As also described by the General Plan, the proposed General Plan land use designation of PD applies to areas in the City with a unique character and is intended to ensure appropriate City review and approval of development proposals in order to preserve the orderly development of the area and promote needed area improvements (City of Monrovia, 2021, p. 18). The proposed PD land use designation would allow the Project site to be developed with a mix of residential and commercial uses as proposed by the Project Applicant and as further described herein.

3.4.2 701 S. MYRTLE SPECIFIC PLAN

The proposed 710 S. Myrtle Specific Plan would apply only to the Project site. As permitted by State law and the Monrovia Municipal Code (MMC), the Specific Plan is proposed by the Project Applicant to establish development standards and design guidelines to implement the General Plan's goals and policies and to guide the orderly development of the Project site in a manner that is consistent with the General Plan and compatible with the City of Monrovia's Old Town Extension District of the South Myrtle Avenue Corridor. The Specific Plan includes all of the content required by State law (Government Code Sections 65450 *et seq.*) and MMC Section 17.54.060, as well as:

a) a development plan addressing land use, circulation, infrastructure, and utilities;

b) development standards and design guidelines to establish the permitted uses and development regulations, standards, and guidelines in order to promote public health, safety, and welfare, as well as safeguard the appearance, quality of development and land uses within the Specific Plan boundary; and

c) implementation measures setting forth the procedures for review of implementing developments for conformance with the provisions of the Specific Plan and addressing the procedures for minor modifications and amendments to the Specific Plan.

Approval of the proposed Specific Plan would facilitate the development of the Project.

3.4.3 Zoning Code Amendment

The City of Monrovia Zoning Code and Official Zoning Map assigns a zoning classification to all properties within the City. All development within the City must comply with the provisions of the Zoning Code. As shown on Figure 3-3, *Proposed Zoning Code Amendment Exhibit*, the Project Applicant is proposing a ZC to change the Project site's zoning classification from O/RD/LM to Planned Development Area 28 (Area PD-28) and to identify the Project site as part of the 701 S. Myrtle Specific Plan. The site's existing O/RD/LM zoning classification is intended to encourage high quality development of office, research and development uses, and support uses. The proposed zoning classifications of PD and Specific Plan would instead allow for redevelopment of the site with a new residential and commercial development in a manner that is consistent with the proposed 701 S. Myrtle Specific Plan, as described in further detail above in Subsection 3.4.2. The proposed PD zoning classification would allow for a maximum base density of 105 dwelling units per acre, which would yield a total of 170 dwelling units on the approximately 1.61-acre Project site. However, by incorporating 17 low-income affordable units (which constitute 10 percent of the 170 units), the Project would be eligible for a density bonus of 20 percent pursuant to California Government Code Section 65915. With the density bonus, the maximum number of permitted dwelling units would be increased to 204 units, resulting in a density of 126 dwelling units per acre. In addition, the Project would provide three of the 204 units as moderate-income affordable units, creating a total of 20 affordable units within the Project.

3.4.4 Vesting Tentative Parcel Map

A VTPM is proposed to consolidate the existing two parcels (APNs 8516-033-030 and 8516-033-031) into one legal lot. A VTPM provides a legal description for the Project site and shows the location of proposed and existing sewer lines and laterals, existing driveway easements, fire hydrants, domestic and irrigation water lines, fire water lines, electric vaults, gas line connection, and the location of the existing building on the site that is proposed to be demolished to make way for the Project.

3.4.5 Conditional Use Permit

A CUP is proposed to address three components of the Project. First, pursuant to Subsection 3.4, *Permitted Uses*, of the proposed 701 S. Myrtle Specific Plan, a CUP is required for certain types of commercial and non-residential uses that have the potential to occupy the proposed building's ground floor commercial space. Second, the City's Zoning Ordinance (MMC Section 17.08.010(E) – Table 1, Footnote 2) requires a CUP for all new construction over 10,000 square feet other than for residential projects. Third, because the Project includes non-residential uses in addition to residential uses, the CUP requirement applies.

Accordingly, the Project Applicant is proposing a CUP to allow for the construction of one new podium-style building having five above-ground levels and 1.5 subterranean parking levels on the approximately 1.61-acre Project site. The building is designed to contain 204 multi-family residential apartment units and 7,622 s.f. of non-residential ground floor space, which includes 2,370 s.f. of commercial retail uses, a 2,782-s.f. fitness room, 1,080 s.f. of leasing office space, and a residential lobby and mail room comprising 1,390 s.f. Parking would occur on a portion of the ground floor and in 1.5 subterranean parking levels.

MMC Section 17.52.290 states that the City of Monrovia's Planning Commission is required to make the following findings prior to the grating of a major CUP:

a) That the site is adequate in size, shape and topography for the proposed use;

b) That the site has sufficient access to streets and highways, adequate in width and pavement type to carry the quantity and quality of traffic generated by the proposed use;

c) That the proposed use is compatible with the General Plan and any applicable specific plan, and will not adversely impact the objectives of the General Plan and any applicable specific plan.

d) That the use will comply with the applicable provisions of the zoning ordinance, except for approved variances;

e) That the proposed location of the use and conditions under which it will be operated or maintained will not be detrimental to the public health, safety, or welfare, or materially injurious to properties or improvements in the vicinity.

3.5 PHYSICAL CHARACTERISTICS

The following subsections describe the primary components of the Project's physical design.

3.5.1 OVERALL BUILDING SIZE

The Project is proposed on an approximately 1.61 acres (~70,131 s.f.). The proposed building is designed to be 65 feet in height and would have five above-ground levels and 1.5 subterranean levels. Parking would occur on a portion of the ground level and in the 1.5 subterranean levels. The 65-foot building height is measured from the "average grade plane"[1] to the middle of the sloped roof of an architectural tower element proposed on the building at the corner of West Olive Avenue and South Myrtle Avenue. Architectural projections on small portions of the roof would be permitted to extend up to 80 feet in height, primarily for architectural interest and to screen rooftop mechanical equipment.

For purposes of calculating the Project's floor area ratio (FAR), all livable occupied spaces and utility and storage spaces in the parking garage areas are included in the gross floor area calculation, which together total 201,571 s.f., resulting in a floor area ratio (FAR) of 2.89 (201,571 ÷ 69,696 = 2.89). Table 3-1, *Gross Building Area Statistics*, summarizes the floor space per building level.

[1] Because the site slopes in two directions and is not flat, "average grade plane" is used, which is a reference plane representing the average of finished ground level adjoining the building at its exterior walls. The Project site's average grade plane is shown on the Project's architectural drawings included as part of the Project's application materials on file with the City.

Table 3-1 Gross Building Area Statistics

Common Name	Floor Level	Parking Garage Area (SF)	Gross Area for FAR Calculation (SF)	Total Residential Unit Area (net usable SF)
Subterranean Parking	Sub-G3 Parking	30,080	1,180	--
Subterranean Parking	Sub G2 Parking	51,160	6,410	--
First Floor	Ground Floor + G1 Parking	43,410	17,236	6,496
Second Floor	R1 Level (Podium Level)	--	45,320	34,095
Third Floor	R2 Level	--	44,145	36,718
Fourth Floor	R3 Level	--	45,710	38,489
Fifth Floor	R4 Level	--	41,570	34,137
	Total	**124,650**	**201,571**	**149,935**

Source: Architects Orange, May 24, 2024
SF = square feet

3.5.2 Residential Unit Mix and Floor Plans

The proposed unit mix includes 10 residential units on the ground floor, 46 units on Level R1 (the podium level or second floor), 49 units on Level R2 (the third floor), 51 units on Level R3 (the fourth floor), and 48 units on Level R4 (the fifth floor). In total, the building is designed to provide 20 studio units, 147 one-bedroom units, and 37 two-bedroom units, for a total of 204 residential apartment units. Of these units, 17 units would be restricted to low-income affordable units, and 3 units would be restricted to moderate income affordable units. The City would require that the units restricted as affordable be distributed throughout the building and not be consolidated into a single area, subject to an affordability covenant.

The 10 residential units located on the ground floor would face West Olive Avenue. Above the ground floor, Levels R1 to R4 are designed to have a "W" shaped structure orientation that surrounds the open-air courtyards provided on Level R1 so that views of the courtyards are offered to the residential units on upper floors that face the courtyards. The "W" shaped architectural design above the ground floor provides a high degree of architectural articulation to the building façade facing West Olive Avenue.

As shown on Figure 3-4, *Conceptual Ground Floor Level G1 Floor Plan (1st Floor),* the ground floor level is designed with a number of amenities located primarily in the eastern portion of the building facing South Myrtle Avenue. These amenities accessible to residents and their guests include a lobby area, leasing office space, fitness center, mail room, parcel lockers, restrooms, elevators, storage areas, move-in/loading area, and the ground level of the parking garage. An outdoor dog park area for resident use would be located to the west of the building at ground level. An outdoor public plaza located near the corner of West Olive Avenue and South Myrtle Avenue and an outdoor arcade located along South Myrtle Avenue would be available to the public at ground level. A 2,370-s.f. commercial tenant space accessible to the public would be located within the eastern portion of the building with pedestrian entrances facing South Myrtle Avenue. Ten one-bedroom residential units would be located within the northern portion of the building at ground level with entrances to the units facing West Olive Avenue.

As shown on Figure 3-5, *Conceptual Residential Level R1 Floor Plan (2nd Floor)*, the podium level of the building is designed with a number of amenities accessible to residents and their guests, including a club house; a hearth room containing kitchen appliances and a dining area; an al fresco patio (also called a California Room); restrooms; elevators; and two courtyard areas with one having a resort-style swimming pool and the other having a "retreat area" that contains features such as pavilions, barbeque counters, shade trees, a fire pit, and lounge furniture. Residential Level R1 is designed to include five studio units, 32 one-bedroom units, and nine two-bedroom units for a total of 46 residential units.

As shown on Figure 3-6, *Conceptual Residential Level R2 Foor Plan (3rd Floor),* Level R2 would include five studio units, 33 one-bedroom units, and 11 two-bedroom units for a total of 49 residential units. No common amenity areas would be provided on Level R2.

As shown on Figure 3-7, *Conceptual Residential Level R3 Floor Plan (4th Floor)*, Level R3 would be designed similar to the Level R2 floor plan with the exception of the northeastern portion of the building, where two additional units are proposed. Level R3 would include five studio units, 34 one-bedroom units, and 12 two-bedroom units for a total of 51 residential units. No common amenity areas would be provided on Level R3.

As shown Figure 3-8, *Conceptual Residential Level R4 Floor Plan (5th Floor)*, Level R4 is designed to provide amenities for residents, including a rooftop terrace with an area for leisure activities, such as movie viewing, and restrooms. Level R4 would include five studio units, 38 one-bedroom units, and five two-bedroom units for a total of 48 residential units.

3.5.3 Vehicle Access and Parking

Resident and visitor vehicle entry to the Project's ground floor parking area and 1.5 levels of subterranean parking would be provided by one driveway located on the north side of the Project site along West Olive Avenue. The subterranean level floor plans are shown in Figure 3-9, *Conceptual Subterranean Level G2 Parking Floor Plan*, and Figure 3-10, *Conceptual Subterranean Level G3 Parking Floor Plan*. A total of 323 parking spaces are planned inside the building and six spaces are planned in the alley south of the building, for a total of 329 proposed parking spaces. The parking spaces would be allocated as follows: 255 spaces for residents, 50 spaces for guests, six spaces for the leasing office, and 12 spaces for the ground floor commercial uses. Each residential unit would be offered the option of designating parking during leasing per California Civil Code Section 1947.1. The commercial parking spaces would occur on a portion of the building's ground floor (Level G1). Resident parking would be separated by a gate with a call box on Level G1 that would provide access to the subterranean parking on Level G2 and Level G3. Regarding the 50 resident guest parking spaces in the parking garage, 10 guest spaces would be provided before the internal gate, and the remaining 40 guest spaces would be distributed conveniently past the gate within the garage. An alley abuts the Project site's southern boundary, where six parallel parking spaces would be allocated to the ground floor commercial uses. The alley is also planned to provide access to a move-in area for vehicles to park during loading and unloading bulky items and parking for deliveries to commercial uses and package delivery vehicles. The alley also would provide access for trash collection.

3.5.4 Pedestrian and Bicycle Access

Public sidewalks abut the Project site along West Olive Avenue and South Myrtle Avenue; as part of the Project, these sidewalks would be reconstructed in their existing locations. Visitor and resident pedestrian access into the building would primarily be provided in three locations: 1) via the building's main entrance from South Myrtle Avenue accessed from the public sidewalk; 2) at the building's entrance positioned at the corner of West Olive Avenue and South Myrtle Avenue accessed from the outdoor public plaza area; and 3) via the proposed parking garage. Secured secondary pedestrian access into the building would also be available from the south side of the building and the west side of the building.

A Class III bikeway (a bikeway shared with vehicular travel lanes) is located adjacent to the Project site's northern boundary on West Olive Avenue. To encourage bicycle use and comply with the California Green Building Standards (CALGreen) Code, the Project would provide 134 bicycle parking spaces in a combination of outdoor short-term bicycle racks and indoor long-term bicycle lockers, along with a bike lounge and storage facilities in the building's parking garage.

3.5.5 Architectural Features

The Specific Plan, if adopted by the City Council, will establish the development standards and guidelines for Project design and architecture. The Project's architectural style is proposed to be a modern interpretation of prevalent features found in Old Town Monrovia, such as the historic buildings and variety of boutique shops. Design elements are intended to create a well-balanced building elevation incorporating architectural features that reduce bulk and massing and activate the pedestrian environment through interactive architecture and landscape elements, such as vibrant storefronts, benches and planter walls, enhanced paving accents, and accent lighting (Specific Plan, pp. 3-19, 20). Architecturally, the Project's building is primarily designed to have a "W" shaped structure footprint above the ground level that surrounds the open-air courtyards on Level R1 (podium level) to provide articulation of architectural elements at the side of the building facing West Olive Avenue.

The height, bulk, and scale of the building elements are comparable to building forms and heights found on other properties within the Old Town Extension District. The fifth story of the building (Level R4) is designed to be set back at least 15 feet from South Myrtle Avenue, while the lower floors would be set back approximately six feet. The building is designed to be 65 feet in height as measured from the average grade plane. Architectural projections may extend to heights of up to 80 feet as measured from the average grade plane, and such projections are proposed on small portions of the building's roof primarily for the purposes of architectural interest and screening rooftop mechanical equipment. Rooftop solar is required on the building pursuant to CALGreen Code requirements. A Shadow Study was prepared for informational purposes to determine if the building would cast shade on adjacent properties (refer to *Technical Appendix B* to this EIR (AO, 2023)) during certain times of the day. As shown, during the spring equinox, summer solstice, and fall equinox, the building would cast shade on a portion of West Olive Avenue, South Myrtle Avenue, and the commercial building located to the west of the Project site. During the winter solstice, shade would be cast on a portion of West Olive Avenue, South Myrtle Avenue, and the parking lots and south-facing façade of the residential apartment building and restaurant located on the north side of West Olive Avenue across the street from the Project site.

The architectural characteristics of the proposed building are shown on Figure 3-12, *Conceptual Architectural Elevations – East and West Elevations*, and Figure 3-13, *Conceptual Architectural Elevations – North and South Elevations*. As shown, the proposed building materials would consist of smooth stucco or comparable finish, brick and stone veneer, with accents of metal, glass, vinyl, and similar materials. The color palette is proposed in shades of brown, beige, clay, white, and gray. The materials and colors are intended to be compatible with the character of the surrounding development, and in harmony with historic and contemporary buildings in Old Town.

3.5.6 Outdoor Amenities

The Project design includes several common outdoor living areas totaling 19,800 s.f. An outdoor public plaza is planned near the corner of West Olive Avenue and South Myrtle Avenue and an outdoor public arcade space would be provided along Myrtle Avenue. Both of these areas would be accessible to the general public. The plaza would offer 1,495 s.f. of space, and the arcade would offer 760 s.f. of space, for a total of 2,255 s.f. of common outdoor space accessible to the general public. For private use by residents and their guests, an 870-s.f. outdoor dog park with synthetic turf would be available on the west side of the building on the ground level. On the podium level (second floor) of the building (Level R1), a 340-s.f. al fresco dining area (also called a California room), a 9,330-s.f courtyard with resort-style swimming pool, and a 4,300-s.f. courtyard called "the retreat" with seating and dining areas, would be open air amenities. In addition, a 2,700-s.f. roof deck would be provided offering seating and area for leisure activities such as movie watching. In total, 17,545 s.f. of private common outdoor space would be available to residents and their guests. Additionally, all proposed residential units from levels R1 to R4 would be provided a private outdoor living space in the form of a private balcony or patio, which collectively would comprise an additional approximately 12,513 s.f. of private open space.

3.5.7 Indoor Amenities

Amenities available to residents and their guests inside the building are designed to include a 1,080-s.f. leasing office, a 1,390-s.f. residential lobby and mail room, a 2,537-s.f. clubhouse and hearth room, and a 2,782-s.f. fitness area. In total, 7,789 s.f. of indoor amenity area is provided in the Project's design.

3.5.8 Conceptual Landscape Plan

If approved, the Specific Plan requires that the City approve a landscape plan for the Project. The Project's Conceptual Landscape Plan provides for the removal of existing non-protected ornamental street trees along the Project site's frontage along West Olive Avenue. New street trees and landscaping would be planted to provide enhanced landscaping as part of the Project. As depicted on Figure 3-14, *Conceptual Landscape Plan,* landscaping would be provided along the perimeter of the Project site, except abutting the alley, and throughout the site in open air common areas. All setback areas are proposed to be landscaped with a variety of ornamental groundcover, vines, shrubs, and trees meeting MMC Title 17, Chapter 17.20, Landscaping/Tree Preservation, which requires water efficient landscaping, among other requirements.

3.5.9 LIGHTING

Proposed exterior site lighting would be installed as necessary for safety, security, and ambiance, including lighting for parking garage and pedestrian entrances, pedestrian walkways, architectural elements, and landscape features. The lighting design would consist of building wall-mounted light fixtures that would provide the required lighting level for adequate security pursuant to the MMC without encroaching beyond the site boundary.

Lighting plans are required to be prepared in compliance with MMC Section 17.32.080, Light. In accordance with MMC Section 17.32.080, lighting provided to illuminate private property shall be arranged to reflect away from adjoining property or any public way, and to not to cause a nuisance to either traffic or the living environment. All lighting and lighting fixtures that are provided are required by the MMC to be maintained in accordance with approved lighting plans.

3.6 OPERATIONAL CHARACTERISTICS

Operational activities associated with the Project are expected to include those typical of multi-family residential living. Residents would travel to and from the site by vehicle, walking, and biking; would reside and engage in leisure activities on the site; and would accommodate visitors. The commercial uses on the ground floor would attract employees and customers, primarily expected from pedestrian foot traffic on West Olive Avenue and South Myrtle Avenue.

According to the Project's traffic study, the Project's residential units are expected to generate 908 daily one-way vehicle trips. Although the ground-floor commercial uses are expected to be primarily served by pedestrian pass-by trips, the Project's traffic study conservatively assumes that 330 daily one-way vehicle trips could be generated by the commercial space. In total, the Project is calculated to generate 1,238 one-way trips, with 85 trips occurring the AM peak hour and 106 trips occurring in the PM peak hour. Vehicles would enter and exit the building's ground floor and subterranean parking levels via one driveway connection at West Olive Avenue.

Under existing conditions, the Project site contains the 25,191-s.f. Myrtle and Olive Business Park, which is occupied and generating traffic. To understand the existing traffic associated with the Myrtle and Olive Business Park, traffic counts were collected at the driveways on Tuesday, April 25 through Thursday, April 27, 2023. A summary of the count data is provided in Appendix 1.1 of EIR *Technical Appendix J1*, and is shown below in Table 3-2 *Existing Project Site Trip Generation Summary*. As shown, 421 trips are generated by the Myrtle and Olive Business Park that is proposed to be demolished as part of the Project.

Table 3-2 Existing Project Site Trip Generation Summary

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Existing Use							
Passenger Cars:	16	9	25	23	29	52	409
Delivery Trucks:	1	1	2	0	0	0	12
Total Trips[2]	**17**	**10**	**27**	**23**	**29**	**52**	**421**

[1] TSF = thousand square feet
[2] Total Trips = Passenger Cars + Truck Trips.
(UXR, 2024, Table 4-1)

Taking into consideration that the Myrtle and Olive Business Park proposed for demolition generates 421 daily trips, the net number of new trips that would be generated by the Project is 817 trips, with 58 AM peak hour trips and 54 PM peak hour trips above the trips generated by the existing use. The comparison is shown in Table 3-3, *Trip Generation Comparison*.

Table 3-3 Trip Generation Comparison

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Existing Use	17	10	27	23	29	52	421
Project	24	61	85	62	44	106	1,238
Net Change in Trips	**7**	**51**	**58**	**39**	**15**	**54**	**817**

(UXR, 2024, Table 4-4)

3.7 CONSTRUCTION CHARACTERISTICS

The following narrative provides a description of the Project's technical construction characteristics.

3.7.1 DEMOLITION, GRADING AND EXCAVATION PLAN

To accommodate the Project, demolition activities would occur to remove the existing Myrtle and Olive Business Park development from the Project site. Recyclable demolished material would be recycled pursuant to the requirements of the MMC, and the materials requiring disposal would be transported to a landfill. Approximately 1,950 tons of demolition waste is reasonably expected from the removal of approximately 25,191 s.f. of building space associated with the existing development (UXR, 2024a, p. 27). As shown on Figure 3-11, *Conceptual Grading Plan*, the Project's grading operation would excavate approximately 54,000 cubic yards of raw cut, all of which would be exported from the Project site to a receiving site that is reasonably expected to be located within a 20-mile radius of the Project site. The maximum depth of grading for excavation of the Project's subterranean parking structure is estimated to be approximately 23 feet and 6 inches.

3.7.2 Construction Schedule and Equipment

The building is proposed to be constructed as four stories of wood framed structure over two levels of above-grade concrete podium over 1.5 subterranean concrete levels. For analytical purposes, the Project's construction was estimated to commence in March 2025 and continue until January 2027. Although construction would actually commence after March 2025 and likely near the end of 2025, the duration of construction activity given in Table 3-4, *Expected Construction Duration,* is an accurate reasonable estimate. Table 3-5, *Expected Construction Equipment*, is based on the Project Applicant's *Preliminary Construction Management Plan*. Noise-producing construction activities are regulated by MMC Section 9.44.080(F) as being permitted to occur between the hours of 7:00 a.m. and 7:00 p.m. during the weekdays and 9:00 a.m. and 6:00 p.m. on weekends and holidays.

Table 3-4 Expected Construction Duration

Construction Activity	Working Days
Demolition	35
Site Preparation	70
Grading	45
Building Construction	125
Paving	170
Architectural Coating	50

Table 3-5 Expected Construction Equipment

Construction Activity	Equipment	Amount	Hours Per Day
Demolition	Rubber Tired Dozers	1	2
	Concrete/Industrial Saws	1	8
	Tractors/Loaders/Backhoes	1	8
	Rubber Tired Dozers	1	8
Site Preparation	Crawler Tractors	1	8
Grading	Graders	1	8
	Crawler Tractors	1	8
	Rubber Tired Dozers	1	8
Building Construction	Forklifts	1	8
	Cranes	1	8
Paving	Pavers	1	8
	Rollers	1	8
Architectural Coating	Air Compressors	1	1

3.7.3 Construction Personnel Trip Generation and Parking

The total number of construction personnel at the Project site would vary depending on the construction activity. However, the Project Applicant expects that there would be an average of 20 workers daily at the jobsite during the site work phase (demolition, site preparation, and grading). During construction of the proposed building and its interior, the Project Applicant expects that there would be up to 200 workers on the site at the height of construction activity.

Based on the Project Applicant's *Preliminary Construction Management Plan*, construction workers would be prohibited from parking on the Project site or in the public right-of-way until the proposed building's parking garage is constructed and available for use by the workers. A final Construction Management Plan would be prepared and submitted to and approved by the City prior to the start of construction prior to the issuance of a demolition, grading, or building permit. The Project Applicant anticipates securing one or more binding off-site parking agreements to accommodate the varying number of workers needed for each construction stage. The off-site parking location(s) is expected to be within a 1.0-mile radius of the Project site, with construction workers shuttled to and from the site using a passenger vehicle/van. It is expected that six to eight shuttle trips would occur each morning and at the end of the workday, with periodic mid-day trips for lunch or other off-site needs. Carpooling among construction workers would be encouraged throughout Project construction. Once the parking garage is completed, workers would be permitted to park within the completed parking structure.

3.7.4 Staging Areas and Materials Storage

Appropriate signage would be posted at the Project site during construction, including "Hard Hat Area," "Think Safety," and other signs for visitor and delivery information. During the demolition phase, heavy and light equipment would be stored on the Project site. After the demolition stage, the excavation equipment and other construction equipment would be located on the Project site. During excavation, two temporary ramps would be created on the site, one for the entry of trucks and equipment and the other for egress. After excavating down to Level G3 of the parking structure, construction equipment would stay on-site during excavation and shoring. Construction truck staging would not be permitted within the public right-of-way. Requests for temporary vehicle travel lane and sidewalk closure approvals would be made to the City of Monrovia if necessary. Full street closures of West Olive Avenue or South Myrtle Avenue are not reasonably anticipated. Traffic control would be coordinated with the Monrovia Police Department and Public Works Department so that street traffic is not obstructed. A plan to control pedestrian traffic during Project construction would also be provided to and approved by the City as part of the Project's demolition, grading, and building permits.

Once the parking structure is built, all other construction trades would be able to take advantage of stocking material and small equipment in the parking structure. The parking structure would provide easy access to equipment and materials throughout multiple phases of the building's construction. There would be no off-site storage locations for equipment and material. Small equipment and tools would be stored on the site in storage facilities or lock boxes.

The Project Applicant may construct a temporary trailer office for use by employees to accommodate onsite meetings and serve as the location where permits and plans are kept. The office would be equipped with power, computers, and a printer/scanner. Temporary toilet facilities would be provided on the Project site.

A. Utility Plan

The Project's plans include a conceptual utility plan that depicts the location of existing and proposed electric vaults, gas line connection, sanitary sewer lines and laterals, fire hydrants, water lines, and utility easements. All utility connections would be site proximate, with no off-site installations anticipated except at Project site-

adjacent connection points. The building's roof would include a rooftop solar system as required by the CALGreen Code. Based on a preliminary conceptual layout, if solar arrays were to be maximized on the building's roof area, the available roof space could accommodate 557 fixed-tilt modules in a 323.1-kilowatt (kW) system (Sprek, 2025).

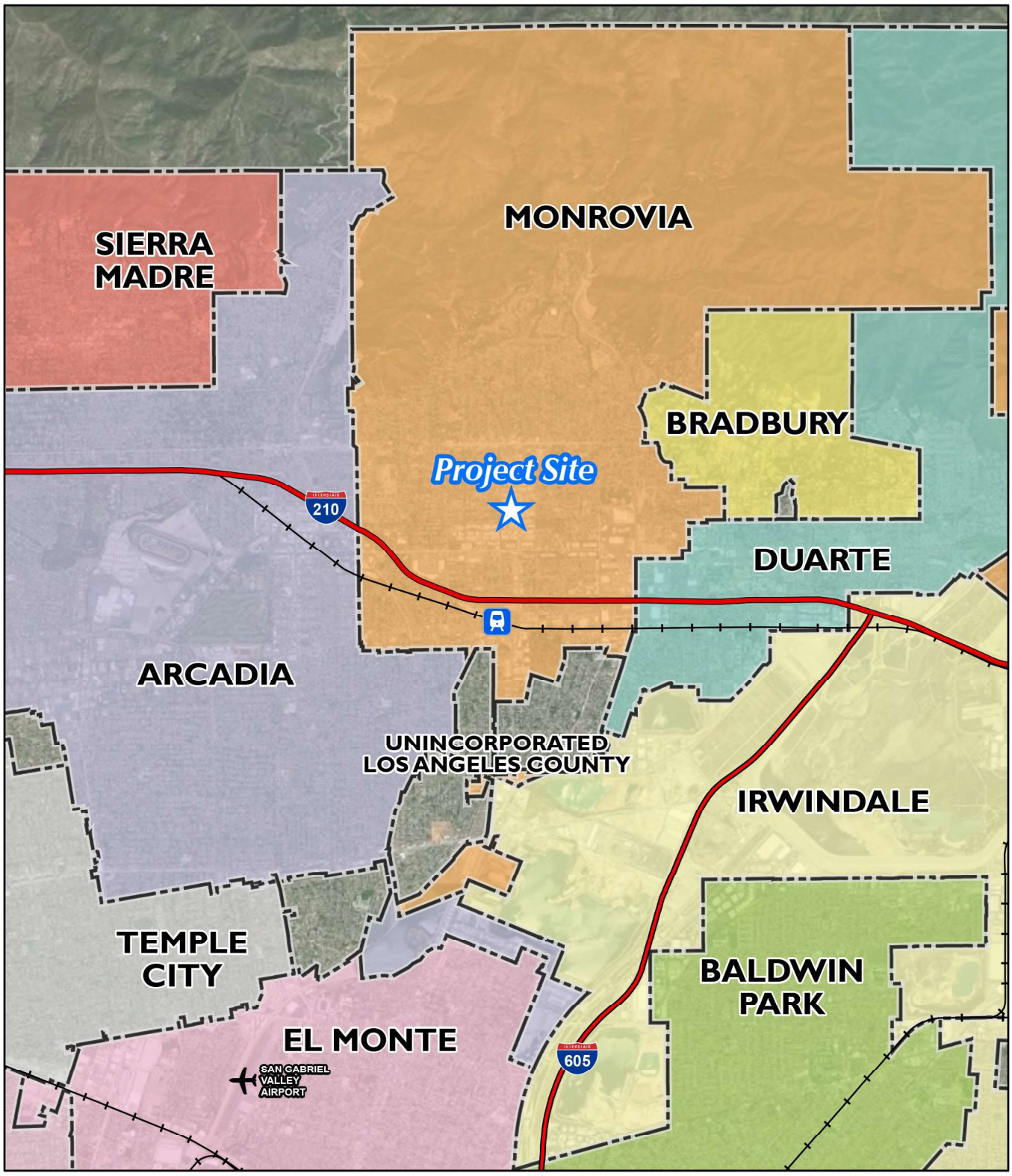
Pertaining to stormwater, low impact development (LID) is a stormwater management strategy that addresses increases in runoff and stormwater pollution as close to its source as possible. The approval of a LID for the Project would be required prior to the commencement of construction activities and would comprise a set of site design approaches and Best Management Practices (BMPs) to address stormwater. With respect to urban development and redevelopment projects, such as the Project, techniques are used to mimic the site's predevelopment drainage characteristics through the use of various infiltration techniques. Infiltration testing on the Project site was completed by Geotechnical Professionals, Inc. in March 2023, and the existing infiltration rate was determined at 3.3 inches per hour. Project plans show the proposed building to extend to the property limits on all sides making conventional stormwater detention systems not feasible. As such, drywells would be installed, extending to depths of at least 25 to 30 feet below the proposed foundations (approximately 40 to 55 feet below existing grades) to provide stormwater infiltration at the site. The drywells would filter pollutants and infiltrate stormwater into the groundwater table.

3.8 Approvals Required from Other Agencies

An approval by the following public agency would be required:

- *Los Angeles Regional Water Quality Control Board (RWQCB), National Pollutant Discharge Elimination System (NPDES) Permit*. NPDES permits apply to construction sites of one acre or more. Project construction would disturb more than one acre of land; therefore, a NPDES Construction General Permit from the Los Angeles RWQCB would be required.

In addition, approvals may be required of other entities and public agencies, such as the South Coast Air Quality Management District (SCAQMD), should any equipment be proposed as part of operation of the commercial uses that requires a SCAQMD permit to construct or permit to operate.

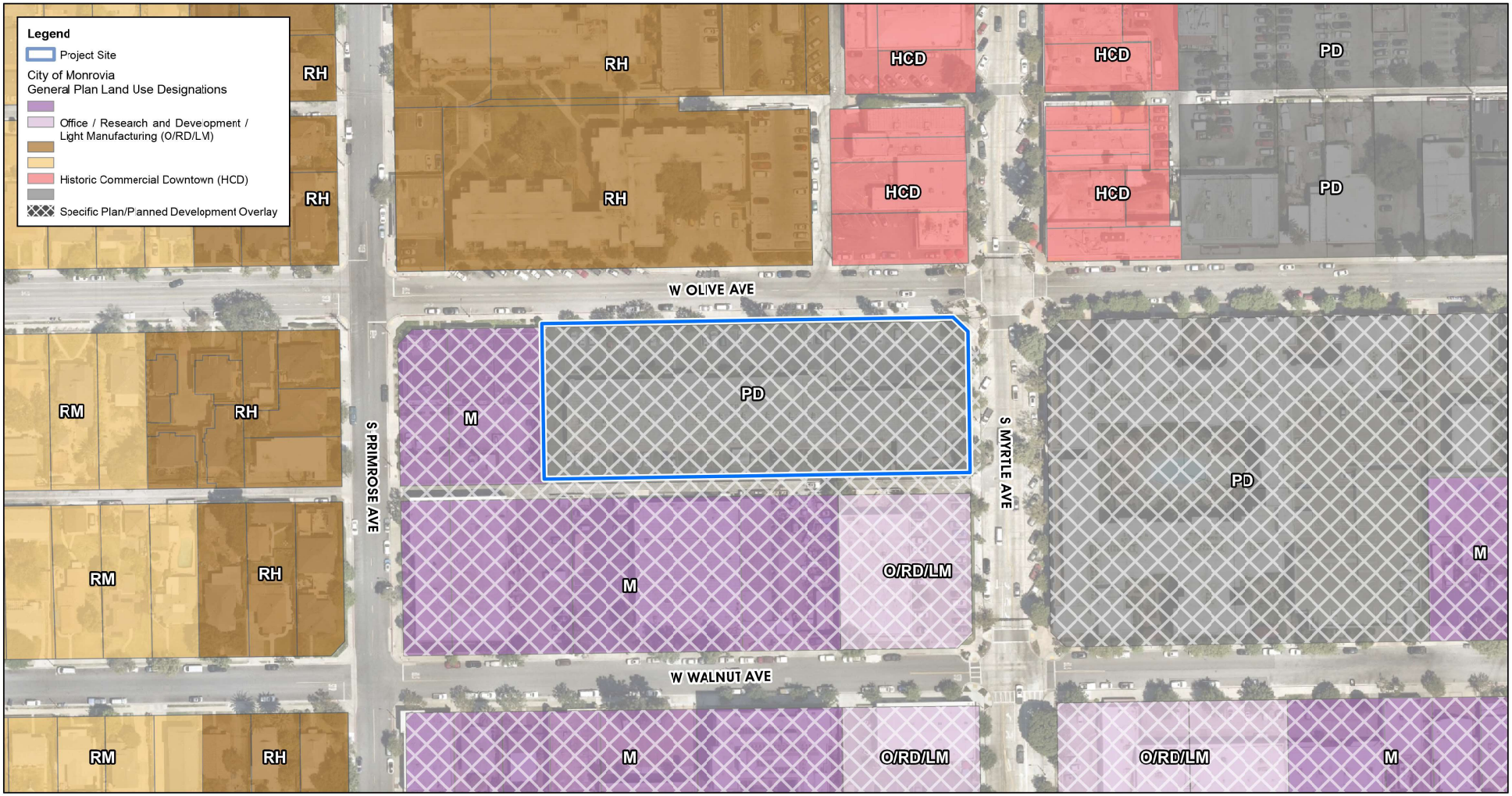


Source(s): ESRI, LA County (2023)

0 1,375 2,750 5,500 Feet

Figure 3-1

Regional Map

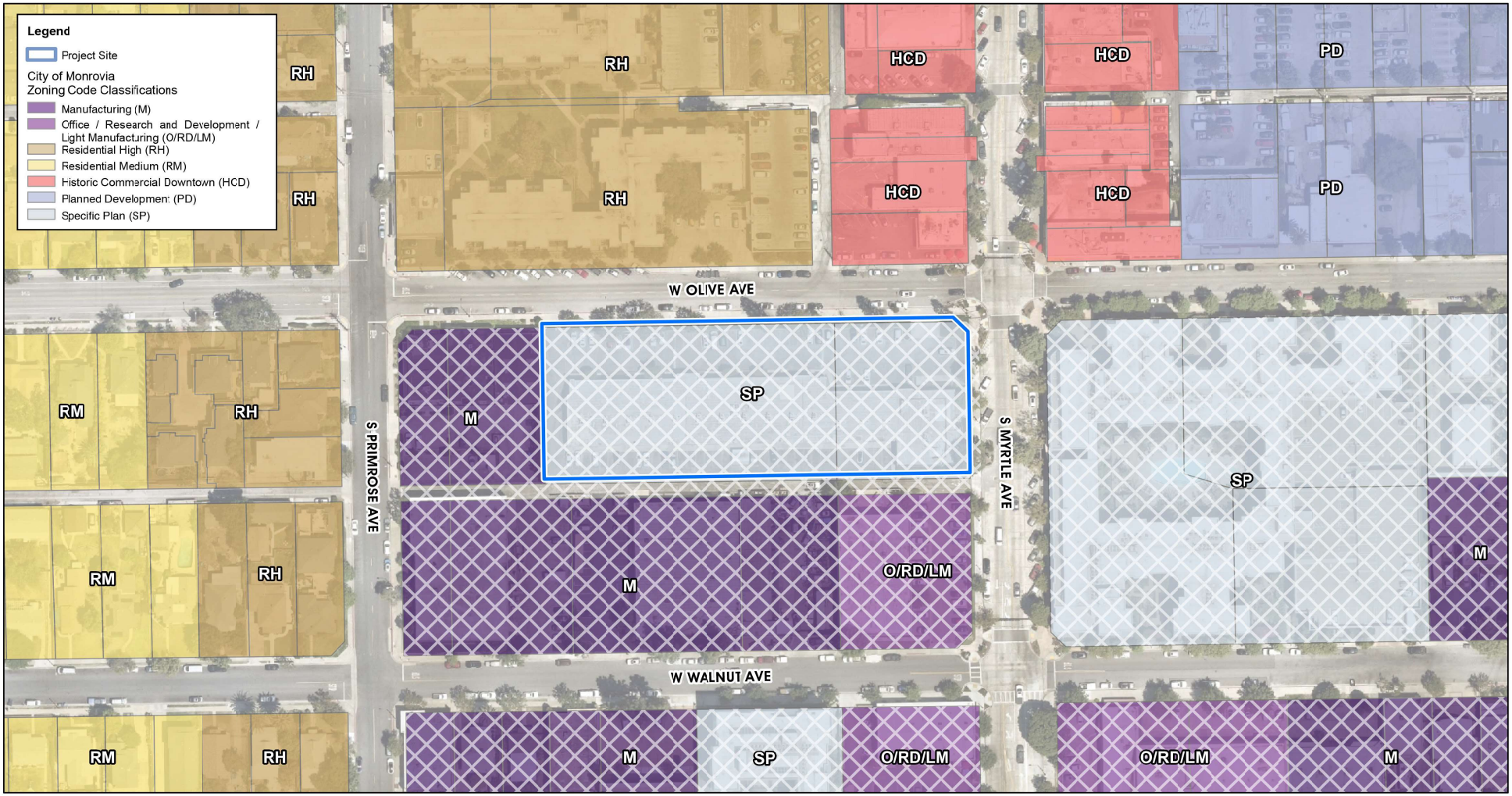


Source(s): ESRI, NearMap Imagery (April 2025), LA County (2023), City of Monrovia (2021)

0 25 50 100 Feet

Figure 3-2

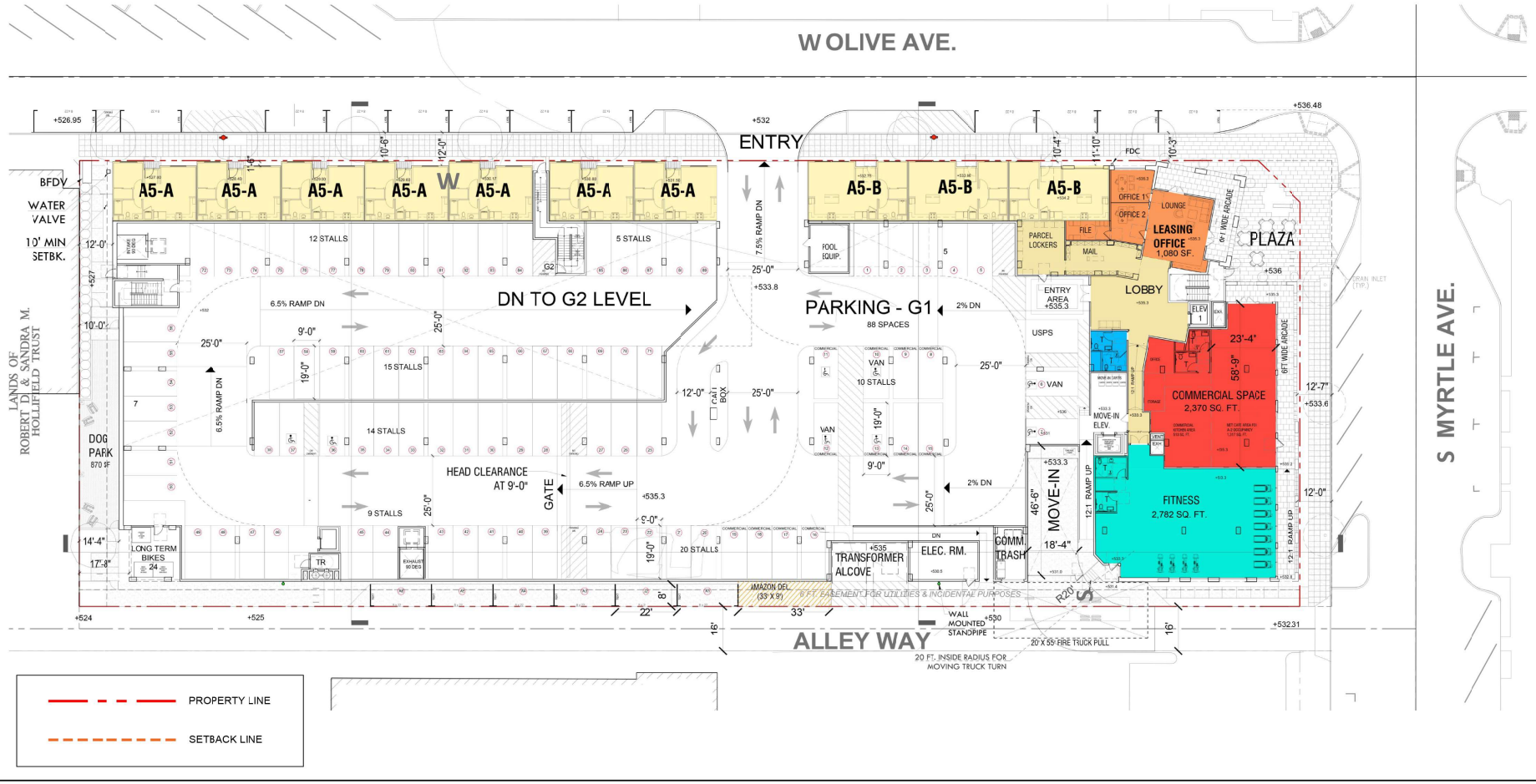
Proposed General Plan Amendment



Source(s): ESRI, NearMap Imagery (September 2023), LA County (2023), City of Monrovia (2019)

Figure 3-3

Proposed Zoning Code Amendment



Source(s): Architects Orange (05-24-2024)

Figure 3-4

Not to Scale

Conceptual Ground Floor Level G1 Floor Plan (1st Floor)

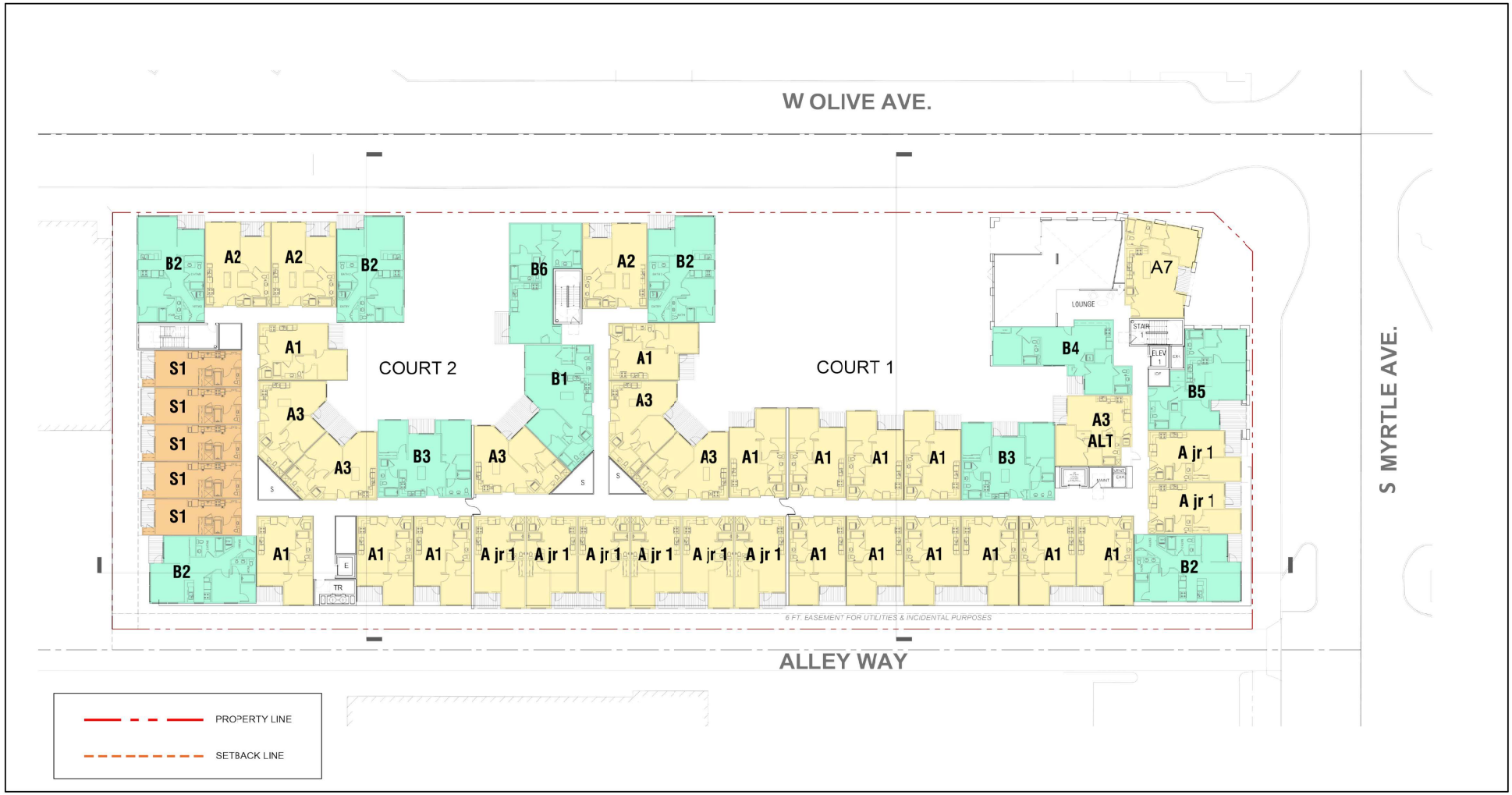


Source(s): Architects Orange (05-24-2024)

Figure 3-5

Not to Scale

Conceptual Residential Level R1 Floor Plan (2nd Floor)

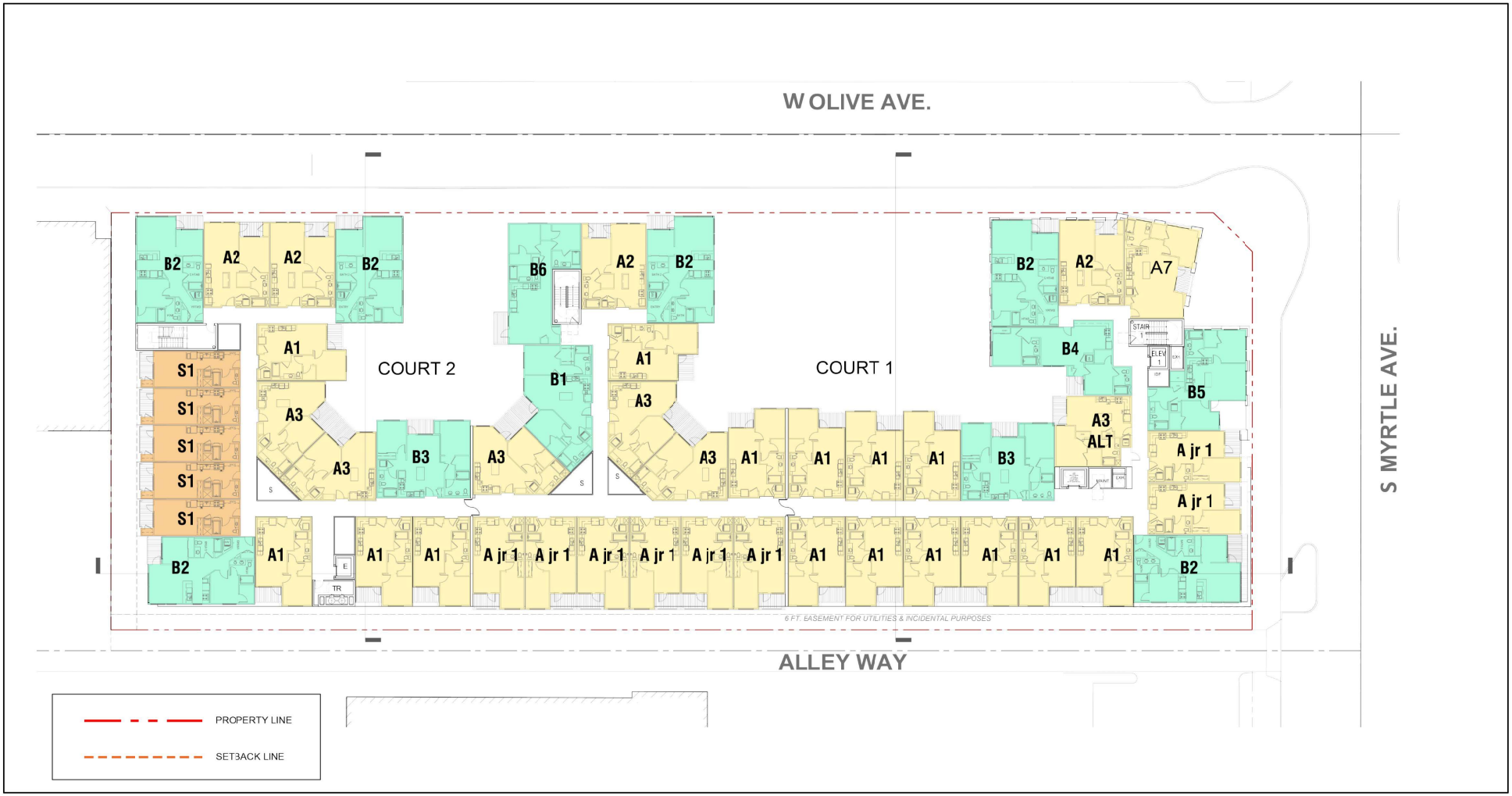


Source(s): Architects Orange (05-24-2024)

Figure 3-6

Not to Scale

Conceptual Residential Level R2 Floor Plan (3rd Floor)

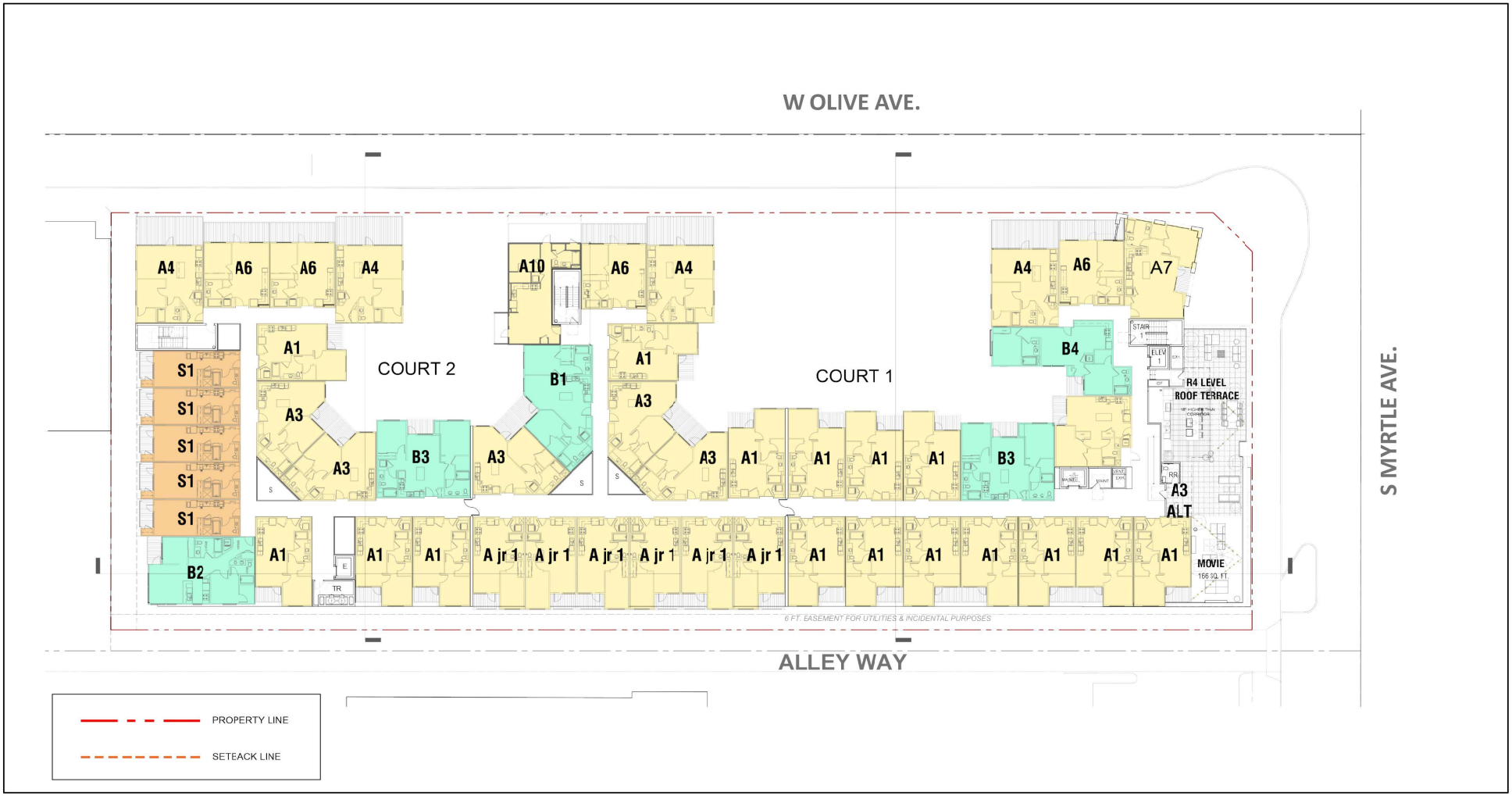


Source(s): Architects Orange (05-24-2024)

Figure 3-7

Not to Scale

Conceptual Residential Level R3 Floor Plan (4th Floor)

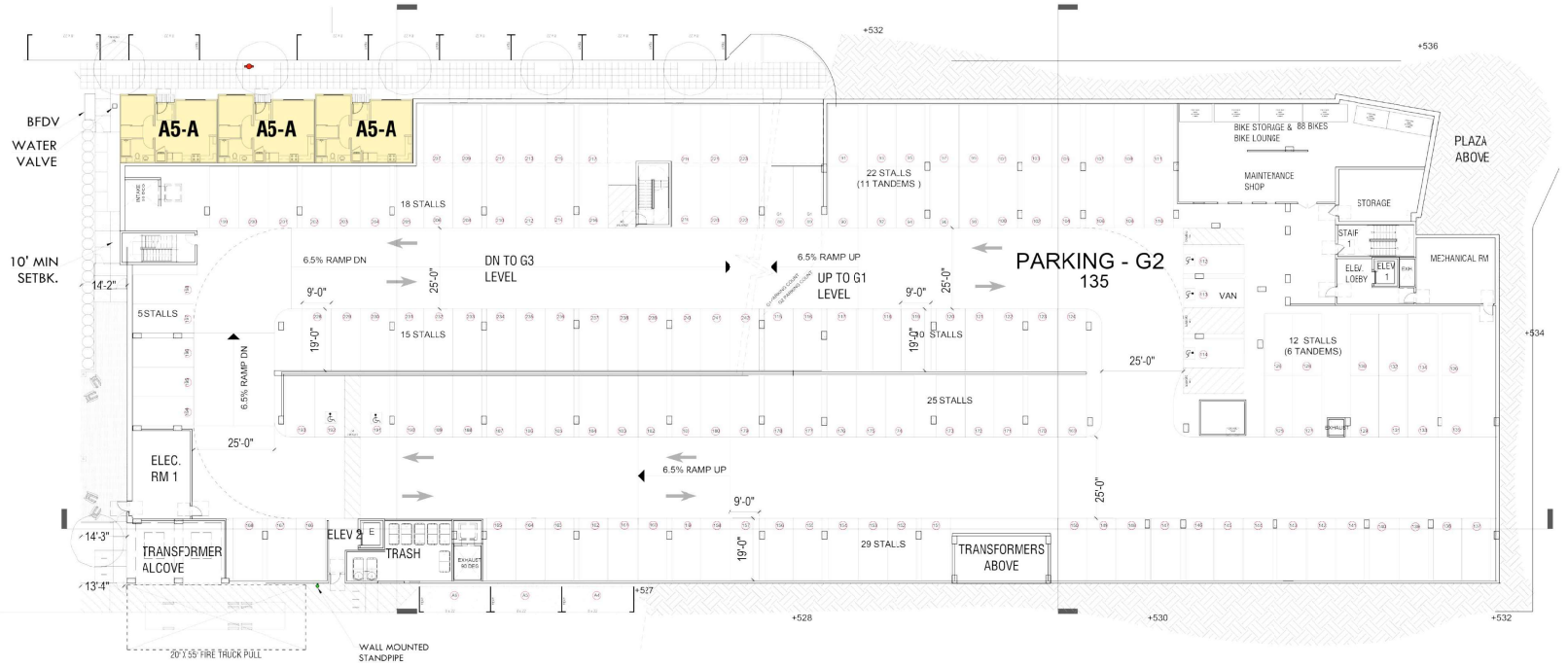


Source(s): Architects Orange (07-31-2023)

Not to Scale

Figure 3-8

Conceptual Residential Level R4 Floor Plan (5th Floor)

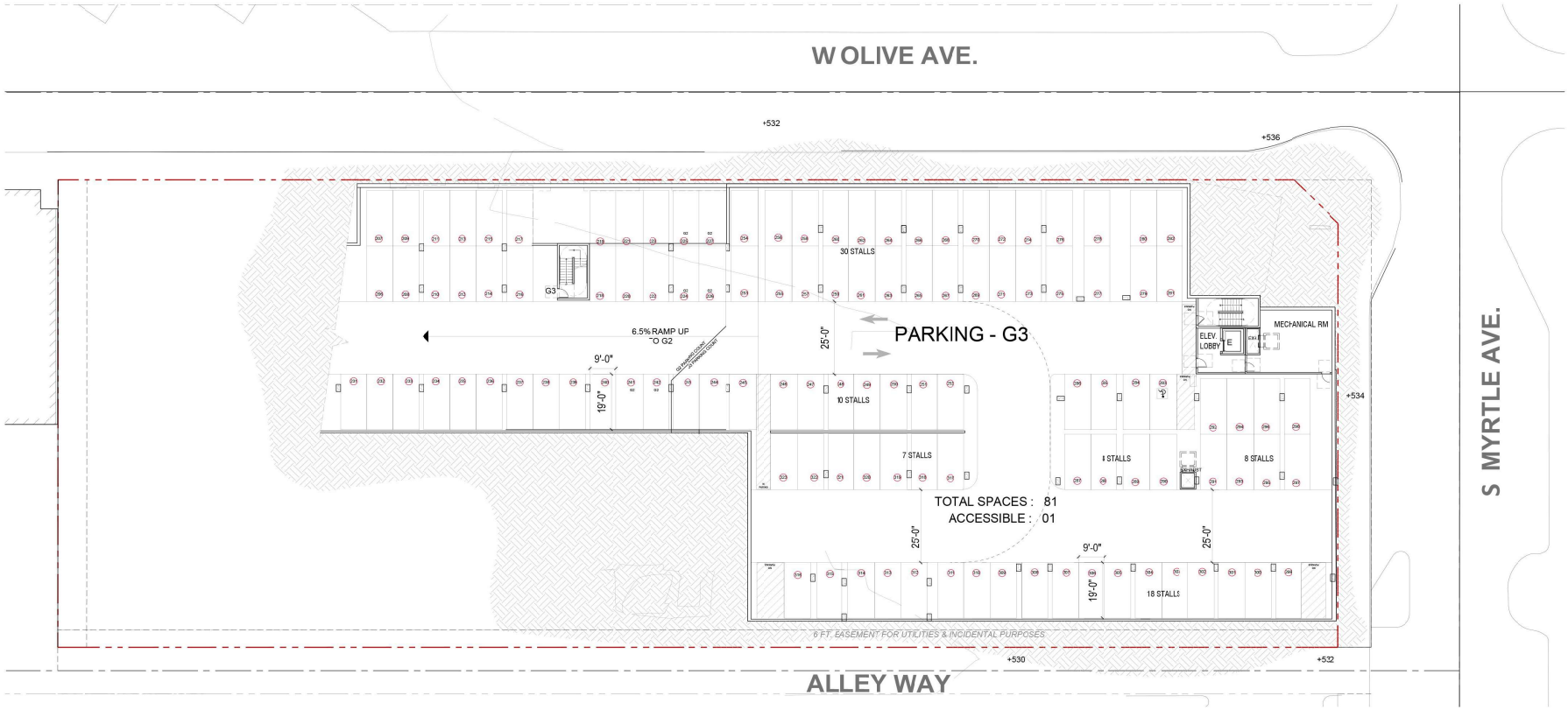


Source(s): Architects Orange (07-31-2023)

Figure 3-9

Not to Scale

Conceptual Subterranean Level G2 Parking Floor Plan

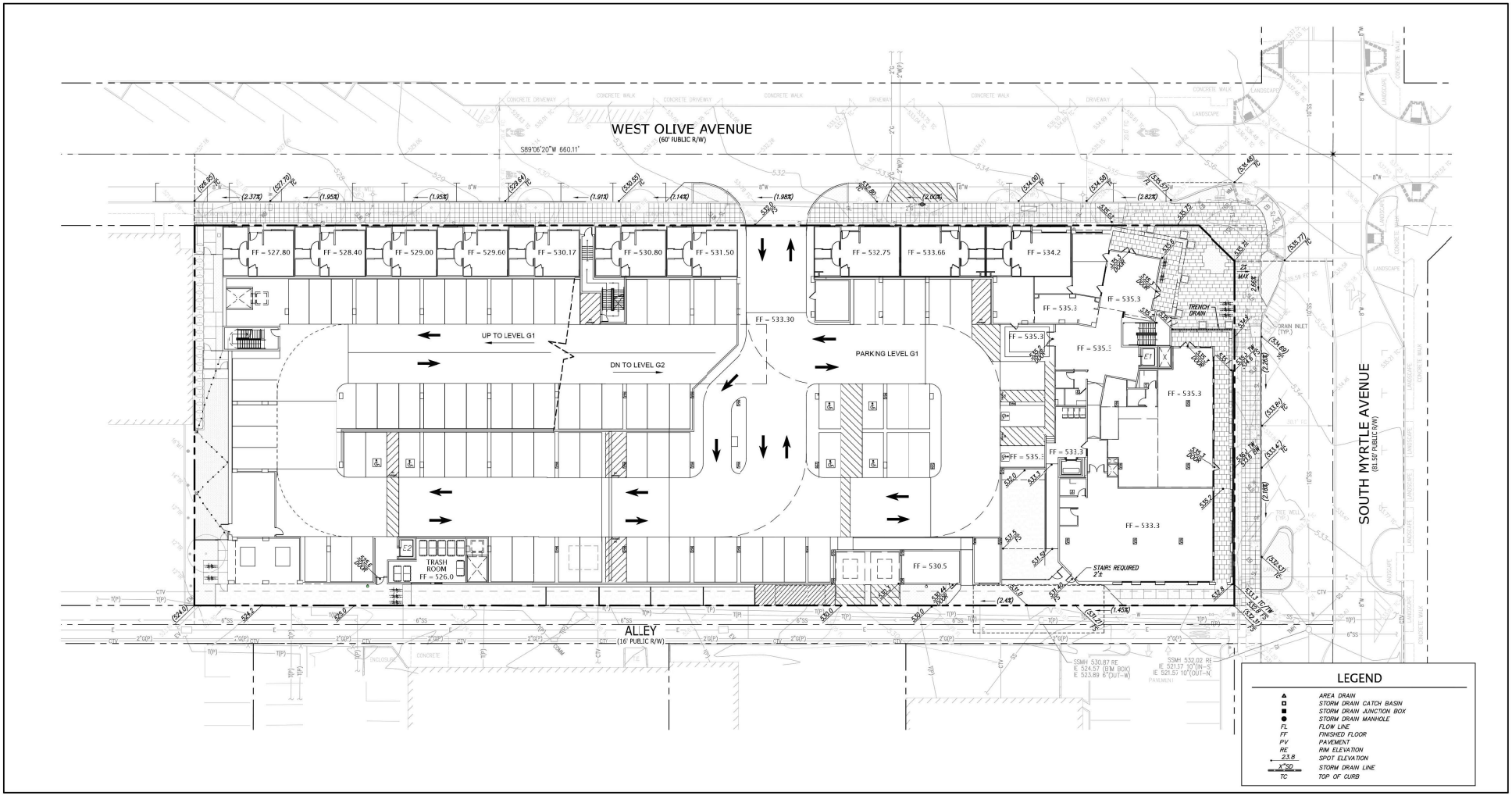


Source(s): Architects Orange (07-31-2023)

Not to Scale

Figure 3-10

Conceptual Subterranean Level G3 Parking Floor Plan



Source(s): Kier & Wright (07-31-2023)

Not to Scale

Figure 3-11

Conceptual Grading Plan

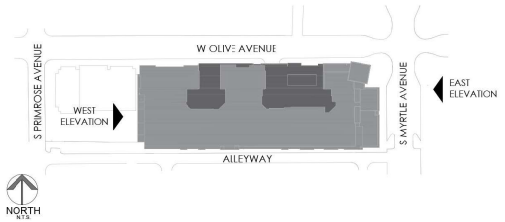


EAST ELEVATION- S MYRTLE AVE.



WEST ELEVATION

KEY MAP



MATERIAL LEGEND

1. Stucco - smooth
2. Stucco - 20/30
3. Brick Veneer
4. Stone Veneer
5. Prefabricated Cornice
6. Metal Awnings
7. Clear Glass Railings
8. Metal Picket Railings
9. Framed Canopy Projection
10. Metal Roll-Up Garage Doors
11. Metal Ventilation Panels
12. Metal Roll-Up Trash Room Door
13. Vinyl Windows
14. Metal Storefront System
15. Exterior Light sconce
16. Mesh Screen System
17. Trellis Awning
18. Pool Glass Fencing

Source(s): Architects Orange (05-24-2024)

Figure 3-12

Not to Scale

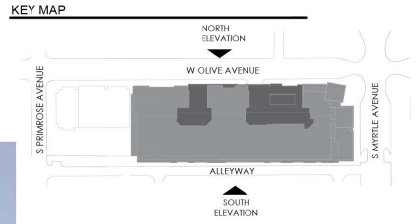
Conceptual Architectural Elevations - East and West Elevations



NORTH ELEVATION- W OLIVE AVE.



SOUTH ELEVATION



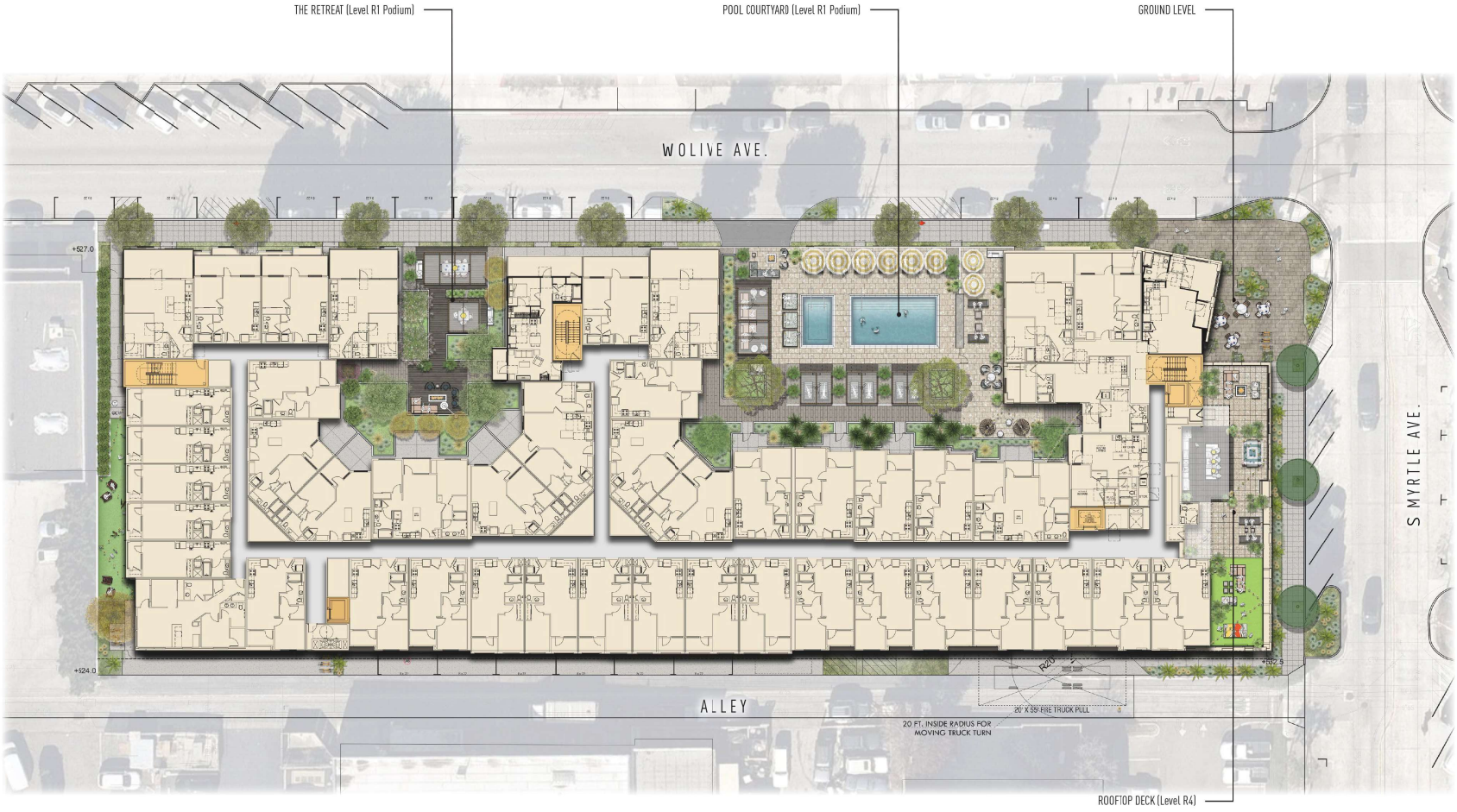
MATERIAL LEGEND
1. Stucco - smooth
2. Stucco - 20/30
3. Brick Veneer
4. Stone Veneer
5. Prefabricated Cornice
6. Metal Awnings
7. Clear Glass Railings
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14. Metal Storefront System
15. Exterior Light sconce
16. Mesh Screen System
17. Trellis Awning
18. Pool Glass Fencing

Source(s): Architects Orange (05-24-2024)

Figure 3-13

Not to Scale

Conceptual Architectural Elevations - North and South Elevations



Source(s): MJS Landscape Architecture (05-16-2024)

Not to Scale

Figure 3-14

Conceptual Landscape Plan

4.0 Environmental Analysis

4.0.1 Summary of EIR Scope

In accordance with California Environmental Quality Act (CEQA) Guidelines Sections 15126-15126.4, this section provides an introduction to the environmental analyses presented in Subsections 4.1 through 4.15, which disclose the potential direct, indirect, and cumulative impacts that could occur from the construction and operation of the Project.

As discussed in EIR Section 1.0, Introduction, an Initial Study was not prepared for the Project because the City determined that most of the environmental issue areas would be fully analyzed in an EIR. Given the developed condition of the site and the developed nature of surrounding land uses, the Project's NOP did scope out certain issue areas from detailed environmental review, including: Agriculture and Forest Resources, Biological Resources, Hydrology/Water Quality, Mineral Resources, and Wildfire. The City distributed a Notice of Preparation (NOP) to public agencies and interested individuals and posted the NOP on its website to solicit input on the scope of study for the EIR. The City also held one EIR Scoping Meeting to solicit input from the general public on the scope of study for this EIR. Taking all known information and public comments into consideration, 15 primary environmental factors are evaluated, as listed below. Each subsection evaluates several specific topics related to the primary environmental subject. The title of each subsection is not limiting; therefore, refer to each subsection for a full account of the subject matters addressed therein.

4.1	Aesthetics	4.9	Noise
4.2	Air Quality	4.10	Population and Housing
4.3	Cultural Resources	4.11	Public Services
4.4	Energy	4.12	Recreation
4.5	Geology and Soils	4.13	Transportation
4.6	Greenhouse Gas Emissions	4.14	Tribal Cultural Resources
4.7	Hazards and Hazardous Materials	4.15	Utilities and Service Systems
4.8	Land Use and Planning		

4.0.2 Scope of Cumulative Effects Analysis

CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project. As noted in CEQA Guidelines Section 15130(a)(1), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." "[A] cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects creating related impacts." As defined in CEQA Guidelines Section 15355:

> *'Cumulative Impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.*
>
> *(a) The individual effects may be changes resulting from a single project or a number of separate projects.*

> *(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

CEQA Guidelines Section 15130(b) describes two acceptable methods for identifying a study area for purposes of conducting a cumulative impact analysis. These two approaches include (1) a list of past, present, and probable future projects producing related or cumulative impacts, including if necessary, those projects outside the control of the agency (the list of projects approach); or (2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact (the summary of projections approach).

The summary of projections approach is used in this EIR, except for the evaluation of cumulative traffic-related noise impacts, for which a combination of the summary of projections and the list of projects approaches are used. The analysis of cumulative traffic-related noise impacts combines the summary of projections approach with the manual addition of past, present, and reasonably foreseeable projects ("combined approach"). The City determined the combined approach to be appropriate because long-range planning documents contain a sufficient amount of information to enable an analysis of cumulative effects for all subject areas, except for vehicular-related noise effects, which require a greater level of detailed study. The cumulative impact analyses of vehicular-related noise impacts, which relies on data from the Project's Traffic Analysis (EIR *Technical Appendix J1*), inherently utilizes the combined approach. With the combined approach, the cumulative impact analyses for traffic-related noise overstates the Project's potential to contribute to cumulative impacts relative to an analysis that relies solely on the list of projects approach or solely on the summary of projections approach; therefore, the combined approach provides a conservative, worst-case analysis for the Project's contribution to cumulative traffic-related noise impacts.

The list of projects used to supplement the summary of projections approach for the traffic-related noise impact analysis includes known approved pending development projects in proximity to the Project site that would contribute traffic to the same transportation facilities as the Project. This methodology recognizes development projects that have the potential to contribute measurable traffic to the same intersections, roadway segments, and/or State highway system facilities as the Project and have the potential to be fully operational in the foreseeable future. Accordingly, the cumulative impact analysis of near-term traffic-related noise impacts includes the seven other known past, present, and reasonably foreseeable projects described in Table 4.0-1, *Cumulative Development Land Use Summary*, and illustrated on Figure 4.0-1, *Cumulative Development Location Map*, in addition to the summary of projections.



Source(s): Esri, Nearmap Imagery (April 2025), Urban Crossroads (06-25-2024)

Figure 4-0-1

Cumulative Development Map

For the cumulative impact analyses that rely on the summary projections approach (i.e., all issue areas with the exception of traffic-related noise impacts, as described above), the cumulative study area for evaluation is identified and defined in each subsection of Section 4.0. The cumulative study area varies depending on the subject area. Please refer to the cumulative impact analysis provided in each subsection in Section 4.0 for an issue-specific discussion of the cumulative study area.

Table 4.0-1 Cumulative Development Land Use Summary

#	Project Name	Land Use	Quantity Units[1]
1	Alexan Foothills[2]	Multifamily (Mid-Rise) Housing	432 DU
		Live/Work Units	4 DU
2	Arroyo at Monrovia	Multifamily (Mid-Rise) Housing	302 DU
		Retail Flex-Space	7.080 KSF
3	Station Square South	Multifamily (Mid-Rise) Housing	296 DU
4	127 Pomona	Multifamily (Mid-Rise) Housing	310 DU
		Retail Flex-Space	10.000 KSF
5	Townplace Suites Hotel[2]	Hotel	109 Rooms
6	In-N-Out Restaurant	Fast-food Restaurant w/ Drive-Thru	3.879 KSF

[1] DU = Dwelling Units; KSF = Thousand Square Feet
[2] The Alexan Foothills project and the Townplace Suites Hotel project were not yet built and operational at the time the NOP for this EIR was released for public review (December 2023), which set the baseline condition for study. It is acknowledged that these projects have since been constructed and are operational.
[3] The Oak Park Apartments project was a previously proposed apartment project that is no longer moving forward although it is considered in some of the Project's technical studies because it was a contemplated project at the time the NOP for this EIR was released for public review in December 2023.
Source: (UXR, 2024, Table 4-4)

For the issue of air quality, the cumulative study area comprises the South Coast Air Basin (SCAB), while the cumulative impact analysis relies on guidance from the South Coast Air Quality Management District (SCAQMD). The SCAQMD published a report giving direction on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (SCAQMD, 2003).

4.0.3 Identification of Impacts

Subsections 4.1 through 4.15 of this EIR evaluate the 15 environmental subjects warranting analysis pursuant to CEQA. The format of discussion is standardized as much as possible in each subsection for ease of review. The environmental setting is discussed first, followed by a discussion of the potential environmental impacts of the Project based on specified thresholds of significance used as criteria to determine whether potential environmental effects are significant.

The thresholds of significance used in this EIR are based on the thresholds presented in CEQA Guidelines Appendix G and as applied by the City. The thresholds are intended to assist the reader of this EIR in understanding how and why this EIR reaches a conclusion that an impact would or would not occur, is significant, or is less than significant (without or with the incorporation of mitigation).

Serving as the Lead Agency for this EIR, the City is responsible for determining whether an adverse environmental effect identified in this EIR should be classified as significant or less than significant. While the City has generally elected to use the thresholds presented in CEQA Guidelines Appendix G, it should be noted that CEQA affords the City discretion to formulate standards of significance, and recognizes that the significance of a particular impact may vary with the setting (CEQA Guidelines Section 15064(b)). The standards of significance used in this EIR are based on the independent judgment of the City, taking into consideration the current CEQA Guidelines Appendix G, the Monrovia Municipal Code (MMC), and adopted City policies and ordinances; the judgment of the technical experts that prepared this EIR's Technical Appendices; performance standards adopted, implemented, and monitored by regulatory agencies; significance standards recommended by regulatory agencies; and the standards in CEQA that trigger the preparation of an EIR. As required by CEQA Guidelines Section 15126.2(a), impacts are identified in this EIR as direct, indirect, cumulative, short-term, long-term, on-site, and/or off-site impacts of the Project. A summarized "impact statement" is provided in each section following the analysis.

The following terms are used to describe the level of significance related to the physical conditions within the area affected by the Project:

- No Impact: An adverse change in the physical environment would not occur.

- Less-than-Significant Impact: An adverse change in the physical environment would occur, but the change would not be substantial or potentially substantial and would not exceed the threshold(s) of significance presented in this EIR.

- Significant Impact: A substantial or potentially substantial adverse change in the physical environment would occur and would exceed the threshold(s) of significance presented in this EIR, requiring the consideration of mitigation measures.

Each subsection also includes a discussion or listing of the applicable regulatory criteria (laws, policies, regulations, etc.) that the Project is required to comply with (if any). If impacts are identified as significant after mandatory compliance with regulatory criteria, feasible mitigation measures are presented that would either avoid the impact or reduce the magnitude of the impact. The following terms are used to describe the level of significance following the application of recommended mitigation measures:

- Less-than-Significant Impact with Mitigation: A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this EIR; however, the impact can be avoided or reduced to a less-than-significant level through the application of feasible mitigation measure(s).

- Significant and Unavoidable Impact: A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this EIR. Feasible and enforceable mitigation measure(s) that have a proportional nexus to the Project's

impact are either not available or would not be fully effective in avoiding or reducing the impact to below a level of significance.

For any impact identified as significant and unavoidable, the City of Monrovia City Council would be required to adopt a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 in order to approve the Project despite its significant impact(s) to the environment. The Statement of Overriding Considerations would list the specific economic, legal, social, technological, and other benefits of the Project, supported by substantial evidence in the administrative record for the Project, that outweigh the unavoidable impacts.

4.1 AESTHETICS

The analysis in this subsection describes the aesthetic qualities and visual resources present on the Project site and in the site's vicinity and evaluates the potential effects that the Project may have on these resources. Descriptions of existing visual characteristics both on the site and in the vicinity of the Project site and the analysis of the Project's potential effects on aesthetic resources are based on field observations and site photographs collected by T&B Planning, Inc. in December 2023 (T&B Planning, 2023), analysis of aerial photography (Google Earth, 2023), and the Project's application materials submitted to the City of Monrovia described in Section 3.0, *Project Description*. All references used in this subsection are listed in EIR Section 7.0, *References*.

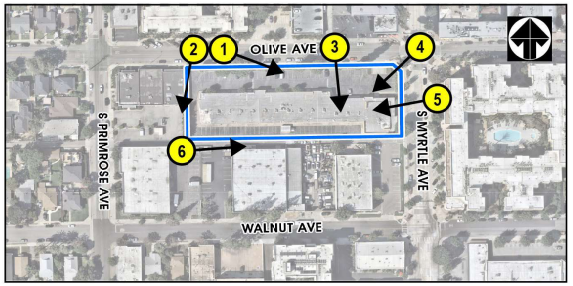
4.1.1 EXISTING CONDITIONS

A. Project Site and Surrounding Areas

The Project site is located in the south-central portion of the City of Monrovia, which is located in the San Gabriel Valley portion of Los Angeles County. The Project site is located at the southwestern corner of West Olive Avenue and South Myrtle Avenue in a location known as the Old Town Extension District. I-210 is located approximately 0.6 miles south of the Project site.

Pursuant to CEQA Guidelines Section 15125 and as discussed in Section 2.0, *Environmental Setting*, the physical environmental condition for purposes of establishing the setting of an EIR is the environment as it existed at the time the EIR's NOP was published. The NOP for this EIR was published on December 4, 2023. As of that date, the Project site was fully developed with one 25,191-s.f. multi-tenant commercial/industrial office building and associated parking, drive aisles, and landscaping. To demonstrate the existing conditions, photographs of the Project site were taken on December 18, 2023. Figure 4.1-1, *Public Viewpoints Key Map and Photographs*, provides a representative photographic inventory of the Project site and the immediately surrounding area. The photographs and visual observations of T&B Planning staff made during the December 18, 2023 field visit are relied upon herein to describe the aesthetic conditions and character of the Project site and surrounding areas. The photographs provide a representative depiction of the site's visual characteristics as seen from surrounding public viewing areas, which consist of public roads adjacent to the Project site. The photographs were taken in clear weather conditions and reflect a field of view approximately five feet above the ground.

As shown in the photos, the Project site contains flat and gently sloping topography and is fully developed with a multi-tenant commercial/industrial office building. Elevations of the Project site range from 524 feet above mean sea level (amsl) to 536 feet amsl. Topographic elevations in the surrounding areas generally descend from northeast to southwest. Vegetation on the site consists of ornamental landscaping, including trees, shrubs, and turf, with three pine trees planted near West Olive Avenue that appear to be over 60 feet tall; no native vegetation communities are present on the Project site. There are no unique topographic or aesthetic features present on the property under existing conditions. Although the three tall pine trees located near West Olive Avenue appear visually interesting in contrast to the low-profile height of the existing building, the trees are not considered visually unique because other pine and palm trees of a similar height are visible in the area.



Source(s): Esri, Nearmap Imagery (September 2023)



Site Photo 1: North of the Project Site along Olive Ave looking southeast.



Site Photo 2: North of the Project Site along Olive Ave looking south.



Site Photo 3: North of the Project Site along Olive Ave looking south.



Site Photo 4: Northeast of the Project Site at the intersection of Olive Ave and S Myrtle Ave looking southwest.



Site Photo 5: East of the Project Site along S Myrtle Ave looking west.



Site Photo 6: Southwest of the Project Site looking east.

Figure 4.1-1

Not to Scale

Public Viewpoint Key Map and Photographs

As previously disclosed in Section 2.0, *Environmental Setting*, land uses in the immediate vicinity of the Project site are illustrated on Figure 2-3, *Surrounding Land Uses and Development*, and are described below. The Project site is located in an urbanized area, and all of the land surrounding the Project site is developed.

- North: West Olive Avenue forms the northern boundary of the Project site. To the north and northeast of West Olive Avenue across the street from the Project site is a mix of residential and commercial uses, including, but not limited to, apartments, restaurants, and service commercial businesses with building heights ranging from one to three stories. North of West Olive Avenue is the heart of Old Town Monrovia, which contains an array of boutique shops, restaurants, and historic buildings with a north-facing view of the San Gabriel Mountains.

- East: South Myrtle Avenue forms the eastern boundary of the Project site. To the immediate east of South Myrtle Avenue across the street from the Project site is a three- and four-story mixed-use structure (Paragon at Old Town) with ground floor retail and residential apartment units, upper floor apartment units, and structured parking including rooftop parking. Beyond this building are lower-profile, one-, two-, and three-story structures containing a variety of residential, commercial, and service commercial uses with a few historic-character structures located farther north along South Myrtle Avenue north of West Olive Avenue.

- South: To the south of the Project site is an alley, beyond which are one- and two-story commercial, office, and industrial uses. To the south of these uses is West Walnut Avenue and a five-story apartment building (Avalon) with some ground floor retail and structured parking.

- West: To the west of the Project site is a one-story light industrial building, beyond which is South Primrose Avenue. To the west of South Primrose Avenue are one- and two-story single-family and multi-family residential structures.

B. Scenic Vistas and Scenic Resources

The Project site is located in the San Gabriel Valley on a relatively flat valley floor surrounded by rugged hills and mountains, with the most prominent topographic feature being the San Gabriel Mountains to the north, the base of which is about 1.7 miles north of the Project site. Under existing conditions, the Project site does not serve as a scenic vista or substantially contribute to a scenic vista as the Project site is fully developed with a multi-tenant commercial/industrial office building, associated parking, and ornamental landscaping. All of the properties surrounding the Project site also are fully developed with a mix of residential, industrial, and commercial land uses and associated ornamental landscaping.

As described in the City's General Plan EIR, the City of Monrovia does not have any designated scenic vistas, scenic resources, or scenic highways. Regardless, the San Gabriel Mountains is a scenic topographic feature visible (at least partially) in north-facing views from the West Olive Avenue and South Myrtle Avenue public rights-of-way located adjacent to the Project site. Looking south, the nearest topographic feature with possibility to be seen from South Myrtle Avenue is the Hacienda Hills area of the Puente Hills Preserve, located in the City of Hacienda Heights approximately 8.1 miles south of the Project site. Due to the distance,

intervening development, and frequent atmospheric haze, this feature is not visually prominent (Google Earth, 2023).

C. Scenic Highways

The Project site is not located within or adjacent to a designated State scenic highway corridor and does not contain any scenic resources under existing conditions, such as trees of scenic value, rock outcroppings, or historic buildings visible from a scenic highway. The nearest designated State scenic highway to the Project site is the segment of State Route (SR) 2 (SR-2) that traverses through the San Gabriel Mountains, and which is located approximately 8.9 miles north of the Project site. The nearest State-eligible scenic highway is a segment of SR-39 north of SR-210, which is located approximately 5.3 miles east of the Project site (Google Earth, 2023; Caltrans, 2021). Due to distances and intervening development and topography, the Project site is not visible from these segments of SR-2 and SR-39.

D. Light and Glare

The Project site contains sources of artificial lighting under existing conditions due to its existing condition as a developed and operating commercial/industrial office building with multiple tenants. Artificial lighting sources include interior and exterior building lighting, building mounted fixtures, streetlights along West Olive Avenue and South Myrtle Avenue, and lighting associated with existing developed properties surrounding the Project site. Headlights and other lights on vehicles traveling to and from the Project site and in the surrounding area also are sources of artificial light in the area.

4.1.2 Regulatory Setting

A. City of Monrovia General Plan

The following policies of the City of Monrovia's General Plan Land Use Element are applicable to the Project (City of Monrovia, 2021):

- Policy 4.1: Require new developments in established neighborhoods to consider the established architectural styles, development patterns, building materials, and scale of buildings within the vicinity of the proposed project.

- Policy 4.2: Require all new development to consider existing uses in terms of neighborhood disruption, buffering, architectural styles, building materials, development patterns, and scale of buildings within the vicinity of the proposed project.

- Policy 9.3: Continue to monitor development standards in single family and multi-family residential districts, including setbacks, height, density, and required open space, in order to ensure that new development is compatible with the scale and character of existing development.

- Policy 9.6: Encourage the continued effort in the downtown to preserve its historic quality. New development shall be designed in harmony with existing buildings.

- Policy 9.8: Continue the street tree and sidewalk pattern in new development where Medium Density and PD neighborhoods have an established street tree and sidewalk pattern.

- Policy 13.3: In commercial and industrial areas designated Planned Development, develop architectural, site design, and landscape guidelines.

B. City of Monrovia Municipal Code (MMC)

MMC Section 17.32.080 requires that lighting, where provided to illuminate private property, must be arranged to reflect away from adjoining property or any public way and to be arranged so as not to cause a nuisance either to highway traffic or to the living environment.

MMC Section 17.32.090 relates to glare, and prohibits direct or reflected glare that is visible from the property boundary line. MMC Section 17.32.090 further requires that sky-reflected glare shall not inconvenience or annoy persons or interfere with the use and enjoyment of property in and about the area where it occurs (City of Monrovia, 2023a, Title 17).

MMC Section 17.52.290 requires the City of Monrovia's Planning Commission to make several findings prior to the granting of a major CUP, including several that address aesthetics:

a) That the site is adequate in size, shape, and topography for the proposed use;

b) That the site has sufficient access to streets and highways, adequate in width and pavement type to carry the quantity and quality of traffic generated by the proposed use;

c) That the proposed use is compatible with the General Plan and any applicable specific plan, and will not adversely impact the objectives of the General Plan and any applicable specific plan.

d) That the use will comply with the applicable provisions of the zoning ordinance, except for approved variances;

e) That the proposed location of the use and conditions under which it will be operated or maintained will not be detrimental to the public health, safety, or welfare, or materially injurious to properties or improvements in the vicinity.

4.1.3 Basis for Determining Significance

According to Section I of Appendix G to the CEQA Guidelines, the Project would result in a significant impact to aesthetics if the Project would:

a) Have a substantial adverse effect on a scenic vista;

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;

c) *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 point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality;*

d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.*

Regarding the determination of significance under Threshold (a), because a "scenic vista" is not defined in CEQA or the MMC or General Plan, for the purposes of this analysis, a scenic vista is considered to be a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public providing or relating to views of impressive natural scenery (such as a mountain range), and a vista is considered to be a distant view through or along a linear corridor or opening. Given the physical conditions of the area, it has been determined, for analysis purposes of this EIR, that views of the San Gabriel Mountains from public viewing areas, such as public streets, constitute a scenic vista. If the Project were to obstruct public views of the San Gabriel Mountains, including its higher elevations, a significant impact to a view of a scenic vista would result.

Regarding the determination of significance under Threshold (b), the methodology to determine impact potential is to first determine if the Project site is visible from a designated scenic highway. If the site is not visible, no impact would occur.

Regarding the determination of significance under Threshold (c), the Project site is located in an urbanized area (CEQA Guidelines Section 15387), and, as such, aesthetic impacts would be significant if the Project design were to conflict with applicable MMC zoning requirements or other regulations governing scenic quality. The analysis methodology entails identifying MMC requirements applicable to the Project that govern scenic quality and determining if any potential conflicts with these requirements would lead to an adverse aesthetic effect, such as view blockage or stark visual incompatibilities with the community character established on properties in the same viewshed.

Regarding the determination of significance under Threshold (d), the Project's artificial light sources and reflective building materials with glare-producing potential are evaluated to determine if light or glare would expose nearby properties or the public rights-of-way to levels that would create a substantial nuisance to vehicles or the living environment, or if the Project were to create sky-reflected glare that would be measurably noticeable against the dark sky.

4.1.4 Impact Analysis

Threshold a.: Would the Project have a substantial adverse effect on a scenic vista?

The Project would entail the construction and operation of a mixed-use five-story building with 1.5 levels of subterranean parking on approximately 1.61 acres. Approximately 90 percent of the site would be covered by the building, with the remaining 10 percent consisting of landscaped and hardscaped setbacks, a public plaza at the corner of West Olive Avenue and South Myrtle Avenue, a public arcade space along South Myrtle

Avenue, and a private dog park for resident use located on the west side of the building. The building would be 65 feet tall as measured from the "average grade plane"[1] to the middle of the sloped roof of an architectural tower element proposed on the building at the corner of West Olive Avenue and South Myrtle Avenue. Architectural projections on small portions of the roof would be permitted to extend up to 80 feet in height, primarily for architectural interest and to screen rooftop mechanical equipment.

As previously noted, north-facing views toward the San Gabriel Mountains are scenic. From West Olive Avenue, the Project has no potential to obscure or block views of the San Gabriel Mountains because the mountains are located north of West Olive Avenue while the Project is located to the south. From South Myrtle Avenue, views of the San Gabriel Mountains are due north, and the Project would be located to the west of the road. As such, the Project has no reasonable potential to block north-facing views from South Myrle Avenue. From public roads located south of the Project site, there is an alley to the immediate south and further beyond is West Walnut Avenue. North-facing views from the alley and West Walnut Avenue are already obstructed by the commercial/industrial office building located on the Project site and intervening industrial and office buildings located south of the Project site. With implementation of the Project, views of the San Gabriel Mountains would continue to be available from publicly-available viewing locations in areas surrounding the Project site, including along South Myrtle Avenue and West Olive Avenue. Therefore, development of the Project would not have a substantial effect on existing public views of scenic vistas, and impacts would be less than significant.

Threshold b.: Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

As discussed above, the Project site is not located within or visible from a State scenic highway. Therefore, development of the Project site with a mixed-use five-story building would not adversely affect views from any State scenic highways, and no impact would occur.

Threshold c.: If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The Project site is located within an urbanized area and the Project entails a proposed GPA, ZC, Specific Plan, VTPM, and CUP to allow demolition of the site's existing multi-tenant commercial/industrial office building and redevelopment of the property with a proposed five-story mixed use building with 1.5 levels of subterranean parking. Policies addressing scenic quality are contained in the City's General Plan, and MMC Section 17.52.290 states that CUPs can be granted only if the City of Monrovia's Planning Commission finds, among other items, that the site is adequate in size, shape and topography for the proposed use and that the proposed use is compatible with the General Plan and any applicable specific plan and would not adversely impact their objectives.

[1] Because the site slopes in two directions and is not flat, "average grade plane" is used, which is a reference plane representing the average of finished ground level adjoining the building at its exterior walls. The Project site's average grade plane is shown on the Project's architectural drawings included as part of the Project's application materials on file with the City.

Although accommodating 204 residential apartment units on a 1.61-acre property may be perceived as dense, the Project's design, including site layout, architecture, and landscaping, incorporates a high degree of architectural articulation, a neutral color palette, and materials, such as smooth stucco, brick veneer, stone veneer, trim, and metal railings, awnings, and canopies for visual interest. Additionally, the Project's landscape plan incorporates low-water-need plant species that can maintain vibrancy during drought conditions. The proposed visual features of the Project would ensure a high-quality aesthetic for the site. There is no indication that with approval of the ZC and Specific Plan, that any component of the Project would conflict with the applicable provisions of the City of Monrovia's Zoning Code that regulate scenic quality. Further, a consistency analysis with applicable provisions of the General Plan is provided below.

Table 4.1-1 Project Consistency with General Plan Policies Addressing Scenic Quality

Applicable General Plan Polices	Consistency Determination
Goal 4: Promote land use patterns and development which contribute to community and neighborhood identity.	
Policy 4.1: Require new developments in established neighborhoods to consider the established architectural styles, development patterns, building materials, and scale of buildings within the vicinity of the proposed project.	Consistent. The Project's proposed mixed-use building is designed to respect and complement the architectural characteristics of existing buildings within the surrounding area in terms of building materials, colors, and level of articulation. The Project's building scale would be similar to adjacent and/or nearby uses, including a three- and four-story apartment building with ground floor retail (Paragon at Old Town) located across South Myrtle Avenue from the Project site, a five-story apartment building with ground floor retail (Avalon) located one block south of the Project site along West Walnut Avenue and South Myrtle Avenue, and a four-story mixed use development one block north of the Project site along West Colorado Boulevard. Accordingly, the Project would not conflict with this policy.
Policy 4.2: Require all new development to consider existing uses in terms of neighborhood disruption, buffering, architectural styles, building materials, development patterns, and scale of buildings within the vicinity of the proposed project.	Consistent. The Project would not physically disrupt an existing neighborhood. Currently, the Project site appears largely unchanged from the time of its original construction in the late 1970s and contains a multi-tenant commercial/ industrial office structure. The Project site is located in a portion of the City's historic downtown main street area known as the "Old Town Extension District." Setbacks along South Myrtle Avenue proposed by the Project would be close to the street and consistent with setbacks found in the historic downtown area. The Project site's South Myrtle Avenue setback also is proposed to be landscaped with a variety of ornamental groundcover, vines, shrubs, and trees. The Project's building would be 65 feet height measured from average ground plane and extend up to 80 feet high on minor portions of the roof to accommodate architectural projections but would be softened through the articulation and setbacks of the upper stories, as well as a cut-out at the corner of South Myrtle and West Olive Avenues, where a public plaza and public arcade would occur. In addition, the Project's

Table 4.1-1 Project Consistency with General Plan Policies Addressing Scenic Quality

Applicable General Plan Polices	Consistency Determination
	proposed maximum building height is comparable with recent redevelopment projects in the Old Town Extension District, including similar, recent new development adjacent to the east and one block to the south. Additionally, as described in the proposed 701 S. Myrtle Specific Plan, the Project's design is based on a detailed analysis of the character, styles, and palette of colors and materials seen throughout Old Town Monrovia. The building's architectural style is designed as a modern interpretation of prevalent features found in Old Town Monrovia. These design elements are intended to create a well-balanced building elevation, incorporating architectural strategies, to reduce bulk and massing and to activate the pedestrian environment through interactive architecture and landscape elements, such as vibrant storefronts, benches and planter walls, enhanced paving accents, and accent lighting. Accordingly, the Project would not conflict with this policy.
GOAL 9: Preserve the character of existing neighborhoods and historic residences.	
Policy 9.3: Continue to monitor development standards in single family and multi-family residential districts, including setbacks, height, density, and required open space, in order to ensure that new development is compatible with the scale and character of existing development.	Consistent. The Project Applicant is proposing a ZC to change the Project site's zoning classification to Area PD-28 and to identify the Project site as part of the 701 S. Myrtle Specific Plan. The standards established by Area PD-28 and the Specific Plan related to setbacks, height, density, and required open space would ensure that the Project is compatible with the existing neighborhood. No building permits would be issued by the City unless the City determines that the building plans fully conform to the applicable requirements. Accordingly, the Project would not conflict with this policy.
Policy 9.6: Encourage the continued effort in the downtown to preserve its historic quality. New development shall be designed in harmony with existing buildings.	Consistent. A Historical Resources Technical Report was prepared to evaluate the potential for the Project to cause direct or indirect substantial adverse impacts to historical resources, and it was determined that impacts would be less than significant. Refer to *Technical Appendix D2* (SWCA, 2024). The attention to design and architectural details required by the proposed Specific Plan would ensure that the Project is designed in harmony and compatible with Old Town Monrovia. Select design features of the Project include (1) the setback design and the open public plaza proposed at the northeastern corner of the Project site; (2) sidewalk setbacks and pedestrian entrances along South Myrtle Avenue

Table 4.1-1 Project Consistency with General Plan Policies Addressing Scenic Quality

Applicable General Plan Polices	Consistency Determination
	consistent with those existing in Old Town Monrovia; (3) clearly articulated ground-floor; and (4) compatible but differentiated variety of materials and color palette, differentiated bays/volumes throughout wall plane, stepped-back top stories. Accordingly, the Project would not conflict with this policy.
Policy 9.8: Continue the street tree and sidewalk pattern in new development where Medium Density and PD neighborhoods have an established street tree and sidewalk pattern.	Consistent. The Project's conceptual landscape plan proposes to preserve existing street trees along South Myrtle Avenue and install new street trees along the site's frontage on West Olive Avenue in a manner that is consistent with existing street trees in the surrounding area. Additionally, the Project would reconstruct the existing sidewalks along the site's frontages on South Myrtle Avenue and West Olive Avenue. Accordingly, the Project would not conflict with this policy.
GOAL 13: Promote high quality design in all new commercial and industrial development.	
Policy 13.3: In commercial and industrial areas designated Planned Development, develop architectural, site design, and landscape guidelines.	Consistent. The proposed 701 S. Myrtle Specific Plan includes guidelines for architecture, site design, and landscaping that address ground-level design of commercial uses on the Project site.

Based on the above analysis, it is concluded that the Project's design would be complementary to the established community character, including in Old Town Monrovia, and the Project would not conflict with applicable zoning and other regulations governing scenic quality, including applicable General Plan policies and the proposed 701 S. Myrtle Specific Plan. As such, no impacts would occur.

Threshold d.: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

A. *Artificial Light*

The Project would introduce new artificial lighting sources to the Project site. All new light sources associated with the Project would be required to comply with the provisions of MMC Section 17.32.080, which requires that lighting, where provided to illuminate private property, shall be arranged to reflect away from adjoining property or any public right-of-way and shall be arranged in a manner not to cause a nuisance either to highway traffic or the living environment. The City would review future applications for building permits for compliance with the provisions of MMC Section 17.32.080, which in turn would ensure that Project lighting does not adversely affect any surrounding properties or the public right-of-way. Accordingly, with mandatory compliance with MMC Section 17.32.080, Project impacts due to substantial light that could potentially and adversely affect day or nighttime views in the area would be less than significant.

B. Glare

A majority of the Project's building materials would be low-reflective, including the stucco finish and brick and stone veneers. While window glazing has a potential to result in minor glare effects, such effects would not adversely affect daytime views of surrounding properties, including motorists along adjacent roadways, because the glass proposed for the Project is low-reflective. In addition, the proposed landscaping also would reduce the potential for glare to adversely affect the surrounding areas because it would filter light and help to screen potential sources of glare from direct sources of artificial light. Any glare potentially reflecting off the Project's swimming pool would be interior to the Project and not visible to surrounding areas. Any glare reflecting off the Project's rooftop solar panels would be above public views and not visible to surrounding areas. Additionally, the Project would be designed in accordance with MMC Section 17.32.090 to minimize sky-reflected glare from the Project. The City would review future applications for building permits for compliance with the provisions of MMC Section 17.32.090, which would ensure that glare impacts from proposed building elements would not adversely affect day or nighttime views in the surrounding area. Therefore, Project impacts due to glare would be less than significant.

4.1.5 Cumulative Impact Analysis

Cumulative Effects to Scenic Vistas

As determined in the analysis above, north-facing views toward the San Gabriel Mountains are scenic. From West Olive Avenue, the Project has no potential to obscure or block views of the San Gabriel Mountains because the mountains are located north of West Olive Avenue while the Project is located to the south. From South Myrtle Avenue, views of the San Gabriel Mountains are due north, and the Project would be located to the east of the road. As such, the Project has no reasonable potential to block north-facing views from South Myrle Avenue. No cumulative development projects known to the City are located in the viewshed between the Project site and the San Gabriel Mountains. Accordingly, because there are no proposed development projects within the Project's viewshed, there would be no cumulative impacts related to scenic vistas.

Cumulative Effects to Views from a State Scenic Highway

As noted under the analysis of Threshold (b), the Project site is not located within close proximity to any designated State scenic highways and does not contain any scenic resources that are visible from State scenic highways. In addition, no cumulative development projects known to the City are located in the immediate vicinity of the Project site. Therefore, the Project has no potential to contribute to a cumulatively significant impact to scenic resources within a designated scenic route corridor, and, as such, no cumulative impacts would occur.

Cumulative Effects Associated with Inconsistencies with Policies and Regulations Governing Scenic Quality

Policies addressing scenic quality are contained in the City's General Plan and MMC. As demonstrated by the analysis above, the Project's proposed zoning classifications of PD and Specific Plan would allow for redevelopment of the site in a manner that is consistent with the proposed 701 S. Myrtle Specific Plan, as well as the policies in the City's General Plan. No cumulative development projects known to the City are located

in the same viewshed of the Project site. Regardless, each cumulative project would be required to conduct a consistency analysis to ensure that it complies with applicable regulatory requirements and policies, ensuring that no adverse cumulative effects would occur.

Cumulative Light or Glare Effects

With respect to potential cumulative light and glare impacts, all development, including the Project and the cumulative development projects within the City, is required to comply with the MMC Sections 17.32.080 and 17.32.090, which set standards for lighting and glare. Compliance with the applicable provisions of the MMC would ensure that light and glare resulting from the Project and the cumulative development projects would be less than significant. Accordingly, cumulative impacts associated with light or glare would be less than significant.

4.1.6 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The Project would not adversely affect views of the San Gabriel Mountains as viewed from South Myrtle Avenue, West Olive Avenue, or other public reviewing areas. Impacts to scenic vistas would be less than significant.

Threshold b.: No Impact. The Project site is not located within the viewshed of a scenic highway and the Project has no potential to adversely affect scenic resources visible from a State scenic highway; therefore, no impact would occur.

Threshold c.: No Impact. The Project site is located in an urbanized area and would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, no impacts would occur.

Threshold d.: Less-than-Significant Impact. The Project is required to comply with MMC Sections 17.32.080 and 17.32.090, which set standards for lighting and glare. Compliance with the applicable provisions of the MMC would ensure that light and glare resulting from the Project would be less than significant.

4.1.7 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.1.8 Design Features (DF) and Regulatory Requirements (RR)

The City of Monrovia requires compliance with the following:

AES DF-1: The 701 S. Myrtle Specific Plan contains development standards and design guidelines to address the Project's site design, architectural character, and landscaping. Compliance with the Specific Plan is mandatory and will be ensured through the building permit and construction inspection process.

AES RR-1: MMC Section 17.32.080 requires that lighting, where provided to illuminate private property, must be arranged to reflect away from adjoining property or any public way and to be arranged so as not to cause a nuisance either to highway traffic or to the living environment.

AES RR-2: MMC Section 17.32.090 relates to glare and prohibits direct or reflected glare that is visible from the property boundary line. MMC Section 17.32.090 further requires that sky-reflected glare shall not inconvenience or annoy persons or interfere with the use and enjoyment of property in and about the area where it occurs.

4.2 AIR QUALITY

The analysis in this subsection is based primarily on a technical study that was prepared by Urban Crossroads, Inc. to evaluate the potential for Project-related construction and operational activities to result in adverse effects on local and regional air quality. The report is titled "701 S. Myrtle Air Quality Impact Analysis, City of Monrovia" (herein "AQIA"), is dated April 16, 2025, and is included as *Technical Appendix C* to this EIR (UXR, 2025a). Refer to Section 7.0, *References*, for a complete list of reference sources used in this Subsection.

4.2.1 EXISTING CONDITIONS

A. Atmospheric Setting

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of South Coast Air Quality Management District (SCAQMD). The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and state air quality standards. The SCAB encompasses approximately 6,745 square miles and includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego Air Basin to the south (UXR, 2025a, p. 9).

B. Regional Climate

The regional climate – temperature, wind, humidity, precipitation, and the amount of sunshine – has a substantial influence on air quality. The SCAB's distinctive climate is determined by its terrain and geographical location, which comprises a coastal plain connected to broad valleys and low hills bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. The SCAB is semi-arid, with average annual temperatures varying from the low-to-middle 60s, measured in degrees Fahrenheit (F); however, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of the SCAB's climate. Humidity restricts visibility in the SCAB and the relative high humidity heightens the conversion of sulfur dioxide to sulfates. The marine layer provides an environment for that conversion process, especially during the spring and summer months. Inland areas of the SCAB, including where the Project site is located, show more variability in annual minimum/maximum temperatures and lower average humidity than coastal areas within the SCAB due to decreased marine influence (UXR, 2025a, p. 9).

More than 90 percent of the SCAB's rainfall occurs between November and April. The annual average rainfall within the SCAB varies between approximately nine inches in Riverside to 14 inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SCAB. Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB; the remaining one-quarter is absorbed by clouds. The abundant amount of sunshine (and its associated ultraviolet radiation) is a key factor to the photochemical reactions of air pollutants in the SCAB. On the shortest day of

the year, there are approximately 10 hours of possible sunshine, and on the longest day of the year, there are approximately 14½ hours of possible sunshine (UXR, 2025a, pp. 9-10).

Dominant airflow direction and speed are the driving mechanisms for transport and dispersion of air pollution. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with storms moving through the region from the northwest. This period also brings five to 10 periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. During the nighttime, heavy, cool air descends mountain slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean. Another characteristic wind regime in the SCAB is the "Catalina Eddy," a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island which results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections (UXR, 2025a, p. 11).

In the SCAB, there are two distinct temperature inversion structures that control the vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level (amsl). A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter, when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as nitrogen oxides and carbon monoxide, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline (UXR, 2025a, p. 10).

C. Wind Patterns

The distinctive climate of the SCAB and vicinity of the Project site is determined by its terrain and geographical location. The SCAB is located in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. Wind patterns across the south coastal region are characterized by westerly and southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Winds are characteristically light although the speed is somewhat greater during the dry summer months than during the rainy winter season (UXR, 2025a, pp. 10-11).

D. Air Quality Pollutants and Associated Human Health Effects

The federal government and State of California have established maximum permissible concentrations for common air pollutants that may pose a risk to human health or would otherwise degrade air quality and adversely affect the environment. These regulated air pollutants are referred to as "criteria pollutants." An overview of the common criteria air pollutants in the SCAB, their sources, and associated effects to human health are summarized on the following pages (also refer to Section 2.4 of *Technical Appendix C*).

- **Carbon Monoxide (CO)** is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest in the winter during the morning, when there is little to no wind and surface-based inversions trap the pollutant at ground levels. CO is emitted directly from internal combustion engines; therefore, motor vehicles operating at slow speeds are the primary source of CO and the highest ambient CO concentrations in the SCAB generally are found near congested transportation corridors and intersections. Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen (O_2) supply to the heart. Inhaled CO does not directly affect the lungs but affects tissues by interfering with oxygen transport and competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Therefore, health conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. The most common symptoms associated with CO exposure include headache, nausea, vomiting, dizziness, fatigue, and muscle weakness. Individuals most at risk to the effects of CO include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic oxygen deficiency as seen at high altitudes (UXR, 2025a, Table 2-1).

- **Sulfur Dioxide (SO_2)** is a colorless gas or liquid. SO_2 enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms sulfates (SO_4). Collectively, these pollutants are referred to as sulfur oxides (SO_X). SO_2 is a respiratory irritant to people afflicted with asthma. After a few minutes' exposure to low levels of SO_2, asthma sufferers can experience breathing difficulties, including airway constriction and reduction in breathing capacity. Although healthy individuals do not exhibit similar acute breathing difficulties in response to SO_2 exposure at low levels, animal studies suggest that very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract. Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO_2 levels. In these studies, efforts to separate the effects of SO_2 from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically, or one pollutant alone is the predominant factor (UXR, 2025a, Table 2-1).

- **Nitrogen Oxides (NO_X)** consist of nitric oxide (NO), nitrogen dioxide (NO_2) and nitrous oxide (N_2O) and are formed when nitrogen (N_2) combines with oxygen (O_2). Their lifespan in the atmosphere

ranges from one to seven days for nitric oxide and nitrogen dioxide, to 170 years for nitrous oxide. Nitrogen oxides are typically created during combustion processes, and are major contributors to smog formation and acid deposition. NO_2 is a criteria air pollutant, and may result in numerous adverse health effects; it absorbs blue light, resulting in a brownish-red cast to the atmosphere, and reduced visibility. Of the nitrogen oxide compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO_2 than those indicated by regional monitoring stations. Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO_2 at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Short-term exposure to NO_2 can result in resistance to air flow and airway contraction in healthy subjects. Exposure to NO_2 can result in decreases in lung functions in individuals with asthma or chronic obstructive pulmonary diseases (e.g., chronic bronchitis, emphysema). In animals, exposure to levels of NO_2 is considerably higher than ambient concentrations result in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of O_3 exposure increases when animals are exposed to a combination of O_3 and NO_2 (UXR, 2025a, Table 2-1).

- **Ozone (O_3)** is a highly reactive and unstable gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, warm temperatures, and light wind conditions are favorable to the formation of this pollutant. Short-term exposure (lasting for a few hours) to ozone at levels typically observed in southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated O_3 levels are associated with increased school absences. In recent years, a correlation between elevated ambient O_3 levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple outdoor sports and live in communities with high O_3 levels. Individuals exercising outdoors, children, and people with pre-existing lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for ozone effects. Children who participate in multiple outdoor sports and live in communities with high ozone levels have been found to have an increased risk for asthma. O_3 exposure under exercising conditions is known to increase the severity of the responses described above. Animal studies suggest that exposure to a combination of pollutants that includes O_3 may be more toxic than exposure to O_3 alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes (UXR, 2025a, Table 2-1).

- **Particulate Matter less than 10 microns (PM_{10}) and less than 2.5 microns ($PM_{2.5}$)** are air pollutants consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols that are 10 microns

or smaller or 2.5 microns or smaller, respectively. These particles are formed in the atmosphere from primary gaseous emissions that include sulfates formed from SO_2 release from power plants and industrial facilities and nitrates that are formed from NO_X release from power plants, automobiles, and other types of combustion sources. The chemical composition of fine particles is highly dependent on location, time of year, and weather conditions. The small size of PM_{10} and $PM_{2.5}$ allows them to enter the lungs where they may be deposited, resulting in adverse health effects. Elevated ambient concentrations of fine particulate matter (PM_{10} and $PM_{2.5}$) have been linked to an increase in mortality rates, respiratory infections, number and severity of asthma attacks, and increased hospital admissions. Some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life-span, and an increased mortality from lung cancer. Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show that lung function growth in children is reduced with long-term exposure to particulate matter. The elderly, people with pre-existing respiratory or cardiovascular disease, and children, appear to be the most susceptible to the effects of high levels of PM_{10} and $PM_{2.5}$ (UXR, 2025a, Table 2-1).

- **Volatile Organic Compounds (VOCs) and Reactive Organic Gasses (ROGs)** are a family of hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. Both VOCs and ROGs are precursors to ozone and contribute to the formation of smog through atmospheric photochemical reactions. Individual VOCs and ROGs have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs often have an odor, including such common VOCs as gasoline, alcohol, and the solvents used in paints. Odors generated by VOCs can irritate the eye, nose, and throat, can cause difficulty in breathing and nausea, and can damage the central nervous system as well as other organs. Some VOCs can cause cancer. Not all VOCs have all these health effects, though many have several (UXR, 2025a, Table 2-1).

- **Lead (Pb)** is a heavy metal that is highly persistent in the environment. Historically, the primary source of lead in the air was emissions from vehicles burning leaded gasoline. Currently, emissions of lead largely are limited to stationary sources such as lead smelters and piston-engine aircraft operating on leaded aviation gasoline. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure. Lead poisoning can cause anemia, lethargy, seizures, and death. Pb can be stored in the bone from early age environmental exposure, and elevated blood Pb levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland) and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be

exposed to higher levels of Pb because of previous environmental Pb exposure of their mothers (UXR, 2025a, Table 2-1).

- **Odor(s)** means the perception experienced by a person when one or more chemical substances in the air come into contact with the human olfactory nerves. Odors can come from many sources including animals, human activities, industry, nature, and vehicles. Although not a criteria pollutant, offensive odors can potentially affect human health in several ways. First, odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Second, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system. Finally, unpleasant odors can trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress (UXR, 2025a, Table 2-1).

E. Existing Air Quality

Air quality is evaluated in the context of ambient air quality standards published by the federal and state governments. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect are detailed in Table 4.2-1, *Ambient Air Quality Standards*. In California, a region's air quality is determined to be healthful (in attainment) or unhealthful (nonattainment) by comparing pollutant levels in ambient air samples to the applicable NAAQS and CAAQS (as presented in Table 4.2-1). The air quality in the South Coast Air Basin is considered to meet federal and state air quality standards if the measured ambient air pollutant levels for O_3, CO, SO_2 (1 and 24 hour), NO_2, PM_{10}, $PM_{2.5}$, and the other pollutants listed in Table 4.2-1 do not exceed the identified state or national standards. It should be noted that the three-year period is presented in Table 4.2-3 for informational purposes and is not the basis for how the State assigns attainment status. Attainment status for a pollutant means that the Air Basin meets the standards set by the federal Environmental Protection Agency (EPA) or the California EPA (CalEPA). Conversely, nonattainment means that an area has monitored air quality that does not meet the NAAQS or CAAQS standards. In order to improve air quality in nonattainment areas, the California Air Resources Board (CARB) has implemented a State Implementation Plan (SIP). The SIP outlines the measures that the state will take to improve air quality. Once nonattainment areas meet the standards and additional redesignation requirements, the EPA will designate the area as a maintenance area (UXR, 2025a, p. 18).

Table 4.2-1 Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
O_3	1 hour	0.09 ppm (180 mg/m^3)	—	Same as primary standard[f]
	8 hours	0.070 ppm (137 mg/m^3)	0.070 ppm (137 mg/m^3)[f]	

Table 4.2-1 Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
NO_2[g]	1 hour	0.18 ppm (339 mg/m^3)	0.100 ppm (188 mg/m^3)	Same as primary standard
	Annual arithmetic mean	0.030 ppm (57 mg/m^3)	0.053 ppm (100 mg/m^3)	
CO	1 hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	None
	8 hours	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	
SO_2[h]	1 hour	0.25 ppm (655 mg/m^3)	0.075 ppm (196 mg/m^3)	—
	3 hours	—	—	0.5 ppm (1,300 mg/m^3)
	24 hours	0.04 ppm (105 mg/m^3)	0.14 ppm (for certain areas)[g]	—
	Annual	—	0.030 ppm (for certain areas)[g]	—
PM_{10}[i]	24 hours	50 mg/m^3	150 mg/m^3	Same as primary standard
	Annual arithmetic mean	20 mg/m^3	—	
$PM_{2.5}$[i]	24 hours	—	35 mg/m^3	Same as primary standard
	Annual arithmetic mean	12 mg/m^3	9.0 mg/m^3	15.0 mg/m^3
Lead[j, k]	30-day average	1.5 mg/m^3	—	—
	Calendar quarter	—	1.5 mg/m^3 (for certain areas)[k]	Same as primary standard
	Rolling 3-month average	—	0.15 mg/m^3	
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m^3)	—	—
Vinyl chloride[j]	24 hours	0.01 ppm (26 µg/m^3)	—	—
Sulfates	24- hours	25 µg/m^3	—	—
Visibility reducing particles	8 hour (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to the number of particles when the relative humidity is less than 70%	—	—

Table Notes:

O_3 = ozone; ppm = parts per million by volume; mg/m^3 = micrograms per cubic meter; NO_2 = nitrogen dioxide; CO = carbon monoxide; mg/m^3= milligrams per cubic meter; SO_2 = sulfur dioxide; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns.

[a] California standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, suspended particulate matter (PM_{10}, $PM_{2.5}$), and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[b] National standards (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once per year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than 1. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

[c] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25°Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[e] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[f] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[g] To attain the national 1-hour standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[h] On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the national 1-hour standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

[i] On February 7, 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12.0 mg/m^3 to 9.0 mg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 mg/m^3, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM_{10} standards (primary and secondary) of 150 mg/m^3 were also retained. The form of the annual primary and secondary standards is the annual mean averaged over 3 years.

[j] CARB has identified lead and vinyl chloride as TACs with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[k] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

(UXR, 2025a, Table 2-2)

2. Regional Air Quality

The EPA has established NAAQS for six of the most common air pollutants: CO, Pb, O_3, particulate matter (PM_{10} and $PM_{2.5}$), NO_2, and SO_2 which are known as criteria pollutants. The SCAQMD monitors levels of various criteria pollutants at 35 permanent monitoring stations and 2 single-pollutant source Pb air monitoring sites throughout the air district. On January 25, 2024, CARB adopted the proposed 2023 amendments to the state and national area designations. The attainment status for criteria pollutants within the SCAB is summarized in Table 4.2-2, *SCAB Criteria Pollutant Attainment Status* (UXR, 2025a, p. 21).

Table 4.2-2 SCAB Criteria Pollutant Attainment Status

Criteria Pollutant	State Designation	Federal Designation
O_3 – 1-hour standard	Nonattainment	--
O_3 – 8-hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO_2	Attainment	Unclassifiable/Attainment
SO_2	Attainment	Unclassifiable/Attainment
Pb[1]	Attainment	Unclassifiable/Attainment

Note: See Appendix 2.1 of *Technical Appendix C* for a detailed map of State and National Area Designations within the SCAB.
[1] The federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.
"-" = No standards identified.
(UXR, 2025a, Table 2-3)

3. Local Air Quality

The SCAQMD has designated general forecast areas and air monitoring areas (referred to as Source Receptor Areas (SRA)) throughout the air district to provide information regarding air quality conditions to Southern California residents. The Project site is located within SRA 9. The East San Gabriel Valley 1 monitoring station within SRA 9 is located approximately 4.45 miles east of the Project site and reports air quality statistics for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$. Prior to releasing the NOP for this EIR in December 2023, the most recent three years of published data available (2020-2022) for ambient air pollutant concentrations in the vicinity of the Project site are summarized in Table 4.2-3, *Air Quality Monitoring Summary 2020-2022*, which also identifies the number of days ambient air quality standards were exceeded for the study area and is considered to be representative of the local air quality at the Project site.

Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ for 2020 through 2022 was obtained from the SCAQMD Air Quality Data Tables. Data for SO_2 has been omitted because federal and state air quality standards for SO_2 are regularly met in the SCAB and few monitoring stations measure SO_2 concentrations (UXR, 2025a, p. 21).

Table 4.2-3 Air Quality Monitoring Summary 2020-2022 in Project Site Vicinity

Pollutant	Standard	Year		
		2020	2021	2022
O_3				
Maximum Federal 1-Hour Concentration (ppm)		0.168	0.108	0.111
Maximum Federal 8-Hour Concentration (ppm)		0.125	0.086	0.080
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	53	20	6
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	61	22	11
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	2.4	1.5	1.3
Maximum Federal 8-Hour Concentration	> 20 ppm	2.0	1.4	0.9
NO_2				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.065	0.078	0.048
Annual Federal Standard Design Value		0.014	0.015	0.013
PM_{10}				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	> 150 $\mu g/m^3$	95	79	98
Annual Federal Arithmetic Mean ($\mu g/m^3$)		37.7	32.8	37.9
Number of Days Exceeding Federal 24-Hour Standard	> 150 $\mu g/m^3$	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 $\mu g/m^3$	8	11	7
$PM_{2.5}$				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	> 35 $\mu g/m^3$	33.0	61.9	18.4
Annual Federal Arithmetic Mean ($\mu g/m^3$)	> 12 $\mu g/m^3$	11.13	11.43	9.98
Number of Days Exceeding Federal 24-Hour Standard	> 35 $\mu g/m^3$	0	3	0

ppm = Parts Per Million
$\mu g/m^3$ = Microgram per Cubic Meter
Source: Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ was obtained from SCAQMD Air Quality Data Tables.
(UXR, 2025a, Table 2-4)

4. Estimated Emissions from On-Site Uses

Under existing conditions, the Project site is occupied by approximately 25,191-s.f. of building space used by commercial/industrial office businesses within the Myrtle and Olive Business Park. Existing operations on the Project site generate air quality pollutants under existing conditions. Estimated air pollutant operational emissions from the existing uses were calculated using CalEEMod defaults assuming a 25,191-s.f. general office building, and are presented in Table 4.2-4, *Air Pollutant Emissions from Existing Development on the Project Site*.

Table 4.2-4 Air Pollutant Emissions from Existing Development on the Project Site

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	1.48	2.81	15.84	0.05	3.48	0.92
Area Source	0.75	0.01	1.10	0.00	0.00	0.00
Energy Source	0.01	0.13	0.11	0.00	0.01	0.01
Total Maximum Daily Emissions	**2.24**	**2.95**	**17.05**	**0.05**	**3.50**	**0.93**
Winter						
Mobile Source	1.47	3.00	14.41	0.04	3.48	0.92
Area Source	0.57	0.00	0.00	0.00	0.00	0.00
Energy Source	0.01	0.13	0.11	0.00	0.01	0.01
Total Maximum Daily Emissions	**2.05**	**3.13**	**14.52**	**0.05**	**3.49**	**0.93**

CalEEMod operational-source emissions are presented in Appendix 3.2 to the Project's AQIA (*Technical Appendix C*). (UXR, 2025a, Table 3-6)

F. Sensitive Receptors

Representative sensitive receptor locations in the Project site's vicinity are described below and shown on Figure 4.2-1, *Sensitive Receptor Locations*. A sensitive receptor is defined as a fixed location such as a home, school, or park where an individual spends time breathing air near the Project site. For purposes of analyzing the Project's potential impacts to sensitive receptors later in this Subsection, localized air quality impacts were evaluated at sensitive receptor land uses nearest the Project site. All distances are measured from the Project site boundary to the outdoor living areas (e.g., backyards or balconies of homes) or at the building façade, whichever is closer to the Project site (UXR, 2025a, p. 36).

- R1: Location R1 represents the existing residence at 120 W. Walnut Avenue, approximately 235 feet south of the Project site. Since there are no private outdoor living areas (backyards or projecting balconies) facing the Project site, receptor R1 is placed at the building façade.
- R2: Location R2 represents the existing residences at 700 S. Myrtle Avenue, approximately 80 feet east of the Project site. Since there are no private outdoor living areas facing the Project site, receptor R2 is placed at the building façade.
- R3: Location R3 represents the existing residential community at 125 W. Olive Avenue approximately 85 feet north of the Project site. Since there are no private outdoor living areas facing the Project site, receptor R3 is placed at the building façade.
- R4: Location R4 represents the existing residence at 201 W. Olive Avenue, approximately 260 feet northwest of the Project site. Since there are no private outdoor living areas facing the Project site, receptor R4 is placed at the building façade.

- R5: Location R5 represents the existing residence at 703 S. Primrose Avenue, approximately 246 feet west of the Project site. Since there are no private outdoor living areas facing the Project site, receptor R5 is placed at the building façade.
- R6: Location R6 represents the existing residence at 203 W. Walnut Avenue, approximately 231 feet west of the Project site. Since there are no private outdoor living areas facing the Project site, receptor R6 is placed at the building façade.
- R7: Location R7 represents the existing commercial building at 139 W. Walnut Avenue, approximately 22 feet south of the Project site. Since there are no private outdoor congregation areas facing the Project site, receptor R7 is placed at the building façade.

4.2.2 Regulatory Setting

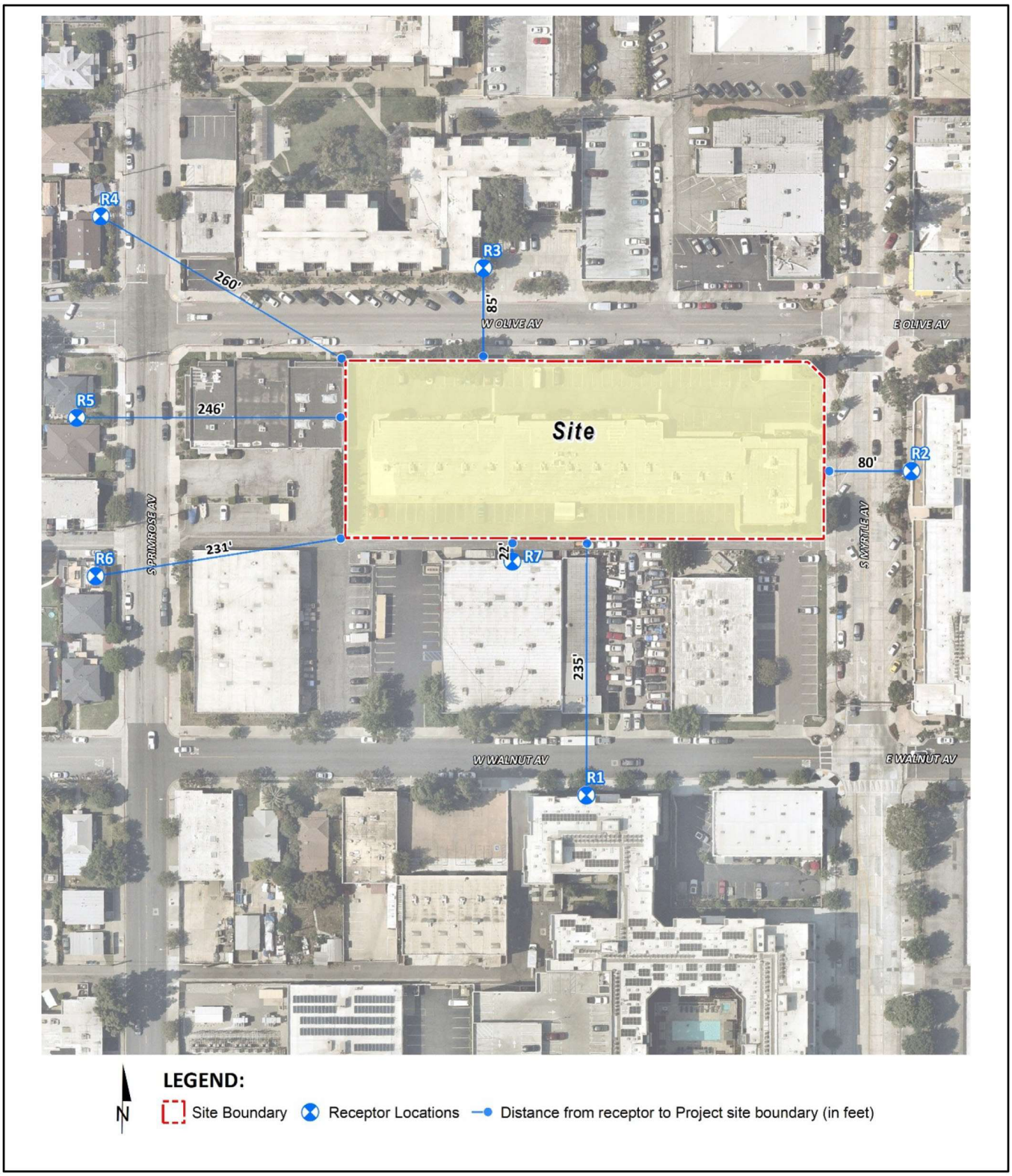
The following is a brief description of the federal, State of California, and local environmental laws and related regulations governing air quality emissions.

A. Federal Plans, Policies, and Regulations

1. Federal Clean Air Act

The Clean Air Act (CAA; 42 U.S.C. Section 7401 *et seq.*) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare and to regulate emissions of hazardous air pollutants, which include O_3, CO, NO_X, SO_2, PM_{10}, $PM_{2.5}$, and lead. One of the goals of the CAA was to set and achieve NAAQS in every state by 1975 in order to address the public health and welfare risks posed by certain widespread air pollutants. The setting of these pollutant standards was coupled with directing the states to develop state implementation plans (SIPs), applicable to appropriate industrial sources in the state, in order to achieve these standards. The CAA was amended in 1977 and 1990 primarily to set new goals (dates) for achieving attainment of NAAQS since many areas of the country had failed to meet the deadlines (EPA, 2023a).

The sections of the federal CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions address the urban air pollution problems of ozone (smog), carbon monoxide (CO), and particulate matter (PM_{10}). Specifically, it clarifies how areas are designated and re-designated "attainment." It also allows EPA to define the boundaries of "nonattainment" areas: geographical areas where air quality does not meet federal air quality standards designed to protect public health.



Source(s): Urban Crossroads (06-16-2025)

Figure 4.2-1

Not to Scale

Sensitive Receptor Locations

Mobile source emissions are regulated in accordance with the CAA Title II provisions. These standards are intended to reduce tailpipe emissions of hydrocarbons, CO, and NO_X on a phased-in basis that began in model year 1994. Automobile manufacturers also are required to reduce vehicle emissions resulting from evaporation of gasoline during refueling. These provisions further require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas (EPA, 2023c).

B. State Plans, Policies, and Regulations

1. California Clean Air Act

The California Clean Air Act (CCAA) establishes numerous requirements for air district plans to attain state ambient air quality standards for criteria air contaminants. The CCAA mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the State's ambient air quality standards, the California Ambient Air Quality Standards (CAAQS), by the earliest practical date. The CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, established standards for sulfates, visibility, hydrogen sulfide, and vinyl chloride. Generally, the CAAQS are more stringent than the NAAQS. For air districts with serious air pollution, their attainment plan should include the following: no net increase in emissions from new and modified stationary sources; and best available retrofit technology for existing sources (SCAQMD, n.d.).

2. Air Toxic "Hot Spots" Information and Assessment Act

The Air Toxic "Hot Spots" Information and Assessment Act of 1987, commonly known as AB 2588, (Health & Safety Code Section 44300, et seq.) requires facilities emitting specified quantities of pollutants to conduct risk assessments describing the health impacts to neighboring communities created by their emissions of numerous specified hazardous compounds. If the air district determines the health impact to be significant, neighbors must be notified. In addition, state law requires the facility to develop and implement a plan to reduce the health impacts to below significance, generally within five years. Additional control requirements for hazardous emissions from specific industries are established by the state and enforced by the air districts (SCAQMD, n.d.).

3. Air Quality Management Planning

The CARB and local air districts throughout California are responsible for developing clean air plans to demonstrate how and when California will attain air quality standards established under both the CAA and CCAA. For the areas within California that have not attained air quality standards, CARB works with local air districts to develop and implement State and local attainment plans. In general, attainment plans contain a discussion of ambient air quality data and trends; a baseline emissions inventory; future year projections of emissions, which account for growth projections and already adopted control measures; a comprehensive control strategy of additional measures needed to reach attainment; an attainment demonstration, which generally involves complex modeling; and contingency measures. Plans may also include interim milestones for progress toward attainment. Air quality planning activities undertaken by CARB also include the development of policies, guidance, and regulations related to State and federal ambient air quality standards;

coordination with local agencies on transportation plans and strategies; and providing assistance to local districts and transportation agencies (CARB, n.d.).

4. Title 24 Energy Efficiency Standards and California Green Building Standards

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in California. Although not originally intended to reduce air pollutant emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer air pollutant emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy-efficiency technologies and methods. The 2022 version of Title 24 was adopted by the CEC and became effective on January 1, 2023.

Part 11 of Title 24 is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code.

5. California Air Resources Board Rules

The CARB enforces rules related to air pollutant emissions in the State of California. Rules with applicability to the Project include, but are not limited to, those listed below.

- CARB Rule 2480 (13 CCR 2480): Airborne Toxics Control Measure to Limit School Bus Idling and Idling at Schools, which limits nonessential idling for commercial trucks and school buses within 100 feet of a school.

- CARB Rule 2485 (13 CCR 2485): Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling, which limits nonessential idling to five minutes or less for commercial trucks.

- CARB Rule 2449 (13 CCR 2449): In-Use Off-Road Diesel Idling Restricts, which limits nonessential idling to five minutes or less for diesel-powered off-road equipment.

6. Truck & Bus Regulation

Under the Truck and Bus Regulation, adopted by CARB in 2008, all diesel truck fleets operating in California are required to adhere to an aggressive schedule for upgrading and replacing heavy-duty truck engines. Older, more polluting trucks were required to be replaced first, while trucks that already have relatively clean engines are required to be replaced later. Pursuant to the Truck and Bus Regulation, all pre-1994 heavy trucks (trucks with a gross vehicle weight rating greater than 26,000 pounds) were to be removed from service on California roads by 2015. Between 2015 and 2020, pre-2000 heavy trucks were required to be equipped with PM filters and upgraded or replaced with an engine that meets 2010 emissions standards. The upgrades/replacements were required to occur on a rolling basis based on model year. By 2023, all heavy trucks operating on California roads were required to have engines that meet 2010 emissions standards (CARB, n.d.).

7. Designated Disadvantaged Communities

Disadvantaged communities in California are specifically targeted for investment of proceeds from the state's Cap-and-Trade Program. These investments are aimed at improving public health, quality of life and economic opportunity in California's most burdened communities, and at the same time, reducing pollution that causes climate change. The investments were authorized by the California Global Warming Solutions Act of 2006 (Assembly Bill 32, Nunez, 2006). In 2012, Senate Bill 535 (De León, Chapter 830, Statutes of 2012) established initial requirements for minimum funding levels to disadvantaged communities. In May 2022, the California Environmental Protection Agency (CalEPA) released an updated designation of disadvantaged communities and based its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, Section 39711, Subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen) (OEHHA, 2023).

The Project site's Census Tract 6037431100 is designated as a disadvantaged community. It is ranked by the State as being in the 98th percentile for pollution burden which, based on the Census Tract's demographic characteristics, results in the Office of Environmental Health Hazard Assessment (OEHHA) ranking the area in the 75th percentile of communities that are disproportionately burdened by multiple sources of pollution. OEHHA's CalEnviroScreen 4.0 is a screening methodology that the State uses to identify California communities that are disproportionately burdened by multiple sources of pollution. For the Project site's Census Tract, the highest environmental exposures from air pollutants are from ozone (O_3) and diesel PM. The highest environmental effects in the Project site's Census Tract are cleanup sites, groundwater threats, hazardous waste, and solid waste (OEHHA, 2023; CalEPA, 2022).

8. Community Air Protection Program

In response to Assembly Bill 617 (AB 617) (C. Garcia, Chapter 136, Statutes of 2017), CARB established the Community Air Protection Program (CAPP or Program). The Program's focus is to reduce exposure in

communities most impacted by air pollution. Communities across California are working together to develop and implement new strategies to measure air pollution and reduce health impacts. This first-of-its-kind statewide effort includes community air monitoring and community emissions reduction programs. In addition, the Legislature appropriated funding to support early actions to address localized air pollution through targeted incentive funding to deploy cleaner technologies in these communities, as well as grants to support community participation in the AB 617 process. AB 617 also includes new requirements for accelerated retrofit of pollution controls on industrial sources, increased penalty fees, and greater transparency and availability of air quality and emissions data, which will help advance air pollution control efforts throughout the State. This new effort provides an opportunity to continue to enhance air quality planning efforts and better integrate community, regional, and State level programs to provide clean air (CARB, n.d.).

C. Local Plans, Policies, and Regulations

1. SCAQMD Air Quality Management Plan

Under existing conditions, the NAAQS and CAAQS are exceeded in most parts of the SCAB. In response, and in conformance with California Health & Safety Code Section 40702 et seq. and the California CAA, the SCAQMD adopted an Air Quality Management Plan (AQMP) to plan for the improvement of regional air quality. AQMPs are updated regularly in order to more effectively reduce emissions and accommodate growth. Each version of the plan is an update of the previous plan and has a 20-year horizon with a revised baseline. The SCAQMD's most recent iteration of the AQMP was adopted in December 2022 (the 2022 Air Quality Management Plan (AQMP)), which incorporates the latest scientific and technological information and local and regional land development plans, including the Southern California Association of Governments (SCAG) *Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*. The 2022 AQMP is based on current emissions modeling data, recent motor vehicle emissions information, and demographic data/projections provided by SCAG. The air quality pollutant levels projected in the 2022 AQMP assume that buildout of the region will occur in accordance with local general plans and specific plans, and in accordance with growth projections identified by SCAG in its RTP/SCS. (SCAQMD, 2022)

2. Applicable SCAQMD Rules

The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emission sources, and enforces such measures through educational programs, or fines when necessary. Rules that are applicable to construction and operation of the Project include, but are not limited to: Rule 402 (Nuisance); Rule 403 (Fugitive Dust); Rule 1113 (Architectural Coatings); Rule 1301 (General); and Rule 1401 (New Source Review of Toxic Air Contaminants). Rule 402 prohibits the discharge of air contaminants that cause nuisance or annoyance to any considerable number of persons or to the public (SCAQMD, 1976). Rule 403 requires the implementation of best available dust control measures (BACMs) during activities capable of generating fugitive dust (SCAQMD, 2005). Rule 1113 requires all buildings within the SCAQMD to adhere to the VOC limits for architectural coatings (SCAQMD, 2016).

- Rule 402 – Nuisance: This rule restricts the discharge of any contaminant in quantities that cause or have a natural ability to cause injury, damage, nuisance, or annoyance to businesses, property, or the public.

- Rule 403 – Fugitive Dust: This rule requires the prevention, reduction, or mitigation of fugitive dust emissions from a project site. Rule 403 restricts visible fugitive dust to a project property line, restricts the net PM_{10} emissions to less than 50 micrograms per cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, Rule 403 requires an Applicant to utilize one or more of the best available control measures (identified in the tables within the rule). Control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities during high winds.

- Rule 1113 – Architectural Coatings: This rule regulates the VOC content in architectural coatings (like paints, primers, sealers, and stains) sold or used in the SCAB, which lowers the emissions of odorous compounds. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use in the SCAB must comply with the current VOC standards.

- Rule 1301 – General: This rule sets forth pre-construction review requirements for new or relocated air pollutant source that emit nonattainment air contaminants, increases of ammonia, and ozone depleting compounds, to ensure that new or relocated facilities do not interfere with progress in attainment of the NAAQS. It applies to any business or facility in the SCAQMD region that plans to build a new piece of equipment that emits air pollutants, modify existing equipment, or move equipment from another location.

- Rule 1401 – New Source Review of Toxic Air Contaminants: This rule controls how much toxic air contaminants (TACs) a new or modified business or facility can release into the air and makes sure that new or modified sources of toxic air pollution do not create unacceptable health risks for nearby residents or workers. It does this by requiring risk assessments and enforcing strict limits on toxic emissions. It states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart (SCAQMD, 2017b).

3. City of Monrovia General Plan

The City of Monrovia's General Plan includes the following policies and associated programs related to air quality as part of its Environmental Justice Element:

- Policy 4.2: Improve air quality conditions and minimize air quality impacts on sensitive population groups, by reducing point source emissions (ozone, small particulate matter, diesel particulates), particularly in the environmental justice community.

- Program 4.2.1: Collaborate with industrial businesses to improve outdoor air quality through enhanced operations and other pollution reduction measures where possible.
- Program 4.2.2: Encourage smoke-free workplaces, multi-family housing, parks, and other outdoor gathering places to reduce exposure to second-hand smoke and coordinate with local advocacy groups to identify more potential smoke-free areas.
- Program 4.2.3: Continue to support the efforts of the South Coast Air Quality Management District (SCAQMD) to identify, monitor, and reduce air pollutants.
- Program 4.2.4: Require new sensitive land uses to include feasible measures such as setbacks, landscaping, ventilation systems, and other effective measures to minimize potential impacts from air pollution.
- Program 4.2.5: Maintain designated truck routes to avoid residential areas and other sensitive areas, especially in the environmental justice community.
- Program 4.2.6: Preserve and enhance natural landscapes and tree canopies in and around the environmental justice community to minimize air pollution impacts and heat exposure. Promote the use of drought tolerant and native species in landscaped areas.
- Program 4.2.7: Support programs promoting the installation of electric vehicle charging stations within public parking lots and continue to explore removing barriers for private entity installations.

- Policy 4.3: Protect sensitive land uses (e.g., schools, housing, health facilities, childcare facilities, senior centers, parks, etc.) from increased pollution exposure, particularly in the environmental justice community.
  - Program 4.3.1: Limit the siting and construction of new large-scale hazardous waste producers and facilities on or near sensitive land uses in and around the environmental justice community.
  - Program 4.3.2: Continue to ensure compatibility between sensitive land uses and heavy industrial uses and other potentially harmful facilities.

In addition, the City's *2021-2029 Housing Element Update, Safety Element Update, New Environmental Justice Element, and Zoning Text Amendment State Clearinghouse # 2022080729 Final Initial Study and Mitigated Negative Declaration* included the following mitigation measures related to air quality: (City of Monrovia, 2022a)

- *Mitigation Measure AIR-A*: If project-level analysis demonstrates that NOx emissions would be significant, the project shall provide a plan, for approval by the City, demonstrating that the heavy duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will utilize all feasible measures to reduce the emissions to a less than significant level. Acceptable options for reducing emissions may include use of late model low

emission diesel engines, alternative fuels, engine retrofit technology, and/or other options as they become available. The SCAQMD web site provides specific information on mitigation options for off-road and on-road construction equipment. The Project would not generate significant NOx emissions (UXR, 2025a, pp. 31-34).

- *Mitigation Measure AIR-B*: The following measure shall be incorporated into all project specifications to reduce diesel engine emissions of O_3 precursors including ROG and NO_X, PM_{10}, $PM_{2.5}$, and diesel PM. This measure would apply to the Project's construction activities.

  Idling Restrictions. Idling of diesel-powered vehicles and equipment shall not be permitted during periods of nonactive vehicle use. Diesel-powered engines shall not be allowed to idle for more than 5 consecutive minutes in a 60-minute period when the equipment is not in use, occupied by an operator, or otherwise in motion, except as follows:

  - When equipment is forced to remain motionless because of traffic conditions or mechanical difficulties over which the operator has no control;
  - When it is necessary to operate auxiliary systems installed on the equipment, only when such system operation is necessary to accomplish the intended use of the equipment;
  - To bring the equipment to the manufacturer's recommended operating temperature;
  - When the ambient temperature is below 40 degrees F or above 85 degrees F; or
  - When equipment is being repaired.

- *Mitigation Measure AIR–C*: The City shall require that all new residential fireplaces be fueled by natural gas. Wood stoves and wood burning fireplaces shall be prohibited. The Project does not propose natural gas use; the Project would be exclusively powered by electricity.

- *Mitigation Measure AIR-D*: The City shall require applicants to complete a Health Risk Assessment (HRA) to determine the cancer risk to sensitive receptors for all residential projects located within 500 feet of Interstate 210 (I-210). As discussed in Section 3.0, *Project Description*, the Project site is not located within 500 feet of I-210.

- *Mitigation Measures AIR-E*: The City shall require applicants to assess the potential impacts to children's respiratory health for all residential projects located within 500 feet of I-210. As discussed in Section 3.0, *Project Description*, the Project site is not located within 500 feet of I-210.

4.2.3 Basis for Determining Significance

According to Section III of Appendix G to the CEQA Guidelines, the Project would result in a significant impact to air quality if the Project would:

a) Conflict with or obstruct implementation of the applicable air quality plan;

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;

c) Expose sensitive receptors to substantial pollutant concentrations; or

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The Project would result in a significant impact under Threshold (a) if the Project were determined to conflict with the SCAQMD 2022 AQMP. Pursuant to Chapter 12, Sections 12.2 and 12.3, of the SCAQMD CEQA Air Quality Handbook, a project would conflict with the *AQMP* if either of the following conditions were to occur as a result of the Project (UXR, 2025a, pp. 43-46):

- The Project would increase the frequency or severity of existing NAAQS and/or CAAQS violations, cause or contribute to new air quality violations, or delay the attainment of interim air quality standards; or
- The Project would exceed the *2022 AQMP's* future year buildout assumptions.

For evaluation under Threshold (b), the analysis relies on SCAQMD significance thresholds which are summarized in Table 4.2-5, *Air Quality Thresholds,* and are outlined in the SCAQMD's publication "CEQA Air Quality Significance Thresholds" dated March 2023.[1] These thresholds indicate that any project within the SCAB with daily emissions exceeding any of the specified mass daily threshold limits should be considered to have a significant air quality impact, both individually and cumulatively.

Table 4.2-5 Air Quality Thresholds of Significance

Mass Daily Thresholds		
Pollutant	**Construction**	**Operation**
NO_X	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Pb	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs) and Odor		
TACs	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	

[1]https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25

Table 4.2-5 Air Quality Thresholds of Significance

(including carcinogens and non-carcinogens	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402
Ambient Air Quality Standards for Criteria Pollutants	
NO2 1-hour average annual arithmetic mean	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)
PM_{10} 24-hour average annual average	0.4 µg/m3 (construction) & 2.5 µg/m3 (operation) 1.0 µg/m3
$PM_{2.5}$ 24-hour average	10.4 µg/m3 (construction) & 2.5 µg/m3 (operation)
SO2 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99th percentile) 0.04 ppm (state)
Sulfate 24-hour average	25 µg/m3 (state)
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)
Lead 30-day Average Rolling 3-month average	1.5 µg/m3 (state) 0.15 µg/m3 (federal)

(UXR, 2025a Table 3-1)

For evaluation under Threshold (c), the Project would result in a significant impact if the Project were to result in localized criteria pollutant emissions exceeding the SCAQMD "Localized Significance Thresholds (LSTs)," cause or contribute to a CO "Hot Spot," or if the Project would result in Toxic Air Contaminant (TAC) impacts to nearby sensitive receptors during construction or long-term operation causing the maximum incremental cancer risk to be ≥ 10 in 1 million, cancer burden to be > 0.5 excess cancer cases (in areas ≥ 1 in 1 million), or chronic and acute hazard index ≥ 1.0 (project increment) as summarized in Table 4.2-5, *Air Quality Thresholds*.

As discussed in detail in Subsection 3.6 of the Project's AQIA, the determination as to whether the Project would exceed the SCAQMD LSTs is based on SCAQMD's publication entitled, *Final Localized Significance Threshold Methodology* (herein, "LST Methodology"). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). The LST Methodology presents mass emission rates for each SRA, project sizes of 1, 2, and 5 acres, and nearest receptor distances of 25, 50, 100, 200, and 500

meters. For project sizes between the values given, or with receptors at distances between the given receptors, the methodology uses linear interpolation to determine the thresholds.
For the Project, the appropriate SRA for the LST analysis is the SCAQMD East San Gabriel Valley 1 (SRA 9). In addition, the nearest sensitive receptor consists of existing residential uses located approximately 22 feet south of the Project site; however, it should be noted that the LST Methodology explicitly states that "[i]t is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." Additionally, Table 3-8 of the Project's AQIA shows that the Project is anticipated to result in daily disturbances of 0.625-acre during demolition, 0.5-acre during site preparation, and 1.5 acres during site grading. Because the total acreage disturbed is less than five acres per day for demolition, site preparation, and grading activities, the SCAQMD's screening look-up tables were utilized to determine impacts for each of the Project's construction phases. Since the look-up tables identify thresholds at only 1 acre, 2 acres, and 5 acres, linear regression has been utilized to determine localized significance thresholds. Consistent with SCAQMD guidance, the thresholds presented in Table 4.2-6, *Maximum Daily Localized Construction Emissions Screening Thresholds*, were calculated by interpolating the threshold values for the Project's disturbed acreage.

Table 4.2-6 Maximum Daily Localized Construction Emissions Screening Thresholds

Construction Activity	Construction Localized Screening Thresholds			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition	74 lbs/day	499 lbs/day	4 lbs/day	2 lbs/day
Site Preparation	70 lbs/day	458 lbs/day	4 lbs/day	2 lbs/day
Grading	109 lbs/day	788 lbs/day	6 lbs/day	4 lbs/day

(UXR, 2025a, Table 3-9)

Threshold (d) evaluates the impacts described in Section III.d of Appendix G of the CEQA Guidelines. SCAQMD Rule 402 ("Nuisance") and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section 41700 prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public, including odors. The potential to violate Rule 402 or Section 41700 is used herein as a threshold against which to consider the Project's potential odors or other emissions to be significant and require feasible mitigation measures.

4.2.4 Methodology for Evaluating Project-Related Air Quality Impacts

A. Air Quality Modeling

1. California Emissions Estimator Model (CalEEMod)

Land uses such as the Project affect air quality through construction-source and operational-source emissions. In August 2023 California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released the latest version of CalEEMod version 2022.1.1.22. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and GHG emissions from direct and indirect sources; and to quantify

applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activities are provided in Appendices 3.1 and 3.2 of the Project's AQIA (*Technical Appendix C*) (UXR, 2025a, p. 27).

B. Methodology for Calculating Project Criteria Pollutant Emissions

1. Methodology for Construction Activities

Construction activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction-related emissions are expected from the following construction activities: 1) demolition; 2) site preparation; 3) grading; 4) building construction; 5) paving; and 6) architectural coating (UXR, 2025a, p. 28).

- Demolition Activities: The Project site currently is developed with 25,191 s.f. of existing uses/structures. Based on information provided by the Project Applicant, demolition of these structures would generate approximately 1,950 tons of demolition waste that would be hauled off-site. For the purpose of this analysis, 1,950 tons of demolition quantities were modeled in CalEEMod and assumed to be hauled off-site. The CalEEMod default trip length of 20-miles was used to analyze the emissions associated with hauling of demolition debris (UXR, 2025a, p. 28).

- Grading Activities: Dust typically is a major concern during grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. Per the Project Applicant's grading contractor, the Project would require 54,000 cubic yards of export for earthwork activities (UXR, 2025a, pp. 28-29).

- On-Road Trips: Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul trucks commuting to and from the site. Typically, construction-related impacts are temporary and are evaluated and mitigated separately from the operational impacts of a project. The number of worker, vendor, and hauling trips assumed in the analysis are presented below in Table 4.2-7, *Construction Trip Assumptions*. Worker trips for demolition, site preparation, grading, and building construction are based on Applicant provided data and paving and architectural coating information is based on CalEEMod defaults. It should be noted that for vendor trips specifically, CalEEMod only assigns vendor trips to the Building Construction phase; however, vendor trips would likely occur during all phases of construction. As such, the CalEEMod defaults for vendor trips have been adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity. Hauling trips are based on CalEEMod defaults (UXR, 2025a, p. 29).

Table 4.2-7 Construction Trip Assumptions

Construction Activity	Worker Trips Per Day	Vendor Trips Per Day	Hauling Trips Per Day[1]
Demolition	40	3	14
Site Preparation	40	6	0
Grading	40	4	57
Building Construction	400	11	0
Paving	5	15	0
Architectural Coating	40	4	0

[1] The number of worker, vendor, and hauling trips are rounded in the table above to whole numbers. (UXR, 2025a, Table 3-2)

- Construction Duration and Equipment: Refer to EIR subsection 3.7.2 and EIR Table 3-2 for a description of the duration of anticipated construction activities. Refer to EIR subsection 3.7.2 and EIR Table 3-3 for a description of the duration of anticipated construction equipment.

2. Methodology for Operational Activities

Operational air pollutant emissions are primarily expected from area source emissions and mobile source emissions, both of which are discussed below. (UXR, 2025a, pp. 31-34).

- Area Source Emissions – Architectural Coatings: Over a period of time, the Project site and the Project's proposed building would require maintenance and would therefore produce emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings. The emissions associated with architectural coatings were calculated using CalEEMod.

- Area Source Emissions – Consumer Products: Consumer products include, but are not limited to, detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on defaults provided within CalEEMod.

- Area Source Emissions – Landscape Maintenance Equipment: Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that on October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by January 1, 2024, which is now in effect. Regardless, for purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod (i.e., that the landscape equipment would be gas powered).

- Energy Source Emissions: Criteria pollutant emissions are emitted through electricity generation and consumption of natural gas. However, because electrical generating facilities that would service the Project are located either outside of California or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity are excluded from the evaluation of significance. Electricity associated with the Project was calculated by CalEEMod using default parameters. Based on information provided by the Project Applicant, the Project site is not expected to utilize natural gas for the building envelope, and therefore, the Project would not generate any emissions from direct energy consumption.

- Mobile Source Emissions: Project-related operational air quality emissions derive primarily from vehicle trips generated by the Project, including employee and resident trips to and from the site and vendor truck trips. Trip characteristics available from the Project's Traffic Study (EIR *Technical Appendix J1*) were utilized in the analysis. Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of brake and tire wear particulates. The emissions estimate for travel on paved roads was calculated using CalEEMod.

3. Methodology for Calculating Localized Significance

The analysis in the Project's AQIA (*Technical Appendix C*) makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or State ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as Localized Significance Thresholds (LSTs) (UXR, 2025a, p. 33).

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses (UXR, 2025a, p. 33).

The appropriate SRA for the Project's LST analysis is the SCAQMD East San Gabriel Valley 1 (SRA 9). LSTs apply to CO, NO_2, PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects less than or equal to 5 acres in size. Refer to the AQIA for additional detail about the look-up tables, which are based on the maximum site acreage that is assumed actively disturbed based on a project's construction equipment fleet and the construction equipment operating hours as estimated in CalEEMod. As shown on Table 3-8 of the Project's AQIA (EIR *Technical Appendix C*), the Project's construction activities could actively disturb approximately 0.625 acre per day during demolition, 0.5 acre per day during site preparation, and 1.5 acres per day during grading activities (nearly the entire approximately 1.62-acre site). The *LST Methodology* states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." As such, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered (UXR, 2025a, p. 34).

4. Methodology for Identifying Sensitive Receptors

As previously stated, LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable NAAQS and CAAQS at the nearest residence or sensitive receptor. Receptor locations are off-site locations where individuals may be exposed to air pollutant emissions from Project activities (UXR, 2025a, p. 35).

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as "sensitive receptors." These structures typically include uses such as residences, hotels, and hospitals where an individual can remain for 24 hours. Consistent with the LST Methodology, the nearest land use where an individual could remain for 24 hours to the Project site has been used to determine construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time (UXR, 2025a, p. 35).

LSTs apply, even for non-sensitive land uses, consistent with *LST Methodology* and SCAQMD guidance. Per the *LST Methodology*, commercial and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24 hours but are typically onsite for 8 hours or less. However, *LST Methodology* explicitly states that "*LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours."* Therefore, any adjacent land use where an individual could remain for 1 or 8-hours, that is located at a closer distance to the Project site than the receptor used for PM_{10} and $PM_{2.5}$ analysis, must be considered to determine construction and operational LST air impacts for emissions of NO_2 and CO since these pollutants have an averaging time of 1 and 8-hours (UXR, 2025a, p. 36).

Refer above to subsection 4.2.1.3 and Figure 4.2-1 (previously presented) for a description and depiction of the sensitive receptor locations in the area surrounding the Project site that were considered as part of the LST analysis. The SCAQMD recommends that the nearest sensitive receptor be considered when determining the Project's potential to cause an individual or a cumulatively considerable significant impact. The nearest land use where an individual could remain for 24 hours to the Project site has been used to determine localized construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$ (since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time). The nearest receptor used for evaluation of localized impacts of PM_{10} and $PM_{2.5}$ is R2, represented by the existing residences at 700 South Myrtle Avenue, approximately 80 feet (24 meters) east of the Project site. As previously stated, and consistent with *LST Methodology*, the nearest commercial/industrial use to the Project site is used to determine construction and operational LST air impacts for emissions of NO_X and CO as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assume that an individual could be present at these sites for periods of one to 8 hours. The nearest receptor used for evaluation of localized impacts of NO_X and CO is R7, represented by the existing building at 139 West Walnut Avenue, approximately 22 feet (7 meters) south of

the Project site. It should be noted that the *LST Methodology* explicitly states that "It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." As such, a 25-meter distance will be used for evaluation of localized emissions of PM_{10}, $PM_{2.5}$, NO_X, and CO (UXR, 2025a, pp. 36-37).

5. Methodology for Cumulative Effects

For the issue of air quality, the cumulative study area comprises the SCAB, while the cumulative impact analysis relies on guidance from the SCAQMD. The SCAQMD published a report giving direction on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (SCAQMD, 2003). In this report the AQMD states on page D-3:

> *"…the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.*
>
> *Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

The cumulative analysis provided herein assumes that individual projects that do not generate emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts also would not cause a cumulatively-considerable increase in emissions for those pollutants for which the SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related emissions that exceed SCAQMD thresholds for Project-specific impacts would be considered cumulatively considerable.

Compliance with the SCAQMD guidelines for evaluating direct and cumulatively-considerable impacts due to air quality emissions has been shown to result in a demonstrable reduction in air quality pollutants within the SCAB. Regulations promulgated by the SCAQMD have led to a dramatic reduction in the level of air quality pollutants within the SCAB, including levels of ozone, particulate matter (PM_{10} and $PM_{2.5}$), carbon monoxide (CO), and oxides of nitrogen (NO_X). As noted in the SCAQMD's 2016 AQMP, "the remarkable historical improvement in air quality since the 1970s is the direct result of Southern California's

comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs" (SCAQMD, 2017a). Improvements also have been seen in ozone levels. Part of the control processes of the SCAQMD's duty to greatly improve the air quality in the SCAB is the uniform CEQA review procedures required by SCAQMD's CEQA Handbook (SCAQMD, 2023). The single threshold of significance used to assess a project's direct and cumulative impacts has in fact been successful, as evidenced by the track record of the air quality in the SCAB dramatically improving over the course of the past decades.

4.2.5 Impact Analysis

Threshold a.: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The Project site is located within the SCAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743-square-mile area, within which the SCAQMD is principally responsible for air pollution control, and works directly with the SCAG, county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet State of California and federal ambient air quality standards. (UXR, 2025a, p. 44)

Currently, the State of California and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy (UXR, 2025a, p. 44).

The SCAQMD released the Final 2022 AQMP in December 2022 (2022 AQMP), which evaluates current integrated strategies and control measures to meet the NAAQS and CAAQS, as well as explores new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including growth projections from the SCAG's RTP/SCS, a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements (UXR, 2025a, p. 44).

The criteria for determining consistency with the 2022 AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the AQMD's CEQA Handbook and are analyzed below.

- *Consistency Criterion No. 1: The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

  Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if localized or regional significance thresholds were exceeded. As indicated

under the discussion and analysis of Thresholds b. and c., below, the Project's localized and regional construction-source emissions would not exceed any applicable regional significance threshold and would not exceed the LST thresholds. As also indicated under the discussion and analysis of Thresholds b. and c., below, the Project's localized and regional operation-source emissions would not exceed any applicable regional significance threshold and would not exceed the LST thresholds. As such, the Project's construction- and operational-related air quality emissions would not exceed any of the SCAQMD regional thresholds or LSTs and as a result, Project is consistent with the first criterion (UXR, 2025a, p. 45).

- *Consistency Criterion No. 2: The proposed project will not exceed the assumptions in the AQMP based on the years of project buildout phase.*

  The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the region are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the City's General Plan is considered to be consistent with the AQMP (UXR, 2025a, p. 45).

  Peak day emissions generated by construction activities are largely independent of land use assignments and rather are a function of development scope and maximum area of disturbance. Irrespective of the site's existing or proposed land use designation, disturbance of the entire site would be expected to occur during construction activities for the site's redevelopment to maximize development potential.

  Related to operation of the Project and resultant air pollutant emissions, the AQMP bases its growth forecasts, in part, on buildout of the land uses anticipated by the General Plans for the various jurisdictions within the Air Basin. The Project includes a proposed GPA to change the Project site's existing land use designation from "Office/Research and Development/Light Manufacturing" to "Planned Development Area" in order to allow for development of the Project site with up to 204 residential dwelling units and 2,370 s.f. of commercial retail space.

  As discussed in EIR Subsection 4.10, *Population and Housing*, the population within the City of Monrovia is anticipated to increase by 5,106 persons between 2023 and 2050, while the number of jobs are anticipated to increase by 925 jobs over this same period. The increase of 4,266 residents as a result of the Project and other cumulative developments would represent 53.47 percent of the anticipated resident growth within the City between 2023 and 2050, while the anticipated net increase of 43 jobs as a result of the Project and other cumulative developments would represent 4.6 percent of the anticipated growth in the number of jobs within the City between 2023 and 2050. As such, it is concluded that the Project, even when considered in the context of other cumulative development projects within the City, would not directly induce substantial unplanned population growth in the City,

as the combined growth from the Project and other cumulative development projects within the City of Monrovia would be within the SCAG population forecasts for the City in 2050 in terms of population and employment projections.

As also discussed in EIR Subsection 4.10, *Population and Housing*, it is estimated that the City of Monrovia had 14,850 housing units in 2023, which is projected to increase to 16,700 housing units by the year 2050, representing an approximately 12.5-percent increase over the 27-year period between 2023 and 2050. With respect to the anticipated increase in the number of dwelling units, there would be an increase of 1,340 dwelling units in the City as a result of cumulative development. Including the Project's 204 dwelling units, the total number of dwelling units would increase by 1,544 dwelling units, representing approximately 83.4 percent of the anticipated increase in the number of dwelling units within the City between 2023 and 2050. Thus, the cumulative increase in dwelling units within the City also would be within the SCAG projections for the City for 2050.

Because the Project would accommodate housing units on site that are needed to accommodate population growth within the City through 2050, and because the Project would not result in an increase in demand for new housing units within the City, it is reasonably concluded that the Project would not exceed the growth forecasts for the City of Monrovia through 2050. Furthermore, the Project's localized and regional air pollutant emissions are calculated to be well below the daily significance thresholds established by the SCAQMD, as discussed in further detail under the analysis of Thresholds b. and c. Given that the Project would not exceed any applicable SCAQMD regional threshold or LST, and because the Project would assist the City in meeting its anticipated demand for housing through 2050, it is concluded that the Project's land uses would be consistent with the AQMP's growth assumptions (UXR, 2025a, pp. 46-47). On the basis of the preceding discussion, the Project is determined to be consistent with the second criterion.

In conclusion, although the Project is not consistent with the site's existing General Plan land use designation and requires a GPA, the Project would assist the City in meeting its projected housing needs through 2050 as described above; thus, the Project would be consistent with SCAG's overall City-wide growth projections for the City and would not exceed the regional or localized construction and operational air pollutant emission thresholds promulgated by SCAQMD. Therefore, and based on the foregoing analysis, the Project would not conflict with the 2022 SCAQMD AQMP, and impacts under Threshold (a) would be less than significant.

Threshold b.: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?

As previously indicated in Table 4.2-2, the SCAB does not meet federal or state air quality standards for ozone and particulate matter and thus has a "non-attainment" designation for ozone (1- and 8-hour standards) and particulate matter ($PM_{2.5}$ and PM_{10}). Refer to Subsection 4.2.1 for more information on existing air quality conditions in the SCAB.

A. Construction Emissions Impact Analysis

Construction of the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$ from earth movement, construction equipment, hauling, deliveries, worker trips, painting/architectural coating, and paving. The Project's estimated maximum daily construction emissions are summarized in Table 4.2-8, *Project-Related Construction Emissions Summary – without Mitigation*. Detailed construction model outputs are presented in Appendix 3.1 of the Project's AQIA (*Technical Appendix C*). Using the Project's forecasted construction schedule, and the summer and winter scenarios shown in Table 4.2-8, emissions resulting from the Project's construction would not exceed the daily criteria pollutant thresholds established by the SCAQMD. Accordingly, construction activities associated with the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment, and the Project's construction-related air quality impacts would be less than significant (UXR, 2025a, p. 31).

B. Operational Emissions Impact Analysis

1. Project Net Increase in Emissions

As previously noted, operation of the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$ from area sources and mobile sources. CalEEMod utilizes summer and winter EMFAC2021 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. Taking into account the Project site's existing air quality emissions as previously presented in Table 4.2-4, the Project's estimated net increases in operational-source emissions are summarized on Table 4.2-9, *Project-Related Peak Operational Emissions*. Detailed operation model outputs for the Project are presented in Appendix 3.1 of the Project's AQIA (EIR *Technical Appendix C*).

Table 4.2-8 Project-Related Construction Emissions Summary – without Mitigation

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2025	2.18	19.43	32.18	0.05	5.51	2.04
2026	0.32	2.93	3.62	0.01	0.31	0.16
Winter						
2025	2.16	15.53	27.95	0.03	5.51	1.43
2026	21.76	6.25	26.33	0.01	5.50	1.41
2027	21.75	0.45	2.31	0.00	0.57	0.14
Maximum Daily Emissions	**21.76**	**19.43**	**32.18**	**0.05**	**5.51**	**2.04**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

(UXR, 2025a, Table 3-5)

Table 4.2-9 Project-Related Peak Operational Emissions Summary

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	4.15	3.32	39.64	0.10	9.42	2.43
Area Source	6.15	3.54	18.77	0.02	0.29	0.29
Project Maximum Daily Emissions	**10.30**	**6.87**	**58.42**	**0.12**	**9.71**	**2.72**
Existing Emissions	*2.24*	*2.95*	*17.05*	*0.05*	*3.50*	*0.93*
Net Emissions (Proposed – Existing)	**8.07**	**3.91**	**41.37**	**0.07**	**6.22**	**1.79**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Mobile Source	4.10	3.64	36.15	0.10	9.42	2.44
Area Source	4.19	3.38	1.44	0.02	0.27	0.27
Project Maximum Daily Emissions	**8.29**	**7.02**	**37.59**	**0.12**	**9.70**	**2.71**
Existing Emissions	*2.05*	*3.13*	*14.52*	*0.05*	*3.49*	*0.93*
Net Emissions (Proposed – Existing)	**6.24**	**3.89**	**23.07**	**0.07**	**6.20**	**1.78**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

(UXR, 2025a, Table 3-7)

As shown in Table 4.2-9, Project operational activities would not exceed the Regional Thresholds of significance established by the SCAQMD for emissions of any criteria pollutant. Therefore, long-term operation of the Project would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is in non-attainment, and impacts due to the Project's regional operational air quality emissions would be less than significant.

Threshold c.: Would the Project expose sensitive receptors to substantial pollutant concentrations?

During construction and operational activities, the Project has the potential to expose nearby sensitive receptors to air pollutant concentrations. The following provides an analysis based on the applicable LSTs established by the SCAQMD, an analysis of the Project's potential to result in or contribute to CO "hot spots," and an analysis of the Project's potential to result in cancer risks and non-cancer health hazards.

A. Localized Criteria Pollutant Analysis

1. Construction Analysis

Since the total acreage disturbed for the Project's construction activities would be less than five acres per day, the SCAQMD's screening look-up tables were utilized to determine impacts. It should be noted that since the look-up tables identify screening thresholds for only 1-acre, 2-acre, and 5-acre sites, linear regression has been utilized to determine localized significance screening thresholds. Consistent with SCAQMD guidance, the thresholds previously presented in Table 4.2-6 were calculated by interpolating the threshold values for the Project's disturbed acreage.

Table 4.2-10, *Localized Construction-Source Emissions – without Mitigation*, identifies the localized impacts at the nearest sensitive receptor location in the vicinity of the Project site. For analytical purposes, emissions associated with peak demolition, site preparation, and grading activities are considered for purposes of LSTs since these phases represent the maximum localized emissions that would occur during the Project's construction phase.

As shown in Table 4.2-10, the Project's localized construction emissions would not exceed the applicable SCAQMD LST screening criteria for emissions of any criteria pollutant. Therefore, the Project's localized air quality impacts during construction activities would not expose any sensitive receptors in the vicinity of the Project site to substantial criteria pollutant concentrations. Impacts would be less than significant, and no mitigation measures would be required. Outputs from the model runs for unmitigated construction LSTs are provided in Appendix 3.1 of the Project's AQIA (EIR *Technical Appendix C*) (UXR, 2025a, p. 40).

Table 4.2-10 Localized Construction-Source Emissions – without Mitigation

Construction Activity	Year	Emissions (lbs/day)			
		NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition	Maximum Daily Emissions	13.99	13.15	1.72	0.71
	SCAQMD Localized Threshold	74	499	4	2
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Site Preparation	Maximum Daily Emissions	2.12	2.05	0.29	0.16
	SCAQMD Localized Threshold	70	458	4	2
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading	Maximum Daily Emissions	14.26	13.23	2.70	1.57
	SCAQMD Localized Threshold	109	788	6	4
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

(UXR, 2025a, Table 3-10)

2. Operational Analysis

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The Project does not include such uses, and thus, due to the lack of significant stationary source emissions, no long-term localized significance threshold analysis is needed. Accordingly, long-term operation of the Project would not expose any sensitive receptors in the vicinity of the Project site to substantial criteria pollutant concentrations, and no impact would occur (UXR, 2025a, p. 41).

B. CO Hot Spot Impact Analysis

A CO "hot spot" is an isolated geographic area where localized concentrations of CO exceed the CAAQS one-hour (20 parts per million) or eight-hour (9 parts per million) standards (UXR, 2025a, p. 40). It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment (UXR, 2025a, p. 42).

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted in 2003 as part of SCAQMD's 2023 AQMP for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any exceedance of the 1-hour (20.0 ppm) or 8-hour (9.0 ppm) CO standards, as shown on Table 3-11 of the Project's AQIA (EIR *Technical Appendix C*) (UXR, 2025a, p. 42).

Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, of the 8.4 ppm 8-hr CO concentration measured at the Long Beach Blvd. and Imperial Highway intersection (i.e., the highest CO generating intersection within the "hot spot" analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, an adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur (UXR, 2025a, p. 42).

The ambient 1-hr and 8-hr CO concentration within the Project study area is estimated to be 1.3 ppm and 0.9 ppm, respectively, based on data from the East San Gabriel Valley 1 monitoring station for 2022, which is well below the 1-hour threshold of 20.0 ppm and 8-hour threshold of 9.0 ppm. Thus, to result in CO concentration levels in excess of these thresholds of significance, Project-related traffic would need to increase

concentrations by 18.7 ppm for the 1-hour standard and 8.1 ppm for the 8-hour standard. Given that traffic at the Long Beach Blvd. and Imperial Highway intersection accounted for only 0.7 ppm of the 7.7 ppm 8-hour CO concentration measured at this intersection, the Project would need to generate more than 11 times the amount of traffic observed at the Long Beach Blvd. and Imperial Highway intersection in order to result in CO concentrations that exceed the 8-hour threshold of 9.0 ppm (8.1 ppm ÷ 0.7 ppm = 11.57) (UXR, 2025a, p. 42).

Traffic volumes generating the CO concentrations for the "hot spot" analysis is shown on Table 3-12 of the Project's AQIA. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vph and AM/PM traffic volumes of 8,062 vph and 7,719 vph, respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4= 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm) (UXR, 2025a, p. 42).

As summarized on Table 4.2-11, *Peak Hour Traffic Volumes*, the intersection of Myrtle Avenue & Olive Avenue would have the highest AM/PM traffic volumes of 810 vph and 994 vph, respectively. As such, total traffic volumes at the intersections considered are much less than the traffic volumes identified in the 2003 AQMP. As such, the Project considered herein along with background and cumulative development would not produce the volume of traffic required to generate a CO "hot spot" based on the 2003 Los Angeles hot spot study. Therefore, no CO "hot spots" were identified from the Project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant (UXR, 2025a, p. 43).

Table 4.2-11 Peak Hour Traffic Volumes

Intersection Location	Peak Traffic Volumes (vph)				
	Northbound (AM/PM)	Southbound (AM/PM)	Eastbound (AM/PM)	Westbound (AM/PM)	Total (AM/PM)
Primrose Av. & Olive Av.	125/173	93/181	59/59	123/83	400/496
Primrose Av. & Walnut Av.	122/209	115/154	17/22	48/46	301/430
Myrtle Av. & Olive Av.	363/431	251/397	115/97	82/69	810/994
Myrtle Av. & Walnut Av.	435/457	279/436	8/55	54/42	777/989

NB = Northbound
(UXR, 2025a, Table 3-13)

C. *Toxic Air Contaminant Emissions Impact Analysis*

The greatest potential for toxic air contaminant (TAC) emissions during the Project's construction phase would be from diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics usually are described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 21 months, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Additionally, SCAQMD's CEQA guidance does not require a health

risk assessment (HRA) for short-term construction emissions. It is, therefore, not necessary to quantitatively evaluate long-term cancer impacts from construction activities, which occur over a relatively short duration. Thus, the Project's construction activities, including generation of TACs, would not expose sensitive receptors to substantial pollutant concentrations. Project-related TAC impacts during construction would be less than significant (UXR, 2025a, p. 48).

The City follows the guidance of the SCAQMD, which recommends that Health Risk Assessments (HRAs) be conducted for substantial sources of diesel particulate matter (DPM), such as truck stops and warehouse distribution facilities. As a residential/commercial mixed-use development, the Project would not generate substantial amounts of DPM during operation. As such, the Project has no potential to result in TAC impacts to nearby sensitive receptors during long-term operation, and no impact would occur (UXR, 2025a, p. 48).

D. Community Health

Most local agencies, including the City of Monrovia, lack the data to conduct their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally-specific thresholds of significance based on potential health impacts from an individual development project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in causing asthma), existing scientific tools cannot accurately estimate health impacts of the Project's air emissions without undue speculation. Instead, readers are directed to the Project's air quality impact analysis above, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project's construction and long-term operation.

Notwithstanding, the Project's AQIA (EIR *Technical Appendix C*) does evaluate the Project's localized impact to air quality for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$ by comparing the Project's on-site emissions to the SCAQMD's applicable LST thresholds. The LST analysis presented above determined that the Project would not result in emissions exceeding SCAQMD's LSTs. Therefore, the Project has no reasonable potential to exceed the most stringent applicable federal or State of California ambient air quality standards for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$.
As the Project would comply with federal, State, and local air quality standards, the Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level and any such analysis would not provide a reliable indicator of health effects if modeled.

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

Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries,

landfills, dairies, and fiberglass molding facilities. The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the Project may result from construction equipment exhaust, the application of asphalt and architectural coatings during construction activities, and the temporary storage of typical solid waste (refuse) associated with the Project's (long-term operational) uses (UXR, 2025a, p. 48).

During construction activities on the Project site, standard construction practices would minimize potential odor emissions and their associated nuisance effects. The Project would be subject to standard construction requirements, including the use of low-VOC architectural coatings as required by SCAQMD Rule 113, *Table of Standards*, and compliance with SCAQMD Rule 402, *Nuisance*, which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public. Compliance with these standard construction requirements would minimize odor impacts from construction. Furthermore, there are no components of the Project's anticipated construction activities that would result in the discharge of air contaminants or other materials that would cause health or safety hazards to sensitive receptors in the surrounding area. As discussed above under the analysis of Threshold c., the Project's construction activities would occur over a period of approximately 21 months, and as such the Project's construction-related emissions, including odors, would not have the potential to result in a long-term (i.e., 70-year) impact due to TAC emissions. Accordingly, the Project's construction activities would not create objectionable odors affecting a substantial number of people and impacts would be less than significant (UXR, 2025a, p. 49).

During long-term operation, the Project would operate as a mixed-use residential and commercial building and there is no reasonable potential that these uses would be associated with the emission of significant objectionable odors. Temporary outdoor refuse storage could be a potential source of odor; however, Project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations, thereby precluding any significant odor impact. Furthermore, the occupant(s) of the proposed mixed-use building would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance, during long-term operation. As such, long-term operation of the Project would not create objectionable odors affecting a substantial number of people and impacts would be less than significant (UXR, 2025a, p. 49).

4.2.6 Cumulative Impact Analysis

With exception of the issue of odors, the cumulative study area for air quality includes the City of Monrovia and the SCAB. The SCAB is designated as a nonattainment area under State standards for O_3, PM_{10}, and $PM_{2.5}$. The region also is designated as a nonattainment area under federal standards for O_3 and $PM_{2.5}$. Cumulative growth in population, vehicle use, and industrial activity could inhibit efforts to improve regional air quality and attain the ambient air quality standards. Thus, with exception of odors, the setting for this cumulative analysis consists of the SCAB and associated growth and development anticipated in the air basin. For the issue of odors, the cumulative study area includes the Project site and lands in close proximity to the Project site, as odors diminish rapidly with distance from the source.

This analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts also would not cause a cumulatively-considerable increase in emissions for those pollutants for which the SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable (UXR, 2025a, p. 49).

AQMP Consistency (Threshold a.)

As discussed under the analysis of Threshold a., Project construction and operational emissions would not exceed any of the SCAQMD's Regional Thresholds or LSTs. Although the Project would require approval of a General Plan Amendment and Zoning Code Amendment, the Project would be consistent with SCAG's growth projections for the City, and therefore the Project's land uses would be consistent with the SCAQMD 2022 AQMP. As such, the Project's impacts due to a conflict with the SCAQMD 2022 AQMP would be less than significant on a cumulatively-considerable basis.

Regional Criteria Pollutant Emissions (Threshold b.)

Based on SCAQMD guidance, any exceedance of the SCAQMD's Regional Thresholds for criteria pollutants also is considered to be a cumulatively-considerable effect, while air pollutant emissions that fall below the SCAQMD Regional Thresholds are not considered to be cumulatively considerable. As discussed in the analysis under Threshold b. and as shown in Table 4.2-8 and Table 4.2-9, the Project's construction and operational emissions would not exceed any of the applicable SCAQMD Regional Thresholds. 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, and Project impacts would be less than significant on a cumulatively-considerable basis.

Localized Air Quality Impacts (Threshold c.)

As indicated under the analysis of Threshold c. and as shown in Table 4.2-10, construction of the Project would not exceed any of the SCAQMD LSTs, while under long-term operating conditions the Project would not include any land uses with the potential to generate substantial stationary source emissions. Accordingly, and based on SCAQMD guidance, because the Project's localized air quality impacts would be less than significant on a direct basis, the Project's construction and long-term operational localized air quality impacts also would be less than significant on a cumulatively-considerable basis. In addition, the Project considered herein along with background and cumulative development would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. Therefore, CO "hot spots" are not an environmental impact of concern for the Project, and the Project would result in less-than-significant cumulatively-considerable impacts due to CO "hot spots."

Odor Impacts (Threshold d.)

As indicated in the analysis of Threshold d, there are no Project components that would expose a substantial number of sensitive receptors to objectionable odors. There are no known sources of offensive odors in the Project area. Because the Project's construction and operation would not create substantial and objectionable odors and because there are no known sources of objectionable odors in the areas immediately surrounding the Project site, there is no potential for odors from the Project to commingle with odors from nearby development projects and expose nearby sensitive receptors to substantial, offensive odors. Accordingly, implementation of the Project would result in a less-than-significant cumulatively-considerable impact related to odors.

4.2.7 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The Project's construction and long-term operational emissions would not exceed any of the SCAQMD Regional Thresholds or LSTs, and the Project would be consistent with SCAG's growth projections for the City. Accordingly, the Project would not conflict with or obstruct implementation of the SCAQMD 2022 AQMP, and impacts would be less than significant.

Threshold b.: Less-than-Significant Impact. Project construction and operational activities would not exceed the applicable SCAQMD Regional Threshold for any criteria pollutant. Thus, the Project would not result in a cumulatively-considerable net increase of any criteria air pollutant for which the SCAB is considered non-attainment under applicable federal and State air quality standards, and impacts would be less than significant.

Threshold c.: Less-than-Significant Impact. Implementation of the Project would not exceed any of the applicable SCAQMD LSTs during construction or operation, and impacts would be less than significant. In addition, the Project, even when considered in the context of cumulative developments, would not produce the level of traffic volumes necessary to create a CO "hot spot"; thus, impacts due to CO "hot spots" would be less than significant. The Project construction activities, including generation of TACs, also would not expose sensitive receptors to substantial pollutant concentrations; thus, Project-related TAC impacts during construction would be less than significant. Additionally, the Project has no potential to result in TAC impacts to nearby sensitive receptors during long-term operation, and no impact would occur.

Threshold d.: Less than Significant Impact. The Project does not propose land uses typically associated with emitting objectionable odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. Additionally, it is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations. The Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the Project construction and operations would be less than significant.

4.2.8 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.2.9 Regulatory Requirements (RR)

The City of Monrovia requires compliance with the following:

AQ RR-1 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1113, *Architectural Coatings*, by requiring that all architectural coatings must consist of low VOCs (i.e., VOCs of less than 50 grams per liter [g/L]) unless otherwise specified in the SCAQMD Table of Standards.

AQ RR-2 The Project is required to comply with applicable SCAQMD rules for construction activities. In addition to Rule 1113, other SCAQMD rules that are currently applicable during construction activity for this Project include Rule 431.2 (Low Sulfur Fuel) and Rule 1186/1186.1 (Street Sweepers).

AQ RR-3 The Project is required to comply with the provisions of SCAQMD Rule 402, "Nuisance" which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public.

AQ RR-4 In accordance with SCAQMD Rule 445, no wood burning devices shall be installed in any dwelling units.

AQ RR-5 The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, "Fugitive Dust" by implementing the dust control measures listed below during construction activities, such as earth-moving activities, grading, and equipment travel on unpaved roads. Prior to grading permit issuance, the City of Monrovia shall verify that the notes listed below are included on the grading plan. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by City of Monrovia staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at an interval of 2.1 hours (i.e., 4 times per day) or a movable sprinkler system shall be in place to ensure minimum soil moisture of 12% is maintained for actively graded or disturbed areas. Moisture content shall be verified with use of a moisture probe by the grading contractor.

- All access points to the Project site shall have track-out devices installed.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 mph or less.

AQ RR-6 Pursuant to Mitigation Measure AIR-B from the City's *2021-2029 Housing Element Update, Safety Element Update, New Environmental Justice Element, and Zoning Text Amendment State Clearinghouse # 2022080729 Final Initial Study and Mitigated Negative Declaration,* the City will condition the Project's construction activities to comply with the following:

- Idling of diesel-powered vehicles and equipment shall not be permitted during periods of nonactive vehicle use. Diesel-powered engines shall not be allowed to idle for more than 5 consecutive minutes in a 60-minute period when the equipment is not in use, occupied by an operator, or otherwise in motion, except as follows:
  - When equipment is forced to remain motionless because of traffic conditions or mechanical difficulties over which the operator has no control;
  - When it is necessary to operate auxiliary systems installed on the equipment, only when such system operation is necessary to accomplish the intended use of the equipment;
  - To bring the equipment to the manufacturer's recommended operating temperature;
  - When the ambient temperature is below 40 degrees F or above 85 degrees F; or
  - When equipment is being repaired.

4.3 CULTURAL RESOURCES

The analysis in this subsection evaluates the potential for Project-related activities to impact sensitive cultural resources located on or beneath the Project site or in the surrounding area. The analysis in this subsection is based in part on a historic resources technical report prepared by SWCA Environmental Consultants (hereinafter "SWCA"), titled "Historical Resources Technical Report, 701 S. Myrtle Avenue Mixed-Use Project, Monrovia California," dated April 2025, and included as *Technical Appendix D2* (SWCA, 2025), and a cultural resources records search of the Project site and a one-mile radius around the Project site (BFSA, 2023). The records search is confidential and not included in or appended to this EIR, but it is on file at the City of Monrovia and available for review by those with credentials to review the confidential information. Under existing law, environmental documents circulated for public review are prohibited from including information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (CEQA Guidelines Section 15120(d)).

4.3.1 HISTORIC CONTEXT

Monrovia is one of the oldest towns in the San Gabriel Valley. In 1887, it became the fourth city to incorporate in Los Angeles County, following the cities of Los Angeles, Santa Monica, and Pasadena. Before Monrovia's incorporation, the land that would form its townsite was part of two ranchos, the Santa Anita Rancho and Azusa de Duarte Rancho. As with so many other communities throughout the area and region, through the 19th century, the lands were primarily used for agricultural uses and cattle ranching (SWCA, 2025, p. 19).

Following a severe drought that struck Southern California in the 1860s, many ranchers sold off their land into smaller parcels for development. The drought along with the 1876 establishment of the transcontinental railway, catalyzed a transition toward subdividing large-scale ranchos into smaller tracts triggering a land boom that greatly increased new subdivisions and construction, including in Monrovia. In terms of Monrovia's early years, in the wake of the drought that impacted cattle ranching, area pioneer E.J. "Lucky" Baldwin purchased nearly 9,000 acres of the former Rancho Santa Anita in 1875. Subsequently, in 1884, Monrovia's founder, William Monroe, bought 240 acres of the former rancho for a new townsite that would become Monrovia (SWCA, 2025, p. 19).

Commercial development in Monrovia in the 20th century was closely related to the development of methods of transportation throughout the city and region. Railroads were critical to the settlement of the town and the surrounding region in the 1880s. Commercial development in Monrovia began along South Myrtle Avenue between Foothill Boulevard and Olive Avenue and on the blocks adjacent to Myrtle Avenue in the vicinity of Palm, Lime, Lemon, and Olive Avenues. Myrtle Avenue was served early on by a mule-driven street railway, then by local and interurban streetcars, and later by highways and the interstate. Monrovia's downtown area saw periods of commercial development associated with each of these primary modes of transportation. With automobile-related transportation improvements came increased travel, tourism, and settlement. In 1926, Route 66 was extended to Monrovia and improved by the Division of Highways. Foothill Boulevard between Pasadena and San Bernardino was widened a few times during the 1930s to serve larger traffic loads and conform with new highway standards (SWCA, 2025, p. 22).

Due to the decreased use of public transportation, Pacific Electric stopped service to Monrovia in 1951. As with many communities across Southern California, agricultural land was largely replaced by residential and commercial development by the mid-20th century. Commercial development in the city through the 1960s was largely concentrated along and near major thoroughfares, highways and freeways, including South Myrtle Avenue, Colorado Boulevard, Duarte Road, Central Avenue, Evergreen Avenue, Peck Road, and the alignments of Route 66 (Foothill Boulevard, Shamrock Avenue, and Huntington Drive) (SWCA, 2025, p. 23).

Beginning in the mid–1950s, properties were acquired across the southern section of Monrovia for the construction of I-210, and approximately 300 residences were demolished. Between 1968 and 1971, I-210 was constructed between Arcadia and Pomona, traversing Monrovia. Storage, light industrial, and manufacturing facilities became concentrated near I-210 and along Huntington Drive. A major change in the community took place in the 1970s and 1980s when downtown Monrovia underwent redevelopment and renovation efforts. Monrovia currently encompasses 13.73 square miles and has a population of approximately 37,900 residents (as of the 2020 census) (SWCA, 2025, p. 23).

4.3.2 Project Site History

According to City of Monrovia planning and building permit records, the Project site was developed by real estate developer George N. Boone of George Boone Associates. In 1978, Boone obtained approval for the construction of the Project site's existing commercial/industrial office building. The property consisted of multiple parcels and had been previously occupied by a variety of uses (such as a warehouse, auto repair garage, and metal shop) but had been designated as part of a redevelopment area by the City in the early 1970s.

Architect Don G. Murphy designed the subject building, described in planning records as contemporary with natural materials, including wood framing and a "very heavy textured plaster with rounded corners, clear glass and bronze aluminum with the heavy use of landscaping." Based on available information, it appears that George Boone & Associates retained ownership of the property and leased it to tenants. Early on, the property appeared to have been primarily occupied by medical uses, including the Myrtle Avenue Medical & Dental Center by 1980. Occupant information was sparse in available records. Identified tenants in the 1980s included Reginald C. Bedney, DDS Inc. and Huntington Construction Inc.; tenants in the 1990s and 2000s included Pacific Multitech Inc., Envision Development, Heil Construction Inc., SUV GP LLC, HPD Red Oak, and HPD Key Largo LP. George Boone & Associates eventually transferred the property to the business entity Boone-Fetter (operated by George's daughter and son-in-law) (SWCA, 2025, p. 26).

4.3.3 Existing Conditions

Currently, the Project site appears largely unchanged from the time of its original construction in the late 1970s. The Project site is located in a portion of the City's historic downtown main street area known as the "Old Town Extension District." The Old Town Extension District is one of three districts of the City's General Plan South Myrtle Avenue Corridor planning area, which is intended to promote urban design and land uses that are compatible with Old Town Monrovia. The Project site is fully developed with the Myrtle and Olive Business Park, a 25,191-square-foot (s.f.) multi-tenant commercial/industrial office building with associated parking and landscaping.

An Area of Potential Effect (APE) for the Project was defined for the assessment of cultural resources, and it encompasses the Project site (to consider potential direct cultural resource impacts), and adjacent parcels and extended areas along Myrtle Avenue (to consider potential indirect cultural resource impacts). Field surveys, literature review, and outreach to the City were conducted to confirm the current historical resource status for properties within the APE. The existing property within the boundaries of the Project site was evaluated at an intensive-level[1]. Properties outside of the boundaries of the Project site, but within the APE, were field checked, and their current historical resource status was ascertained through literature review and coordination with the City of Monrovia Planning Division. The Project site does not appear to have undergone a previous historic resource evaluation. It is not identified in the "City of Monrovia Historic Landmarks" list or the "Historic Landmarks in the City of Monrovia" map, and it is not located in either of the City's two designated historic districts (Wild Rose and North Encinitas Historic Districts). The Project site is also not included on the City's list of Potential Historic Landmarks or the California Office of Historic Preservation's (OHP) Built Environment Resources Directory for Los Angeles County. Additionally, the Project site was not identified in the 2018 *City of Monrovia Historic Context Statement* (Historic Context Statement) (SWCA, 2025, p. 32 and 37).

The structure on the Project site was evaluated using the eligibility criteria of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and City of Monrovia. Additionally, the evaluative framework from the *City of Monrovia Historic Context Statement* was reviewed. The contexts most relevant to the Project site are Commercial Development and Architecture and Design. However, the Commercial Development context extends only through 1967, and the Architecture and Design extends through 1976. Therefore, the context did not include specific eligibility standards for the contexts/themes that apply to the Project site, which was developed in the late 1970s. Nonetheless, based on the thorough and professional evaluation conducted by SWCA, the existing building on the Project site does not appear eligible under any of the criteria evaluated (SWCA, 2025, pp. 52-53).

The presence of one presumed historical resource within the APE, the Downtown Commercial Historic District, located adjacent to the north side of the Project site was confirmed. Identified in an early draft of the City's Historic Context Statement (but not yet subject to a full due-diligence historic resources evaluation), the potential historic district encompasses several blocks of Monrovia's early commercial corridor along Myrtle Avenue and extends into adjacent streets. The potential district has an irregular boundary, delineated by East Foothill Boulevard to the north, South Ivy Avenue to the east, East Olive Avenue to the south, and South Primrose Avenue to the west. As noted in the Administrative Draft of the City's Historic Context Statement, the district is "anchored by North Myrtle Avenue, where the first of Monrovia's commercial establishments

[1] The intensive-level evaluation included a field survey; digital photography and field notes to document the existing condition and character of the property and its setting; recordation of the property on California Department of Parks and Recreation (DPR) 523 series forms; research to characterize the property's construction history from a variety of available online and print sources; examination of the City of Monrovia Historic Context Statement, General Plan, and associated Draft Environmental Impact Report, and previous landmark designations and resource records prepared for nearby properties; a review of contexts and themes identified in the City of Monrovia Historic Context Statement; review of historic aerial and topographic maps, Sanborn Fire Insurance Maps, and City directory data; and property-specific research utilizing the collections of Newspapers.com, Ancestry.com, the historic Los Angeles Times, and other local newspapers, City building permit and planning records, and the American Institute of Architects Historical Directory (SWCA, 2025, p. 9).

were concentrated. Although there is some infill of newer buildings, most of the properties were constructed over a long period of development from the 1880s through the 1930s. Although facades and signage have been replaced, many original one- and two-story brick commercial buildings remain, and the district conveys a strong sense of its associations with the historical commercial downtown." Additional research and evaluation are necessary to confirm the status/designation of the historic district; however, for purposes of this analysis and compliance with CEQA, the Downtown Commercial Historic District is a presumed to be a historical resource. No other known or presumed historical resources were identified within the APE (SWCA, 2025, p. 32).

A cultural resources records search was conducted through the South Central Coastal Information Center (SCCIC) at California State University (CSU), Fullerton. The records search encompassed a one-mile radius surrounding the Project site. The records search did not identify any previously recorded resources on the Project site; however, 32 cultural resources have been recorded within one mile of the Project site. All of the recorded resources are historic and include 12 single-family residences, one residential and commercial building, six commercial buildings, five industrial buildings, two bridges, one trash scatter, the First Methodist Church of Monrovia, the St. Luke's Episcopal Church, the Aztec Hotel, the Eleven Oaks Hotel, and the Monrovia Santa Fe Railroad Depot. The records search also indicated that 23 previous studies have been conducted within one mile of the Project site; however, none included the Project site (SWCA, 2025, p. 34).

4.3.4 Regulatory Setting

The following is a brief description of the federal, State, and local environmental laws and related regulations governing the protection of cultural resources.

A. Federal Plans, Policies, and Regulations

1. National Historic Preservation Act and National Register of Historic Places

The National Historic Preservation Act of 1966 (NHPA) was passed primarily to acknowledge the importance of protecting United States heritage. While Congress recognized that national goals for historic preservation could best be achieved by supporting the drive, enthusiasm, and wishes of local citizens and communities, it understood that the federal government must set an example through enlightened policies and practices. In the words of the Act, the federal government's role would be to "provide leadership" for preservation, "contribute to" and "give maximum encouragement" to preservation, and "foster conditions under which our modern society and our prehistoric and historic resources can exist in productive harmony" (NPS, 2024a).

The National Register of Historic Places (NRHP) is the official list of the nation's historic places worthy of preservation. Authorized by the NHPA, the National Park Service's NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archaeological resources (NPS, 2023a). To be considered eligible, a property must meet the NRHP criteria for evaluation. This involves examining the property's age, integrity, and significance, as follows:

- Age and Integrity. Is the property old enough to be considered historic (generally at least 50 years old), and does it still look much the way it did in the past?

- Significance. To be eligible for listing in the NRHP, a resource must meet at least one of the following criteria: A. It is associated with events that have made a significant contribution to the broad patterns of our history; B. It is associated with the lives of persons significant in our past; C. It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; D. It has yielded, or may be likely to yield, information important in history or prehistory (NPS, 2023a).

Nominations can be submitted to a State Historic Preservation Office from property owners, historical societies, preservation organizations, governmental agencies, and other individuals or groups. The State Historic Preservation Office notifies affected property owners and local governments and solicits public comment. If the owner (or a majority of owners for a district nomination) objects, the property cannot be listed but may be forwarded to the NPS for a Determination of Eligibility (DOE). Listing in the NRHP provides formal recognition of the historical, or archaeological significance of a property based on national standards used by every state (NPS, 2023a).

Under federal law, the listing of a property in the NRHP places no restrictions on what a non-federal owner may do with their property, up to and including destruction, unless the property is involved in a project that receives Federal assistance, usually funding or licensing/permitting. Although there are no property restrictions under federal law, CEQA Guidelines Section 15064.5 requires environmental review of buildings over 50 years old that are considered historic resources (NPS, 2023a).

2. National Historic Landmarks Program

National Historic Landmarks (NHLs) are nationally significant historic places designated by the U.S. Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Over 2,600 historic places bear this national distinction. Working with citizens throughout the nation, the NHL Program draws upon the expertise of NPS staff, who guide the nomination process for new NHLs and provide assistance to existing NHLs (NPS, 2023b).

B. State Plans, Policies, and Regulations

1. California Code of Regulations, Title 14, Section 4308

Section 4308, *Archaeological Features*, of Title 14 of the California Code of Regulations (CCR) provides that: "No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value" (CCR, n.d.).

2. California Code of Regulations Title 14, Section 1427

CCR Title 14, Section 1427 provides that: "No person shall collect or remove any object or thing of archaeological or historical interest or value, nor shall any person injure, disfigure, deface or destroy the physical site, location or context in which the object or thing of archaeological or historical interest or value is found." (NAHC, n.d.)

3. California Register of Historic Resources

The State Historical Resources Commission (SHRC) has designed the CRHR program for use by State and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The CRHR is the authoritative guide to the State's significant historical and archaeological resources. The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for State and local planning purposes; determines eligibility for State historic preservation grant funding; and affords certain protections under CEQA (OHP, n.d.).

The CRHR consists of properties that are listed automatically, as well as those that must be nominated through an application and public hearing process. The CRHR automatically includes the following:

- California properties listed in the NRHP and those formally Determined Eligible for the NRHP.
- California Registered Historical Landmarks from No. 0770 onward.
- California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the SHRC for inclusion on the CRHR.

The criteria for eligibility of listing in the CRHR are based on the NRHP criteria. To be eligible for listing in the CRHR, a property must be at least 50 years of age and possess significance at the local, State, or national level under one or more of four criteria:

- It is 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 (Criterion 1).
- It is associated with the lives of persons important to local, California or national history (Criterion 2).
- It embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values (Criterion 3).
- It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4) (OHP, n.d.).

Historical resources eligible for listing in the CRHR may include buildings, sites, structures, objects, and historic districts. Resources less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand their historical importance. Although the enabling legislation for the CRHR is less rigorous with regard to the issue of integrity, properties are expected to reflect their appearance during their period of significance, as stated in Public Resources Code (PRC) Section 5024.

The CRHR may also include properties identified during historical resource surveys. However, in accordance with PRC Section 5024.1, the survey must meet all of the following criteria:

- The survey has been or will be included in the State Historical Resources Inventory.
- The survey and the survey documentation were prepared in accordance with OHP procedures and requirements.
- The resource is evaluated and determined by the OHP to have a significance rating of Category 1 to 5 on a Department of Parks and Recreation (DPR) Form 523.

If the survey is five or more years old at the time of the resource's nomination for the CRHR, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource (OHP, n.d.).

4. California Public Resources Code

Certain cultural resources are protected pursuant to a wide variety of state policies and regulations enumerated under the California PRC. In addition, cultural (and paleontological) resources are recognized as nonrenewable resources and, therefore, receive protection under the PRC and CEQA.

- **PRC Sections 5020–5029.5** continued the former Historical Landmarks Advisory Committee as the SHRC. The SHRC oversees the administration of the CRHR and is responsible for the designation of State Historical Landmarks and Points of Historical Interest.

- **PRC Sections 5079–5079.65** defines the functions and duties of OHP. OHP is responsible for the administration of federal- and state-mandated historic preservation programs in California and the California Heritage Fund.

- **PRC Section 5097.5** prohibits a person from moving, destroying, injuring, or defacing, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

5. State Health and Safety Code

California Health and Safety Code (HSC) Section 7050.5(b) requires that excavation and disturbance activities must cease "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery…" until the coroner can determine the circumstances regarding the manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the HSC makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. HSC Section 7051 specifies that the removal of human remains from interment or a place of storage while awaiting interment with the intent to sell them or to dissect them with "malice or wantonness" is a public offense punishable by imprisonment in a state prison (CA Legislative Info, n.d.).

6. CEQA Guidelines Section 15064.5

Section 15064.5 of the CEQA Guidelines establishes the procedure for determining the significance of impacts to archaeological and historical resources, as well as classifying the type of resource. Cultural resources are aspects of the environment that require identification and assessment for potential significance. The evaluation of cultural resources under CEQA is based upon the definitions of "historical resources" provided in CEQA Guidelines Section 15064.5 as follows:

- A resource listed in, or determined to be eligible by the SHRC, for listing in the CRHR (PRC Section 5024.1, Title 14 CCR Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in an historical resource survey meeting the requirements PRC Section 5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- 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 to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (PRC Section 5024.1, Title 14 CCR Section 4852) including the following:
  - Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
  - Is associated with the lives of persons important in our past;
  - Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
  - Has yielded, or may be likely to yield, information important in prehistory or history.
- The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1(k)), or identified in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Section 5020.1(j) or 5024.1.

C. Local Regulations

1. City of Monrovia Municipal Code

Monrovia Municipal Code (MMC) Chapter 17.40.060(A) establishes the criteria for the designation of landmarks and historic districts. Per MMC Chapter 17.40.060(A), on the recommendation of the Historic

Preservation Commission, the Monrovia City Council can designate improvements, sites, or natural features that meet one or more of the following eligibility criteria:

- It is identified with persons/events significant in local, regional, state, or national history.
- It is representative of the work of a notable builder, designer, or architect.
- It contributes to the significance of an historic area, being a geographically definable area possessing a concentration of not less than 50% of historic or architecturally related grouping of properties…unified aesthetically by physical layout or development.
- It embodies one or more distinctive characteristics of style, type, period, design, materials, detail, or craftsmanship.
- It has a unique location or physical characteristics or represents an established and familiar visual feature of neighborhood, community, or the city.
- It incorporates elements that help preserve and protect an historic place or area of historic interest in the city.
- It has yielded, or may be likely to yield information important in prehistory or history.

4.3.5 Basis for Determining Significance

Based on Section V of Appendix G to the CEQA Guidelines, the Project would result in a significant impact to cultural resources if the Project would:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or

c) Disturb any human remains, including those interred outside of dedicated cemeteries.

The methodology for analysis of historical resources is based on research and an intensive-level field survey, research, and evaluation by historic resource experts at SWCA as documented in *Technical Appendix D2* (SWCA, 2025). The evaluation specifically follows the guidelines set forth in CEQA Guidelines Section 15064.5, which defines the criteria for determining the significance of historical resources. Given the Project site's proximity to a presumed historical resource, the Downtown Commercial Historic District, the analysis places particular emphasis on assessing the historic potential of the Project site, as well as the Project's potential to cause indirect impacts to both individual historic properties and the integrity of the broader historic context.

The methodology for analysis of pre/protohistoric archaeological resources is based on a cultural resources records search conducted through SCCIC at CSU Fullerton (BFSA, 2023). Because the Project site is fully developed, there is no potential for significant archaeological resources or human remains to be located on the

surface of the site; therefore, the analysis of potential impacts focuses on the potential for discovery of resources that may be located beneath the ground surface and discoverable during grading and other ground-disturbing construction activities.

4.3.6 IMPACT ANALYSIS

Threshold a.: Would the Project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

Under CEQA, a project has a significant impact on a historical resource if it would result in the "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resources would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1)). Further, and pursuant to CEQA Guidelines Section 15064.5(b)(3), a project that follows the Secretary of the Interior's *Standards for the Treatment of Historic Properties* or the Secretary of the Interior's *Standards for Rehabilitation* (the "*Secretary's Standards*") shall be considered as mitigated to having a less-than-significant impact on historical resources. A resource is "historically significant" if it meets the criteria for listing on the CRHR.

A. Direct Impacts

As discussed previously, the existing building located on the Project site, which is proposed for demolition, has been determined to be ineligible for listing in the NRHP or CRHP or by the City of Monrovia. Therefore, the proposed Project would not result in a direct impact to any historical resources, and, as such, no impact would occur.

B. Indirect Impacts

To weigh the potential for significant adverse impacts to the potential Downtown Commercial Historic District, SWCA's analysis considered the proposed Project's level of compliance with the U.S. Secretary of the Interior's *Standards for Rehabilitation*.

For an analysis of potential indirect impacts to adjacent historical resources, the most relevant guidelines to consider are Standard No. 9, as well as the aspects of "setting" and "feeling" for the historical resource. The analysis contained in *Technical Appendix D2* concludes that the proposed Project complies with Standard No. 9 by not adversely affecting the historic spatial relationships of the Downtown Commercial Historic District. The spatial relationships between the buildings and the setting/landscape, circulation corridors, and sidewalks would be maintained during and after construction of the Project, for a cohesive, integration of the north-south commercial corridor along South Myrtle Avenue.

Setbacks along South Myrtle Avenue proposed by the Project would be uniform with those of the presumed historical resource, the Downtown Commercial Historic District. The Project site's South Myrtle Avenue setback also is proposed to be landscaped with a variety of ornamental groundcover, vines, shrubs, and trees meeting MMC Chapter 17.20, Landscaping/Tree Preservation. The proposed Project's building displays a mass that is generally higher than that of the potential Downtown Commercial Historic District. However, the Project's proposed building height of 65 feet (with architectural projections up to 80 feet) would be softened

through the articulation and setbacks of the upper stories, as well as a cut-out at the corner of South Myrtle and Olive Avenues. In this way, the proposed Project is not expected to compromise the presumed historic district's integrity of setting or feeling (SWCA, 2025, p. 70).

In addition, the Project's proposed maximum building height is comparable with recent redevelopment projects in the Old Town Extension District, including similar, recent new development adjacent to the east and one block to the south. The maximum height of the proposed Project's building would indeed change the setting and feeling of the adjacent presumed historic district, but, due to the otherwise highly compatible design, this change would not be expected to compromise the Old Town Extension District's overall historic character and integrity of setting and feeling (SWCA, 2025, p. 70).

Finally, and based on the proposed 701 S. Myrtle Specific Plan, the Project's design was based on a detailed analysis of the character, styles, and palette of colors and materials seen throughout the potential Downtown Commercial Historic District. The proposed Project's architectural style is a modern interpretation of prevalent features found in Old Town Monrovia. These design elements are intended to create a well-balanced building elevation, incorporating architectural strategies, to reduce bulk and massing and to activate the pedestrian environment through interactive architecture and landscape elements, such as vibrant storefronts, benches and planter walls, enhanced paving accents, and accent lighting. The attention to design and architectural details has resulted in a proposed Project that, while higher than the scale of the potential Downtown Commercial Historic District, is compatible with it. This influence is reflected in the incorporation of features that help it blend in with the Downtown Commercial Historic District; these features include (1) the setback design and the 1,495-s.f. open public plaza at the northeastern corner of the Project site; (2) sidewalk setbacks and pedestrian entrances along South Myrtle Avenue consistent with those existing in the Downtown Commercial Historic District; (3) clearly articulated ground-floor; and (4) compatible but differentiated variety of materials and color palette, differentiated bays/volumes throughout wall plane, stepped-back top stories.

Based on the preceding discussion, the Project components comply with the *Secretary's Standards,* as well as updated guidelines and recommendations. Per CEQA Guidelines Section 15331, a project in conformance with the *Secretary's Standards* is generally considered a project that would not cause a significant adverse impact on historical resources, and no further CEQA analysis or development of mitigation measures are required. Accordingly, impacts would be less than significant.

Threshold b.: Would the Project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5?

A records search was conducted through the SCCIC at CSU Fullerton, which indicated that that no pre/protohistoric cultural resources have been recorded on or within a one-mile radius of the Project site. Therefore, implementation of the Project would not cause a substantial adverse change in the significance of a known prehistoric archeological resource pursuant to CEQA Guidelines Section 15064.5.

Given the lack of any previously identified pre/protohistoric sites within or near the Project site and the fact that the Project site is fully developed and was graded to implement the existing development, there is little potential for any pre/protohistoric resources to be present beneath the site and discoverable as part of the

Project's construction activities. However, there is a remote potential that Project-related ground-disturbing construction activities could extend into previously undisturbed soils and encounter potentially significant archaeological resources. If any pre/protohistoric cultural resources are unearthed during Project construction that meet the definition of a significant archaeological resource pursuant to CEQA Guidelines Section 15064.5 and are disturbed or damaged by Project construction activities, impacts to those pre/protohistoric cultural resources would be potentially significant.

Threshold c.: Would the Project disturb any human remains, including those interred outside of formal cemeteries?

The Project site is fully developed and does not contain a cemetery, and no known formal cemeteries are located within the immediate site vicinity (Google Earth, 2023). Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction should Project-related construction activities extend into previously undisturbed soils.

If human remains are unearthed during Project construction, the construction contractors would be required by law to comply with HSC Section 7050.5 "Disturbance of Human Remains." According to HSC Sections 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner is required to contact the NAHC by telephone within 24 hours. Pursuant to PRC Section 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to PRC Section 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials. Through mandatory compliance with HSC Section 7050.5 and PRC Section 5097.98, any potential impacts to human remains, including human remains of Native American ancestry, that may result from development of the Project would be less than significant.

4.3.7 Cumulative Impact Analysis

Historic Resources

The potential for implementation of modern development on the Project site to contribute to cumulative impacts to historical resources was analyzed in conjunction with other projects located in areas that were once similarly influenced by the historical context of the City of Monrovia and surrounding area. The record search indicates the absence of significant historical sites and resources on the Project site. As identified above, one presumed historical resource, the Downtown Commercial Historic District, is located adjacent to the north side of the Project site; however, the proposed Project would comply with the *Secretary's Standards,* as well as its

associated 2017 updated guidelines and recommendations. At this time, no cumulative projects known to the City are located within the Project's APE for historic resources impact evaluation. Future projects subject to CEQA review would have to be reviewed for compliance with the *Secretary's Standards,* as well as its associated guidelines and recommendations prior to approval or certification of the CEQA compliance document. Therefore, implementation of the Project has no potential to contribute towards a significant cumulative impact to historical sites and/or resources.

Archaeological Resources

The potential for construction on the Project site to result in cumulative impacts to prehistoric archaeological resources was analyzed in conjunction with other projects located in the traditional use areas of Native American tribes that are affiliated with the Project site. Development activities on the Project site would not impact any known prehistoric archaeological resources, and the likelihood of uncovering subsurface prehistoric archaeological resources during Project construction is low due because the Project site is fully developed and past ground disturbance has occurred on the Project site. Nonetheless, a remote potential exists for subsurface prehistoric archaeological resource that meet the CEQA Guidelines Section 15064.5 definition of a significant archaeological resource to be discovered beneath the surface of the Project site, and on other development project sites in the region, during construction activities. Accordingly, the Project has the potential to contribute to a significant cumulative impact to prehistoric archaeological sites and/or resources.

Human Remains

Mandatory compliance with the provisions of HSC Section 7050.5, as well as PRC Section 5097 *et seq.*, would ensure that all development projects within the region treat human remains that may be uncovered during development activities in accordance with prescribed, respectful, and appropriate practices, thereby avoiding significant cumulative impacts. Therefore, cumulative impacts related to human remains would be less than significant.

4.3.8 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. No historical resources, as defined by CEQA Guidelines Section 15064.5, are present on the Project site that could be affected by Project-related construction activities. As such, no direct impacts to historical resources would occur. One presumed historical resource, the Downtown Commercial Historic District, is located adjacent to the north side of the Project site; however, the proposed Project would comply with the *Secretary's Standards,* as well as its associated updated guidelines and recommendations and the development standards and guidelines proposed in the 701 S. Myrtle Avenue Specific Plan, which would ensure compatibility with the character of the presumed historic district. Therefore, no historical resources would be adversely indirectly affected by construction or operation of the Project, and impacts to historical resources would be less than significant.

Threshold b.: Potentially Significant Direct and Cumulative Impact. No known prehistoric resources are present on the Project site, and the likelihood of uncovering buried prehistoric resources on the Project site is low because the Project site is fully developed and past ground disturbance has occurred on the Project site. Nonetheless, the remote potential exists for Project-related construction activities to result in direct and

cumulative impacts to significant subsurface prehistoric archaeological resources should such resources be discovered during Project-related construction activities. Therefore, without mitigation, Project-level and cumulative impacts to archaeological resources would be potentially significant.

Threshold c.: Less-than-Significant Impact. In the unlikely event that human remains are discovered during Project grading or other ground disturbing activities, the Project's construction contractors would be required to comply with the applicable provisions of HSC Section 7050.5 and PRC Section 5097 *et seq*. Mandatory compliance with State law would ensure that any discovered human remains are appropriately treated and that impacts are reduced to less than significant.

4.3.9 Mitigation

The following mitigation measures address the potential for Project construction activities to impact significant archaeological resources that may be discovered during ground-disturbing construction activities. Mitigation Measures MM 4.3-1, MM 4.3-2, and MM 4.3-3 would be imposed on the Project to set forth the procedures that would be followed should subsurface resources be discovered during construction.

MM 4.3-1 Prior to the issuance of a demolition permit or any permit authorizing ground-disturbing construction activities, evidence shall be provided to the City of Monrovia that the construction contractors have been trained on how to identify potential cultural, tribal cultural, and archaeological resources. Construction personnel in charge of supervising ground-disturbing activities must have received cultural resource awareness training within 60 days of commencing work on the Project site.

MM 4.3-2 Upon discovery of any suspected cultural, tribal cultural, or archaeological resources, construction activities within 100 feet of the find shall pause until the find can be assessed by a Qualified Archaeologist meeting the U.S. Secretary of the Interior Standards for archaeology and a tribal monitor/consultant (if such tribal monitor chooses to participate in monitoring following adequate written notice to the Tribe). If a resource is discovered that the Qualified Archaeologist determines to be significant pursuant to the definition given in CEQA Guidelines Section 15064.5, mitigation shall occur following the guidance given in CEQA Guidelines Section 15126.4(b) and as approved by the City Community Development Director or her designee to reduce impacts to less than significant. Mitigation methods include, but are not limited to, data recovery, documentation, preservation in place, and removal for laboratory processing and analysis followed by either curation at a non-profit institution or conveyance to a culturally affiliated Native American Tribe. Work may continue on other parts of the construction site while the evaluation takes place.

MM 4.3-3 Archaeological and Native American monitoring, if determined necessary upon the discovery of any significant resource(s), and excavation during construction shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel shall meet the Secretary of the Interior standards for archaeology

and have a minimum of 10 years' experience as a principal investigator working with Native American archaeological sites in Southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

4.3.10 Design Features (DF) and Regulatory Requirements (RR)

The City of Monrovia requires compliance with the following:

CUL DF-1: The 701 S. Myrtle Specific Plan contains development standards and design guidelines to address the Project's site design, architectural character, and landscaping. Compliance with the Specific Plan is mandatory and will be ensured through the building permit and construction inspection process.

CUL RR-1: California Health and Safety Code (HSC) Sections 7050.5(b) and (c) pertain to the discovery of human remains. If remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) by telephone within 24 hours.

CUL RR-2: California Public Resources Code (PRC) Section 5097.98, which requires that whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.

4.3.11 Significance of Impacts After Mitigation

Threshold b.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measures MM 4.3-1 through MM 4.3-3 would ensure the proper identification and subsequent treatment of any significant archaeological resources that may be encountered during ground-disturbing activities associated with Project construction. With implementation of the required mitigation, the Project's potential impacts to important archaeological resources would be reduced to less than significant. Cumulative impacts would likewise be reduced to a less than significant.

4.4 ENERGY

The analysis in this subsection is primarily based on information contained in a technical report prepared by Urban Crossroads, Inc., titled, "701 S. Myrtle Energy Analysis, City of Monrovia" (herein, "EA"), and dated April 16, 2025 (UXR, 2025b). The technical report is included as *Technical Appendix E* to this EIR. Refer to Section 7.0, *References*, for a complete list of reference sources used in this Subsection.

4.4.1 EXISTING CONDITIONS

Refer to *Technical Appendix E,* pp. 7 through 15 for an overview of energy resource availability and consumption information for the State of California. The information below is specific to the Project site and the service areas of the Project site's energy providers.

A. Electricity

The Project site is located within the service area of Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE's 2018 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers. Table 4.4-1, *SCE 2022 Power Content Mix*, provides SCE's specific proportional shares of electricity sources in 2022, which is the most recent year of available data. As indicated in Table 4.4-1, the 2022 SCE Power Mix has renewable energy at 33.2% of the overall energy resources. The City has selected Clean Power Alliance (CPA) as its new preferred electricity provider. Starting in March 2024, homes and businesses began transitioning to CPA service and automatically receive clean, competitively priced energy from CPA. The City also selected 100% Green Power with 100% renewable energy as its preferred energy option (City of Monrovia, 2024b).

Table 4.4-1 SCE 2022 Power Content Mix

Energy Resources	2022 SCE Power Mix
Eligible Renewable	**33.2%**
Biomass & Waste	0.1%
Geothermal	5.7%
Eligible Hydroelectric	0.5%
Solar	17.0%
Wind	9.8%
Coal	**0.0%**
Large Hydroelectric	**3.4%**
Natural Gas	**24.7%**
Nuclear	**8.3%**
Other	**0.1%**
Unspecified Sources of power*	30.3%
Total	**100%**

* "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.

(UXR, 2025b, Table 2-2)

The Project site is currently occupied by approximately 25,191-s.f. of office use within the Myrtle and Olive Business Park. The estimated energy demands from the existing development are summarized in Table 4.4-2, *Total Existing Operational Electricity Demand Summary*. Existing energy demands were modeled utilizing CalEEMod model defaults. Detailed operation model outputs are presented in Appendix 4.2 of the Project's Energy Analysis (*Technical Appendix E*) (UXR, 2025b, p. 30).

Table 4.4-2 Total Existing Operational Electricity Demand Summary

Land Use	Natural Gas Demand (kBTU/year)	Electricity Demand (kWh/year)
Existing	490,600	92,504
EXISTING ENERGY DEMAND	***490,600***	***92,504***

(UXR, 2025b, Table 4-9)

B. Transportation Energy Resources

Gasoline (and other vehicle fuels) are commercially provided commodities and are available to the Project site's residents, visitors, patrons, and employees via commercial outlets. The Department of Motor Vehicles (DMV) identified 36.2 million registered vehicles in California, and those vehicles consume an estimated 17.2 billion gallons of fuel each year. While gasoline consumption has been declining across California since 2008 it is still by far the dominant fuel used to power vehicles (UXR, 2025b, p. 15).

The estimated transportation fuel demands from the existing development are summarized in Table 4.4-3, *Existing Building Total Traffic Annual Fuel Consumption*. Existing transportation fuel demands were modeled utilizing CalEEMod model defaults and trip characteristics available from the Project's *Traffic Analysis Report*. Detailed operation model outputs are presented in Appendix 4.2 of the Project's Energy Analysis (*Technical Appendix E*) (UXR, 2025b, p. 28).

Table 4.4-3 Existing Building Total Traffic Annual Fuel Consumption

Vehicle Type	Average Vehicle Fuel Economy (mpg)	Annual VMT	Estimated Annual Fuel Consumption (gallons)[1]
LDA	31.24	619,649	19,834
LDT1	24.32	54,158	2,227
LDT2	24.04	275,781	11,470
MDV	19.71	167,916	8,518
MCY	41.21	25,410	617
HHD	6.04	127,670	21,139
EXISTING FUEL CONSUMPTION (ALL VEHICLES)		***1,270,585***	***63,805***

[1] The estimated annual fuel consumption includes both diesel and gasoline.
(UXR, 2025b, Table 4-7)

C. Natural Gas

The Project site is located within the service area of the Southern California Gas Company (SoCalGas) which is regulated by the California Public Utilities Commission (CPUC). As summarized in the Project's Energy Analysis, the existing Myrtle and Olive Business Park operating on the Project site under existing conditions is estimated to consume approximately 490,600 kBTU/year of natural gas.

4.4.2 Regulatory Setting

The following is a brief description of the federal, State, and local environmental laws and related regulations related to energy use and conservation.

A. Federal Plans, Policies, and Regulations

1. Federal Energy Independence And Security Act Of 2007 (EISA)

On December 19, 2007, President Bush signed the Energy Independence and Security Act of 2007 (EISA) which reinforces energy reductions put forth in Executive Order 13423 as well as introduces more aggressive requirements. The three enacted provisions are the Corporate Average Fuel Economy Standards, the Renewable Fuel Standard, and the Appliance/Lighting Efficiency Standards. Additionally, the EISA aims to move the United States towards greater energy independence and energy security, improving the Federal Governments energy performance, increase the production rate of renewable fuels and efficiency of vehicles, products and buildings, and promote research on greenhouse gas capture and storage options.

B. State Plans, Policies, and Regulations

1. Integrated Energy Policy Report (IEPR)

/State law requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (Public Resources Code Section 25301[a]). The CEC prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report.

The 2023 IEPR was adopted February 2024, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2023 IEPR introduces a new framework for embedding equity and environmental justice at the CEC and the California Energy Planning Library which allows for easier access to energy data and analytics for a wide range of users. Additionally, energy reliability, western electricity integration, gasoline cost factors and price spikes, the role of hydrogen in California's clean energy future, fossil gas transition and distributed energy resources are topics discussed within the 2023 IEPR (UXR, 2025b, p. 17).

2. State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The State

Energy Plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access (UXR, 2025b, p. 17).

3. California Code of Regulations, Title 24, Parts 6 and 11

California Code of Regulations (CCR) Title 24 Part 6, Energy Efficiency Standards, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective on January 1, 2023. The CEC anticipates that the 2022 energy code will provide $1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons. The Project would be required to comply with the applicable standards in place at the time building permit document submittals are made (UXR, 2025b, pp. 17-18).

4. Pavley Fuel Efficiency Standards

On September 24, 2009, CARB adopted amendments to the "Pavley" regulations that reduced GHG emissions in new passenger vehicles from model year 2009 through 2016. The U.S. EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles on June 30, 2009. It is expected that the Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs. CARB has since adopted a new approach to cars and light trucks by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California (CARB, n.d.).

5. California Renewable Portfolio Standards

The California Energy Commission (CEC) implements and administers portions of California's Renewables Portfolio Standard (RPS). Under the RPS, 25% of retail sales were originally required to be from renewable sources by December 31, 2016, 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030. SB 100 raises California's RPS requirement to 50% renewable resources target by December 31, 2026, and to a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a

carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and California Air Resources Board (CARB) to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal (CEC, n.d.).

6. Advanced Clean Cars Program

In 2012, the CARB adopted a set of regulations to control emissions from passenger vehicle model years 2017 through 2025, collectively called Advanced Clean Cars. Advanced Clean Cars, developed in coordination with the U.S. EPA and National Highway Traffic Safety Administration (NHTSA), combined the control of smog-causing (criteria) pollutants and GHG emissions into a single coordinated package of regulations: the Low-Emission Vehicle III Regulation for criteria (LEV III Criteria) and GHG (LEV III GHG) emissions, and a technology-forcing mandate for zero-emission vehicles (ZEV). The goal of the program is to guide the development of environmentally advanced cars that would continue to deliver the performance, utility, and safety car owners have come to expect. Advanced Clean Cars includes the following elements (CARB, n.d.):

- LEV III Criteria: Reducing Smog-Forming Pollution. CARB adopted new emission standards to reduce smog-forming emissions (also known as "criteria pollutants") beginning with 2015 model year vehicles. The goal of this regulation is to have cars emit 75 percent less smog-forming pollution than the average car sold in 2012 by 2025.
- LEV III GHG: Reducing GHG Emissions. California's GHG regulations are projected to reduce GHG emissions from new vehicles by approximately 40 percent (from 2012 model vehicles) in 2025.
- ZEV Regulation: Promoting the Cleanest Cars. The ZEV regulation is designed to achieve the State's long-term emission reduction goals by requiring auto manufacturers to offer for sale specific numbers of the very cleanest cars available. These vehicle technologies include full battery-electric, hydrogen fuel cell, and plug-in hybrid-electric vehicles. Updated estimates using publicly available information show about 8 percent of California new vehicle sales in 2025 will be ZEVs and plug-in hybrids.

7. Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved, and the Governor signed SB 350, also known as the Clean Energy and Pollution Reduction Act of 2015, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions (CA Legislative Info, 2015):

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly owned utilities.

- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

8. Clean Energy, Jobs, and Affordability Act of 2022

SB 1020, also known as the Clean Energy, Jobs, and Affordability Act of 2022, revised State policy to include interim targets requiring that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035, 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040, 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045, and 100 percent of electricity procured to serve all state agencies by December 31, 2035. SB 1020 also requires each State agency to ensure that zero-carbon resources and eligible renewable energy resources supply 100 percent of electricity procured to serve their agency by December 31, 2035. In addition, SB 1020 requires the State Water Project (SWP) to procure eligible renewable energy and zero-carbon resources as necessary to meet the clean energy requirements specified for all State agencies. Finally, SB 1020 requires the California Public Utilities Commission (CPUC) to develop utility affordability metrics for both electricity and gas service (CA Legislative Info, 2022a).

C. Local Policies and Regulations

1. City of Monrovia General Plan

The City of Monrovia General Plan Land Use Element includes the following policy related to the conservation of energy resources:

- Policy 10.6: Encourage the conservation of water and energy resources in order to reduce the need for expansion of water reservoirs and distribution facilities, as well as energy generating plants and distribution facilities.

2. City of Monrovia Energy Action Plan (EAP)

The EAP identifies Monrovia's long-term vision and commitment to achieve energy efficiency in the community and in municipal operations. It recommends future actions that could improve energy efficiency and reduce GHG emissions to support City efforts to optimize energy performance in the community, increase operational productivity, reduce costs, and improve the quality of life for residents, employees, and business owners. The Plan also identifies programs to achieve cost savings in City government facilities through energy reductions and more efficient maintenance and operational practices. Over time, the City of Monrovia evaluates recommendations and implements measures if appropriate and as funding and staff resources allow.

In 2007 the City adopted 21 Environmental Accords that direct the City's efforts related to energy, waste reduction, transportation, and water conservation. These accords continue to guide the City's efforts to address environmental and urban design issues. As part of the regional partnership between the City, SCE, and the San Gabriel Valley Council of Governments (SGVCOG), the City prepared the EAP to further the objectives expressed in the Environmental Accords. The EAP charts a path to Monrovia's continued leadership in implementing energy conservation strategies and improving municipal operations. The EAP is a stand-alone

document that meets multiple objectives of the City and SCE. The EAP supports the City's status in the Energy Leader Partnership with SCE. Starting in March 2024, the CPA began purchasing energy from renewable power resources, such as wind, solar, or geothermal, and SCE deliver the energy to City residences and businesses. In addition, the EAP serves as the equivalent of an electricity efficiency chapter of a climate action plan (EECAP). It is designed to integrate into a comprehensive climate action plan when the City's resources support the preparation of a climate action plan to address the reduction of GHG emissions from electricity, natural gas, waste, transportation, and other sectors (Monrovia, 2012a).

4.4.3 Basis for Determining Significance

According to Section VI of Appendix G to the CEQA Guidelines, the Project would result in a significant impact associated with energy if the Project would:

a) *Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or*

b) *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.*

A. Methodology for Calculating Project Energy Demands

Information from the CalEEMod Version 2022 outputs for the Project's Air Quality Impact Analysis (EIR *Technical Appendix C*; herein, "AQIA") was utilized in this analysis, detailing Project related construction equipment, transportation energy demands, and facility energy demands (UXR, 2025b, p. 20).

In August 2023, the SCAQMD, in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the CalEEMod Version 2022.1.1.22. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources as well as energy usage. Accordingly, the latest version of CalEEMod has been used to determine the Project's anticipated transportation and facility energy demands. Outputs from the annual model runs are provided in Appendices 4.1 and 4.2 of the Project's Energy Analysis (*Technical Appendix E)* (UXR, 2025b, p. 20).

On May 2, 2022, the EPA approved the 2021 version of the EMissions FACtor model (EMFAC2021) web database for use in State Implementation Plan (SIP) and transportation conformity analyses. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, and VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. This energy study utilizes the different fuel types for each vehicle class from the annual EMFAC2021 emission inventory in order to derive the average vehicle fuel economy which is then used to determine the estimated annual fuel consumption associated with vehicle usage during Project construction and operational activities. For purposes of analysis, the 2024 through 2027 analysis years were utilized to determine the average vehicle fuel economy used throughout the duration of the Project. Outputs from the EMFAC2021 model run are provided in Appendix 4.3 of the Project's Energy Analysis (*Technical Appendix E*) (UXR, 2025b, pp. 20-21).

4.4.4 IMPACT ANALYSIS

Threshold a.:	***Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

A. Project Construction

The Project's construction process would consume electrical energy and fuel. Project-related construction would represent a short-term energy demand and would not require on-going or permanent commitment of electricity or fuel resources. The amount of electricity consumed by construction equipment is speculative to quantify, but is expected to be minimal as most of the equipment pieces would be powered by fuel. As shown by detailed calculations in the Project's Energy Analysis in *Technical Appendix E*, approximately 19,389 gallons of fuel are estimated to be consumed to power the Project's construction equipment (UXR, 2025b, pp. 22-23), approximately 38,654 gallons of fuel are estimated to be used by construction workers traveling to and from the Project site (UXR, 2025b, pp. 25-26), and an additional 17,544 gallons of fuel are expected to be consumed for construction vendor trips (UXR, 2025b, pp. 26-27). Construction equipment fuel use would be typical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable California Air Resources Board (CARB) emissions standards.

In 2014, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turnover the oldest equipment to newer, cleaner models. Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.

Limitations on idling vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations, Title 13, Sections 2449 and 2485, limit idling from both on-road and off-road diesel- powered equipment and are enforced by the Air Resources Board (ARB). Additionally, given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

A full analysis related to the embodied energy needed to form the Project's construction materials is not included in this analysis due to a lack of detailed Project-specific information on the origin of construction materials. At this time, an analysis of the embodied energy needed to create Project-related construction materials would be extremely speculative and thus is not included herein. In general, construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing, and refinement. Use

of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations (UXR, 2025b, p. 28).

Due to the temporary nature of construction, the regulations in place to reduce energy consumption, and the financial incentives for developers and contractors to use energy-consuming resources in an efficient manner, the construction phase of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy. Therefore, construction-related impacts related to electricity and fuel consumption would be less than significant. No mitigation is required.

B. Project Operation

Energy consumption in support of or related to Project operations would include transportation fuel demands (fuel consumed by passenger car and truck vehicles accessing the Project site), fuel demands from operational equipment, and facilities energy demands (energy consumed by building operations and site maintenance activities) (UXR, 2025b, p. 28).

1. Transportation Fuel Demands

Energy that would be consumed by Project-generated traffic is a function of total vehicle miles traveled (VMT) and estimated vehicle fuel economies of vehicles accessing the Project site. The VMT per vehicle class can be determined by evaluating the vehicle fleet mix and the total VMT. As with worker and vendors trips, operational vehicle fuel efficiencies were estimated using information generated within EMFAC2021 developed by CARB. EMFAC2021 was run for the Los Angeles sub-area for the 2027 calendar year. Data from EMFAC2021 is shown in Appendix 4.3 of the Project's Energy Analysis (*Technical Appendix E*) (UXR, 2025b, p. 29).

The estimated transportation energy demands are summarized on Table 4.4-4, *Total Project-Generated Traffic Annual Fuel Consumption*. As summarized on Table 4.4-4, the Project would result in a net total of 3,443,645 annual VMT and an estimated annual fuel consumption of 116,822 gallons of fuel (UXR, 2025b, p. 29).

Project annual fuel consumption estimates presented in Table 4.4-4 represent likely potential maximums that would occur for the Project. Under subsequent future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation, and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system (UXR, 2025b, p. 31).

Table 4.4-4 Total Project-Generated Traffic Annual Fuel Consumption

Vehicle Type	Average Vehicle Fuel Economy (mpg)	Annual VMT	Estimated Annual Fuel Consumption (gallons)
LDA	33.97	2,325,452	68,461
LDT1	25.86	199,551	7,716
LDT2	26.03	1,132,523	43,509
MDV	21.46	676,021	31,508
LHDT1	16.81	127,128	7,564
LHDT2	15.95	32,648	2,046
MHD	8.02	51,909	6,473
HHD	6.38	42,169	6,614
OBUS	6.34	3,985	628
UBUS	3.40	2,919	858
MCY	41.59	103,756	2,495
SBUS	6.63	3,060	461
MH	5.72	13,110	2,293
PROJECT FUEL CONSUMPTION (ALL VEHICLES)		***4,714,230***	***180,627***
EXISTING FUEL CONSUMPTION (ALL VEHICLES)		*1,270,585*	*63,805*
TOTAL NET FUEL CONSUMPTION (ALL VEHICLES)		**3,443,645**	**116,822**

(UXR, 2025b, Table 4-8)

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) likely would decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands (UXR, 2025b, p. 31).

2. Operational Energy Demands

Project building operational activities would result in the consumption of natural gas and electricity, which would be supplied to the Project by SoCalGas and SCE, respectively. Gas and electricity use associated with the Project's operation were calculated based on CalEEMod default values. As summarized on Table 4.4-5, *Project Annual Operational Energy Demand Summary*, the Project is calculated to result in a net increase of 1,971,012 kBTU per year in natural gas use and a net increase of 576,716 kWh per year in electricity consumption. Use of the CalEEMod default values is a conservative analysis methodology and results in an over-estimation of natural gas and electricity demand that would be placed upon SoCalGas and SCE for the following reasons. First, the CalEEMod default values assume that all portions of the Project's building other than the parking areas would be supplied with natural gas whereas the Project Applicant anticipates that only the building's commercial space would require the use of natural gas. Second, the Project design includes the installation of a rooftop solar photovoltaic (PV) system with a capacity of 321 kW. This system is expected to generate approximately 523,854 kWh of electricity annually to service the Project. Pursuant to CALGreen 2022, high-rise multifamily developments, which are defined as buildings that have four or more habitable stories, are required to accommodate PV systems to generate on-site renewable energy. Thus, the Project's

electricity demand supplied from the SCE power grid would be lower than the total estimated electricity demand presented in Table 4.4-5 (UXR, 2025b, pp. 30-31).

Table 4.4-5 Project Annual Operational Energy Demand Summary

Land Use	Natural Gas Demand (kBTU/year)	Electricity Demand (kWh/year)
Apartments Mid Rise	2,265,796	223,976
Commercial Space	14,135	23,277
Fitness Center	119,075	26,687
Leasing Office/Lobby/Mail Room	62,606	44,016
Parking	0	351,264
PROJECT ENERGY DEMAND	***2,461,612***	***669,220***
EXISTING ENERGY DEMAND	490,600	92,504
TOTAL NET ENERGY DEMAND	**1,971,012**	**576,716**

Note: Calculations are based on CalEEMod default values. Project demand on SoCalGas and SCE is anticipated to be lower than reported in this table.
(UXR, 2025b, Table 4-10)

C. CEQA Guidelines Appendix F

An analysis of the factors identified in CEQA Guidelines Appendix F is provided in Table 4.4-6, *CEQA Guidelines Appendix F Energy Analysis.* As shown, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation; and impacts would be less than significant. No mitigation is required.

Table 4.4-6 CEQA Guidelines Appendix F Energy Analysis

CEQA Guidelines Appendix F Factors	Analysis
The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project, including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.	The Project's energy requirements by fuel type during construction and operation are analyzed above. As discussed, construction equipment fuel use would be typical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards. Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. The Project is located on an infill site that is surrounded by existing urban uses; the existing transportation facilities and infrastructure would provide future residents, visitors, vendors, customers, and employees associated with the Project access to a mix of land uses near the Project, thus further reducing fuel consumption demand. Additionally, the Project would provide designated EV parking spaces and EV infrastructure for the charging of EV's that would further promote fuel efficient vehicles in compliance with the 2022 California Green Building Codes,

Table 4.4-6 CEQA Guidelines Appendix F Energy Analysis

CEQA Guidelines Appendix F Factors	Analysis
	which have been adopted by the City, and the Project would promote the use of bicycles as an alternative means of transportation by providing short-term and/or long-term bicycle parking accommodations. For these reasons, both construction-related and operational-related transportation fuel consumption would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, impacts related to vehicle fuel consumption would be less than significant.
The effects of the project on local and regional energy supplies and on requirements for additional capacity. The effects of the project on energy resources.	As discussed above, Project building operations would result in the consumption of natural gas and electricity, which would be supplied to the Project by SoCalGas and SCE, respectively. The Project site is an infill development, and electricity is currently provided to the site by SoCalGas and SCE for the existing business park use. As summarized on Table 4.4-5, operations for the Project would result in a net increase of approximately 1,971,012 kBTU/year of natural gas and 576,716 kWh/year of electricity Furthermore, the Project would be required to obtain will serve letters from SoCalGas and SCE, although it is anticipated that natural gas and electrical service to the Project's proposed building would be provided without disruptions to existing electrical service in the local area. SoCalGas is pursuing renewable natural gas procurement in response to the California Public Utilities Commission issued Decision 22-02-025 to implement 2022 Senate Bill 1440, defining two collective biomethane procurement targets for the California investor-owned natural-gas utilities. To meet California's Renewable Gas Standard established in accordance with California Public Utilities Code Section 650 et. seq, investor-owned natural gas utilities may procure biomethane produced not only from landfill organic waste, but also from other feedstocks, including those from landfills, wastewater treatment plants, synthetic gas, and dairies (SoCalGas, 2025). Furthermore, SCE is undertaking a number of measures to ensure not only that it can meet the growing demands for electricity within its service area, but also to ensure that new sources of electricity meet the State's goals for renewable energy. These measures include accelerating transmission upgrades and seeking new sources of generation to increase reliability and bolster power reserves, while also

Table 4.4-6 CEQA Guidelines Appendix F Energy Analysis

CEQA Guidelines Appendix F Factors	Analysis
	encouraging its customers to reduce their consumption of electricity. With respect to electricity reliability, the California Public Utility Commission (CPUC) Integrated Resource Plan aims to add 7 gigawatts (GW) of electricity per year over the next 10 years to meet growing demands. As the Project is within the City's overall growth projections through 2050, and because SCE is anticipated to implement improvements to the electrical grid to accommodate new development within its service area, the Project would not result in impacts on local or regional energy supplies and would not directly result in the need for new or expanded sources of electricity beyond what already is being planned by SCE and the CPUC (SCE, 2023). With the City's selection of CPA, the City has chosen to use 100 percent green power with 100 percent renewable energy as its preferred energy option. Therefore, the Project would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.
The effects of the project on peak and base period demands for electricity and other forms of energy.	The Project's total energy demand is evaluated above. The Project consists of a residential and mixed-use development and would affect peak and base period demands for electricity typical of other similar buildings. The Project would be required to obtain a will serve letter from SCE, although it is anticipated that electrical service to the Project's proposed building would be provided without disruptions to existing electrical service in the local area. Furthermore, the SCE is undertaking a number of measures to ensure not only that it can meet the growing demands for electricity within its service area, but also to ensure that new sources of electricity meet the State's goals for renewable energy. These measures include accelerating transmission upgrades and seeking new sources of generation to increase reliability and bolster power reserves, while also encouraging its customers to reduce their consumption of electricity. With respect to electricity reliability, the CPUC Integrated Resource Plan aims to add 7 GW of electricity per year over the next 10 years to meet growing demands. As the Project is within the City's overall growth projections through 2050, and because SCE is anticipated to implement improvements to the electrical grid to accommodate new development within its service area, the Project would not result in impacts on local or regional energy supplies and would not directly result in the need for new or expanded sources of electricity beyond what already is being planned

Table 4.4-6 CEQA Guidelines Appendix F Energy Analysis

CEQA Guidelines Appendix F Factors	Analysis
	by SCE and the CPUC (SCE, 2023). Impacts would be less than significant.
The degree to which the project complies with existing energy standards.	As analyzed under Threshold b, below, the Project would comply with and not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. For example, during construction, the Project would comply with California Code of Regulations Title 13, Sections 2449 and 2485, which limit idling from both on- road and off-road diesel-powered equipment and are enforced by the CARB. During operation, the Project would be designed and constructed in accordance with the California Title 24 energy efficiency standards. Title 24 standards are widely regarded as the most advanced energy efficiency standards in the United States and would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in the building and promote energy conservation. Impacts would be less than significant.

D. Conclusion

As supported by the preceding analyses, Project construction and long-term operation would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, and based on long-term planning efforts by SCE and the CPUC, the energy demands of the Project can be accommodated within the context of available and/or planned resources and energy delivery systems. The SCE is undertaking a number of measures to ensure not only that it can meet the growing demands for electricity within its service area, but also to ensure that new sources of electricity meet the State's goals for renewable energy. These measures include accelerating transmission upgrades and seeking new sources of generation to increase reliability and bolster power reserves, while also encouraging its customers to reduce their consumption of electricity. With respect to electricity reliability, the California Public Utility Commission (CPUC) Integrated Resource Plan aims to add 7 gigawatts (GW) of electricity per year over the next 10 years to meet growing demands. As the Project is within the City's overall growth projections through 2050, and because SCE is anticipated to implement improvements to the electrical grid to accommodate new development within its service area, the Project would not result in impacts on local or regional energy supplies and would not directly result in the need for new or expanded sources of electricity beyond what already is being planned by SCE and the CPUC (SCE, 2023). Future building permit applications associated with the Project would be required to comply with the applicable Title 24 standards. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Therefore, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant. No mitigation is required.

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

A summary of the Project's consistency with applicable regulations and requirements related to renewable energy and energy efficiency is provided below.

A. Construction

As discussed in Threshold a, above, the Project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker and vendor commute vehicles, and construction equipment, and the use of electricity for temporary construction trailer, lighting, and other sources. California Code of Regulations Title 13, Sections 2449 and 2485, limit idling from both on-road and off-road diesel-powered equipment and are enforced by the CARB. The Project's construction activities would be required to comply with these regulations. There are no policies at the local level applicable to energy conservation specific to the construction phase. Therefore, construction of the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; and impacts would be less than significant. No mitigation is required.

B. Operation

California's RPS establishes a goal of renewable energy for local providers to be 44 percent by 2040. Similarly, the State is promoting renewable energy targets to meet the 2022 Scoping Plan greenhouse gas emissions reductions. As discussed in Threshold a, above, the Project would result in approximately 1,100,569 net kWh of electricity annually and would cease the natural gas usage that is currently consumed by the on-site business park that will be demolished. No natural gas would be used as the Project would be all electric.

1. Consistency with IEPR

Electricity would be provided to the Project site by SCE. SCE's Clean Power and Electrification Pathway (CPEP) white paper builds on existing state programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2023 IEPR. Additionally, the Project would comply with the applicable Title 24 standards. As such, development of the Project would support the goals presented in the 2023 IEPR.

2. Consistency with California Code Title 24, Part 6, Energy Efficiency Standards

The Project would be designed and constructed in accordance with the California Title 24 energy efficiency standards. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. For example, the Title 24 Lighting Power Density requirements define the maximum wattage of lighting that can be used in a building based on its square footage. Title 24 standards are widely regarded as the most advanced energy efficiency standards in the United States and would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. The 2022 version of Title 24 was adopted by the CEC and became effective on January 1, 2023. The Project would be required to comply with the Title 24 standards in place at the time plan check submittals are made. Therefore, the Project would not result in a

significant impact on energy resources. The Project would be subject to Title 24 standards. As such, the Project would not conflict with or obstruct implementation of the 2022 Title 24 standards.

3. Consistency with SB 350

The Project would use energy from SCE, which has committed to diversifying their portfolio of energy sources by increasing energy from wind and solar sources. The City has also selected CPA as its new preferred electricity provider, which will allow CPA to purchase energy from renewable power resources (such as wind, solar, and geothermal) which will be delivered to residences and businesses by SCE. No feature of the Project would interfere with implementation of SB 350.

4. Consistency with the Monrovia General Plan and Energy Action Plan (EAP)

The City of Monrovia General Plan Land Use Element includes Policy 10.6, which encourages the conservation of energy and water resources in order to reduce the need for expansion distribution facilities, as well as energy generating plants and distribution facilities. As demonstrated in the proceeding analysis, the Project would be required to comply with the 2022 version of Title 24 adopted by the CEC, which became effective on January 1, 2023. The current version of Title 24 (CALGreen Code) includes a number of measures that would ensure that the Project does not result in the inefficient, wasteful, or unnecessary consumption of energy resources. For example, the CALGreen Code requires that the Project accommodate photovoltaic (PV) systems to generate on-site renewable energy; in compliance, the Project design includes a PV system with a capacity of 321 kW that expected to generate approximately 523,854 kWh of electricity annually to service the Project. Additionally, the Project would include energy efficient appliances, low flow plumbing fixtures, and electric vehicle charging stations. Further, the CALGreen Code calls for the use of low U-value windows, a light colored "cool roof" where possible on areas of the roof structure exposed to sunlight and not otherwise covered with solar panels or other uses, and energy-efficient heating, cooling, and lighting devices.

The energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The SCE is undertaking a number of measures to ensure not only that it can meet the growing demands for electricity within its service area, but also to ensure that new sources of electricity meet the State's goals for renewable energy. These measures include accelerating transmission upgrades and seeking new sources of generation to increase reliability and bolster power reserves, while also encouraging its customers to reduce their consumption of electricity. With respect to electricity reliability, the California Public Utility Commission (CPUC) Integrated Resource Plan aims to add 7 gigawatts (GW) of electricity per year over the next 10 years to meet growing demands. As the Project is within the City's overall growth projections through 2050, and because SCE is anticipated to implement improvements to the electrical grid to accommodate new development within its service area, the Project would not result in impacts on local or regional energy supplies and would not directly result in the need for new or expanded sources of electricity beyond what already is being planned by SCE and the CPUC (SCE, 2023). The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. Consistency with General Plan Land Use Element Policy 10 would thus be assured. Further, the Project would be consistent with, or otherwise would not conflict with, the EAP goals, policies, and actions, as discussed in further detail in Table 4.4-7, *Project Consistency with City of Monrovia Energy Action Plan Policies*.

Table 4.4-7 Project Consistency with City of Monrovia Energy Action Plan Policies

Energy Action Plan Goals, Policies, and Actions	Project Consistency
Goal 1: Reduce Household Energy Use and Costs. ***Policy 1.1: Increase Energy Conservation in Residential Structures.*** *Actions:* • *Host energy efficiency and renewable energy financing workshops to promote:* – *Energy conservation practices.* – *The use of energy conservation features in use and design of residential buildings.*	Consistent. The proposed building would be constructed in conformance with the 2022 version of the Title 24 building regulations, which include a number of measures, including a requirement to accommodate on-site electrical production through photovoltaic systems, that would serve to minimize the Project's demand for fossil fuel energy resources. Remaining portions of this policy provide direction to City staff and decision makers and is not applicable to the Project.
Policy 1.2: Reduce Energy Use Through Upgrades to Household Appliances and Equipment. Actions: • Promote existing and new energy efficiency rebate offerings for appliances, heating, and ventilation equipment, and lighting fixtures. • Promote the use of smart-grid-integrated appliances. • Create an appliance trade-in program or take advantage of existing programs (e.g., Energy Star) to replace inefficient appliances.	Consistent. Policy 1.2 relates to upgrades to existing household appliances and equipment and provides direction to City staff and decision makers promoting the use of energy efficient appliances. The Project is required to be CALGreen compliant, including requirements to use energy efficient systems and appliances. There are no components of the Project that would conflict with Policy 1.2.
Policy 1.3: Support Residential Energy Efficiency Improvements Through Energy Audits and Retrofit Programs. Actions: • Provide a residential energy efficiency checklist that identifies various retrofit programs and activities and the typical payback period for each. • Provide a website and/or materials at City facilities and events to promote energy efficiency improvements in partnership with local and regional programs. • Share results of locally representative building energy efficiency audits and retrofits on the City's website and through other publications to show people the costs and benefits of energy efficiency improvements. • Encourage residential homeowners to participate in the Energy Upgrade California program to maximize education and access to incentives to improve the energy efficiency of their homes. • Partner with local community groups to develop and implement a community-based home energy audit/retrofit program to provide energy use history, conduct an audit, or provide a Home Energy Rating System rating at the time of sale. • Promote development of the local workforce by funding contractor training and certification for energy efficiency	Not Applicable. Policy 1.3 relates to existing buildings within the City and encourages a variety of measures to reduce energy consumption from these existing buildings. The Project consists of a proposed new mixed-use building that would be constructed in a manner consistent with the incumbent Title 24 building regulations, and there are no components of the Project with a potential to conflict with Policy 1.3.

Table 4.4-7 Project Consistency with City of Monrovia Energy Action Plan Policies

Energy Action Plan Goals, Policies, and Actions	Project Consistency
retrofits, including Building Performance Institute training, or other electricity efficiency workforce development programs. • Pursue funding for a neighborhood residential retrofit pilot program, which would partially or fully fund audits for representative house types to identify common electricity efficiency opportunities that can be applied throughout the community.	
Policy 1.4: Identify and Promote Opportunities to Improve the Energy Efficiency of Renter-Occupied Housing Units. ***Actions:*** • Encourage multi-family property owners to install separate electric meters for each apartment. • Encourage multi-family property owners to participate in the Los Angeles County Property Assessed Clean Energy financing program to improve the energy efficiency of their properties. • Develop a landlord-tenant collaboration program to support the financing of energy efficiency retrofits to renter-occupied housing units. • Consider establishing a low-income retrofit program to facilitate exterior energy efficiency improvements to income-qualified households.	Consistent. The Project would be constructed in conformance with City of Monrovia building codes and the incumbent version of the Title 24 building standards, and separate electric meters are anticipated to be provided to each of the Project's proposed dwelling units. The remaining portions of this policy relate to retrofitting existing multi-family units within the City and are not applicable to the Project, which consists of proposed new construction.
Policy 1.5: Identify and Promote Energy Efficiency Improvements That Are Compatible With the Aesthetics of a Variety of Housing Types. Actions: • Establish design guidelines to address energy retrofit improvements and renewable energy facilities on homes that were constructed prior to 1950. • Provide building and material specifications for window and door treatments, roofing materials, and similar exterior improvements that are compatible with construction practices employed in older homes.	Not Applicable. Policy 1.5 and its associated actions relate to retrofitting existing homes and providing building and material specification recommendations compatible with construction practices in older homes, and is not applicable to the Project as the Project includes a new mixed-use building that would be constructed in full conformance with the incumbent Title 24 regulations as implemented by the City of Monrovia.
Goal 2: Reduce Energy Use in Nonresidential Buildings. ***Policy 2.1: Identify and Pursue Opportunities to Conserve Energy Resources in the Nonresidential Building Sector.*** Actions: • Investigate providing incentives for energy-efficient construction (e.g., LEED-certified or equivalent) for new and/or retrofitted nonresidential buildings. • Partner with the Monrovia Chamber of Commerce to highlight available conservation actions and energy efficiency programs to business and property owners. • Encourage building and facility managers to participate in energy-monitoring programs that inform energy use	Consistent. The Project's proposed mixed-use building would be constructed in compliance with the incumbent Title 24 regulations, as implemented by the City of Monrovia. Although the Project Applicant is not proposing Leadership in Energy and Environmental Design (LEED) certification for the proposed building, the Project already is required to accommodate a broad range of energy efficient design features. For example, under the 2022 version of Title 24, the Project would be required to accommodate photovoltaic (PV) systems to generate on-site renewable energy. The building's roof would include a rooftop solar system as required by the CALGreen Code. Based on a preliminary

Table 4.4-7 Project Consistency with City of Monrovia Energy Action Plan Policies

Energy Action Plan Goals, Policies, and Actions	Project Consistency
decisions and reduce peak energy demand such as Southern California Edison's Demand Response Program. • Distribute information on energy conservation actions that can be implemented at local businesses through the City's website, Chamber of Commerce, and similar methods for sharing information.	conceptual layout, if solar arrays were to be maximized on the building's roof area, the available roof space could accommodate 557 fixed-tilt modules in a 323.1-kilowatt (kW) system (Sprek, 2025).. The remaining actions under Policy 2.1 provide direction to City staff and decision makers and are not applicable to the Project.
Policy 2.2: Facilitate Retrofits and Energy Efficiency Improvements to Existing Nonresidential Buildings. Actions: • Work with Los Angeles County and local and regional public and private organizations to create a revolving loan fund to support nonresidential retrofits. • Develop a collaborative program for landlords and tenants to support the financing of energy efficiency retrofits to renter-occupied buildings. • Provide education and outreach to disclosure at the time of sale or lease of nonresidential property. commercial property owners on the benefits of complying with state requirements on energy	Not Applicable. Policy 2.2 relates to retrofits to implement energy efficiency improvements within existing non-residential buildings. As the Project's proposed mixed-use building would consist of new construction that is subject to compliance with the incumbent Title 24 building regulations, Policy 2.2 is not applicable to the Project.
Goal 3: By 2020, New Development in Monrovia Will Have No Net Impact on Community-Wide Energy Demand. ***Policy 3.1: The City Will Work With Project Applicants to Incorporate Innovative Building, Site Design, and Orientation Techniques to Minimize Energy Use.*** Actions: • Continue to collaborate with local green building organizations to provide training and workshops related to energy-efficient design and construction. • Promote the use of energy conservation features in the design of development to conserve natural resources and lower energy costs. • Support the use of innovative and alternative building materials and designs that improve building energy efficiency. • Encourage project applicants to participate in Southern California Edison's Savings by Design program. • Develop an offset or mitigation fee program to allow projects with significant energy impacts to provide fees that fund energy efficiency and renewable energy projects within the community. • Establish design guidelines and standards that promote compact development that can be served by multiple modes of transportation. • Promote transit-oriented development and complete streets.	Consistent. The Project's proposed mixed-use building would be constructed in accordance with the incumbent Title 24 building regulations, which include a number of requirements intended to ensure that new development does not result in the unnecessary, wasteful, or inefficient consumption of energy resources. As noted above, the Project would be required to install PV systems pursuant to the 2022 Title 24 regulations, which would serve to ensure that the Project's net increase in energy consumption is minimized to the extent feasible.

Table 4.4-7 Project Consistency with City of Monrovia Energy Action Plan Policies

Energy Action Plan Goals, Policies, and Actions	Project Consistency
Policy 3.2: Update the City's Green Building and Sustainability Policies to Create Alternative Energy Sources and Reduce Energy Demand. Actions: • Increase the use of renewable energy to meet 10% of the city's peak electric load by 2015, consistent with Action 1 of Monrovia's 21 Accords. • Reduce the city's peak electric load by 10% within seven years through energy efficiency, shifting the timing of energy demands, and conservation policies, consistent with Action 2 of Monrovia's 21 Accords.	Not Applicable. Policy 3.2 provides direction to City staff and decision makers related to the City's green building and sustainability policies. No component of the Project would conflict with Policy 3.2.
Policy 3.3: The City Will Promote the Use of Energy-Efficient Appliances and Equipment Installation in New Development. Actions: • Encourage all sizes of developments to install energy-efficient appliances within new and renovated buildings consistent with the City's Sustainable Development Practices. • Promote existing energy efficiency rebate offerings for appliances, heating, and ventilation equipment, and lighting fixtures. • Promote the use of smart-grid-integrated appliances in new development.	Consistent. The Project would be required to comply with all requirements of the Title 24 building regulations, which include specifications mandating the use of energy-efficient appliances and equipment.
Goal 4: Create A Framework To Support An Energy-Efficient Local Economy. ***Policy 4.1: Provide Support to Businesses that Promote Energy-Efficient Behaviors, Products, Practices, And Jobs.*** Actions: • Create and host an annual energy conservation competition to promote energy-efficient behavior. • Continue to work with schools to provide energy efficiency education to elementary and high school students, host (in partnership with US Green Building Council) LEED training for college students, and promote hands-on energy efficiency learning projects. • Promote development of the local workforce by supporting contractor training and certification for energy efficiency projects. • Continue to provide contractor and architect training on green building and energy efficiency design and construction practices to demonstrate compliance with the City's Sustainable Development Practices. • Consider creating an energy efficiency or green business awards program to recognize and award prizes to	Not Applicable. Policy 4.1 provides direction to City staff and decision makers. There are no components of the Project that would conflict with Policy 4.1.

Table 4.4-7 Project Consistency with City of Monrovia Energy Action Plan Policies

Energy Action Plan Goals, Policies, and Actions	Project Consistency
homeowners and businesses that have achieved energy efficiency improvements as models for the community.	
Policy 4.2: Identify And Pursue Funding Opportunities And Financing Programs To Support Community Energy Efficiency Upgrades And Retrofits. Actions: • Work with the San Gabriel Valley Council of Governments and other cities to pursue regional funding for residential audits and/or retrofits. • Partner with local community banks and/or credit unions to support low-interest energy efficiency financing programs for energy efficiency retrofits. • Provide Environmentally Preferable Purchasing policies and education in the City's Recycle News, and business waste reduction/recycling program information. • Participate in the Los Angeles County Energy Program to establish an energy efficiency loan program to promote energy retrofits. • Encourage nonresidential and multi-family property owners to participate in the Los Angeles County Property Assessed Clean Energy financing program to improve the energy efficiency of their facilities.	Not Applicable. Policy 4.2 provides direction to City staff and decision makers. There are no components of the Project that would conflict with Policy 4.2.
Goal 5: Optimize Shading and Cooling to Reduce Community-Wide Energy Demand. ***Policy 5.1: Increase the Shading and Cooling Capacity of the Community's Suburban Forest Through Additional Tree Planting, Preservation of Existing Trees, and Proper Maintenance.*** Actions: • Plant and maintain canopy coverage in not less than 50% of all available sidewalk planting sites. • Host events, workshops, or community "work days" to complete voluntary, low-cost actions that facilitate urban cooling such as tree plantings, or the installation of shade structures. • Work with project applicants to increase tree planting and design landscaping to shade building exteriors from the summer sun.	Consistent. The Project's conceptual landscape plan is depicted on EIR Figure 3-14, and requires the Project Applicant to replace the existing non-protected street trees along the site's frontage with new street trees, including 8 new trees that would be planted along West Olive Avenue and three street trees that would be planted along South Myrtle Avenue.
Policy 5.2: Maximize the Use of Cool Roofs and Surfaces to Reduce Building Energy Use. Actions: • Promote cost-effective opportunities for residents and business owners to install cool roofs, light-colored paved surfaces, and permeable pavement.	Consistent. The Project would be required to be constructed in a manner consistent with the proposed 701 S. Myrtle Specific Plan, which requires the provision of "high Solar Reflectance Index (SRI) roofs." Thus, the rooftop of the proposed building would include cool roofs and surfaces in areas not planned to be covered by PV panels.

Table 4.4-7 Project Consistency with City of Monrovia Energy Action Plan Policies

Energy Action Plan Goals, Policies, and Actions	Project Consistency
Goal 6: Facilitate Water-Related Energy Conservation In New And Existing Development. ***Policy 6.1: Encourage Voluntary Water Conservation and Efficient Use Behaviors in the Community to Reduce Electricity Use Related to Water Conveyance and Treatment.*** Actions: • Participate in ongoing regional efforts to promote water conservation. • Become an Environmental Protection Agency Water Sense Partner and provide water conservation resources to the community. • Update the City's "Water 4 Life" conservation program to reduce per capita water demand by 10% by 2015 and 35% by 2030 by: o Implementing a rate restructuring and public awareness campaign. o Supporting plumbing retrofit programs. • Work with project applicants to identify water conservation opportunities in new or retrofitted buildings. • Continue working to implement a discount rain barrel purchasing program to promote stormwater retention and water reuse.	Consistent. The Project would be constructed in compliance with the incumbent Title 24 building regulations, which include requirements specifying the required efficiency of all plumbing fixtures. Additionally, landscaping associated with the Project would be required to comply with Chapter 17.20 of the MMC, including requirements related to efficient irrigation practices. Specifically, MMC Chapter 17.20 requires the use of water-efficient irrigation systems in conformance with California Code of Regulations Title 23, Waters; Division 2, Department of Water Resources; Chapter 2.7, Model Water Efficient Landscape Ordinance.
Policy 6.2: Promote Water-Efficient Landscaping Practices to Reduce Electricity Use for Conveyance and Pumping. Actions: • Promote water-efficient landscaping and the use of irrigation controls. • Provide educational information and install demonstration projects to promote water conservation landscape practices. • Encourage installation and use of graywater and rainwater harvesting systems to reduce outdoor potable water use.	Consistent. As noted above, landscaping associated with the Project would be required to comply with Chapter 17.20 of the Monrovia Municipal Code (MMC), including requirements related to efficient irrigation practices. Specifically, Chapter 17.20 requires the use of water-efficient irrigation systems in conformance with California Code of Regulations Title 23, Waters; Division 2, Department of Water Resources; Chapter 2.7, Model Water Efficient Landscape Ordinance.
Policy 6.3: Continue to Facilitate the Installation and Use of Water-Conserving Appliances to Reduce Water Conveyance and Treatment Related Electricity Use. Actions: • Provide incentives and rebates to customers that install water-conserving appliances. • Require plumbing retrofit improvements of older buildings with water-efficient plumbing when the unit is sold. • Coordinate with local businesses and neighboring cities to arrange for bulk purchase of water-conserving appliances at lower rates than are available at the individual level.	Not Applicable. Policy 6.3 provides direction to City staff and decision makers. There are no components of the Project that would conflict with Policy 6.3.
Policy 6.4: Maximize the Efficient Use of Water Resources Through Efficient Building and Landscaping Practices in	Consistent. As noted above, landscaping associated with the Project would be required to comply with MMC Chapter

Table 4.4-7 Project Consistency with City of Monrovia Energy Action Plan Policies

Energy Action Plan Goals, Policies, and Actions	Project Consistency
New Development to Reduce Electricity Needed for Water Conveyance and Treatment. Actions: • Require new development to comply with applicable water conservation measures of the City's Sustainable Development Practices and the California Green Building Code requirements for water conservation. • Identify opportunities to integrate the public education efforts related to water efficiency into new development or renovation projects. • Continue to revise the City's administrative practices as necessary to comply with state building codes and regulations regarding water efficiency and conservation.	17.20, including requirements related to efficient irrigation practices. Specifically, Chapter 17.20 requires the use of water-efficient irrigation systems in conformance with California Code of Regulations Title 23, Waters; Division 2, Department of Water Resources; Chapter 2.7, Model Water Efficient Landscape Ordinance.
Goal 7: Conserve Energy and Act as a Leader In Energy Efficiency and Conservation Projects and Practices. ***Policy 7.1: Continue to Monitor Energy Use and Identify Opportunities to Reduce Energy Use and Municipal Facilities.*** Actions: • Adopt a policy that mandates a green building rating standard for all future municipal buildings. • Conduct periodic audits of City facilities to ensure peak energy performance and identify new technologies or appliances to be installed as they become cost-effective. • Participate in the San Gabriel Valley Council of Government's utility manager program, the Enterprise Energy Management Information System, to regularly track energy use and identify cost-saving opportunities through sub-metering and energy management.	Not Applicable. Policy 7.1 provides direction to City staff and decision makers to monitor energy use and identify opportunities to reduce energy use in municipal facilities. The Project does not include any proposed municipal facilities; thus, Policy 7.1 is not applicable to the Project.
Policy 7.2: Install Energy-Efficient Appliances and Equipment to Reduce City Energy Use. Actions: • Continue to install motion sensors within municipal facilities to eliminate lighting-related energy use when spaces are unoccupied. • Implement an energy-efficient procurement policy to ensure that the purchase of energy-efficient equipment is purchased when energy cost savings will provide a positive return on investment.	Consistent. The Project would be constructed in compliance with the incumbent Title 24 building regulations, which include requirements specifying the required efficiency of all plumbing fixtures.
Policy 7.3: Work with the San Gabriel Valley Council of Governments to Track Energy Use at City Facilities, Identify Opportunities for Efficiencies and Cost Savings, and Implement Energy Efficiency Projects. Actions: • Continue to support City staff participation in regional planning efforts and trainings related to energy efficiency.	Not Applicable. Policy 7.3 provides direction to City staff and decision makers to work with the San Gabriel Valley Council of Governments to Track Energy Use at City Facilities, and is not applicable to the Project.

Table 4.4-7 Project Consistency with City of Monrovia Energy Action Plan Policies

Energy Action Plan Goals, Policies, and Actions	Project Consistency
• Encourage creation of a regional energy manager position to coordinate efficiency efforts and help departments implement energy-reduction activities.	

C. Conclusion

As indicated in the preceding analysis, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Thus, there would be no impacts. No mitigation is required.

4.4.5 Cumulative Impact Analysis

As indicated under the analysis of Threshold (a), above, there are no components of the Project that would result in the wasteful, inefficient, or unnecessary consumption of energy resources. Other developments within the region subject to CEQA would be required to demonstrate that the wasteful, inefficient, or unnecessary energy consumption would not occur or that impacts would be mitigated to the greatest feasible extent. Additionally, other developments would be subject to the same regulatory requirements as the Project, including compliance with the Title 24 Energy Code, and CALGreen, which would ensure that cumulative development does not result in the wasteful, inefficient, or unnecessary consumption of energy. The Project and other cumulative developments also inherently would be consistent with the IEPR, State of California Energy Plan, SB 350, and the City's EAP as discussed herein. Accordingly, the Project's projected energy demand during construction and long-term operations would be less-than-cumulatively considerable with mandatory compliance with applicable regulations.

As indicated under the analysis of Threshold b., the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As such, the Project has no potential to result in cumulatively-considerable impacts due to a conflict with or obstruction of such plans.

4.4.6 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. Project construction and operation would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would, therefore, not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.

Threshold b.: Less-than-Significant Impact. The Project would not conflict with or obstruct a federal or State plan for renewable energy or energy efficiency. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.

4.4.7 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.4.8 Design Features (DF) and Regulatory Requirements (RR)

The City of Monrovia requires compliance with the following:

ENERGY DF-1 The Project will include the installation of a rooftop solar PV system with a minimum capacity of 321 kW.

ENERGY RR-1 The Project's parking areas will be designed to provide electric vehicle (EV) charging stations, meeting at minimum the number of EV charging stations required by the California Green Building Standards Code at the time of building permit application.

ENERGY RR-2 The Project shall accommodate on-site renewable energy production as required by Section 140.10 (Prescriptive Requirements for Photovoltaic and Battery Storage Systems) of the 2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6, and associated administrative regulations), or the incumbent standards identified by the current version of the Building Efficiency Standards in effect at the time of application for building permits.

4.5 GEOLOGY AND SOILS

The analysis in this subsection assesses the existing surface and subsurface geological conditions and features of the Project site and determines the potential for impacts associated with these features. The analysis in this subsection is based on information from the report titled, "Geotechnical Design-Level Investigation Mixed-Use Apartment Development," prepared by Geotechnical Professionals, Inc. (herein, "GPI"), dated November 3, 2022, and included in *Technical Appendix F* to this EIR (GPI, 2022). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.5.1 EXISTING CONDITIONS

A. Regional Geologic Setting

The City of Monrovia is located in the northern San Gabriel Valley at the southern face of the San Gabriel Mountains. The San Gabriel Mountains to the north of the City, as opposed to the valley basin, consist of relatively hard, igneous, and metamorphic rocks, which support the steep slopes and major canyons. The less steep San Rafael Hills, to the northwest of the City, are composed of the same substance. It is this difference in terrain of the valley basin and surrounding hills that suggests the past uplift along the front of the San Gabriel Mountains (City of Monrovia, 2022a).

The western San Gabriel Valley is underlain by Holocene and Pleistocene alluvium up to 5,000 to 6,000 feet in thickness. The valley floor, south of the Raymond Hill fault, which is situated in the foothills in the northern portion of the City, is underlain by tertiary rocks. North of the same fault the valley floor is underlain by granite and metamorphic rocks comparable to those in the hills to the west and north (City of Monrovia, 2022a).

B. Local Geologic Setting

Based on available documents and conducted field investigations for the Project site, the subsurface conditions of the Project site consist of predominately interbedded layers of sands, silty sands, and sandy silts, with man-made fills that appear to extend approximately 2 to 4 feet below existing grades. A layer of clayey silt extending from about 30 to 35 feet below existing grades also was encountered in one of the conducted borings during geotechnical investigations conducted on the Project site. The sandy soils range from medium dense to dense within the upper 25 to 40 feet, with the soils becoming dense to very dense with depth. The limited fine-grained soils are typically stiff to hard. In addition, because of the commercial/industrial office building that exists on the site and former structures that existed on the site and that were previously demolished, there may be foundation elements and undocumented fills associated with the buildings that may exist below the ground surface. The near-surface soils on the Project site are predominantly medium dense sands, which are susceptible to caving in open cuts and excavations. Additionally, corrosivity testing at nearby sites indicated negligible levels of sulfate exposure and mild corrosivity to buried metals (GPI, 2022, pp. 2-3).

C. Site Topography

The Project site is developed and is mostly flat, with elevations ranging from 524 feet above mean sea level (amsl) to 536 ft amsl, with a slight downward slope to the north. Topographic elevations in the surrounding areas generally decrease in elevation from northeast to southwest.

D. Faulting and Seismicity

Based on available documents and conducted field investigations, the Project site is not located in an Alquist-Priolo Earthquake Fault Zone, discussed further below. There are no known active faults crossing or trending towards the Project site. The Project site is located approximately one mile from an Earthquake Fault Zone, which includes the Sierra Madre Fault Zone (GPI, 2022, p. 3).

E. Liquefaction

Liquefaction is a phenomenon in which loose, saturated, relatively cohesion-less soil deposits lose shear strength during strong ground motions, which causes the soil to behave as a viscous liquid. Liquefaction is generally limited to the upper 50 feet of subsurface soils. Based on available documents and conducted geotechnical field investigations for the Project, the Project site is not located in a liquefaction zone. Additionally, based on the results of cone penetration tests (CPTs) conducted on the Project site, liquefaction induced settlement is not anticipated to negatively impact the Project site (GPI, 2022, pp. 3, 5).

F. Landslides

The Project site and areas immediately surrounding the Project site are developed, flat, and gently sloping and do not contain steep slopes capable of producing landslide hazards that could affect future development on the Project site. The closest lands containing steep topography that are capable of producing landslides occur more than 1.7 miles north of the Project site associated with the San Gabriel Mountains (Google Earth, 2023).

G. Expansive Soils

Expansive soils typically contain large amounts of clay that expand when water is absorbed and shrink when they dry. No expansive soils were identified on the Project site during the conducted field investigations conducted by GPI for the Project.

H. Septic Tanks

No current or former septic tanks are known to exist on the Project site. The City provides domestic wastewater conveyance service from the Project site. Under existing conditions, sewer lines are located beneath West Olive Avenue, South Myrtle Avenue, and beneath the alley along the southern boundary of the Project site.

I. Paleontological Resources

Paleontological resources are the remains of prehistoric life that have been preserved in geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils, such as footprints and burrows. Fossils are considered older than 5,000 years of age but may include younger remains (subfossils) when viewed in the context of local extinction of the organism or habitat, for example. Fossils are considered a nonrenewable resource under State, county, and local guidelines.

According to the City's General Plan EIR, no paleontological sites are known to exist within the City of Monrovia. Prior discoveries of resources in the region have been limited to projects located within two sensitive geologic formations: Topanga Formation and Late Miocene Marine Monterey Formation. These formations do not exist beneath the Project site, which is underlain with undocumented fill, sand, silt, clayey silt, and silty sand to at least 50 feet in depth (GPI, 2022). As such, there is no reasonable possibility for the discovery of significant paleontological features beneath the surface of the Project site.

4.5.2 Regulatory Setting

The following is a brief description of the State, and local environmental laws and related regulations governing issues related to geology and soils.

A. State Plans, Policies, and Regulations

1. Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The A-P Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The A-P Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards (CA Legislative Info, n.d.).

The A-P Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. ["Earthquake Fault Zones" were called "Special Studies Zones" prior to January 1, 1994.] The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Local agencies must regulate most development projects within the zones. Projects include all land divisions and most structures for human occupancy. Single family wood-frame and steel-frame dwellings up to two stories not part of a development of four units or more are exempt. However, local agencies can be more restrictive than state law requires (CA Legislative Info, n.d.).

Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet) (CA Legislative Info, n.d.).

2. Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code [PRC] Sections 2690-2699.6) directs the Department of Conservation, California Geological Survey to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards (CDC, n.d.).

Staff geologists in the Seismic Hazards Program gather existing geological, geophysical, and geotechnical data from numerous sources to produce the Seismic Hazard Zone Maps. They integrate and interpret these data regionally in order to evaluate the severity of the seismic hazards and designate as Zones of Required Investigation (ZORI) those areas prone to liquefaction and earthquake–induced landslides. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes (CDC, n.d.).

The SHMA requires site-specific geotechnical investigations be conducted within the ZORI to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy (CDC, n.d.).

3. Natural Hazards Disclosure Act

The Natural Hazards Disclosure Act, effective June 1, 1998 (as amended June 9, 1998), requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more state-mapped hazard areas, including a Seismic Hazard Zone. The law requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone maps). These maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling construction and development. Single-family frame dwellings up to two stories, not part of a development of four or more units are exempt from the state requirements. However, local agencies can be more restrictive than state law requires (CA Legislative Info, n.d.).

Before a development permit can be issued or a subdivision approved, cities and counties must require a site-specific investigation to determine whether a significant hazard exists at the site and, if so, recommend measures to reduce the risk to an acceptable level. The investigation must be performed by state-licensed engineering geologists and/or civil engineers (CA Legislative Info, n.d.).

4. California Building Standards Code

California Code of Regulations (CCR) Title 24 is reserved for state regulations that govern the design and construction of buildings, associated facilities, and equipment. These regulations are also known as building standards (reference California Health and Safety Code Section 18909). California Health and Safety Code (HSC) Section 18902 gives CCR Title 24 the name California Building Standards Code (CBSC) (BSC, 2022, p. 1).

The CBSC in CCR Title 24 is published by the California Building Standards Commission and it applies to all building occupancies (see HSC Sections 18908 and 18938) throughout the State of California. Cities and counties are required by state law to enforce CCR Title 24 (reference HSC Sections 17958, 17960, 18938(b), and 18948). Cities and counties may adopt ordinances making more restrictive requirements than provided by CCR Title 24, because of local climatic, geological, or topographical conditions. Such adoptions and a finding of need statement must be filed with the California Building Standards Commission (reference HSC Sections 17958.7 and 18941.5) (BSC, 2022, p. 1).

5. California Public Resources Code

PRC Section 5097.5 states that "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." PRC Section 30244 states that, "Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required" (CCR, n.d.).

B. Local Plans, Policies, and Regulations

1. General Plan Safety Element

The City's General Plan Safety Element identifies and evaluates natural hazards associated with seismic activity, landslides, flooding, and fire within the City of Monrovia. The Safety Element provides the goals for each of the relevant City departments to provide responsible planning to ensure reduction of loss of life, injuries, damage to property and other losses associated with such disasters, and to act as a guide to prepare for possible natural or human-induced disasters (City of Monrovia, 2022a).

The following policy of the Safety Element applies to the Project:

- Policy 1.3.2: If an EIR, or detailed geologic investigation confirms existence of seismic hazards, the City shall require special earthquake resistant design features or use limitations, as appropriate, to protect the public health and safety and to reduce the exposure of individuals and property to seismic risks.

2. Monrovia Municipal Code

The Monrovia Municipal Code (MMC) contains several provisions pertaining to geology and soils.

- Chapter 15.04 contains building and construction codes, which establish procedures for performing safety assessments and posting of buildings to indicate whether they can continue to be occupied following a natural or man-made disaster, such as an earthquake.

- MMC Chapter 12.08 contains information pertinent to excavation activities, including permit and application requirements.

- MMC Chapter 15.28 provides minimum standards to safeguard life, health, property, and the public welfare by regulating and controlling the quality of materials used in, and the design, construction, location, and maintenance of grading, and to implement measures to substantially reduce the potential for erosion and sedimentation damage within the City.

- MMC Chapter 12.36 contains applicable Best Management Practices (BMPs) developed pursuant to the Municipal National Pollutant Discharge Elimination System (NPDES) Permit for redevelopment projects, which is relevant to the prevention of substantial soil erosion and sedimentation.

4.5.3 Basis for Determining Significance

Based on Section VII of Appendix G to the CEQA Guidelines, the Project would result in a significant impact associated with the topic of geology and soils if the Project would:

a) *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
   i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42;*
   ii. *Strong seismic ground shaking;*
   iii. *Seismic-related ground failure, including liquefaction; or*
   iv. *Landslides;*

b) *Result in substantial soil erosion or the loss of topsoil;*

c) *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;*

d) *Be located on expansive soil, as defined in Section 1803.5.3. of the California Building Code (2022), creating substantial direct or indirect risks to life or property;*

e) *Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water; or*

f) *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.*

The methodology for analysis of the above-stated thresholds, given the flat and developed nature of the approximately 1.61-acre Project site, focuses on geologic hazards and the potential for paleontological resource discovery that could occur during the Project's construction, as well as suitability of the Project site from a geologic perspective for the Project, inclusive of its proposed 1.5 levels of subterranean parking and five above ground levels. The analysis and conclusions are supported by the professional judgment of qualified professional geologists at GPI, the firm that prepared the Project site's geotechnical investigation and produced the report that is contained as *Technical Appendix F* to this EIR (GPI, 2022).

4.5.4 IMPACT ANALYSIS

Threshold a.:	***Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***
	i. ***Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.?***
	ii. ***Strong seismic ground shaking?***
	iii. ***Seismic-related ground failure, including liquefaction?***
	iv. ***Landslides?***

A. Fault Rupture

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone. The Project site is located approximately one mile from the Sierra Madre Earthquake Fault Zone to the northwest (GPI, 2022, p. 3). However, because there are no known active faults crossing or trending towards the Project site, there is no reasonable potential that the Project would be subject to the rupture of a known earthquake fault. Therefore, no impact would occur.

B. Seismic Ground Shaking

As with most properties in Southern California, the Project site is located in a seismically active area of Southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. The risk is not considered substantially different than that of other similar properties in the area. The Project is required to be constructed in accordance with the CBSC and the City Building Code. The CBSC and the City Building Code are designed to preclude significant adverse effects associated with strong seismic ground shaking. Mandatory compliance with the CBSC and the City Building Code ensure that potential effects associated with strong seismic ground shaking would be less than significant.

C. Liquefaction

The Project site is not located in a liquefaction zone. Additionally, based on the results of geotechnical field investigations conducted on the Project site by GPI, liquefaction-induced settlement is not anticipated to negatively impact the Project site in GPI's professional opinion (GPI, 2022, pp. 3, 5). As such, the Project would not be subject to liquefaction hazards; therefore, no impact would occur.

D. Landslide Potential

The Project site is flat, developed, located in a developed urban context, is not located in a landslide area, and has no potential to be affected by landslides. Accordingly, no impacts due to landslide hazards would occur.

Threshold b.: Would the Project result in substantial soil erosion or the loss of topsoil?

Under existing conditions, the Project site is developed with a commercial/industrial office building, parking lots/drive aisles, and ornamental landscaping. No exposed soils susceptible to erosion occurs on the site because the Project site is covered in impervious surfaces or irrigated landscaping. When demolition activities commence and the Project is under construction, these activities would temporarily expose underlying soils and disturb surficial soils. Thus, implementation of the Project has the potential to result in soil erosion. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and long-term operation of the Project.

Proposed demolition, excavation, grading, and construction activities at the Project site would expose underlying soils and disturb surficial soils. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of landscaping and impervious surfaces and exposure of these erodible materials to wind and water. Erosion by water would be greatest during the first rainy season after grading and excavation of the subterranean parking levels and before the Project's proposed building foundation is established and surface paving and landscaping occur. Erosion by wind would be highest during periods of high wind speeds when soils are exposed. However, through a combination of the erosion control measures identified in the Project's Storm Water Pollution Prevention Plan (SWPPP) analyzed in Subsection 5.4.3, which is a regulatory requirement of the applicable National Pollutant Discharge Elimination System (NPDES) Permit, and compliance with SCAQMD Rule 403 as analyzed in Subsection 4.2, the potential for water and/or wind erosion impacts during Project construction would be reduced to less-than-significant levels.

Following construction, wind and water erosion on the Project site would be minimized as the disturbed areas would be landscaped or covered with impervious surfaces. At buildout, 90 percent of the Project site would be covered by the building, and the remaining 10 percent of the site would be covered by hardscape and irrigated landscape area. Accordingly, operation of the Project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

Threshold c.: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

A. Landslide Hazards

Under existing conditions, the Project site and the surrounding areas are developed and are flat or gently sloping, exhibiting little topographic variations. The flat nature of the site and its immediate surroundings indicates that the Project site has no potential to be affected by landslides. Additionally, the Project would not create any large slopes that would have the potential to result in landslide hazards. Accordingly, no impact related to landslides would occur.

B. Lateral Spreading, Subsidence, and Collapse

Based on the presence of undocumented fill and the variability of the depth to dense soils encountered during the CPTs, on-site soils were found to be susceptible to caving in open cuts and excavations. Accordingly, the

Project has the potential to be located on a geologic unit or soil that is unstable or has the potential to become unstable, and, as such, impacts may be potentially significant.

C. Liquefaction

As previously indicated in Subsection 4.6.1 and under the analysis of Threshold a., the Project site is not located within a designated liquefaction hazard zone. In addition, based on the results of the CPTs, deep groundwater is not present beneath the Project site, and liquefaction induced settlement has no potential to negatively impact the Project site. Accordingly, no impact would occur (GPI, 2022, pp. 3, 5).

Threshold d.: ***Would the Project be located on expansive soil, as defined in Section 1803.5.3. of the California Building Code (2022), creating substantial direct or indirect risks to life or property?***

No expansive soil was identified on the Project site during the geotechnical investigations conducted by GPI; therefore, the Project has no reasonable potential to cause substantial direct or indirect risks to life or property associated with the presence of expansive soils. As such, no impact would occur.

Threshold e.: ***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 waste water?***

The City of Monrovia owns, operates, and maintains a sanitary sewer collection system, which provides local sewage collection service via in-street and regional trunk lines varying from 6 inches to 24 inches. The Project proposes two sewer connections, with one proposed connection to an existing 10-inch main line located under South Myrtle Avenue and a second proposed connection to an existing 6-inch sewer lateral located in alleyway south of the Project site that discharges into a manhole on South Myrtle Avenue. No septic tanks or alternative wastewater disposal systems are proposed as part of the Project. Accordingly, no impact related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems would occur.

Threshold f.: ***Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

Formations known in the City to potentially contain paleontological resources are the Topanga Formation and Late Miocene Marine Monterey Formation. These formations do not exist beneath the Project site, which is underlain with undocumented fill, sand, silt, clayey silt, and silty sand to at least 50 feet in depth (GPI, 2022). As such, there is no reasonable possibility for the discovery of significant paleontological features beneath the Project site during ground-disturbing construction activities. No impacts would occur.

4.5.5 Cumulative Impact Analysis

Seismic-Related Hazards

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone, is not located on a geologic fault, and has no potential to be impacted by ground rupture, liquefaction, or landslides but would be subject to ground shaking hazards from a seismic event, as would all other properties in the region. Potential effects related to seismic-related hazards, such as ground shaking, are inherently restricted to the area of a project site proposed for development and would not contribute to cumulative impacts associated with other existing, planned, or proposed development. Accordingly, addressing these potential hazards for the proposed development would involve using measures to conform to existing requirements, and/or specific design and construction efforts specific to the site and the proposed development project that have no relationship to, or impact on, off-site areas. Because of the site-specific nature of these potential hazards and the measures to address them, there would be no connection of the Project to similar potential issues or cumulative effects to or from other properties. Therefore, cumulative impacts would be less than significant.

Soil Erosion or the Loss of Topsoil

As discussed under Threshold (b), the potential for water and wind erosion during Project construction would be addressed through a combination of the erosion control measures identified in the Project's SWPPP and compliance with SCAQMD Rule 403. Other cumulative projects that have the potential to contribute towards erosional effects in the same watershed and air basin as the Project would also be required to prepare and comply with SWPPPs and the provisions of SCAQMD Rule 403 to address water and wind erosion. All projects subject to CEQA also would be required to demonstrate that mitigation measures, if applicable, have been incorporated to ensure that the project does not result in substantial increases in the amount or rate of water runoff under long-term operating conditions, which could in turn increase soil erosion. Further, all cumulative projects would be required to comply with local ordinances related to erosion and sedimentation, which would minimize water- and wind-related erosion hazards during construction. Therefore, because the Project would result in less-than-significant erosion impacts via mandatory SWPPP and SCAQMD Rule 403 compliance, and because other projects in the same watershed and air basin would be subject to similar requirements to control erosion hazards during construction and long-term operation, cumulative impacts associated with wind and water erosion hazards are determined to be less than significant.

Geologic and Soil Stability

Under existing conditions, the Project site and the surrounding areas are developed and are flat or gently sloping and have no potential to be affected by landslides. Additionally, the Project and cumulative development projects would not create any large slopes that would have the potential to result in cumulative landslide hazards. Accordingly, no cumulative impact related to landslides would occur.

Soils on the Project site are susceptible to caving in open cuts and excavations during the Project's construction. No cumulative development projects are located adjacent to the Project site or that would affect the same land area as the Project's excavation activities. As such, there is no reasonable potential that the Project would contribute to cumulative construction-related caving conditions. Accordingly, although the Project has the

potential to be located on a geologic unit or soil that is unstable or has the potential to become unstable, cumulative impacts would not occur.

The Project site is not located within a designated liquefaction hazard zone and deep groundwater is not present beneath the Project site, Accordingly, no liquefaction hazard impacts would occur from the Project on a direct or cumulative basis (GPI, 2022, pp. 3, 5).

Unique Paleontological Resource or Site or Unique Geologic Feature

Because the Project site's subsurface up to 50 feet in depth contains undocumented fill, sand, silt, clayey silt, and silty sand to at least 50 feet in depth and not of Topanga Formation or the Late Miocene Marine Monterey Formation, there is no reasonable possibility for the discovery of significant paleontological features beneath the Project site during ground-disturbing construction activities (Monrovia, 2022a). Other cumulative development projects in the region could result in the potential disturbance of paleontological resources if such developments are located in the Topanga or Late Miocene Marine Monterey Formation; however, since no impact would occur under the Project, then the Project would not have any contributions toward potential cumulative impacts related to paleontological resources or unique geologic features. No impacts would occur.

4.5.6 Significance of Impacts Before Mitigation

Thresholds a.: Less-than-Significant Impact. The Project site is not located within an Alquist-Priolo Earthquake Fault Zone, is not located on a geologic fault, and has no potential to be impacted by ground rupture, but would be subject to ground shaking hazards from a seismic event. Although the Project site is located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project, mandatory compliance with the CBSC, the City Building Code, and recommendations contained in the Project's geotechnical evaluation report (*Technical Appendix F*) would ensure that potential effects associated with strong seismic ground shaking would be less than significant.

Threshold b.: Less-than-Significant Impact. The Project would not result in substantial soil erosion or loss of topsoil. With mandatory compliance to the Project's SWPPP which is a regulatory requirement under the applicable NPDES Permit to address water erosion, and mandatory compliance to SCAQMD Rule 403 to address wind erosion, the potential for water and wind erosion impacts during construction would be less than significant. Following development, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be covered with impervious surfaces or landscaping. Impacts would be less than significant.

Threshold c.: Potentially Significant Direct Impact. The Project site and its immediate surrounding areas are developed and exhibit little topographic variation, indicating that there is no potential for the Project to be impacted by or cause landslides. Given the geotechnical conditions of the Project site, there is no potential for liquefaction to occur. Based on the presence of undocumented fill and the variability of the depth to dense soils, on-site soils were found to be susceptible to caving in open cuts and excavations. Accordingly, the Project has the potential to be located on a geologic unit or soil that is unstable or has the potential to become unstable, and, as such, impacts may be potentially significant.

Threshold d.: No Impact. The Project site does not contain expansive soils; therefore, the Project has no potential to create substantial direct or indirect risks to life or property associated with the presence of expansive soils. No impact would occur.

Threshold e.: No Impact. No septic tanks or alternative wastewater disposal systems are proposed as part of the Project. Accordingly, there is no potential for the Project to cause impacts associated with soil compatibility for these systems.

Threshold f.: No Impact. The Project site's subsurface does not contain formations that have potential to contain significant or unique paleontological resources. Accordingly, no impact to paleontological resources would occur.

4.5.7 Mitigation

The following mitigation measures address the Project's potential to result in impacts due to unstable soils.

GEO MM-1 Prior to the issuance of grading permits, the Public Works Director for the City of Monrovia (or his/her designee) shall verify that all of the recommendations given in the Project's November 3, 2022 Geotechnical Design-Level Investigation, prepared by Geotechnical Professionals, Inc. are incorporated into the construction and grading plans. The recommendations shall include, but not be limited to, the following.

a) Earthwork
Undocumented fills or debris buried from the current commercial structure that is present and encountered during demolition shall be removed within the building footprint. These undocumented fills and debris shall be removed during excavation of the subterranean parking levels. Removals within the building footprint shall extend to the bottom of the footings. The bottom of the excavation shall be compacted with heavy vibratory equipment in order to densify soils directly beneath the footing bottoms. Recommendations for removals may be modified by the Project's geotechnical engineer when more field and laboratory data are obtained at the site or in the field based on conditions observed in the bottom of the excavations. Granular soils under the building footprint shall be compacted to at least 95 percent of maximum dry density in accordance with ASTM D-1557.

b) Foundations and Slab-On-Grade Floors
Spread footings and a slab-on-grade floor shall be used to support the proposed building (4 stories of wood framed apartments over 2 levels of above-grade concrete podium over 1 to 2 subterranean concrete levels). The footings shall be supported on natural soils or a layer of engineered fill derived from natural soils. The footings shall be designed for an allowable net bearing capacity on the order of 4,000 to 5,000 pounds per square foot (psf). These preliminary recommendations will limit the total settlement (static and seismic) to approximately 1.5 inches.

Soil resistance to lateral loads shall be provided by a combination of frictional resistance between the bottom of footings and underlying soils and by passive soil pressures acting against the embedded sides of the footings. For preliminary design of footings, a coefficient of friction of 0.35 shall be used for frictional resistance. In addition, an allowable lateral bearing pressure equal to an equivalent fluid weight of 300 pounds per cubic foot shall be used for the preliminary design of footings.

The slab-on-grade floors shall be supported on engineered fill derived from natural soils. For concrete floors for the subterranean parking level, a vapor retarder is not necessary from a geotechnical standpoint except where moisture sensitive flooring such as at lobby areas near the elevators.

c) Shoring

Since there is not sufficient space for sloped embankments along the property limits, shoring shall be required. One method of shoring would consist of steel soldier piles placed in drilled holes, backfilled with concrete. Driven or vibrated soldier piles may be a feasible and more economical alternative to drilled holes, however vibrating piles adjacent to the existing building at the property line to the west shall not be permitted.

The shoring contractor shall evaluate the potential drilling conditions when planning the installation methods and shall note that caving of drilled holes is likely due to the presence of medium dense clean sands.

Due to the proximity to the adjacent streets, and buildings, an additional surcharge load shall be added to the recommended earth pressure to account for structure and traffic surcharge loading.

Excavations deeper than approximately 15 to 17 feet shall require tied-back earth anchors or rakers to support the temporary shoring.

Due to anticipated caving soil conditions, the voids between the lagging and retained earth shall be backfilled with lean-mix sand-cement slurry prior to continuing the excavation deeper.

4.5.8 Regulatory Requirements (RR)

The City of Monrovia requires compliance with the following:

GEO RR-1 The Project is required to comply with the provisions of MMC Chapter 15.04, which generally requires that all projects comply with California Building Codes. The codes establish site-specific investigation requirements, construction standards, and inspection procedures to

ensure that development does not pose a threat to the health, safety, and welfare of the public, and include requirements related to erosion.

GEO RR-2 Seismic design of the Project is required to comply with the most current California Building Code (CBC). Based on the results of the shear wave measurements performed during the subsurface explorations at the Project site, a Site Class C shall be used for seismic design.

GEO RR-2 The Project shall comply with all applicable provisions of the Los Angeles County Municipal Separate Storm Sewer System (MS4) NPDES Permit (NPDES Permit No. CAS004001), as required by Chapter 12.36 (Storm Water and Urban Runoff Pollution Control) of the City of Monrovia Municipal Code. The Project shall implement a SWPPP pursuant to the requirements of the NPDES Permit.

4.5.9 Significance of Impacts After Mitigation

Threshold c.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measure GEO MM-1 would ensure that the recommendations of the Project's geotechnical report (*Technical Appendix F*) are implemented to address potential impacts associated with unstable soils that may result in lateral spreading, subsidence, and collapse. With implementation of the required mitigation, substantial adverse effects associated with soil that is unstable or has the potential to become unstable would be reduced to less than significant.

4.6 GREENHOUSE GAS EMISSIONS

The analysis in this Subsection is based on a greenhouse gas (GHG) analysis prepared for the Project by Urban Crossroads, Inc., titled, 701 S. Myrtle Greenhouse Gas Analysis, City of Monrovia" (herein, GHGA), dated April 16, 2025, and included as EIR *Technical Appendix G* (UXR, 2025c). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.6.1 EXISTING CONDITIONS

A. Introduction to Global Climate Change

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years (UXR, 2025c, p. 8).

Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radiative heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages (UXR, 2025c, p. 8).

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature (UXR, 2025c, p. 8).

B. Greenhouse Gases

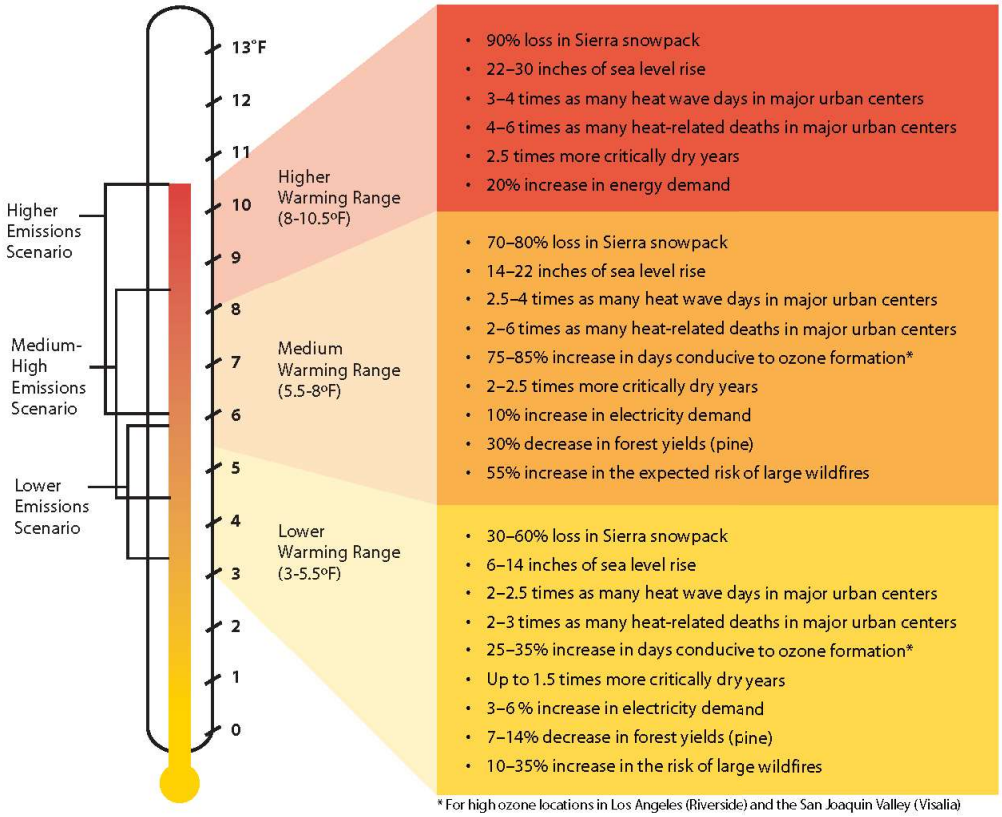
1. Greenhouse Gases and Health Effects

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties and are discussed below. For the purposes of this analysis, emissions of CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases (UXR, 2025c, pp. 8-9).

The potential health effects related directly to the emissions of CO_2, CH_4, and N_2O as they relate to development projects such as the Project are still being debated in the scientific community. Their cumulative

effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Climate change would likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas. Figure 4.6-1, *Summary of Projected Global Warming Impact, 2070-2099 (as compared with 1961-1990)*, presents the potential impacts of global warming (UXR, 2025c, p. 14).

Figure 4.6-1 Summary of Projected Global Warming Impact, 2070-2099 (as compared with 1961-1990)



(UXR, 2025c, Exhibit 2-A)

Provided below is a description of GHGs, their sources, and their health effects.

❑ Water

Water is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. A climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change (UXR, 2025c, Table 2-1).

As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth's surface and heat it up) (UXR, 2025c, Table 2-1).

The main source of water vapor is evaporation from the oceans (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves (UXR, 2025c, Table 2-1).

There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor (UXR, 2025c, Table 2-1).

❑ Carbon Dioxide (CO_2)

CO_2 is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO_2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of CO_2 in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources (UXR, 2025c, Table 2-1).

CO_2 is emitted from natural and manmade sources. Natural sources include the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include the burning of coal, oil, natural gas, and wood. CO_2 is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks (UXR, 2025c, Table 2-1).

Outdoor levels of CO_2 are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH), high concentrations of CO_2 can result in health effects such as headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of CO_2 in the earth's atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour work week and short-term reference exposure levels of 30,000 ppm averaged over a 15-minute period (UXR, 2025c, Table 2-1).

❑ Methane (CH_4)

CH_4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO_2 and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs (UXR, 2025c, Table 2-1).

CH_4 has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, decomposition at landfills, and mining coal have added to the atmospheric concentration of CH_4. Other anthropocentric sources include fossil-fuel combustion and biomass burning (UXR, 2025c, Table 2-1).

CH_4 is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of CH_4 can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate (UXR, 2025c, Table 2-1).

❑ Nitrous Oxide (N_2O)

Nitrous oxide (N_2O), also known as laughing gas, is a colorless GHG. Concentrations of N_2O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb) (UXR, 2025c, Table 2-1).

N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, i.e., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. N_2O can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction (UXR, 2025c, Table 2-1)

N_2O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage). (UXR, 2025c, Table 2-1).

❑ Chlorofluorocarbons (CFCs)

Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are non-toxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs have no natural source. They are found in aerosol sprays, blowing agents for foams and packing materials, as solvents, and as refrigerants. In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation (UXR, 2025c, Table 2-1).

❑ Hydrofluorocarbons (HFCs)

Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential (GWP). The HFCs with the largest measured atmospheric abundances are (in order), Fluoroform (HFC-23), 1,1,1,2-tetrafluoroethane (HFC- 134a), and 1,1-difluoroethane (HFC-152a). Prior to 1990, the only significant emissions were of HFC-23. HCF-134a emissions are increasing due to its use as a refrigerant. HFCs are manmade for applications such as automobile air conditioners and refrigerants. No health effects are known to result from exposure to HFCs (UXR, 2025c, Table 2-1).

❑ Perfluorocarbons (PFCs)

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The Environmental Protection Agency (EPA) estimates that concentrations of CF_4 in the atmosphere are over 70 parts per trillion (ppt) (UXR, 2025c, Table 2-1).

The two main sources of PFCs are primary aluminum production and semiconductor manufacture. No health effects are known to result from exposure to PFCs (UXR, 2025c, Table 2-1).

❑ Sulfur Hexafluoride (SF_6)

Sulfur hexafluoride (SF_6) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900). The EPA indicates that concentrations in the 1990s were about 4 ppt (UXR, 2025c, Table 2-1).

SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing (UXR, 2025c, Table 2-1).

❑ Nitrogen Trifluoride (NF_3)

Nitrogen trifluoride (NF_3) is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF_3 has a 100-year GWP of 17,200 (UXR, 2025c, Table 2-1).

NF_3 is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers. Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis (UXR, 2025c, Table 2-1).

2. Global Warming Potential (GWP)

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO_2 is utilized as the reference gas for GWP, and thus has a GWP of 1. CO_2 equivalent (CO_2e) is a term used for describing the difference GHGs in a common unit. CO_2e signifies the amount of CO_2 which would have the equivalent GWP. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4.6-1, *GWP and Atmospheric Lifetime of Select GHGs*. As shown in Table 4.6-1, GWP for the 6th Assessment Report, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for CO_2 to 25,200 for SF_6 (UXR, 2025c, p. 15).

Table 4.6-1 GWP and Atmospheric Lifetime of Select GHGs

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon) 6th Assessment Report
CO_2	Multiple	1
CH_4	11.8	28
N_2O	109	273
HFC-23	228	14,600
HFC-134a	14	1,526
HFC-152a	1.6	164
SF_6	3,200	25,200

(UXR, 2025c, Table 2-2)

3. GHG Emissions Inventories

Global

Worldwide anthropogenic GHG emissions are tracked by the Intergovernmental Panel on Climate Change (IPCC) for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2021. Based on the latest available data, the sum of these emissions totaled approximately 28,272,940 gigagram (Gg) CO_2e[1] as summarized on Table 4.6-2, *Top GHG Producing Countries and the European Union* (UXR, 2025c, p. 16).

[1] The global emissions are the sum of Annex I and non-Annex I countries, without counting Land-Use, Land-Use Change and Forestry (LULUCF). For countries without 2020 data, the United Nations' Framework Convention on Climate Change (UNFCCC) data for the most recent year were used U.N. Framework Convention on Climate Change, "Annex I Parties – GHG total without LULUCF," The most recent GHG emissions for China and India are from 2014 and 2016, respectively.

Table 4.6-2 Top GHG Producing Countries and the European Union

Emitting Countries	GHG Emissions (Gg CO_2e)
China	12,300,200
United States	6,340,228
European Union (27-member countries)	3,468,394
India	2,839,425
Russian Federation	2,156,599
Japan	1,168,094
Total	**28,272,940**

(UXR, 2025c, Table 2-3)

United States

As noted in Table 4.6-2, the United States, as a single country, was the number two producer of GHG emissions in 2021 (UXR, 2025c, p. 16).

State of California

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the United States (U.S.) emissions inventory total. The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2024 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2022 GHG emissions period, California emitted an average 371.1 million metric tons of CO_2e per year ($MMTCO_2e$/yr) or 371,1000 Gg CO_2e (6.01% of the total United States GHG emissions) (UXR, 2025c, p. 16).

C. Effects of Climate Change in California

1. Public Health

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35% under the lower warming range to 75 to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. Based on *Our Changing Climate Assessing the Risks to California by the California Climate Change Center*, large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced (UXR, 2025c, p. 18).

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a significant increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat

stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat (UXR, 2025c, pp. 23-24).

2. Water Resources

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the State from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages (UXR, 2025c, p. 17).

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90%. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding. (UXR, 2025c, p. 17)

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply. (UXR, 2025c, p. 17)

3. Agriculture

Increased temperatures could cause widespread changes to the agriculture industry, reducing the quantity and quality of agricultural products Statewide. First, California farmers could possibly lose as much as 25% of the water supply needed. Although higher CO_2 levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth. (UXR, 2025c, p. 17)

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits, and nuts (UXR, 2025c, p. 17).

In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range

contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates (UXR, 2025c, p. 18).

4. Forests and Landscapes

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55%, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks would not be uniform throughout the State. In contrast, wildfires in northern California could increase by up to 90% due to decreased precipitation. (UXR, 2025c, p. 18)

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the State. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80% by the end of the century as a result of increasing temperatures. The productivity of the State's forests has the potential to decrease as a result of GCC (UXR, 2025c, p. 18).

5. Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the State's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12-14 inches (UXR, 2025c, p. 18).

4.6.2 Regulatory Setting

The following is a brief description of the federal, State, and local environmental laws and related regulations related to GHG emissions. Please refer to Subsection 2.7, *Regulatory Setting*, of the Project's GHGA (*Technical Appendix G*) for a detailed description of applicable international, national, and State regulations related to GHG emissions.

A. State Regulations

1. Statewide GHG Reduction Targets (Executive Order (EO) S-3-05; 2015)

Executive Order (EO) S-3-05 documents GHG emission reduction goals, creates the Climate Action Team and directs the Secretary of the California EPA to coordinate efforts with meeting the GHG reduction targets with the heads of other State agencies. The EO requires the Secretary to report back to the Governor and Legislature biannually to report: progress toward meeting the GHG goals; GHG impacts to California; and applicable Mitigation and Adaptation Plans. EO S-3-05 goals for GHG emissions reductions include: reducing GHG emissions to 2000 levels by the year 2010; reducing GHG emissions to 1990 levels by the year 2020; and reducing GHG emissions to 80 percent below 1990 levels by 2050.

2. Pavley Law (California Assembly Bill (AB) 1493, 2002)

AB 1493 of 2002, called the Pavley Law, required CARB to adopt the nation's first GHG emission standards for automobiles. On September 24, 2009, CARB adopted amendments to the Pavley regulations that reduce greenhouse gas (GHG) emissions in new passenger vehicles from model year 2009 through 2016. These amendments were part of California's commitment toward a nation-wide program to reduce new passenger vehicle GHGs from 2012 through 2016. CARB's September 2009 amendments cement California's enforcement of the Pavley regulations starting in 2009 while providing vehicle manufacturers with new compliance flexibility. The amendments also prepare California to harmonize its rules with the federal rules for passenger vehicles (CARB, n.d.).

The U.S. EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles On June 30, 2009. The first California request to implement GHG standards for passenger vehicles, known as a waiver request, was made in December 2005, and was denied by the EPA in March 2008. That decision was based on a finding that California's request to reduce GHG emissions from passenger vehicles did not meet the CAA requirement of showing that the waiver was needed to meet "compelling and extraordinary conditions" (CARB, n.d.).

CARB's Board originally approved regulations to reduce GHGs from passenger vehicles in September 2004, with the regulations to take effect in 2009. These regulations were authorized by AB 1493 (Pavley) (CARB, n.d.).

The regulations had been threatened by automaker lawsuits and were stalled by the EPA's delay in reviewing and then initially denying California's waiver request. The parties involved entered a May 19, 2009 agreement to resolve these issues. With the granting of the waiver on June 30, 2009, it is expected that the Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs (CARB, n.d.).

The CARB has adopted a new approach to passenger vehicles – cars and light trucks – by combining the control of smog-causing pollutants and greenhouse gas emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California (CARB, n.d.).

3. Low Carbon Fuel Standard

Executive Order S-01-07 is effectively known as the Low Carbon Fuel Standard (LCFS). The Executive Order seeks to reduce the carbon intensity of California's passenger vehicle fuels by at least 10 percent by 2020. The LCFS requires fuel providers in California to ensure that the mix of fuel they sell into the California market meet, on average, a declining standard for GHG emissions measured in CO_2e grams per unit of fuel energy sold. In 2018, CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero emission vehicle adoption, alternative jet

fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector.

4. Global Warming Solutions Act of 2006 (California Assembly Bill (AB) 32; 2006)

In September 2006, Governor Schwarzenegger signed Assembly Bill 32 (AB 32), the California Climate Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020, which represents a reduction of approximately 15 percent below emissions expected under a "business as usual" scenario. Pursuant to AB 32, the CARB must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. The full implementation of AB 32 will help mitigate risks associated with climate change, while improving energy efficiency, expanding the use of renewable energy resources, cleaner transportation, and reducing waste (CARB, 2018).

AB 32 specifically required that CARB do the following:

- Prepare and approve a Scoping Plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020, and update the Scoping Plan every five years.
- Maintain and continue reductions in emissions of GHG beyond 2020.
- Identify the Statewide level of GHG emissions in 1990 to serve as the emissions limit to be achieved by 2020.
- Identify and adopt regulations for discrete early actions that could be enforceable on or before January 1, 2010.
- Adopt a regulation that establishes a system of market-based declining annual aggregate emission limits for sources or categories of sources that emit GHG emissions.
- Convene an Environmental Justice Advisory Committee to advise CARB in developing and updating the Scoping Plan and any other pertinent matter in implementing AB 32.
- Appoint an Economic and Technology Advancement Advisory Committee to provide recommendations for technologies, research, and GHG emission reduction measures.

In November 2007, CARB completed its estimated calculations of Statewide 1990 GHG levels. Net emission 1990 levels were estimated at 427 million metric tons (MMTs) (emission sources by sector were: transportation – 35 percent; electricity generation – 26 percent; industrial – 24 percent; residential – 7 percent; agriculture – 5 percent; and commercial – 3 percent). Accordingly, 427 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) equivalent was established as the emissions limit for 2020. For comparison, CARB's estimate for baseline GHG emissions was 473 MMTCO2e for 2000 and without emissions reduction measures 2010 emissions were projected to be 532 $MMTCO_2e$. "Business as usual" conditions (without the reductions to be implemented by CARB regulations) for 2020 were projected to be 596 $MMTCO_2e$ (CARB, 2007).

AB 32 required CARB to develop a Scoping Plan which identified California's strategy for meeting the AB 32 reduction goals for 2020. The Scoping Plan must be updated every five years. In December 2008, CARB approved the initial Scoping Plan, which included a suite of measures to sharply cut GHG emissions to achieve the AB 32 GHG reduction target (CARB, 2018).

In May 2014, CARB approved the First Update to the Climate Change Scoping Plan (Update), which builds upon the initial Scoping Plan with new strategies and recommendations. The Update highlights California's progress toward meeting the near-term 2020 GHG emission reduction goals, highlights the latest climate change science, and provides direction on how to achieve long-term emission reduction goal described in Executive Order S-3-05. The Update recalculates 1990 GHG emissions using new global warming potentials identified in the IPCC Fourth Assessment Report released in 2007. Using those GWPs, the 427 $MTCO_2e$ 1990 emissions level and 2020 GHG emissions limit identified in the 2008 Scoping Plan would be slightly higher, at 431 $MTCO_2e$. Based on the revised 2020 emissions level projection identified in the 2011 Final Supplement and the updated 1990 emissions levels identified in the discussion draft of the First Update, achieving the 1990 emissions level in 2020 would require a reduction of 78 $MTCO_2e$ (down from 509 $MTCO_2e$), or approximately 15.3 percent (down from 28.5 percent), from the BAU condition (CARB, 2017; CARB, 2018).

In November 2017, CARB released the Final 2017 Scoping Plan Update, which identifies the State's post-2020 reduction strategy and reflected the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by Senate Bill (SB) 32. Executive Order B-30-15 set a goal to reduce GHG emissions in California to 40 percent below 1990 levels by 2030, while SB 32 requires the State to reduce Statewide GHG emissions based on the goals established by Executive Order B-30-15. Key GHG emissions reductions programs that the Second Update proposes to build upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard (LCFS), and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes. The Final 2017 Scoping Plan Update established a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030 (CARB, 2017).

AB 1279, also known as the California Climate Crisis Act, was signed by the Governor on September 16, 2022. AB 1279 declares that it is the policy of the State to achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045; to achieve and maintain net negative greenhouse gas emissions thereafter; and to ensure that by 2045, Statewide anthropogenic greenhouse gas emissions are reduced to at least 85% below the 1990 levels. The bill requires the California Air Resources Board (CARB) to work with relevant State agencies to ensure that updates to the CARB Scoping Plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies in California. AB 1279 also requires CARB to submit an annual report evaluating progress towards these policies (CA Legislative Info, 2022c).

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the 2017 Scoping Plan, as well as the requirements set forth by AB 1279, which directs the State to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes

a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5 (UXR, 2025c, p. 30).

5. Senate Bill 97 (SB 97)

By enacting SB 97 in 2007, California's lawmakers expressly recognized the need to analyze GHGs as a part of the CEQA process. SB 97 required the Governor's Office of Planning and Research (OPR) to develop, and the Natural Resources Agency to adopt amendments to the CEQA Guidelines addressing the analysis and mitigation of greenhouse gas emissions. Those CEQA Guidelines amendments clarified several points, including the following: (CA Legislative Info, 2007)

- Lead agencies must analyze the GHG emissions of proposed projects, and must reach a conclusion regarding the significance of those emissions. See CEQA Guidelines Section 15064.4.
- When a project's GHG emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions. See CEQA Guidelines Section 15126.4(c).
- Lead agencies must analyze potentially significant impacts associated with the potential exacerbation of risks that could result from placing projects in locations potentially affected by climate change. See CEQA Guidelines Section 15126.2(a).
- Lead agencies may significantly streamline the analysis of GHGs on a project level by using a programmatic GHG emissions reduction plan meeting certain criteria. See CEQA Guidelines Section 15183.5(b).

As part of the administrative rulemaking process, the Natural Resources Agency developed a Final Statement of Reasons explaining the legal and factual bases, intent, and purpose of the CEQA Guidelines amendments. The amendments to the CEQA Guidelines implementing SB 97 became effective on March 18, 2010 (CA Legislative Info, 2007).

Of note, the current guidelines state that a lead agency shall have discretion to determine whether to use a quantitative model or methodology, or in the alternative, rely on a qualitative analysis or performance-based standards. Pursuant to CEQA Guidelines Section 15064.4(a): "A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Quantify greenhouse gas emissions resulting from a project; or (2) Rely on a qualitative analysis or performance-based standards" (CA Legislative Info, 2007).

CEQA Guidelines provide that an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in Section 15065(a)(3). See CEQA Guidelines Section 15130(a).

Section 15064.4(b) of the CEQA Guidelines provides direction for lead agencies for assessing the significance of impacts of greenhouse gas emissions:

1. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;

2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; or
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

The CEQA Guidelines amendments do not identify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a "good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." The amendments encourage lead agencies to consider many factors in performing a CEQA analysis and preserve lead agencies' discretion to make their own determinations based upon substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. Specific GHG language incorporated in the Guidelines' suggested Environmental Checklist (Guidelines Appendix G) is as follows:

VIII. GREENHOUSE GAS EMISSIONS

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

6. 2018 CEQA Guidelines Update

In January 2018, OPR transmitted its proposal for comprehensive updates to the CEQA Guidelines to the California Natural Resources Agency. The updated Guidelines became effective on December 28, 2018, and include changes to CEQA Guidelines Section 15064.4 related to determining the significance of impacts from GHG emissions. The changes to Section 15064.4 include clarification in how to determine the significance of a project's GHG emissions, indicate that the lead agency has discretion to use a model or methodology to estimate GHG emissions resulting from a project, and allow for the use of environmental standards as thresholds of significance in order to promote consistency in significance determinations.

B. Local and Regional Regulations

1. South Coast Air Quality Management District (SCAQMD) GHG Emissions Thresholds

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions (UXR, 2025c, p. 37).

In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, that could be applied by lead agencies. The working group has not provided additional guidance since release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15 which occurred on September 28, 2010, focused on refining methodologies for assessing GHG emissions in CEQA reviews. These minutes are attached in Appendix 2.1 of the GHGA included as EIR *Technical Appendix G* (UXR, 2025c). The current interim thresholds consist of the following tiered approach (UXR, 2025c, p. 38):

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.

- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.

- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
  - Residential and commercial land use: 3,000 $MTCO_2e$/yr
  - Industrial land use: 10,000 $MTCO_2e$/yr
  - Based on land use type: residential: 3,500 $MTCO_2e$/yr; commercial: 1,400 $MTCO_2e$/yr; or mixed use: 3,000 $MTCO_2e$/yr

- Tier 4 has the following options:
  - Option 1: Reduce Business-as-Usual (BAU) emissions by a certain percentage (this percentage is currently undefined)
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures

- Option 3: 2020 target for service populations (SP), which includes residents and employees: 4.8 $MTCO_2e$ per SP per year for projects and 6.6 $MTCO_2e$ per SP per year for plans;
- Option 3: 2035 target of 3.0 $MTCO_2e$ per SP per year for projects and 4.1 $MTCO_2e$ per SP per year for plans

- Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate (UXR, 2025c, p. 38).

SCAQMD Regulation XXVII, adopted in 2009 includes the following rules (UXR, 2025c, pp. 38-39):

- Rule 2700 defines terms and post global warming potentials.
- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the SCAQMD.
- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the SCAQMD. The SCAQMD will fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

2. *Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles.

SCAG's 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), also referred to as Connect SoCal, develops long-range regional transportation plans including a sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. The RTP/SCS provides objectives for meeting air pollution emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. The Subregional Sustainable Communities Strategies identifies the Project Site as being located in an area with a "Standard Suburban" land use pattern, which is defined as auto-oriented development with a minimal mix of land uses.

In April 2024, SCAG's Regional Council adopted the *2024-2050 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)*. Although the 2024-2050 RTP/SCS includes modeling for and quantification of GHG reductions, CARB is still working with SCAG to make refinements to the RTP/SCS discussion of

GHGs. Similar to the 2020-2045 RTP/SCS, the 2024-2050 RTP/SCS develops long-range regional transportation plans including a sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. The RTP/SCS provides objectives for meeting air pollution emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning.

3. City of Monrovia Energy Action Plan (EAP)

The EAP identifies Monrovia's long-term vision and commitment to achieve energy efficiency in the community and in municipal operations. It recommends future actions that could improve energy efficiency and reduce GHG emissions to support City efforts to optimize energy performance in the community, increase operational productivity, reduce costs, and improve the quality of life for residents, employees, and business owners. The Plan also identifies programs to achieve cost savings in City government facilities through energy reductions and more efficient maintenance and operational practices. Over time, the City of Monrovia evaluates recommendations and implements measures if appropriate and as funding and staff resources allow.

In 2007 the City of Monrovia adopted 21 Environmental Accords that direct the City's efforts related to energy, waste reduction, transportation, and water conservation. These accords continue to guide the City's efforts to address environmental and urban design issues. As part of a regional partnership between the City, Southern California Edison (SCE), and the San Gabriel Valley Council of Governments (SGVCOG), the City of Monrovia prepared the EAP to further the objectives expressed in the Environmental Accords. The EAP charts a path to Monrovia's continued leadership in implementing energy conservation strategies and improving municipal operations. The EAP is a stand-alone document that meets multiple objectives of the City and SCE. The EAP supports the City's status in the Energy Leader Partnership with SCE. In addition, the EAP serves as the equivalent of an electricity efficiency chapter of a climate action plan (EECAP). It is designed to integrate into a comprehensive climate action plan when the City's resources support the preparation of a climate action plan to address the reduction of GHG emissions from electricity, natural gas, waste, transportation, and other sectors.

4.6.3 Basis for Determining Significance

According to Section VIII of Appendix G to the CEQA Guidelines, the Project would result in a significant impact due to GHG emissions if the Project would:

a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or*

b) *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*

Section 15064.7(c) of the CEQA Guidelines specifies that "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by

other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of the CEQA's requirements for cumulative impact analysis. CEQA Guidelines Section 15064.4(a) further states, ". . . A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use . . .; or (2) Rely on a qualitative analysis or performance-based standards."

CEQA Guidelines Section 15064.4 provides that a lead agency should consider the following factors, among others, in assessing the significance of impacts from greenhouse gas emissions:

- Consideration 1: The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.

- Consideration 2: Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.

- Consideration 3: The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

The City of Monrovia has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 $MTCO_2e$/yr to determine if additional analysis is required is an acceptable approach for small projects such as the Project. This approach is a widely accepted screening threshold used by the City of Monrovia and numerous cities in the South Coast Air Basin (SCAB) and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required. As noted by the SCAQMD (UXR, 2025c, p. 42):

> "*…the…screening level for stationary sources is based on an emission capture rate of 90% for all new or modified projects...the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90% of all new or modified stationary source projects. A GHG significance threshold based on a 90% emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90% emission*

capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than 1% of future 2050 statewide GHG emissions target (85 [MMTCO2e/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."

Thus, and based on guidance from the SCAQMD, if a non-industrial project would emit GHGs less than 3,000 $MTCO_2e$/yr, the project is not considered a substantial GHG emitter and the GHG impact is less than significant, requiring no additional analysis and no mitigation. On the other hand, if a non-industrial project would emit GHGs in excess of 3,000 $MTCO_2e$/yr, then the project could be considered a substantial GHG emitter, requiring additional analysis and potential mitigation. As previously discussed, a screening threshold of 3,000 $MTCO_2e$/yr is an acceptable approach for small projects to determine if additional analysis is required and is therefore applied for this Project (UXR, 2025c, p. 42).

Potential impacts of the Project are evaluated for their cumulative effect. While estimated Project-related GHG emissions can be quantified, the direct impacts of such emissions on GCC and global warming cannot be determined for an individual project on the basis of available science. There is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect the global climate. AB 32 states, in part, that "[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California." Because most scientists take the position that global warming is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the Project would have no potential to result in a direct impact to global warming; rather, Project-related contributions to GCC, if any, only have potential significance on a cumulative basis. Therefore, the analysis below focuses on the Project's potential to contribute to GCC in a cumulatively-considerable way.

4.6.4 Impact Analysis

In August 2023, the California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including the SCAQMD, released the latest version of CalEEMod, version 2022.1.1.22. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity are provided in Appendices 3.1 and 3.2 of the Project's GHGA (*Technical Appendix G*). CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water, and refrigerants (UXR, 2025c, p. 43).

A full life-cycle analysis (LCA) for construction and operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time. Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the Project development, infrastructure, and on-going operations) depends on emission factors or econometric factors that are not well established for all processes. At this time, an LCA would be extremely speculative and thus has not been prepared (UXR, 2025c, p. 43).

Additionally, the SCAQMD recommends analyzing direct and indirect project GHG emissions generated within California and not life-cycle emissions because the life-cycle effects from a project could occur outside of California, might not be very well understood, or documented, and would be challenging to mitigate. Additionally, the science to calculate life cycle emissions is not yet established or well defined; therefore, SCAQMD has not recommended, and is not recommending, life-cycle emissions analysis (UXR, 2025c, p. 43).

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

Provided below is an assessment of the Project's GHG emissions during construction and long-term operation.

A. Construction Emissions

Project construction activities would generate CO_2 and CH_4 emissions. The Project's Air Quality Impact Analysis ("AQIA"; EIR *Technical Appendix C*) contains detailed information regarding Project construction activities. As discussed in the Project's AQIA, construction-related emissions are expected from the following construction activities: demolition, site preparation, grading, building construction, paving, and architectural coating (UXR, 2025c, p. 43).

For purposes of analysis, construction of the Project is expected to commence in March 2025 and would last through January 2027. The construction schedule utilized in the analysis, previously shown in Table 3-2 in EIR Section 3.0, *Project Description*, represents a "conservative" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per the CEQA Guidelines (UXR, 2025c, p. 44).

A detailed summary of construction equipment assumptions by phase previously was provided in EIR Table 3-3 in EIR Section 3.0¸ *Project Description*. Detailed modeling inputs/outputs for the Project's construction-related emissions are included in Appendix 4.1 of the Project's GHGA (*Technical Appendix G*).

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year

period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 4.6-3, *Amortized Annual Construction Emissions*.

B. Operational Emissions

Operational activities associated with the Project would result in emissions of CO_2, CH_4, N_2O and Refrigerants from the following primary sources: area source emissions, energy source emissions, mobile source emissions, water supply, treatment, and distribution, solid waste, and refrigerants. Each is discussed below (UXR, 2025c, pp. 45-46).

Table 4.6-3 Amortized Annual Construction Emissions

Year	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e[1]
2025	440.03	0.02	0.03	0.45	448.73
2026	257.53	0.01	0.01	0.28	261.80
2027	4.72	0.00	0.00	0.01	4.80
Total GHG Emissions	702.28	0.03	0.04	0.73	715.33
Amortized Construction Emissions	**23.41**	**0.00**	**0.00**	**0.02**	**23.84**

CalEEMod annual construction-source emissions are presented in Appendix 3.1 of the Project's GHGA (*Technical Appendix G)*.

[1] CalEEMod reports the most common GHGs emitted which include CO_2, CH_4, N_2O and Refrigerants. These GHGs are then converted into CO_2e by multiplying the individual GHG by the GWP.

(UXR, 2025c, Table 3-3)

1. Area Source Emissions

❑ Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that on October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by January 1, 2024, which is now effective. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod (i.e., that the landscape equipment would be gas powered) (UXR, 2025c, p. 46).

❑ Energy Source Emissions (Combustion Emissions Associated with Natural Gas and Electricity)

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions

of the Project. Electricity and natural gas usage associated with the Project was calculated by CalEEMod using default parameters (UXR, 2025c, p. 46).

2. Mobile Source Emissions

The Project related GHG emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site and truck trips associated with the proposed uses. Trip characteristics available from the Project's Traffic Study (EIR *Technical Appendix J1*) were utilized in the analysis (UXR, 2025c, p. 46).

Per the Project's Traffic Study, the existing site currently generates an average of 421 two-way trips per day, with 27 trips during the AM peak hour and 52 trips during the PM peak hour. The Project is anticipated to generate a total of 1,258 two-way trip-ends per day with 86 AM peak hour trips and 108 PM peak hour trips. Comparing the existing use and the Project trip generation results in net increase of 837 trips per day with 59 net new AM peak hour trips and 56 net new PM peak hour trips as compared to the existing use (UXR, 2024, pp. 23-25).

3. Water Supply, Treatment, and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used (UXR, 2025c, p. 46).

4. Solid Waste

The Project use would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the Project were calculated by CalEEMod using default parameters (UXR, 2025c, pp. 46-47).

5. Refrigerants

Air conditioning (A/C) and refrigeration equipment associated with the proposed building are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the USEPA. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. Per 17 CCR 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022. Additionally, as of January 1, 2025, all new air conditioning equipment may not use refrigerants with a GWP of 750 or greater. GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters (UXR, 2025c, p. 47).

C. Project Emissions Summary and Impact Analysis

1. Existing Emissions

As previously stated, the Project site is currently occupied by approximately 25,191 s.f. of office use within the Myrtle and Olive Business Park. The existing emissions were calculated based on the Traffic Analysis for mobile sources, client provided data for energy, water, and solid waste demands and CalEEMod defaults for the remaining parameters. The estimated GHG emissions from the existing development are summarized on Table 4.6-4, *Emissions From Existing Development*. Detailed operational model outputs for the existing use are presented in Appendix 3.2 of the Project's GHGA (EIR *Technical Appendix G*) (UXR, 2025c, p. 47).

Table 4.6-4 Emissions From Existing Development

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Mobile Source	570.81	0.03	0.04	0.83	585.29
Area Source	0.51	0.00	0.00	0.00	0.51
Energy Source	40.66	0.00	0.00	0.00	40.82
Water Usage	1.50	0.04	0.00	0.00	2.63
Waste	27.85	2.78	0.00	0.00	97.44
Refrigerants	0.00	0.00	0.00	0.01	0.01
Total Existing CO_2e (All Sources)	**726.69**				

CalEEMod output, See Appendix 3.2 of the Project's GHGA (EIR *Technical Appendix G*) for detailed model outputs. (UXR, 2025c, Table 3-4)

2. Project Emissions

The estimated Project-related GHG emissions are summarized on Table 4.6-5, *Project Net Increase in GHG Emissions*. Detailed operation model outputs for the Project are presented in Appendix 3.2 of the Project's GHGA (EIR *Technical Appendix G*). As shown in Table 4.6-5, construction and operation of the Project would generate a net increase of approximately 1,283.83 $MTCO_2e$/yr. As previously noted, the screening threshold of 3,000 $MTCO_2e$/yr is used to determine if additional analysis is required, and non-industrial projects that would emit less than 3,000 $MTCO_2e$/yr of GHGs are presumed to have a less-than-significant cumulatively-considerable impact due to GHGs. Therefore, because the Project would not exceed the SCAQMD's recommended numeric screening threshold of 3,000 $MTCO_2e$/yr, Project-related GHG emissions would be less than significant, and no mitigation measures would be required (UXR, 2025c, p. 48).

Table 4.6-5 Project Net Increase in GHG Emissions

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction-related emissions amortized over 30 years	23.41	1.05E-03	1.29E-03	2.43E-02	23.84
Mobile Source	1,595.65	0.07	0.06	2.18	1,619.05
Area Source	54.90	0.00	0.00	0.00	54.97
Energy Source	236	0.02	<0.005	0.00	237.00
Water Usage	11.95	0.27	0.01	0.00	20.79
Waste	15.63	1.56	0.00	0.00	54.69
Refrigerants	0.00	0.00	0.00	0.18	0.18
Total CO_2e (All Sources)	**2,010.52**				
Existing	*726.69*				
Total Net CO_2e (All Sources)	**1,283.83**				

CalEEMod output, See Appendices 3.1 and 3.2 of the Project's GHGA (EIR *Technical Appendix G)* for detailed model outputs.
(UXR, 2025c, Table 3-5)

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

As previously stated, pursuant to 15604.4 of the *CEQA Guidelines*, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the Project's consistency with the City's 2007 Environmental Accords, the City's Energy Action Plan, SCAG's RTP/SCS, and the CARB 2022 Scoping Plan is discussed below. It should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 and SB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary since both of these plans have been superseded by the 2022 Scoping Plan (UXR, 2025c, p. 49).

A. City of Monrovia 2007 Environmental Accords

In 2007, the City of Monrovia City Council adopted several Environmental Accord Goals. As indicated in Table 4.6-6, *Project Consistency with City of Monrovia 2007 Environmental Accords*, the Project would be consistent with or otherwise would not conflict with the City's 2007 Environmental Accord Goals, and impacts would therefore be less than significant.

Table 4.6-6 Project Consistency with City of Monrovia 2007 Environmental Accords

Environmental Accord Goals	Project Consistency
Energy	
Increase the use of renewable energy to meet 10% of the city's peak electric load by 2015.	Consistent. Pursuant to the 2022 version of Title 24, the Project would be required to accommodate photovoltaic (PV) systems to generate on-site renewable energy equal to approximately 80% of the building's annual energy demand

Table 4.6-6 Project Consistency with City of Monrovia 2007 Environmental Accords

Environmental Accord Goals	Project Consistency
	without battery storage, and approximately 90% of the building's energy demand with battery storage. Compliance with the incumbent version of Title 24 would ensure that the Project's energy demand primarily is met through renewable energy.
Reduce the city's peak electric load by 10% within seven years.	Consistent. As noted above, pursuant to the 2022 version of Title 24, the Project would be required to accommodate photovoltaic (PV) systems to generate on-site renewable energy equal to approximately 80% of the building's annual energy demand without battery storage, and approximately 90% of the building's energy demand with battery storage. Compliance with the incumbent version of Title 24 would ensure that the Project assists the City in achieving a reduction in the City's peak electric load.
Reduce the community's greenhouse emissions by 25% by 2030.	Consistent. The City's Environmental Accord goals and policies were adopted by the City in 2007. According to information available from CARB, in 2007 Statewide emissions of GHGs were approximately 483 million tonnes of CO_2e per year, and Statewide emissions in 2022 were reduced to approximately 371.1 million tonnes of CO_2e per year (CARB, 2022b). Thus, between 2007 and 2020, Statewide GHG emissions were reduced by approximately 23.2%. The Project would be subject to compliance with the incumbent Title 24 regulations, which would ensure that the Project would assist both the City and State in achieving the target reductions in GHG emissions by 2030. Furthermore, as demonstrated by the analysis provided for Threshold a., above, because the Project would emit fewer than 3,000 $MTCO_2e$/yr of GHG emissions, the Project would not inhibit the State's or the City's ability to achieve the GHG reduction targets established for 2030.
Waste Reduction	
Achieve a 75% diversion of waste going to landfills by 2015.	Consistent. The Project would be required to comply with mandatory waste reduction requirements of the California Integrated Waste Management Act (AB 939), the California Solid Waste Reuse and Recycling Act of 1991 (Cal Pub Res. Code Section 42911), and Chapter 8.08 (Residential Solid Waste, Green Waste and Recyclable Materials Collection) of the City of Monrovia Municipal Code. The Project Applicant also would be required to prepare and implement a City-approved Waste Management Plan pursuant to Chapter 8.09 of the City's Municipal Code, which would ensure that solid waste generated during the Project construction phase is not excessive. There are no components of the proposed Project that would inhibit the City's ability to achieve a 75% diversion rate from area

Table 4.6-6 Project Consistency with City of Monrovia 2007 Environmental Accords

Environmental Accord Goals	Project Consistency
	landfills.
Reduce the use of disposable, toxic, or non-renewable products by at least 50% by 2015.	Consistent. The Project includes residential and commercial retail land uses, which are not associated with the use or disposal of toxic substances, and there are no components of the Project that would inhibit the City's ability to reduce non-renewable products by 50%.
Implement user-friendly recycling and composting programs and reduce solid waste per capita by 20% by 2015.	Not Applicable. This goal provides direction to City staff and decision makers, and is not applicable to the Project. There are no components of the Project that would inhibit the City's ability to implement recycling and composting programs to achieve the 20% reduction in per capita solid waste use.
Urban Design	
Establish a green building standard for all new municipal buildings.	Not Applicable. This goal provides direction to City staff and decision makers and relates to municipal buildings, which are not proposed as part of the Project.
Advance higher density, mixed use, walk-able, bike-able, and disabled-accessible neighborhoods, and coordinate both land use and transportation with open space for recreation and ecological restoration.	Consistent. The Project comprises a proposed residential and commercial mixed-use building that would be located within an existing walkable and bike-able community that also affords access for disabled persons, and the Project Applicant would be required to pay the City's Dwelling Unit Tax pursuant to Chapter 3.32 of the City's Municipal Code, a portion of which may be used to provide for recreational amenities within the City.
Create environmentally-friendly jobs throughout the community	Not Applicable. This goal provides direction to City staff and decision makers, and there are no components of the Project that would inhibit the City's ability to promote the creation of environmentally-friendly jobs throughout the community.
Urban Nature	
Ensure that there are accessible public parks, trails, or recreation open space within a half-mile of every city resident by 2015.	Consistent. The Project includes various recreational facilities and amenities for the residents, including a resort-style pool, rooftop deck, dog park, courtyard gathering areas, and an outdoor public plaza. The Project Applicant would be required to pay the City's Dwelling Unit Tax pursuant to Chapter 3.32 of the City's Municipal Code, a portion of which may be used to provide for recreational amenities within the City. Additionally, and as discussed in EIR subsection 4.12.1, there are four (4) existing parks located within 0.5-mile of the Project site. Thus, the Project would be served by recreational amenities within a half-mile of the Project site.
Plant and maintain the community's tree canopy in not less than 50% of all available sidewalk planting sites.	Consistent. The Project includes a Conceptual Landscape Plan that would require that existing non-protected ornamental street trees would be removed along the Project site's frontage along West Olive Avenue, and new trees and

Table 4.6-6 Project Consistency with City of Monrovia 2007 Environmental Accords

Environmental Accord Goals	Project Consistency
	landscaping would be planted to provide enhanced landscaping as part of the Project in conformance with Municipal Code Chapter 17.20, Landscaping/Tree Preservation.
Protect critical habitat corridors, resources, and shelter from unsustainable development.	Not Applicable. The Project Site is located within a fully developed portion of the City of Monrovia and is not located within or near any critical habitat corridors or resources.
Transportation	
Expand affordable public transportation to within a quarter-mile of all city residents within 10 years.	Not Applicable. Although the Project site is located approximately 230 feet from the nearest bus stop, this goal provides direction to City staff and decision makers and is not applicable to the proposed Project.
Phase down sulfur emissions in diesel and gasoline fuels by 50% concurrent with using advanced emission controls on all buses, taxis, and public fleets to reduce particulate matter and smog-forming emissions by an additional 50% by 2015.	Not Applicable. This goal relates to sulfur emissions from buses, taxis, and public vehicle fleets, none of which are proposed as part of the Project.
Reduce the percentage of commuting trips in single-occupancy vehicles by 10% by 2015.	Consistent. The Project site is located approximately 230 feet northeast of the nearest bus stop, which would encourage the use of transit by Project residents and would assist the City in meeting a reduction of single-occupancy vehicles by 10%.
Environmental Health	
Annually identify one product, chemical or compound that is used within the city (with a focus on areas used by children and youth) that represents a risk to human health, and reduce or eliminate its use by the municipal government.	Not Applicable. This goal provides direction to City staff and decision makers, and is not applicable to the proposed Project.
Promote wellness and fitness when planning or redesigning city facilities.	Not Applicable. This goal relates to City-owned facilities, and the Project does not include any proposed City-owned facilities.
Water	
Reduce per capita water demand by 10% by 2015 and 35% by 2030.	Consistent. The Project would be subject to the incumbent Title 24 regulations and City of Monrovia Municipal Code Chapter 13.20, *Water Conservation*. Compliance with the Title 24 regulations and Chapter 13.20 would ensure that the Project achieves the City's goal to reduce water demand by 35% compared to 2007 levels by 2030.
Protect the ecological integrity of the city's primary drinking water sources.	Not Applicable. This goal provides direction to City staff and decision makers, and there are no components of the proposed Project that would affect the ecological integrity of the City's primary drinking water sources.
Reduce the volume of untreated wastewater discharges by 10% by 2015.	Not Applicable. This goal provides direction to City staff and decision makers, and is not applicable to the proposed Project. All wastewater generated by the Project would be

Table 4.6-6 Project Consistency with City of Monrovia 2007 Environmental Accords

Environmental Accord Goals	Project Consistency
	conveyed to the San Jose Creek Water Reclamation Plant for treatment, and there are no components of the Project that would result in untreated wastewater discharges.
Increase groundwater recharge by 5% by 2020.	Not Applicable. This goal provides direction to City staff and decision makers, and there are no components of the Project with the potential to inhibit the City's ability to meet this goal. The Project site is not located within a groundwater recharge area.

B. City of Monrovia Energy Action Plan (EAP) Consistency

The City of Monrovia Energy Action Plan (EAP) demonstrates the City of Monrovia's commitment to pursue energy efficiency and reduce greenhouse gas emissions as expressed in the City's Environmental Accords. The plan suggests the need for citizen involvement and focuses heavily on actionable items related to managing City facilities and vehicles. The EAP includes a number of policies, which generally encourage the City to engage in public outreach to provide information to the public regarding energy efficiency and energy efficiency programs; identifies recommendations related to the retrofitting of existing buildings to improve energy efficiency; and provides direction to City staff and decision makers. The EAP establishes a target to achieve a 15% reduction in energy consumption in comparison to 2007 energy consumption levels by 2020. It is important to note that the EAP was prepared in September 2012, and addressed the City's level of energy efficiency at that time. Since the EAP was adopted in 2012, the State has enacted a total of four updates to the Title 24 Building Energy Standards, with the most recent updates having gone into effect on January 1, 2023. Each update to the Title 24 requirements imposed more stringent energy efficiency requirements. For example, the 2016 version of the Title 24 requirements were 28 percent more efficient for residential construction and 5 percent more efficient for nonresidential construction than the 2013 Building Energy Efficiency Standards they replaced, while the 2019 version of Title 24 was 7 percent more efficient than the 2016 Building Energy Efficiency Standards for residential construction and 30 percent more efficient than the previous Standards for non-residential construction. The Project would be consistent with the 2022 version of the Title 24 building codes (or the current version of Title 24 that would be in effect at the time of issuance of building permits). Mandatory compliance with the applicable version of the Title 24 building code requirements would ensure that the Project exceeds the EAP's reduction target to achieve a 20% reduction in electricity consumption below 2007 levels by 2020, and therefore the Project would be consistent with the goals of the Energy Action Plan (UXR, 2025c, p. 49; CEC, 2020).

C. 2020-2045 RTP/SCS Consistency

On September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to as "Connect SoCal." Although the 2020-2045 RTP/SCS has been superseded by SCAG's 2024-2050 RTP/SCS (which is discussed separately below), CARB still is working with SCAG to make refinements to the RTP/SCS discussion of GHGs. As such, an analysis of the Project's consistency with the 2020-2045 RTP/SCS is provided herein for disclosure purposes. As indicated in Table

4.11-2, *Analysis of Consistency with Connect SoCal Goals*, the Project would not conflict with any of the 2020-2045 RTP/SCS goals; therefore, no impact would occur due to an inconsistency with the 2020-2045 RTP/SCS.

Table 4.6-7 Analysis of Consistency with Connect SoCal Goals

Goal	Goal Statement	Project Consistency Discussion
1.	Encourage regional economic prosperity and global competitiveness.	**Consistent.** This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive local and regional planning efforts. The Project would support this goal by providing employment-generating land uses (i.e., commercial retail uses) in close proximity to existing residential uses.
2.	Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The Project includes reconstruction of sidewalks, curb, and gutter along South Myrtle Avenue and West Olive Avenue to meet ADA accessibility standards and improve pedestrian access. Bicycle racks would be provided near building entrances, and the site layout supports access by walking and biking to existing Foothill Transit bus stops, including Line 187 (approximately 0.25 mile south) and Line 270 (approximately 600 feet southwest). These features would support a multimodal environment accommodating pedestrians, cyclists, and transit users, consistent with this goal. Loading functions would occur in the alley to the south of the building and away from pedestrian sidewalk frontages, which would improve safety for all users, including vulnerable groups such as older adults and children. These elements are consistent with a context-sensitive streetscape approach and would contribute to pedestrian safety. While dedicated micromobility infrastructure is not currently proposed, the site layout could accommodate such features in the future.
3.	Enhance the preservation, security, and resilience of the regional transportation system.	**Consistent.** This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive local and regional planning efforts. There are no components of the Project that would adversely affect the preservation, security, or resilience of the regional transportation system, and the Project Applicant would contribute fees towards regional improvements required in the Project vicinity.
4.	Increase person and goods movement and travel choices within the transportation system.	**Consistent.** This policy would be implemented by the cities and counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system. The Project would expand facilities for goods movement in the local area, and would construct or contribute fees towards regional transportation improvements. Additionally, the intensity of the Project would facilitate expanded transit service in the local area.
5.	Reduce greenhouse gas emissions and improve air quality.	**Consistent.** This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive transportation planning efforts. The Project would entail development of a mixed-use building within close proximity to

Table 4.6-7 Analysis of Consistency with Connect SoCal Goals

Goal	Goal Statement	Project Consistency Discussion
		existing transit service; thus, the Project would serve to reduce worker commute times in the local area by locating residential uses in close proximity to public transit, and by co-locating commercial retail and residential uses within the same building. Furthermore, the analysis presented in EIR Subsections 4.2, *Air Quality*, and this Subsection 4.6 demonstrate that the Project's impacts due to GHG and air quality emissions would be less than significant, in conformance with this Goal.
6.	Support healthy and equitable communities.	**Consistent.** An analysis of the Project's environmental impacts is provided throughout this EIR, and mitigation measures are specified where warranted. Air quality is addressed in EIR Subsection 4.2, *Air Quality*, which demonstrates that the Project's impacts due to air quality emissions would be less than significant. Additionally, the Project would include a number of recreational amenities on site, including 17,545 s.f. of outdoor private common open space, including a dog park, al fresco dining area, courtyard with swimming pool, courtyard with seating and dining area, and a roof deck, as well as 2,225 s.f. of outdoor public use area including a public plaza and public arcade. These amenity areas would help meet the recreational demands of future Project residents. Furthermore, the intensity of the Project would help support future expansion of transit routes in the local area. Additionally, the Project would be consistent with or otherwise would not conflict with any applicable General Plan policies or requirements. Thus, the Project would facilitate the establishment of healthy and equitable communities.
7.	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent.** This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive transportation planning efforts. As indicated in the analysis presented in this Subsection, the Project's impacts due to GHG emissions would be less than significant, thereby demonstrating that the Project would not inhibit the City's ability to meet its greenhouse gas reduction targets. The Project also would be conditioned to construct transportation improvements and/or contribute fees towards improving the regional transportation network.
8.	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable.** This policy provides guidance to the cities and counties within the SCAG region to leverage new transportation technologies and data-driven solutions that result in more efficient travel. There are no components of the Project that would preclude the SCAG region's ability to implement this goal.
9.	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Not Applicable.** This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive transportation planning efforts. The Project would accommodate up to 204 high-density dwelling units, which would expand the range of housing available within the City and Project vicinity.

Table 4.6-7 Analysis of Consistency with Connect SoCal Goals

Goal	Goal Statement	Project Consistency Discussion
10.	Promote conservation of natural and agricultural lands and restoration of habitats.	**Not Applicable.** The Project is located in a portion of the City of Monrovia that is fully developed with urban uses, and there are no natural lands, agricultural lands, or biological habitat within the Project vicinity. There are no components of the Project that would conflict with this goal.

Source: (SCAG, 2020)

D. 2024-2050 RTP/SCS Consistency

The 2024-2050 RTP/SCS, developed with input from local governments, including the City of Monrovia, establishes GHG emissions goals for automobiles and light-duty trucks for 2050 and establishes an overall GHG target for the region consistent with the statewide GHG-reduction targets for the post-2020 statewide GHG reduction goals. The 2024-2050 RTP/SCS is a long-range visioning plan to encourage and promote the safe and efficient management, operation, and development of a regional intermodal transportation system that, when linked with appropriate land use planning, will serve the mobility needs of goods and people. Future investments seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices. The RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for federal funding. In addition, the RTP/SCS is supported by a combination of transportation and land use strategies that help the region achieve state GHG emission reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support the vital goods movement industry, and use resources more efficiently (UXR, 2025c, p. 56).

Although the 2024-2050 RTP/SCS includes modeling for and quantification of GHG reductions, CARB is still working with SCAG to make refinements to the RTP/SCS discussion of GHGs. An analysis of the Project's consistency with the 2020-2045 RTP/SCS is presented above and in Table 4.6-7. Although not formally approved by CARB, Table 4.6-8, *Consistency with SCAG's 2024-2050 RTP/SCS*, summarizes the Projects consistency with the five strategies found within the SCAG's 2024-2050 RTP/SCS. It should be noted that Table 4.6-8 excludes those goals and policies from the 2024-2050 RTP/SCS that are not applicable to the proposed Project, such as policies that provide direction to City staff and decision makers and policies that are related to land uses that are not proposed as part of the Project. As shown in Table 4.6-8, the Project would be consistent with the GHG reduction strategies contained within the SCAG's RTP/SCS. Implementing SCAG's RTP/SCS would reduce the regional GHG emissions from transportation, helping to achieve statewide emission reduction targets. The Project would be consistent with and would not conflict with the policies of the RTP/SCS; therefore, the Project would not interfere with SCAG's ability to achieve the region's post-2024 mobile-source GHG reduction targets outlined in the RTP/SCS, and it can be assumed that regional per capita mobile emissions will decrease in line with the goals of the RTP/SCS (UXR, 2025c, pp. 56-57).

Table 4.6-8 Consistency with SCAG's 2024-2050 RTP/SCS

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
Mobility	
Complete Streets	
03. Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit)	Consistent. Under existing conditions, there are sidewalks along the Project site's frontages with West Olive Avenue and South Myrtle Avenue, and a Class III Bikeway along the Project site's frontage with West Olive Avenue. The sidewalks and Class III Bikeway would be retained as part of the Project and would be enhanced with landscaping on-site at the back edge of the sidewalks.
Transit and Multimodal Integration	
09. Encourage residential and employment development in areas surrounding existing and planned transit/rail stations	Consistent. The Project Applicant proposes to develop a five-story mixed-use building that includes 204 multi-family dwelling units and 2,370 s.f. of commercial retail land uses. The Project site is located in a portion of the City that is fully developed with a mix of residential, commercial, and light industrial uses, and the Project site is located in close proximity to public transit. Specifically, Foothill Transit Line 270 runs along South Primrose Avenue, with the nearest bus stops occurring at the intersection of South Primrose Avenue and West Walnut Avenue, approximately 230 feet southwest of the Project site. In addition, the Project site is within walking distance to the Metro L (Gold) Line Monrovia light rail station, located approximately 0.7 miles south of the Project site.
Communities	
Priority Development Areas	
32. Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities	Consistent. The Project Applicant proposes to develop a five-story mixed-use building that includes 204 multi-family dwelling units and 2,370 s.f. of commercial retail land uses. The Project site is located in a portion of the City that is fully developed with a mix of residential, commercial, and light industrial uses, and the Project site is located in close proximity to public transit. Specifically, Foothill Transit Line 270 runs along South Primrose Avenue, with the nearest bus stops occurring at the intersection of South Primrose Avenue and West Walnut Avenue, approximately 230 feet southwest of the Project site. In addition, the Project site is within walking to the Metro Gold Line Monrovia light rail station, located approximately 0.7 miles south of the Project site. Additionally, the Project site is located in an area with urban infrastructure, including utilities, that would be adequate to serve the proposed development.
33. Promote the growth of origins and destinations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicle	Consistent. The Project Applicant proposes to develop a five-story mixed-use building that includes 204 multi-family dwelling units and 2,370 s.f. of commercial retail

Table 4.6-8 Consistency with SCAG's 2024-2050 RTP/SCS

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
(SOV) dependency and vehicle miles traveled	land uses. The Project site is located in a portion of the City that is fully developed with a mix of residential, commercial, and light industrial uses, and the Project site is located in close proximity to public transit. Specifically, Foothill Transit Line 270 runs along South Primrose Avenue, with the nearest bus stops occurring at the intersection of South Primrose Avenue and West Walnut Avenue, approximately 230 feet southwest of the Project site. In addition, the Project site is within walking to the Metro Gold Line Monrovia light rail station, located approximately 0.7 miles south of the Project site. The Project's proximity to transit options would assist the City in reducing single-occupant vehicle dependency and vehicle miles traveled.
34. Seek to realize scale economies or a critical mass of jobs and destinations in areas across the region that can support non-SOV options and shorter trip distances, combined trips and reduced vehicle miles traveled	Consistent. The Project Applicant proposes to develop a five-story mixed-use building that includes 204 multi-family dwelling units and 2,370 s.f. of commercial retail land uses. The Project site is located in a portion of the City that is fully developed with a mix of residential, commercial, and light industrial uses, and the scale of the Project's land uses and intensity of development in the surrounding area would assist the City in supporting non-SOV options and shorter trip distances, combined trips and reduced vehicle miles traveled.
Housing the Region	
35. Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to further fair housing access and equity across the region	Consistent. The Project Applicant proposes to develop a five-story mixed-use building that includes 204 multi-family dwelling units and 2,370 s.f. of commercial retail land uses. The Project site is located in a portion of the City that is fully developed with a mix of residential, commercial, and light industrial uses that would provide services and amenities for future Project residents. In addition, the Project would provide 17 affordable low-income units and three moderate-income units, which would help further fair housing access and equity across the region.
36. Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities	Consistent. The Project Applicant proposes to develop a five-story mixed-use building that includes 204 multi-family dwelling units and 2,370 s.f. of commercial retail land uses. The Project site is located in a portion of the City that is fully developed with a mix of residential, commercial, and light industrial uses, and the Project site is located in close proximity to public transit. Specifically, Foothill Transit Line 270 runs along South Primrose Avenue, with the nearest bus stops occurring at the intersection of South Primrose Avenue and West Walnut

Table 4.6-8 Consistency with SCAG's 2024-2050 RTP/SCS

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
	Avenue, approximately 230 feet southwest of the Project site. In addition, the Project site is within walking to the Metro Gold Line Monrovia light rail station, located approximately 0.7 miles south of the Project site. The Project's proximity to transit options would assist the City in increasing the amount of housing within transit-supportive and walkable areas, thereby helping to enhance the existing surrounding interconnected and resilient community.
37. Support local, regional, state, and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region	Consistent. The Project Applicant proposes to develop a five-story mixed-use building that includes 204 multi-family dwelling units and 2,370 s.f. of commercial retail land uses. The Project would provide 17 low-income affordable units and three moderate-income units, which would help further fair housing access and equity across the region.
40. Advocate for and support programs that emphasize reducing housing cost burden (for renters and homeowners), with a focus on the communities with the greatest needs and vulnerabilities	Consistent. The Project site is located within a Disadvantaged Community pursuant to SB 535. The Project Applicant proposes to develop a five-story mixed-use building that includes 204 multi-family dwelling units and 2,370 s.f. of commercial retail land uses. The Project would provide 17 low-income affordable units and three moderate-income units, which would assist the City in reducing the housing cost burden within the City within an existing Disadvantaged Community.
15-Minute Communities	
42. Promote 15-minute communities as places with a mix of complementary land uses and accessible mobility options that align with and support the diversity of places (or communities) across the region. These are communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses	Consistent. The Project Applicant proposes to develop a five-story mixed-use building that includes 204 multi-family dwelling units and 2,370 s.f. of commercial retail land uses. The Project site is located in a portion of the City that is fully developed with a mix of residential, commercial, and light industrial uses that would provide services and amenities for future Project residents. The Project site's location in an urbanized area would ensure that future Project residents would have non-vehicular access to basic-day-to-day needs within a 15-minute walk, bike ride, or roll, thereby resulting in fewer and shorter trips due to the proximity of complementary land uses.
43. Support communities across the region to realize 15-minute communities through incremental changes that improve equity, quality of life, public health, mobility, sustainability, resilience, and economic vitality	Not Applicable. RTP/SCS Policy 43 provides direction to City and regional agency staff and decision makers, and is not applicable to the Project.
Environment	
Sustainable Development	
48. Promote sustainable development and best practices that enhance resource conservation, reduce resource	Consistent. As presented throughout this EIR, the Project's impacts to the environment would be less than significant

Table 4.6-8 Consistency with SCAG's 2024-2050 RTP/SCS

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
consumption, and promote resilience	or would be reduced to less-than-significant levels with the implementation of mitigation measures. Additionally, the analysis presented in EIR Subsection 4.4, *Energy*, with mandatory compliance with applicable federal and State regulations and requirements, including the provisions of the Title 24 Building Energy Standards, Project construction and operation would not result in the inefficient, wasteful, or unnecessary consumption of energy. For example, under the 2022 version of Title 24, the Project would be required to accommodate photovoltaic (PV) systems and a rooftop PV system is proposed as part of the Project design. Title 24 standards are widely regarded as the most advanced energy efficiency standards in the United States and would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in the building and promote energy conservation.
50. Recognize and support the diversity of communities across the region by promoting local place-making, planning and development efforts that advance equity, mobility, resilience, and sustainability	Consistent. The Project Applicant proposes to develop a five-story mixed-use building that includes 204 multi-family dwelling units and 2,370 s.f. of commercial retail land uses. The Project would enhance the existing sense of place in the surrounding areas by promoting urban design and land uses more compatible with Old Town Monrovia to the north, than the commercial, office, and industrial uses along Myrtle Avenue to the south. In addition, the Project would provide 17 low-income affordable units and three moderate-income units, which would promote equitable housing opportunities within the City. Additionally, the Project site is located in close proximity to public transit. Specifically, Foothill Transit Line 270 runs along South Primrose Avenue, with the nearest bus stops occurring at the intersection of South Primrose Avenue and West Walnut Avenue, approximately 230 feet southwest of the Project site. In addition, the Project site is within walking to the Metro Gold Line Monrovia light rail station, located approximately 0.7 miles south of the Project site. The Project's proximity to transit options would promote non-vehicular mobility for future Project residents.
Air Quality	
51. Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts	Consistent. As evaluated herein and in EIR Subsection 4.2, *Air Quality*, Project impacts due to reginal and localized air quality emissions and due to GHG emissions would be less than significant. Specifically, the analysis of Threshold a. in EIR Subsection 4.2 includes an detailed discussion demonstrating that the Project would not conflict with SCAQMD's 2022 AQMP. Additionally, the analysis

Table 4.6-8 Consistency with SCAG's 2024-2050 RTP/SCS

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
	presented above demonstrates that the Project would be consistent with or otherwise would not conflict with any GHG reduction plans, including the City of Monrovia 2007 Environmental Accords, the City of Monrovia EAP, or the 2020-2045 RTP/SCS. Furthermore, the Project would be located within a fully urbanized portion of the City of Monrovia, and the proposed building would be located approximately 230 feet northeast of the nearest transit stop. The Project area also provides a number of amenities to serve future Project residents, such as restaurants and shops, and the Project also includes the co-location of residential and commercial uses within the proposed building. The location of the Project within an urbanized area, the mixed-use nature of the Project area, the availability of public transit, and general walkable nature of the Project area would ensure that the Project would reduce its emissions of air quality pollutants and GHGs to the maximum feasible extent. Thus, the Project would assist the City in reducing hazardous air pollutants and GHG emissions and would assist in improving air quality throughout the region.

E. 2022 CARB Scoping Plan Consistency

Included in the 2022 CARB Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan (UXR, 2025c, p. 70).

The 2022 Scoping Plan lays out a framework to determine Project-level consistency when there is not a CEQA-qualified CAP that projects can tier from. CARB recommends that the first approach for determining whether a proposed residential or mixed-use residential development would align with the State's climate goals is to examine whether the project includes key project attributes that reduce operational GHG emissions while simultaneously advancing fair housing. Appendix D to the 2022 Scoping Plan goes on to note that projects that incorporate the attributes identified on Table 3, *Key Residential and Mixed-Use Project Attributes that Reduce GHGs*, of the 2022 Scoping Plan are clearly consistent with the Scoping Plan and the State's climate goals. Projects that incorporate some, but not all, of the key attributes may also be determined to be consistent with the State's climate goals with adequate supporting evidence. As such, these projects are considered to be consistent with the Scoping Plan or other plans, policies, or regulations adopted for the purposes of reducing GHGs; therefore, the GHG emissions associated with such projects would be less than significant with no mitigation is required.

The Project's consistency with the *Key Residential and Mixed-Use Project Attributes that Reduce GHGs* outlined in Table 3 of Appendix D to the 2022 Scoping Plan is summarized on Table 4.6-9, *Project Consistency with 2022 Scoping Plan Key Residential and Mixed-Use Project Attributes that Reduce GHGs*.

Table 4.6-9 Project Consistency with 2022 Scoping Plan Key Residential and Mixed-Use Project Attributes that Reduce GHGs

Priority Areas	Key Project Attribute	Consistency Analysis
Transportation Electrification	Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval	**Consistent.** The Project would include 157 parking spaces with EV chargers or EV receptacles. that, at minimum, would equal the Tier 2 Residential and Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.3.2. Therefore, the Project would be consistent with this attribute.
VMT Reduction	Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)	**Consistent.** The Project site currently is developed with an occupied 25,191-sf commercial office building and parking lot. The Project would redevelop the underutilized land with a 204-residential-unit mixed use development consisting of apartments and commercial space. The Project would be developed on an infill site that is well served by existing infrastructure and public services. Therefore, the Project would be consistent with this attribute.
	Does not result in the loss or conversion of natural and working lands	**Consistent.** The Project site is currently developed with an occupied 25,191-sf commercial office building and associated parking lot. The Project would not result in the loss or conversion of natural and working lands, as none exist on the Project site. Therefore, the Project would be consistent with this attribute.
	Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or Is in proximity to existing transit stops (within a half mile), or Satisfies more detailed and stringent criteria specified in the region's SCS	**Consistent.** The overall density for the Project would be 127.5 dwelling units per acre, and the Project site is located in close proximity to transit opportunities, including an existing bus route along South Primrose Avenue. Therefore, the Project would be consistent with this attribute.
	Reduces parking requirements by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or For multifamily residential development, requiring parking costs to	**Consistent.** Although the Project does not specifically reduce parking requirements, the Project's VMT analysis concludes that the Project meets the Transit Priority Area and Low VMT Screening Criteria. Additionally, the Project's retail component meets the Project-type screening criteria and the Project's VMT impact is presumed to be less than significant. As such, the Project would not conflict with this VMT reduction attribute and would be consistent with the 2022 Scoping Plan. In accordance with Civil Code Section 1947.1, the parking for the apartment units would be unbundled from the unit rent.

Table 4.6-9 Project Consistency with 2022 Scoping Plan Key Residential and Mixed-Use Project Attributes that Reduce GHGs

Priority Areas	Key Project Attribute	Consistency Analysis
	be unbundled from costs to rent or own a residential unit.	
	At least 20 percent of units included are affordable to lower-income residents	**Consistent.** The Project would include 17 residential units allocated for low-income households and three units allocated to moderate-income households. Approximately 9.8 percent of the Project would include affordable units for low/moderate-income residents. Although the Project does not include 20 percent affordable or low-income units, the Project's VMT analysis concludes that the Project meets the Transit Priority Area and Low VMT Screening Criteria. Additionally, the Project's retail component meets the Project-type screening criteria and the Project's VMT impact is presumed to be less than significant. Furthermore, the Project is located in an area with a mix of jobs, retail, and service uses within close proximity, allowing future residents to achieve many of their needs without traveling by vehicle. As such, the Project would not conflict with this VMT reduction attribute and would be consistent with the 2022 Scoping Plan.
	Results in no net loss of existing affordable units	**Consistent.** There are no affordable units on the Project site under existing conditions. The Project site currently is developed with an occupied 25,191-s.f. commercial office building and associated parking lot. The Project would not result in a net loss of existing affordable units; rather, the Project would include 17 units allocated for low-income households and three units allocated to moderate-income households. The Project would meet RHNA requirements per the City's 2021-2029 Housing Element. Therefore, the Project is consistent with this attribute.
Building Decarbonization	Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking	**Consistent.** Although some natural gas would be used in association with the proposed on-site commercial space, the Project's residential units would not be served by natural gas. Because the residential units would not be served by natural gas, all residential units proposed as part of the Project would use all-electric appliances without any natural gas connections and would not include the use of propane or other fossil fuels for space heating, water heating, or indoor cooking. Therefore, the Project would not conflict with the CARB 2022 scoping plan according to this attribute.

(UXR, 2025c, Table 3-7)

As demonstrated on Table 4.6-9, the Project would be consistent with or otherwise would not conflict with the 2022 Scoping Plan's key residential and mixed-use project attributes to reduce GHGs. Additionally, the Project would result in a net increase in GHG emissions by only 1,283.83 $MTCO_2e$/yr, which is far below the SCAQMD screening threshold of 3,000 $MTCO_2e$/yr for residential and mixed-use projects, and the Project also would be subject to all applicable Title 24 requirements. As such, the Project would not impede the State's

progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan.

As described on the preceding pages, the Project would be consistent with the City's EAP, SCAG's RTP/SCS, and the CARB 2022 Scoping Plan. Therefore, the Project would not have a less-than-significant impact and no mitigation is required.

4.6.5 Cumulative Impact Analysis

As discussed in subsection 4.6.3, there is no evidence at this time that would indicate that the emissions from a project the size of the Project would directly or indirectly affect the global climate. As such, Project impacts due to GHG emissions are inherently cumulative in nature.

As discussed under the analysis of Threshold a., the Project would result in a net increase in GHG emissions by 1,283.83 $MTCO_2e$/year; thus, the Project would not exceed the SCAQMD's screening threshold of 3,000 $MTCO_2e$/yr. Accordingly, the Project would result in less-than-cumulatively considerable impacts on the environment with respect to GHG emissions.

As discussed under the analysis of Threshold b., the Project would be consistent with or otherwise would not conflict with the CARB 2022 Scoping Plan, the City of Monrovia EAP, and the 2024-2050 RTP/SCS. As such, the Project would result in less-than-cumulatively considerable impacts due to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

4.6.6 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The Project would result in a net increase of emissions of approximately 1,283.83 $MTCO_2e$ per year, which would not exceed SCAQMD's screening threshold of 3,000 $MTCO_2e$ per year. Thus, the Project's GHG emissions impact would be less than significant.

Threshold b.: Less-than-Significant Impact. The Project would be consistent with or otherwise would not conflict with the CARB 2022 Scoping Plan, the City of Monrovia EAP, and the 2024-2050 RTP/SCS, which are the applicable plans adopted for the purpose of reducing the emissions of GHGs. As such, Project impacts due to a conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases would be less than significant.

4.6.7 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.6.8 Design Features (DF) and Regulatory Requirements (RR)

Refer to AQ RR-1 through RR-6 in Subsection 4.2, *Air Quality*, and ENERGY DF-1 through RR-3 in Subsection 4.4, *Energy*, for a list of design features and regulatory requirements that are also applicable to GHG emission reductions.

4.7 HAZARDS AND HAZARDOUS MATERIALS

The analysis in this subsection is based on technical studies that were prepared to determine the presence or absence of hazardous materials on the Project site under existing conditions. The first technical study is titled, "Phase I Environmental Site Assessment" (herein, "Phase I ESA"), prepared by Ramboll US Consulting, Inc. (herein, "Ramboll"), dated December 8, 2022, and included as *Technical Appendix H1* to this EIR (Ramboll, 2022). The second technical study is titled "Phase II Subsurface Investigation" (herein, "Phase II ESA"), prepared by Ramboll, dated March 15, 2023, and included in *Technical Appendix H2* to this EIR (Ramboll, 2023). All references used in this subsection are included in EIR Section 7.0, *References*.

4.7.1 EXISTING CONDITIONS

A. Definition of Toxic Substances and Hazardous Waste

For purposes of this EIR, the term "toxic substance" is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may present an unreasonable risk of injury to human health or the environment. Toxic substances include chemical, biological, flammable, explosive, and radioactive substances.

"Hazardous material" is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may (1) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, disposed of, or otherwise mismanaged; or (2) cause or contribute to an increase in mortality or an increase in irreversible or incapacitating illness.

Hazardous waste is defined in the California Code of Regulations (CCR) Title 22, Section 66261.3. The defining characteristics of hazardous waste are ignitability (oxidizers, compressed gases, and extremely flammable liquids and solids), corrosivity (strong acids and bases), reactivity (explosives or generates toxic fumes when exposed to air or water), and toxicity (materials listed by the United States Environmental Protection Agency (USEPA) as capable of inducing systemic damage to humans or animals).

Certain wastes are called "Listed Wastes" and are found in the CCR Title 22, §§ 66261.30 through 66261.35. Wastes appear on the lists because of their known hazardous nature or because the processes that generate them are known to produce hazardous wastes (which are often complex mixtures).

A historical recognized environmental condition (HREC) is a previous release of hazardous substances or petroleum products affecting a subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations) (Ramboll, 2022, p. 28).

A controlled recognized environmental condition (CREC) is a recognized environmental condition affecting a subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of

required controls (for example, activity and use limitations or other property use limitations) (Ramboll, 2022, p. 28).

A recognized environmental condition (REC) is (1) the presence of hazardous substances or petroleum products in, on, or at a subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at a subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at a subject property under conditions that pose a material threat of a future release to the environment (Ramboll, 2022, p. 28).

A *De Minimis* Condition is a condition related to a release that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies (Ramboll, 2022, p. 28).

A data gap/significant data gap is a lack of or inability to obtain information required by the practice despite good faith efforts by the environmental professional to gather such information. A data gap that affects the ability of the environmental professional to identify a REC is considered a significant data gap (Ramboll, 2022, p. 28).

B. Past Uses, Prior Investigations, Regulatory Review, and Field Reconnaissance

As part of the Project's Phase I ESA (*Technical Appendix H1*), a site reconnaissance was conducted to document the current condition of the Project site; the site representative, who has a good knowledge of the site's prior conditions and the existing physical and operational characteristics associated with the Project site, was interviewed; regulatory databases, historical sources (e.g., aerial photographs, topographic maps, City directory listings, and Sanborn Maps), previously-prepared reports for the Project site, and the Project site's Title Report were reviewed. The results of the assessment are summarized below.

From as early as 1888, between two to four separate residences were located within the western portion of the Project site. By 1928, the Project site appeared to have a mix of residential buildings in the west and commercial buildings in the east. A gasoline dispenser island canopy with automotive repair shop first appeared in the 1938 photograph at the southeastern corner of the Project site, and remained on the site until at least 1977. By 1979, the residential and commercial buildings were replaced by a long rectangular one-story commercial/industrial office building in present day configuration either parking or small landscaped areas (Ramboll, 2022, p. 9).

No visual evidence of either underground storage tanks (UST) or aboveground storage tanks (AST) within the Project site was identified during the site reconnaissance. Chemical storage was observed to be limited to small quantities (one gallon or less) of isopropyl alcohol, sanitizers, and detergents as well as janitorial and household-type maintenance chemicals (stored in individual tenant spaces). Chemicals associated with the existing commercial/industrial office building are not stored in the exterior area of the Project site, and no evidence of release was observed (Ramboll, 2022, p. 13).

The site representative was not aware of any equipment stored or used on the site that is known to contain polychlorinated biphenyls (PCBs). There is currently one pad-mounted transformer on the Project site; the unit is owned by Southern California Edison. The unit is not labeled as to its PCB content. Because the unit may have been installed before the 1979 federal ban on the manufacture of PCBs, it is possible that transformer oils contain PCBs. Because the building was constructed around the time of the 1979 federal ban on the manufacture of PCBs, it is possible that hydraulic or other types of electrical equipment, such as capacitors, contain PCBs. No evidence of leaks or releases from the transformer or other hydraulic/electrical equipment was observed during the site visit (Ramboll, 2022, p. 14).

Based on additional review of historical resources, an automotive repair shop and gasoline service station (R&B Service) were located at the southeastern portion of the Project site from approximately the 1920s through the 1970s, prior to the enactment of specific tank closure requirements. Based on a review of aerial photographs, the associated structures were removed before 1979, when the current structure was constructed. Service stations typically maintain one or more USTs for the storage of fuels. Information and records evaluated as part of the Project's Phase I ESA, which included a review of responses to requests submitted to the City of Monrovia Fire and Building Departments, the Los Angeles County Fire Department, and the Project site's current owner, did not uncover additional detail regarding the gasoline service station closure. More than 45 years have passed since the gasoline service station ceased operations, and there has been no regulatory scrutiny of this matter since that time. Further, the site was subsequently redeveloped (the eastern end of the current building is in the location of the former gas station), and although it is likely that grading and excavation activities during construction would have encountered and removed the former fueling system and USTs if they were not already removed, no data is available to verify the UST removal. Because the Phase I ESA did not identify documentation of a release or a potentially material threat of contamination in relation to a hazardous substance or petroleum product, this finding is not considered an REC (Ramboll, 2022, p. 26).

Additionally, the property adjacent to the south of the Project site located at 727 Myrtle Avenue (beyond the alley that borders the Project site to the south) is listed as a former laundry facility and dry cleaner under various names from the 1920s to the late 1960s. Former dry-cleaning operations may have included the use of chlorinated solvents. Chemical use prior to the 1980s predates the enactment of robust environmental regulations related to the handling, storage, and disposal of hazardous chemicals. There is no public record of current regulatory scrutiny or investigation related to potential contamination matters in relation to the dry-cleaning operation (a soil-only matter related to a former diesel UST at the adjacent site received regulatory case closure in 1989), and the associated database listings do not indicate the confirmed or suspected presence of contamination as a result of dry-cleaning operations. Because the Phase I ESA did not identify documentation of a release or a potentially material threat of contamination in relation to a hazardous substance or petroleum product, this finding is not considered a REC (Ramboll, 2022, pp. 27-28).

A limited Phase II soil sampling for the Project site was conducted to develop an understanding of the subsurface conditions as they relate to redevelopment of the Project site. Sampling locations, where borings were advanced to 24 feet below ground surface (bgs), were determined based on the historical uses described in the Phase I ESA to evaluate the effects of the former onsite automobile repair shop and gasoline stations and off-site dry-cleaning operations. The soil sample results detected very low concentrations of fuel-related chemicals and perchloroethylene (PCE), all of which were well below calculated residential screening levels

for vapor intrusion using the California Department of Toxic Substances Control (DTSC)-recommended attenuation factor of 0.001 for future residential development (Ramboll, 2023, pp. 2, 6).

Based on the review of the Project site's historical documents and interviews with the Project site's representatives, no other or prior Phase I environmental assessments, UST closures, environmental sampling, or remediation activities are known to have been conducted at the Project site (Ramboll, 2022, p. 12).

Although the Phase I and Phase II ESAs did not identify any RECs associated with the Project site, the existing building on the Project site was constructed in 1979. The use of asbestos containing materials (ACMs) (a known carcinogen) and lead-based paint (LBP) (a known toxin) was common in building construction prior to the 1980s and have the potential to be present. These materials are assumed to be present but unverifiable until building demolition begins because ACMs and LBP can occur in walls, ceiling tile, floor tile, and duct work that is inaccessible until these areas are exposed during demolition activities.

C. Airport-Related Hazards

The Project site is not located within two miles of a public airport or within an airport land use plan. The closest public use airport is the San Gabriel Valley Airport (SGVA) located approximately 3.9 miles southwest of the Project site (Google Earth, 2023). According to mapping information available from Los Angeles County GIS, the Project site is located approximately 3.6 miles northeast of the nearest portion of the Airport Influence Area (AIA) for the SGVA, indicating that the Project site is not subject to airport-related hazards (LA County, n.d.).

D. Wildfire Hazards

According to mapping information available from California Department of Forestry and Fire Protection (CAL FIRE), the Project site is located in a Local Responsibility Area (LRA), indicating that fire protection services in the Project area are provided by Monrovia Fire and Rescue. According to CAL FIRE mapping (including updated maps published in March 2025), the Project site is not located in an area considered to have Moderate to Very High susceptibility to fire hazards. The Project is located approximately 0.9 miles southeast of the nearest portion of the City of Monrovia that is classified as having a Very High Fire Hazard Severity Zone (VHFHSZ). Accordingly, the Project site is not located in a portion of the City that is subject to wildland fire hazards under existing conditions (CALFIRE, 2011; CALFIRE, 2025).

4.7.2 Regulatory Setting

The following is a brief description of the federal, State, and local environmental laws and regulations related to hazards and hazardous materials.

A. Federal Plans, Policies, and Regulations

1. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Superfund Amendments and Reauthorization Act (SARA)

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund, provides a Federal "Superfund" to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, the USEPA was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. USEPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when responsible parties fail to act. Through various enforcement tools, USEPA obtains private party cleanup through orders, consent decrees, and other small party settlements. USEPA also recovers costs from financially viable individuals and companies once a response action has been completed (USEPA, 2023g).

The EPA is authorized to implement CERCLA in all 50 states and U.S. territories. Superfund site identification, monitoring, and response activities in states are coordinated through the state environmental protection or waste management agencies. The Superfund Amendments and Reauthorization Act (SARA) of 1986 reauthorized CERCLA to continue cleanup activities around the country. Several site-specific amendments, definitions clarifications, and technical requirements were added to the legislation, including additional enforcement authorities. Also, Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (EPCRA) (USEPA, 2023g).

2. Resource Conservation and Recovery Act (RCRA)

The Resource Conservation and Recovery Act (RCRA) gives the EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. The RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to the RCRA enabled the EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to the RCRA that focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program (USEPA, 2023h).

3. Hazardous Materials Transportation Act (HMTA)

The Hazardous Materials Transportation Act of 1975 (HMTA) empowered the Secretary of Transportation to designate a hazardous material as any "particular quantity or form" of a material that "may pose an unreasonable risk to health and safety or property" (OSHA, n.d.).

The HMTA (Section 112, 40 U.S.C. 1811) preempts state and local government requirements that are inconsistent with the statute, unless that requirement affords an equal or greater level of protection to the public than the HMTA requirement (OSHA, n.d.).

4. Hazardous Materials Transportation Uniform Safety Act of 1990

In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify the maze of conflicting state, local, and federal regulations. Like the HMTA, the HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property (OSHA, n.d.).

The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials (OSHA, n.d.).

5. Occupational Safety and Health Act (OSHA)

Congress passed the Occupational and Safety Health Act (OSHA) to ensure worker and workplace safety. The goal was to make sure employers provide workers with a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions (USEPA, 2023i).

In order to establish standards for workplace health and safety, the OSHA also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for OSHA. OSHA is a division of the U.S. Department of Labor that oversees the administration of the OSHA and enforces standards in all 50 states (USEPA, 2023i).

6. Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 (15 U.S.C. Sections 2601 *et seq.*) provides the EPA with the authority to require reporting, record-keeping, and testing requirements and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from the TSCA, including, among others, food, drugs, cosmetics, and pesticides. The TSCA addresses the production, importation, use, and disposal of specific chemicals, including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint (USEPA, 2023j).

B. State Plans, Policies, and Regulations

1. Cal/OSHA and the California State Plan

Under an agreement with the OSHA, since 1973 California has operated an occupational safety and health program in accordance with Section 18 of the federal OSHA. The State of California's Department of Industrial Relations administers the California Occupational Safety and Health Program, commonly referred to as Cal/OSHA. The State of California's Division of Occupational Safety and Health (DOSH) is the principal agency that oversees plan enforcement and consultation. In addition, the California State program has an independent Standards Board responsible for promulgating State safety and health standards and reviewing variances. It also has an Appeals Board to adjudicate contested citations and the Division of Labor Standards Enforcement to investigate complaints of discriminatory retaliation in the workplace (OSHA, n.d.).

The Cal/OSHA program enforcement unit conducts inspections of California workplaces in response to a report of an industrial accident, a complaint about an occupational safety and health hazard, or as part of an inspection program targeting industries with high rates of occupational hazards, fatalities, injuries, or illnesses (OSHA, n.d.).

2. California Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) (Health and Safety Code [HSC], Division 20, Chapter 6.5, Section 25100, et seq.) is the primary hazardous waste statute in California. The HWCL implements RCRA as a "cradle-to-grave" waste management system in the State. It specifies that generators have the primary duty to determine whether wastes created are hazardous and to ensure proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reused as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning and broadening requirements for permitting facilities that treat hazardous waste. It also regulates a number of waste types and waste management activities not covered by federal law (RCRA) (CA Legislative Info, n.d.).

3. California Code of Regulations (CCR), Titles 22 and 26

To aid the regulated community, California has compiled hazardous materials, waste, and toxics-related regulations from CCR Titles 3, 8, 13, 17, 19, 22, 23, 24, and 27 into one consolidated listing: CCR Title 26 (Toxics). However, the hazardous waste regulations are still commonly referred to collectively as "Title 22." Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and facilities for treatment, storage, and disposal. Because California is a fully-authorized State according to RCRA, most regulations (i.e., 40 CFR Part 260, et seq.) have been duplicated and integrated into Title 22. However, because the DTSC regulates hazardous waste more stringently than the USEPA, the integration of State and federal hazardous waste regulations that make up Title 22 do not contain as many exemptions or exclusions as does 40 CFR Part 260. As with the HSC, Title 22 also regulates a wider range of waste types and waste management activities than does RCRA (DTSC, n.d.). CCR Title 17, Division 1, Chapter 8: Accreditation, Certification and Work Practices for Lead-Based Paint and Lead Hazards, defines and regulates lead-based paint. Any detectable amount of lead is regulated.

4. Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

California's Unified Program, overseen by the California Environmental Protection Agency (CalEPA), protects Californians from hazardous waste and hazardous materials by ensuring local regulatory agencies consistently apply statewide standards when they issue permits, conduct inspections, and engage in enforcement activities.

State agency partners involved in the implementation of the Unified Program are responsible for setting program element standards, working with CalEPA to ensure program consistency, and providing technical assistance to the California Unified Program Agencies (CUPAs) and Program Agencies (PAs). The State agencies involved with the Unified Program include CalEPA, DTSC, the Governor's Office of Emergency

Services (Cal OES), California Department of Forestry and Fire Protection (CAL FIRE) – Office of the State Fire Marshall, and the State Water Resources Control Board (SWRCB) (CalEPA, n.d.).

5. Uniform Fire Code

The Uniform Fire Code, Article 80 (Section 80.103 of the Uniform Fire Code as adopted by the State Fire Marshal pursuant to HSC Section 13143.9), includes specific requirements for the safe storage and handling of hazardous materials. These requirements are intended to reduce the potential for a release of hazardous materials and for mixing of incompatible chemicals, and specify the following specific design features to reduce the potential for a release of hazardous materials that could affect public health or the environment (CCR, n.d.):

- Separation of incompatible materials with a noncombustible partition;
- Spill control in all storage, handling, and dispensing areas; and
- Separate secondary containment for each chemical storage system. The secondary containment must hold the entire contents of the tank, plus the volume of water needed to supply the fire suppression system for a period of 20 minutes in the event of catastrophic spill.

6. License to Transport Hazardous Materials

The California Department of Transportation (Caltrans) regulates hazardous materials transportation on all interstate roads (California Vehicle Code Section 32000.5, et seq). Within California, the State agencies with primary responsibility for enforcing federal and State regulations and for responding to transportation emergencies are the California Highway Patrol (CHP) and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications for vehicles transporting hazardous materials (CCR, n.d.).

7. California Hazardous Materials Release Response Plan and Inventory Law of 1985

The Business Plan Act requires preparation of Hazardous Materials Business Plans and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures for businesses that handle, store, or transport hazardous materials in amounts exceeding specified minimums (HSC, Division 20, Chapter 6.95, Article 1). Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the State. Local agencies are responsible for administering these regulations.

Several State agencies regulate the transportation and use of hazardous materials to minimize potential risks to public health and safety, including CalEPA and the California Emergency Management Agency. The California Highway Patrol and California Department of Transportation (Caltrans) enforce regulations specifically related to the transport of hazardous materials. Together, these agencies determine container types

used and license hazardous waste haulers for hazardous waste transportation on public roadways (CA Legislative Info, n.d.).

C. Local Plans, Policies, and Regulations

1. Monrovia Municipal Code

Monrovia Municipal Code (MMC) Chapter 8.08, Residential Solid Waste, Green Waste and Recyclable Materials Collection, establishes standards for solid waste and hazardous waste disposal. MMC Chapter 8.40 establishes hazardous material release response procedures.

2. SCAQMD Rule 1403

SCAQMD Rule 1403 would apply to the Project, which requires notification of the SCAQMD prior to commencing any demolition or renovation activities. SCAQMD Rule 1403 also sets forth specific procedures for the removal of asbestos and requires that an on-site representative trained in the requirements of SCAQMD Rule 1403 be present during the stripping, removing, handling, or disturbing of ACMs.

3. Los Angeles County Fire Department (LACFD) Requirements

The Los Angeles County Fire Department's (LACFD) Health Hazardous Materials Division (HHMD) requires a business plan to be prepared, submitted, and implemented by any business handling hazardous materials or a mixture containing a hazardous material. The HHMD requires business plans for all hazardous waste generators, regardless of quantity generated, and for any business that uses quantities of hazardous materials, including insecticides, fungicides, rodenticides, and Class I explosives. LACFD inspections reduce risks associated with exposure to hazardous materials and adverse effects on the environment. The federal government and the State of California require all businesses that handle more than a specified amount of hazardous materials or extremely hazardous materials to submit a business plan to its local Certified Unified Program Agency (CUPA). The Monrovia Fire and Rescue is the local CUPA. The Site Mitigation Unit of the HHMD has been delegated some authority by DTSC to oversee the investigation and remediation of certain contaminated sites undergoing voluntary cleanups in Los Angeles County under HSC Chapter 6.5 of Division 20 (LACFD, n.d.).

4.7.3 Basis for Determining Significance

Based on Section IX of Appendix G to the State CEQA Guidelines, the Project would result in a significant impact to hazards and hazardous materials if the Project would:

a) *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;*

b) *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;*

c) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment;

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area;

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

The methodology for analysis of the potential impacts related to hazards and hazardous materials resulting from the Project is based on reviews of site-specific past and current conditions, literature and database research, and review of expected construction- and operational related activities associated with implementing the Project. The Project's construction and operational activities would be subject to various laws, regulations, and policies summarized above in Subsection 4.7.2, Regulatory Setting. Compliance with applicable State, and local laws and regulations is assumed in this analysis, and local and State agencies would be expected to continue to enforce applicable requirements to the extent that they do so today. Compliance with many of the regulations would be a condition of Project approval. A significant impact would occur if, after considering the Project, and the required compliance with regulatory requirements, a threshold of significance would nevertheless be exceeded.

4.7.4 IMPACT ANALYSIS

Threshold a.:	***Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***
Threshold b.:	***Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

The analysis below evaluates the potential for the Project to result in a substantial hazard to people or the environment due to existing site conditions, construction activities, and long-term operation, both in terms of the potential for transport, use, and disposal of hazardous materials, and the potential for upset and accident conditions.

A. Impact Analysis for Construction Activities

The Project's construction activities entail demolition of the existing building and site features, site preparation, excavation and grading, and building construction, paving, and landscaping. During demolition and ground-disturbing construction activities, there is a potential to encounter hazardous materials that may exist on the Project site and that would need to be handled and/or transported off the site and disposed.

First, the existing building on the Project site would be demolished. Assuming that ACMs and LBP are present in the existing building materials, the removal of these materials would be required, which requires transport and disposal activities. Mandatory compliance with the provisions of SCAQMD Rule 1403 pertaining to ACMs would ensure that construction-related demolition activities do not expose construction workers or nearby sensitive receptors to significant health risks associated with ACMs. Also, the transport and disposal of ACMs is regulated under SCAQMD Rule 1403. Because the Project would be required to comply with SCAQMD Rule 1403 during demolition activities, including transport and disposal, impacts due to potential asbestos exposure would be less than significant.

During demolition of the existing building on-site, there also is a potential to expose construction workers to health hazards associated with LBPs, which is assumed to be present in the structure to be demolished. Demolition contractors would be required to comply with CCR Title 17, Division 1, Chapter 8, which includes requirements, such as employer provided training, air monitoring, protective clothing, respirators, and hand washing facilities. Mandatory compliance with these requirements would ensure that construction workers and the public are not exposed to significant LBP health hazards during demolition and/or during transport of demolition waste to an appropriate disposal facility and would ensure that impacts related to LBP remain less than significant.

As indicated above under Subsection 4.7.1, there is no documentation of a release or a potentially material threat of contamination condition on the Project site, including in relation to a hazardous substance or petroleum product used at the prior automotive shop and gasoline service station and at an off-site laundry/dry cleaner. However, there are no available records to verify that the former gas station's UST was removed from the property, and there is no feasible way to determine if the UST exists beneath the footprint of the existing building until the building is demolished and the site is excavated. As such, there is a potential for accidental upset of a subsurface UST and the potential need to transport and dispose of a UST, which is concluded to be a potentially significant impact requiring mitigation.

Pertaining to the transport and disposal of exported earth materials from excavation activities, the results of the Project site's soil sampling detected very low concentrations of fuel-related chemicals and PCE, all of which were found to be well below calculated residential screening levels for vapor intrusion using the DTSC-recommended attenuation factor of 0.001 for future residential development (Ramboll, 2023, p. 6). Accordingly, and based on the findings of the Phase II ESA, no impact associated with hazardous materials would occur associated with exporting soil materials from the site during the grading and excavation activities, because the soils do not contain hazardous materials above regulatory limits.

Heavy equipment, such as dozers, excavators, and tractors, would be operated on the Project site during demolition and construction of the Project. These pieces of heavy equipment likely would be fueled by petroleum-based substances, such as diesel fuel, gasoline, oil, and maintained by hydraulic fluids, which are considered hazardous if improperly stored or handled. In addition, materials, such as paints, adhesives, solvents, and other substances typically used in building construction, would be used on the Project site during construction. Improper use, storage, or transport of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated

with the Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including, but not limited to those listed above in Subsection 4.7.2, Regulatory Setting. Because compliance with these regulatory requirements is mandatory during building construction, including during transport, use, and disposal of construction-related equipment fuel, paints, adhesives, solvents, and similar materials, potential impacts associated with storing, using, transporting, disposing of hazardous materials and risks regarding upset and accidental release are determined to be less than significant.

B. Impact Analysis for Long-Term Operation

The Project's proposed mixed-use building, including its multi-family residential units, amenity features, and commercial retail space, is not a building type that is typically associated with the transport, use, or disposal of significant quantities of hazardous materials. Household and other goods used in residential buildings and commercial businesses that contain toxic substances are usually low in concentration and small in amount; therefore, there is no significant risk to humans or the environment from the use of such household goods. Residents and employees are required to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility. Also, as of February 2006, fluorescent lamps, batteries, and mercury thermostats can no longer be disposed in the trash. Residents, visitors, vendors, and employees would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of household hazardous materials, including, but not limited to those listed above in Subsection 4.7.2, Regulatory Setting.
In California, the disposal of household hazardous waste (HHW) is governed by the Health and Safety Code, specifically Division 20, Chapter 6.5, Article 10.8 (Sections 25218 to 25218.14). These statutes define HHW and establish guidelines for its proper management to protect public health and the environment. According to Section 25218.1, "household hazardous waste" refers to hazardous waste generated incidental to owning or maintaining a place of residence, excluding waste produced from business activities conducted at a residence. California law prohibits the disposal of HHW in regular trash, down drains, or through abandonment. Residents are required to bring HHW to authorized household hazardous waste facilities for proper handling. In California, households may self-transport up to 5 gallons or 50 pounds of HHW to an approved HHW Collection Facility (DTSC, 2022) The City of Monrovia Public Works Department maintains a website to inform residents about the proper procedures for HHW disposal, at https://www.monroviaca.gov/your-government/public-works/trash-services/household-hazardous-waste-and-e-waste. Because compliance with HHW regulatory requirements during the life of the Project's operation is mandatory, impacts are determined to be less than significant.

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

The closest existing school, Calvary Road Baptist Academy, is located approximately 0.21 miles northwest of the Project site. There are no additional existing or proposed schools within 0.25 miles of the Project site. As described under the analysis of Thresholds a. and b., the use and transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations to minimize public safety hazards. Accordingly,

while there is an existing school located within 0.25 miles of the Project site, the potential for the Project to expose this school to substantial safety hazards associated with emissions, handling, or the routine transport of hazardous substances, materials, or waste to-and-from the Project site would be low and minimized through the Project's compliance with applicable laws that regulate hazardous materials, substances, or wastes. Impacts would be less than significant.

Threshold d.: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?

Based on the results of the Project's Phase I ESA (*Technical Appendix H1*) and Phase II ESA (*Technical Appendix H2*), the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Ramboll, 2022, p. 11). Accordingly, the Project would not create a significant hazard to the public or the environment, and no impact would occur.

Threshold e.: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?

As discussed in Subsection 4.7.1, the Project site is not located within two miles of a public or private airport, within an airport land use plan, or in an area subject to airport-related hazards (LA County, n.d.). Accordingly, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area, and no impacts due to public or private airport-related hazards would occur.

Threshold f.: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Project site does not contain any emergency facilities, and immediately adjacent streets do not serve as an emergency evacuation route. Additionally, there are no components of the Project that would interfere with an adopted emergency response or evacuation plan in effect in the local area. During construction and at Project build-out, the Project would be required to maintain adequate access for emergency vehicles. Furthermore, improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including along nearby segments of South Myrtle Avenue and West Olive Avenue. Emergency access to the Project site is available from the public street frontages at South Myrtle Avenue, West Olive Avenue, and the alleyway. As part of the City's review of construction documents prior to issuance of a building permit, the City will ensure that appropriate emergency ingress and egress would be available to and from the Project site and that circulation on the Project site is adequate for emergency vehicles, including during periods when temporary one-way vehicle travel lane and sidewalk closures would occur. The Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan. Accordingly, no impacts would occur.

Threshold g.: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

As previously noted, the Project site is not located within an area considered to have Moderate to Very High susceptibility to fire hazards. Accordingly, the Project site is not located in a portion of the City that is subject to wildland fire hazards under existing conditions (CALFIRE, 2011; CALFIRE, 2025). Furthermore, the proposed new building would be in compliance with all applicable Building and Fire Codes and include installation of on-site and off-site improvements to provide fire access. As such, the Project would not expose people or structures, directly or indirectly, to significant risk of loss, injury or death involving wildland fires, and no impact would occur.

4.7.5 Cumulative Impact Analysis

Because the issue of hazards and hazardous materials tends to be site-specific in nature, the cumulative study area includes cumulative projects within a one-mile radius of the Project site, as identified in Table 4.0-1 in Section 4.0, Environmental Analysis, of this EIR. A one-mile radius is appropriate for most of the thresholds identified herein because that is the standard distance used in regulatory database searches of properties that may generate or store toxic materials.

Routine Transport, Use or Disposal of Hazardous Materials / Release of Hazardous Materials into the Environment

As discussed under the analysis of Thresholds (a) and (b), During demolition and construction activities, transporting or disposing of existing contaminated materials during demolition and construction activities. The potential removal of a UST from the subsurface of the site has no potential to result in a significant cumulative effect, as this would be a one-time activity and there is no reasonable potential that other USTs or contamination from other sites would be transported along the same route(s) at the same time and disposed of in the same manner and location as the Project's, at the same time. There are no conditions associated with the Project's proposed demolition, construction activities, or operations that would result in a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or conditions that could 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. Although the existing building on the Project site may contain ACMs and/or LBPs, compliance with applicable regulatory requirements, including, but not necessarily limited to, SCAQMD Rule 1403 and CCR Title 17, Division 1, Chapter 8, would ensure that appropriate measures are undertaken during construction activities to preclude potentially significant adverse health effects to Project construction workers and existing residents and businesses in the surrounding area. Even if other demolition activities involving materials with ACMs or LBPs are occurring at the same time as the Project's demolition activities, all of the activities would be mandated to comply with the above stating regulatory requirements, thereby precluding the potential for cumulative impacts. As with the Project, other cumulative developments would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials. Even if other projects are under construction at the same time as the Project's construction, all of the activities would be mandated to comply with applicable regulatory requirements

pertaining to hazardous materials use, transport, and disposal, thereby precluding the potential for cumulative impacts. Accordingly, cumulative impacts would be less than significant.

Hazardous Emissions within 0.25 Miles of an Existing or Proposed School

Pertaining to Threshold (c), although there is an existing school (Calvary Road Baptist Academy) located approximately 0.21 miles northwest of the Project site, no other development project other than the Project is proposed within 0.25 miles of the school. As such, there is no potential for other projects' construction activities to combine with the Project's construction activities to impact the school with significant quantities of hazardous materials. Because the Project's proposed land uses, as well as those of the seven cumulative development projects in the area, are not associated with substantial quantities of hazardous materials and all use and transport of hazardous materials would be subject to applicable regulations, cumulative impacts would be less than significant.

Hazardous Materials Site Compiled Pursuant to Environmental Code Section 65962.5

As discussed under the analysis of Threshold d., the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, the Project would not create a significant hazard to the public or the environment. In addition, a review of the Cortese List Data Resources available from the California Environmental Protection Agency (CalEPA), there are no properties within one mile of the Project site that are included on the hazardous materials lists compiled pursuant to Government Code Section 65962.5, including on the sites of the cumulative listed herein on Table 4.0-1. Therefore, no cumulative impacts would occur (CalEPA, n.d.; Ramboll, 2022, Table 5).

Airport Land Use Plan or Airports

The Project site and the cumulative development projects are not located within any airport compatibility zones and is outside of the AIA for the SGVA. Accordingly, cumulative impacts due to an inconsistency with an Airport Master Plan would not occur, and the Project and the cumulative development projects would not result in a safety hazard for people residing or working in the Project area associated with SGVA. Accordingly, cumulative impacts related to safety hazards associated with the SGVA would not occur.

Emergency Response or Emergency Evacuation Plans

As discussed under the analysis of Threshold f., the Project site does not contain any emergency facilities, and the Project would not impact an emergency evacuation route. Other cumulative developments would be reviewed by the City of Monrovia or other applicable agencies to ensure no interference with emergency access and evacuation routes would occur. Accordingly, cumulative impacts associated with emergency evacuation plans or evacuation routes would be less than significant.

Wildland Fires

The Project site and the cumulative development projects are not located within or in close proximity to areas identified as being subject to wildland fire hazards (CALFIRE, 2025); thus, the Project and the cumulative

development projects have no potential to expose people or structures to a significant risk of loss, injury, or death, involving wildland fires, and, as such, cumulative impacts due to wildland fire hazards would not occur.

4.7.6 Significance of Impacts Before Mitigation

Thresholds a. and b.: Potentially Significant Direct Impact. Because there are no available records to verify that the former gas station's UST was removed from the property, there is a potential for accidental upset of a subsurface UST and the potential need to transport and dispose of an UST during the Project's construction activities, which is concluded to be a potentially significant impact requiring mitigation. During Project construction and operation, the transport, storage, use, and disposal of hazardous materials and risk of upset would be addressed through mandatory compliance with applicable and mandatory hazardous materials regulations that would ensure that the Project would not create a significant hazard to the public or environment.

Threshold c.: Less-than-Significant Impact. The Project site is located within 0.25 miles of an existing school (Calvary Road Baptist Academy). The use, storage, and transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations. With adherence to mandatory regulatory requirements, the Project would result in a less-than-significant impact to nearby schools, including the Calvary Road Baptist Academy.

Threshold d.: No Impact. The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As such, the Project would not create a significant hazard to the public or the environment due to the Project site's inclusion on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and no impact would occur.

Threshold e.: No Impact. The Project site is not located within two miles of a public airport or within an airport land use plan. Thus, the Project would not result in an airport-related safety hazard or excessive noise for people residing or working in the Project area, and no impacts would occur.

Threshold f.: No Impact. The Project would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. Thus, no impacts would occur.

Threshold g.: No Impact. The Project site is not located in a portion of the City that is subject to wildland fire hazards. Furthermore, the proposed new building would be in compliance with all applicable Building and Fire Codes and include installation of on-site and off-site improvements to provide fire access. As such, the Project would not expose people or structures, directly or indirectly, to significant risk of loss, injury or death involving wildland fires, and no impact would occur.

4.7.7 Mitigation

The following mitigation measure would address the potential for discovery of a UST beneath the site during Project construction activities. Implementation of this mitigation measure shall ensure the safe and lawful handling of USTs, if present, and prevent potential risks to human health and the environment.

HAZ MM-1 During demolition and ground excavation activities, the construction contractors shall be advised about the potential presence of an UST in the location of the former fuel station that existed on the Project site. The contractors shall be required by their contracts to ensure that all underground storage tanks (USTs) discovered on site are identified, assessed, and removed in accordance with all applicable federal, state, and local regulations, including but not limited to Title 23 of the California Code of Regulations, Division 3, Chapter 16 (Underground Storage Tank Regulations), and oversight requirements of the State Water Resources Control Board and Monrovia Fire and Rescue, the local Certified Unified Program Agency (CUPA). The following actions shall be implemented:

a) UST Assessment and Permitting: If a UST is discovered, construction activities around the UST shall pause and a qualified environmental professional shall evaluate the UST to determine its contents, structural integrity, and potential contamination. Prior to removal, appropriate permits must be obtained from the Monrovia Fire and Rescue (the local CUPA).

b) UST Removal and Decommissioning: The UST shall be removed by a licensed contractor in accordance with regulatory protocols. Removal activities shall include safe evacuation of any residual contents, purging of vapors, and appropriate decontamination of the tank and associated piping.

c) Sampling and Remediation (if necessary): After UST removal, the area around the UST shall be assessed for contamination. Soil and, if necessary, groundwater sampling shall be conducted to determine whether petroleum hydrocarbons or other hazardous substances have been released. If contamination is detected, a site-specific remediation plan shall be prepared and approved by the oversight agency. Cleanup activities shall be implemented prior to commencement of construction activities in the impacted area.

a) Documentation and Disposal:
All USTs, residual materials, and contaminated media shall be transported and disposed of at facilities licensed to handle such waste. Waste manifests and disposal documentation shall be retained on file and made available to regulatory authorities upon request.

4.7.8 Regulatory Requirements (RR)

The City of Monrovia requires compliance with the following:

HAZ RR 4-1 All construction contractors are required to comply with all applicable regulations and requirements promulgated by the federal Occupational Safety and Health Administration (OSHA).

HAZ RR 4-2 Compliance is required with Title 22, Division 4.5 of the California Code of Regulations, which requires residents and employees to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility.

HAZ RR 4-3 Compliance is required with Title 22, Division 4.5, Chapter 11 of the California Code of Regulations which requires fluorescent lamps, batteries, and mercury thermostats be recycled or taken to a Household Hazardous Waste Collection Facility.

HAZ RR 4-4 Compliance with South Coast Air Quality Management District (SCAQMD) Rule 1403 is required. Prior to the issuance of demolition permits for the existing on-site structure, the Project Applicant shall contract with a certified Asbestos Consultant to perform an asbestos survey for the existing structures on site. In the event asbestos containing materials (ACMs) are identified on site, the City of Monrovia shall condition all demolition permits to comply with SCAQMD Rule 1403 with respect to asbestos-containing materials and the demolition contractor shall be required to comply with Rule 403. All asbestos-related work conducted during the demolition process shall be performed by a licensed Asbestos-abatement Contractor under the supervision of a certified Asbestos Consultant. Asbestos-containing construction materials (ACCMs) shall be removed and disposed of in compliance with notification and asbestos-removal procedures outlined in SCAQMD Rule 1403 to reduce asbestos-related health risks. During demolition, the demolition contractor shall maintain all records of compliance with SCAQMD Rule 1403, including, but not limited to, the following: evidence of SCAQMD Rule 1403 Asbestos Removal and Demolition notification; contact information for the Asbestos-abatement Contractor and Asbestos Consultant; and receipts (or other evidence) of off-site disposal of all ACCMs. These records shall be made available for City inspection upon request.

HAZ RR 4-5 Compliance with Title 17, California Code of Regulations (CCR), Division 1, Chapter 8 (LBP Regulations) is required. Prior to the issuance of demolition permits for the existing on-site structure, the Project Applicant shall retain the services of a California-certified Lead Inspector/Risk Assessor to collect lead paint, dust, and/or soil samples. The samples shall be tested at a qualified facility for the presence of lead-based paint (LBP). In the event that LBPs are identified, the City of Monrovia shall condition all demolition permits to comply with Title 17, California Code of Regulations (CCR), Division 1, Chapter 8 (LBP Regulations), which addresses requirements for the removal of components painted with LBPs during demolition of existing structures. The demolition contractor shall be required to comply with these provisions. Notification to the California Department of Public Health (CDPH) shall be conducted through completion of an Abatement of Lead Hazards Notification, CDPH Form 8551. The removal of all LBP materials shall be conducted:

- By a Certified Lead Supervisor or Certified Lead Works, as defined by Sections 35008 and 35009 of the LBP Regulations, respectively;
- In accordance with the procedures specified in Chapter 12: Abatement, "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," U.S. Department of Housing and Urban Development, June 1995;
- Using containment and in a manner which does not result in contamination of non-work areas with lead-contaminated dust, lead-contaminated soil, or lead-based paint debris; and
- In accordance with an abatement plan prepared by a certified lead supervisor, certified lead project monitor, or certified lead project designer, which includes all of the requirements as specified in Section 36100(4)(A) of the LBP Regulations

The Certified Lead Supervisor conducting abatement shall retain records of the notification to the CDPH, and shall retain a copy of the abatement plan on-site at all times during demolition activities. The notification and abatement plan shall be made available to the City of Monrovia upon request for review. All demolition activities shall be subject to inspection by the CDPH and/or City officials to ensure compliance with the requirements of the LBP Regulations and abatement plan. Following completion of all abatement activities, a clearance inspection shall be conducted by a certified lead inspector/assessor or certified lead project monitor in accordance with Sections 36000(a) and 36000(c)(3) of the LBP Regulations. A copy of the results of the clearance inspection shall be provided to the City of Monrovia Planning Division upon completion of abatement and inspection activities.

4.7.9 Significance of Impacts After Mitigation

Threshold a: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measure HAZ MM-1 would ensure that a potential UST below the surface of the site, if it exists, is identified, treated, and disposed of in accordance with regulatory requirements and by methods that would preclude significant hazardous materials impacts to human health and the environment. With implementation of the mitigation, the potential impact would be less than significant.

4.8 LAND USE AND PLANNING

The analysis in this subsection discusses consistency of the Project with applicable land use and planning policies adopted by the City of Monrovia and other agencies for the purpose of identifying and reducing adverse effects on the environment. Information used to support the analysis in this subsection was obtained from the City of Monrovia General Plan, City of Monrovia Zoning Code, and the Southern California Association of Governments (SCAG) *Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)* (SCAG, 2024). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.8.1 EXISTING CONDITIONS

A. Existing On-Site and Adjacent Land Uses

Under existing conditions, the Project site is developed with an approximately 25,191-s.f. single-story multi-tenant commercial/industrial office building that was constructed in 1979. The single-story building includes 15 tenant suites. The primary site access is from West Olive Avenue that abuts the Project site to the north. Two private driveways connect the site with West Olive Avenue and lead to asphalt-paved surface parking area in the northern portion of the Project site. An additional access to the Project site is available from the alley located south of the Project site, which connects to South Myrtle Avenue and leads to an additional asphalt-paved surface parking area behind the existing building. Landscaping occurs along the western, northern, and eastern perimeters of the Project site. Land uses in the immediate vicinity of the Project site are described below and are illustrated on Figure 2-1, *Vicinity Map and Surrounding Land Uses and Development*, in Section 2.0 of this EIR.

- North: West Olive Avenue forms the northern boundary of the Project site. To the north and northeast of West Olive Avenue across the street from the Project site is a mix of residential and commercial uses, including, but not limited to, apartments, restaurants, and service commercial businesses with building heights ranging from one story to three stories. North of West Olive Avenue is the heart of Old Town Monrovia, which contains an array of boutique shops, restaurants, and historic buildings with a north-facing view of the San Gabriel Mountains.

- East: South Myrtle Avenue forms the eastern boundary of the Project site. To the immediate east of South Myrtle Avenue across the street from the Project site is a three- and four-story mixed-use structure (Paragon at Old Town) with ground floor retail and residential apartment units, upper floor apartment units, and structured parking including rooftop parking. Beyond this building are lower-profile, one-, two-, and three-story structures containing a variety of residential, commercial, and service commercial uses with a few historic-character structures located farther north along South Myrtle Avenue, north of West Olive Avenue.

- South: To the south of the Project site is an alley, beyond which are one- and two-story commercial, office, and industrial uses. To the south of these uses is West Walnut Avenue and a five-story apartment building (Avalon) with some ground floor retail and structured parking.

- West: To the west of the Project site is a one-story light industrial building, beyond which is South Primrose Avenue. To the west of South Primrose Avenue are one- and two-story single-family and multi-family residential structures.

B. Existing General Plan Designations

The prevailing planning document for the Project site and its surrounding area is the City of Monrovia General Plan. As previously depicted on EIR Figure 2-2, *Existing General Plan Land Use Designation,* the Project site is designated by the General Plan for Office/Research and Development/Light Manufacturing (O/RD/LM) land uses with a Specific Plan/Planned Development Overlay (SP/PD Overlay). The O/RD/LM land use designation is intended to encourage high quality development of office, research and development uses, and support uses (City of Monrovia, 2021).

As also shown on EIR Figure 2-2, the General Plan land use designations surrounding the Project site are:

- North: Residential High (RH) and Historic Downtown Commercial (HCD)
- East: Planned Development (PD)
- South: Office/Research and Development/Light Manufacturing (O/RD/LM) and Manufacturing (M)
- West: Manufacturing (M)

C. Existing Zoning Designations

The City's Zoning Code, which is established by Title 17 of the Monrovia Municipal Code (MMC), establishes zoning classifications within the City, consistent with the City's General Plan. As previously shown on EIR Figure 2-3, *Existing Zoning Classifications,* the Project site is zoned Office/Research and Development/Light Manufacturing (O/RD/LM). The O/RD/LM zone is intended to facilitate the development of a variety of commercial land uses, including administrative/professional services, athletic clubs/health spas, business support services, communication services, financial institutions, instructional services, medical laboratory services, light manufacturing, research and development, warehousing/wholesaling, and utility distribution facilities (City of Monrovia, 2023a).

As also shown on EIR Figure 2-3, the zoning classifications surrounding the Project site are:

- North: Residential High (RH) and Historic Downtown Commercial (HCD)
- East: Specific Plan (Paragon at Old Town) (SP)
- South: Office/Research and Development/Light Manufacturing (O/RD/LM) and Manufacturing (M)

- West: Manufacturing (M)

4.8.2 Regulatory Setting

The following is a brief description of the regional and local plans, policies, environmental laws, and related regulations related to land use and planning.

A. Southern California Association of Governments (SCAG) Regional Transportation Plan and Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency (RTPA) and a Council of Governments (COG). The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans, including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and other plans for the region (SCAG, n.d.).

As an MPO and public agency, SCAG develops transportation and housing strategies that transcend jurisdictional boundaries that affect the quality of life for southern California as a whole. SCAG's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. The 2024-2050 SCS/RTP seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. 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. The 2024-2050 RTP/SCS also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in a direct response to the Sustainable Communities and Climate Protection Act of 2008 , which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning (SCAG, 2024).

B. City of Monrovia General Plan

All cities and counties in California are required to adopt a General Plan to guide future development of the community. Generally speaking, a General Plan is a long-range planning document that typically looks forward about 20 years. A General Plan guides decisions to achieve the established goals of the community. Actions taken, laws enacted, and agreements made by the City must be consistent with the policies of the General Plan. The Planning Division is responsible for the maintenance of the Monrovia General Plan. The General Plan is divided into eight separate elements, including the Land Use Element, Circulation Element, Housing Element, Safety Element, Noise Element, Open Space Element, Conservation Element, and Environmental Justice Element, each of which is briefly described below. Goals and policies applicable to the Project and that avoid

or mitigate an environmental effect are presented in Table 4.8-1, *Project Consistency with the General Plan*, in the analysis of Threshold b. below.

❑ Land Use Element

The Land Use Element establishes land use policy and land use patterns that govern growth in Monrovia until 2030. This element designates future land use patterns and specifies the appropriate density and intensity of development. The Land Use Element is the central element of the General Plan, and the goals and policies it contains have a common link to the other elements. The Land Use Policy Map provides a graphic depiction of the General Plan's development policies and indicates the land use designations for which relevant goals and policies have been developed (City of Monrovia, 2021).

❑ Circulation Element

The Circulation Element is intended to guide the development of the City's circulation system in a manner compatible with the Land Use Element. The intent of the Circulation Element is to provide the City with a circulation system that is safe, sensible, and provides efficient movement of people and goods throughout Monrovia. The Circulation Element identifies portions of the circulation system that require improvements due to anticipated land uses. Street improvements, travel demand management strategies, and additional transit opportunities are also identified in an effort to alleviate traffic congestion and improve mobility in the City (City of Monrovia, 2012).

❑ Housing Element

The 2021-2029 Housing Element provides the City with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing for all community residents, and has been certified as substantially compliant with State law by the California Department of Housing and Community Development. The Housing Element identifies the City's strong commitment to implementing a vision that embraces new opportunities, supports housing development, and provides diverse housing options, in order for the City to do its part to address the State's housing crisis by continuing to increase housing capacity and supply in Monrovia (City of Monrovia, 2022b).

❑ Safety Element

The Safety Element identifies and evaluates natural hazards associated with seismic activity, landslides, flooding, and fire within the City. Goals for each of the relevant City departments are identified to provide responsible planning resulting in reduction of loss of life, injuries, damage to property, and other losses associated with such disasters, and to act as a guide to prepare for possible natural or man-caused disasters (City of Monrovia, 2022c).

❑ Noise Element

The Noise Element is a statement of the City's policy and intent regarding land use in relation to environmental noise and the control of noise sources within the community. Its purpose is to provide a framework within

which future planning and noise mitigating decisions will be made and implemented. The Noise Element consists of a survey of the current noise environment, indicating the major contributors of noise, and concludes with a proposed "noise control program," which includes certain practicable City actions towards reduction of noise and mitigation of its adverse effects (City of Monrovia, 2022d).

❑ Open Space Element

The Open Space Element creates a vision for an innovative, inclusive, and interconnected system of parks and open spaces and is consistent with the City's Land Use Element, Circulation, Housing, Safety, and Conservation Elements with its mutually reinforcing policies for ensuring a healthy livable community. The Open Space Element addresses multi-use parks and open spaces for aesthetic benefits, buffering for public health and safety, Preservation of natural resources, and recreation. The primary purpose of the Open Space Element is to establish the goals and policies that guide the continual preservation of Monrovia's existing open spaces and ensure that opportunities for both active and passive recreation are available throughout the City in its parks and recreation facilities (City of Monrovia, 2018a).

❑ Public Service/Conservation Element

The Public Service/Conservation Element provides estimates on the future need for improvement and extension of water and sewer facilities within the City, based on a detailed analysis of existing systems, their condition, and capacity for future service. The ability of the City to provide additional capacities determines, to some extent, the rate of future growth (City of Monrovia, 1966).

❑ Environmental Justice Element

The Environmental Justice Element contains a comprehensive set of goals and policies aimed at increasing the role and influence of historically marginalized populations and reducing their exposure to environmental and health hazards. The Environmental Justice Element includes a background discussion of environmental justice principles and methodology for identifying disadvantaged communities; an evaluation of baseline (2021) environmental issues within the environmental justice community and surrounding communities; and goals, policies, and programs to describe how the City of Monrovia will incorporate environmental justice into decision making and support positive outcomes for affected residents (City of Monrovia, 2022e).

C. Monrovia Municipal Code Subdivision and Zoning Ordinances

The Subdivisions and Zoning Ordinances, MMC Titles 16 and 17, provide development and performance standards for the development of land uses and related activities in Monrovia. The Zoning Ordinance serves as the primary implementation tool for the General Plan and the goals and policies it contains, and the Zoning Map identifies the zoning categories applied to each parcel of land within Monrovia. Together, the Zoning Ordinance and Map are used to identify the specific types of use, intensity, and development standards applicable to given parcels or areas of land (City of Monrovia, 2023a, Title 16 and Title 17).

4.8.3 Basis for Determining Significance

Based on Section XI of Appendix G to the CEQA Guidelines, the Project would result in a significant impact on land use and planning if the Project would:

a) *Physically divide an established community;*

b) *Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.*

4.8.4 Impact Analysis

Threshold a.: Would the Project physically divide an established community?

Under existing conditions, the Project site is 1.61 acres and contains one single-story commercial/industrial office building with 15 tenant spaces. The surrounding area is developed with a mix of uses, including commercial, industrial, single-family residential, and apartments. The Project entails demolition of the Project site's existing building and redevelopment of the Project site with one building designed to include 204 multi-family residential apartment units, 2,370 s.f. of commercial retail space, 2,782 s.f. of fitness center space, 2,470 s.f. of leasing office/lobby/mail room space, open air amenity space, parking on a portion of the ground floor, and 1.5 levels of subterranean parking. With implementation of the Project, there would be no change to the availability of access to any surrounding properties, and there are no components of the Project that would physically divide any of the existing uses in the surrounding area. Therefore, the Project would not physically divide an established community, and no impact would occur.

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

The City's General Plan and the SCAG 2024-2050 RTP/SCS provide goals and strategies focused on avoiding or mitigating environmental effects. Additionally, the Project's consistency with the SCAQMD AQMP is addressed under EIR Subsection 4.2, *Air Quality*, which demonstrates that the Project would not conflict with the 2022 SCAQMD AQMP, resulting in a less-than-significant impact; as such, Project consistency with the SCAQMD AQMP is not discussed further in this subsection. Provided below is an analysis of the Project's consistency with the City's General Plan and Zoning Code and the SCAG 2024-2050 RTP/SCS.

A. City of Monrovia General Plan

Implementation of the Project would require a General Plan Amendment (GPA) to change the land use designation of the Project site from O/RD/LM to Planned Development Area 28 (Area PD-28). With approval of the Project's GPA, the Project would be fully consistent with the General Plan land use designations for the Project site. Impacts associated with the Project's proposed land uses and their construction and operation have been evaluated throughout this EIR. Where significant impacts are identified (under the environmental topics of Cultural Resources (Subsection 4.3), Geology and Soils (Subsection 4.4), Hazards and Hazardous Materials (Subsection 4.7) and Tribal Cultural Resources (Subsection 4.14), mitigation measures are identified to reduce

impacts to less than significant. Accordingly, if the Project is approved, impacts associated with the Project's proposed GPA would be less than significant. In addition, Table 4.8-1, *Project Consistency with the General Plan*, provides an analysis of the Project's consistency with applicable General Plan policies that were adopted to avoid or mitigate significant environmental effects. General Plan policies that are not related to the Project, that provide direction to City staff and/or decision makers, or that do not relate to avoiding or mitigating significant environmental effects are not discussed in Table 4.8-1. As shown in Table 4.8-1, the Project would not conflict with any applicable General Plan policies that were adopted to avoid or mitigate significant environmental effects; therefore, no impacts due to an inconsistency with the City's General Plan would occur.

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
LAND USE ELEMENT	
Goal 1: Provide for a mix of land uses (residential, commercial, industrial) which provides a balanced community.	
Policy 1.4: Encourage the location of new high density residential development in close proximity (i.e., within walking distance) of the downtown, other major retail commercial areas, and/or transit facilities.	Consistent. The 1.61-acre Project site is located in a portion of the Old Town Extension District. In conformance with this policy, the Project would result in the development of one building with five above-ground levels and 1.5 subterranean parking levels. The building would contain 204 multi-family dwelling units, including 17 low-income dwelling units and three moderate-income dwelling units, 2,370 s.f. of commercial retail space, 2,782 s.f. of fitness center space, 2,470 s.f. of leasing office/lobby/mail room space, open air amenity space, parking on a portion of the ground floor, and 1.5 levels of subterranean parking. The Project site is located in close proximity to the downtown and other major retail commercial areas. Bus service is available in the local area, with the nearest bus stops (Foothill Transit Line 270) located at the intersection of South Primrose Avenue and West Walnut Avenue, approximately 230 feet southwest of the Project site. In addition, the Project site is approximately 0.7 miles north of the Metro Gold Line Monrovia Station.
Policy 1.5: Allow the development of mixed-use projects consisting of residential, retail, and office along existing and future transit corridors such as Myrtle Avenue and the Station Square Planning Area.	Consistent. In conformance with this policy, the Project site is located adjacent to South Myrtle Avenue, and the Project would be mixed use, including 204 multi-family residential apartment units and 2,370 s.f. of ground-floor commercial space.
Policy 1.6: Promote a variety of housing types ranging in size, density, and price.	Consistent. The Project would provide 204 multi-family residential apartment units, including 17 units restricted for low-income households, and three units restricted for moderate income households, for a total of 20 affordable housing units. Residential units in the Project are designed to vary in size from 490 to 1,070 s.f., consisting of 20 studio, 147 one-bedroom, and 37 two-bedroom units.
Policy 1.8: Develop higher density residential area in close proximity to employment centers.	Consistent. In conformance with this policy, the Project entails the development of 204 multi-family residential

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
	apartment units in close proximity to employment centers, including employment opportunities available in the Old Town Extension District, Old Town Monrovia immediately north of the Project site, and other commercial and light manufacturing uses to the east, southeast, south, southwest, and west of the Project site.
Policy 1.9: Provide for the development of a mix and balance of housing opportunities, commercial goods and services, and employment opportunities to support the City's business community and to satisfy the demands of the City's resident population.	Consistent. In conformance with this policy, the Project would include a mix of residential and commercial land uses, including 204 multi-family residential apartment units, 2,370 s.f. of commercial retail space, 2,782 s.f. of fitness space, and 2,470 s.f. of leasing office/lobby/mail room space. The Project would expand the availability of residential homes, and the Project's commercial space would provide commercial goods and service business opportunities in a portion of the City that already is developed with a mix of residential and employment-generating land uses.
Policy 1.11: Develop residential areas with densities and housing types related to existing and proposed public facilities and services.	Consistent. In conformance with this policy, and as demonstrated in the analysis presented in EIR Subsection 4.15, *Utilities and Service Systems*, adequate infrastructure, including sewer, water, and drainage facilities, exists in the surrounding area to accommodate the Project, which involves a high-density residential development that would provide a range of housing types (e.g., studio, one-bedroom, and two-bedroom units, as well as units for low- and moderate-income households). Under existing conditions, the Project site is developed, and the City already provides public facilities and services to the Project site.
Goal 2: Provide adequate infrastructure for all development.	
Policy 2.1: Ensure that land use intensities are consistent with the capacities of existing and planned infrastructure and public services.	Consistent. As indicated in the analysis presented in EIR Subsections 4.11, *Public Services*, and 4.15, *Utilities and Service Systems*, adequate infrastructure facilities for water, sewer, drainage, electricity, natural gas, and telecommunications exist in the local area, and the Project site currently is served with adequate public services, including police, fire, and schools. Development of the Project would not require the expansion of any existing utilities or facilities beyond the Project's proposed site-adjacent infrastructure connection points, and the Project would not adversely affect service ratios, response times, or other performance objectives for public services. As indicated in EIR Subsection 4.12, *Recreation*, the Project Applicant would pay fees to the City that the City would use towards providing parks and recreation services for the broader community, including for residents of the Project. Accordingly, and in conformance with this policy, the

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
	Project's land use intensity would be consistent with the capacities of existing infrastructure and public services in the local area.
Policy 2.2: Encourage the coordination of new development with the provision of adequate schools.	Consistent. As indicated in EIR Subsection 4.11, *Public Services*, the Project Applicant would be required to pay developer fees to the Monrovia Unified School District pursuant to pursuant to the Leroy F. Greene School Facilities Act. In conformance with this Act, the Project Applicant would pay fees that could be used by the School District for school updates or construction.
Policy 2.3: Require that new development pay its pro rata share of the costs of services required to support that development.	Consistent. In conformance with this policy, the Project would be required to pay impact fees discussed in EIR Subsections 4.11, *Public Services*, and 4.12, *Recreation*. MMC Title 3 (Revenue and Finance) establishes impact fees that are imposed on new developments in order to provide for public services throughout the City. Pursuant to MMC Chapter 3.21 (Fire Service Impact Fee), applicants for new development are required to pay a Fire Service Impact Fee as a condition of issuance of building permits. MMC Chapter 3.32 (Dwelling Unit Tax) establishes a uniform fee to be paid to the City to be used by the City for a variety of purposes which may include purchasing land, constructing buildings and improvements, and purchasing machinery, equipment and other capital-type facilities. MMC Chapter 3.12 (Recreation and Park Fund) is a City-established fund into which all funds levied, collected, or derived for recreational programs, park maintenance, development and improvement, street, tree planting and maintenance, are deposited, and a fee will be levied on the Project for the Recreation and Park Fund. Also, MMC Chapter 3.43 (Monrovia Library and Children's Reading Improvement Act Special Tax) imposes a special tax to fund the design, construction, and furnishing of a new Monrovia public library facility in the City.
Policy 2.5: Where appropriate, require developers to pay the cost of studies needed to determine infrastructure capacity in conjunction with a proposed project.	Consistent. In conformance with this policy, and as demonstrated in the analysis presented in EIR Subsection 4.15, *Utilities and Service Systems*, adequate infrastructure exists in the surrounding area to accommodate the Project, including adequate sewer, water, drainage, and dry utility (electric, gas, and communications) facilities.
Goal 3: Preserve the integrity of residential neighborhoods.	
Policy 3.1: Ensure adequate on-site parking for all residential developments.	Consistent. In conformance with this policy, the Project is designed to meet the minimum parking standards specified by MMC Chapter 17.24 (Parking), which requires the Project to provide 297 parking spaces. Specifically, the Project

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
	would provide 329 parking spaces, including 323 parking spaces within the proposed building and six additional spaces within the alley to the south of the building. Accordingly, the Project would exceed the minimum parking requirements per MMC Chapter 17.24.
Policy 3.2: Where feasible, preserve the integrity of a block frontage by providing alley access where alleys can support the traffic.	Consistent. In conformance with this policy, the Project would preserve the existing alley to the south of the proposed building.
Policy 3.3: Blend new medium and high-density development with existing neighborhoods by encouraging Planned Unit Developments.	Consistent. In conformance with this policy, the Project entails legislative and discretionary applications for a GPA, ZC, Specific Plan, VTPM, and CUP, all of which specify development standards and design requirements to ensure that the Project's building would blend with the existing surrounding neighborhood.
Goal 4: Promote land use patterns and development which contribute to community and neighborhood identity.	
Policy 4.1: Require new developments in established neighborhoods to consider the established architectural styles, development patterns, building materials, and scale of buildings within the vicinity of the proposed project.	Consistent. In conformance with this policy, the Project's proposed mixed-use building is designed to respect and complement the architectural characteristics of existing buildings within the surrounding area in terms of building materials, colors, and level of articulation. Also, other buildings in the area of a similar scale, including a three- and four-story apartment building with ground floor retail (Paragon) located across South Myrtle Avenue from the Project site and a five-story apartment building with ground floor retail (Paragon at Old Town) located one block south of the Project site at West Walnut Avenue. There is also a three- and four-story residential building with rooftop parking one block north of the Project site along West Colorado Boulevard, east of South Primrose Avenue, and the three- and four-story Myrtle Building located on the north side of West Colorado Boulevard, west of Myrtle Avenue.
Policy 4.2: Require all new development to consider existing uses in terms of neighborhood disruption, buffering, architectural styles, building materials, development patterns, and scale of buildings within the vicinity of the proposed project.	Consistent. The Project would not physically disrupt an existing neighborhood. Currently, the Project site appears largely unchanged from the time of its original construction in the late 1970s and contains a one-story multi-tenant commercial/industrial office building. The Project site is located in a portion of the City's historic downtown main street area known as the Old Town Extension District. Setbacks along South Myrtle Avenue proposed by the Project would be close to the street and consistent with setbacks found in the historic downtown area. The Project site's South Myrtle Avenue setback also is proposed to be landscaped with a variety of ornamental groundcover, vines, shrubs, and trees and includes a public arcade at the ground level to provide a wide sidewalk experience. The Project's building

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
	would be 65 feet high measured from the average ground plane and extend up to 80 feet high as measured from the average ground plane on minor portions of the roof to accommodate rooftop equipment screening and architectural projections, which would be softened through the articulation and setbacks of the upper stories, as well as a cut-out at the corner of South Myrtle and West Olive Avenues, where a public plaza would be located, connecting with a public arcade along South Myrtle Avenue. In addition, the Project's proposed maximum building height is comparable with recent redevelopment projects in the Old Town Extension District, including similar, recent new development adjacent to the east (Paragon at Old Town) and one block to the south (Avalon). Additionally, the Project's design and the proposed 701 S. Myrtle Specific Plan's Chapter 3.0, Development Standards and Design Guidelines, were based on a detailed analysis of the character, styles, and palette of colors and materials seen throughout Old Town Monrovia. The building's architectural style is designed as a modern interpretation of prevalent features found in Old Town Monrovia. These design elements are intended to create a well-balanced building elevation, incorporating architectural styles, to reduce bulk and massing and to activate the pedestrian environment through interactive architecture and landscape elements, such as vibrant storefronts, benches and planter walls, enhanced paving accents, and accent lighting.
Goal 5: Encourage new development that is compatible with and complements existing land uses.	
Policy 5.1: Consider the impacts of new development on infrastructure.	Consistent. In conformance with this policy, and as demonstrated in the analysis presented in EIR Subsection 4.15, *Utilities and Service Systems*, adequate infrastructure exists in the surrounding area to accommodate the Project, including adequate sewer, water, drainage, and dry utility (electricity, natural gas, and communications) facilities.
GOAL 9: Preserve the character of existing neighborhoods and historic residences.	
Policy 9.3: Continue to monitor development standards in single family and multi-family residential districts, including setbacks, height, density, and required open space, in order to ensure that new development is compatible with the scale and character of existing development.	Consistent. The Project includes applications for a GPA, ZC, Specific Plan, VTPM, and CUP, all of which specify development standards and design requirements to ensure that the Project's building would be compatible with the scale and character of existing development in the surrounding area. The proposed 701 S. Myrtle Specific Plan and Area PD-28 would establish requirements related to setbacks, height, density, and required open space. In conformance with this policy, as part of future building permit application review,

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
	the City would ensure that building plans conform to all applicable standards and requirements of the City's General Plan, the proposed 701 S. Myrtle Specific Plan, Area PD-28, and the MMC. No building permits would be issued by the City unless the City determines that the building plans fully conform to these applicable requirements.
Policy 9.6: Encourage the continued effort in the downtown to preserve its historic quality. New development shall be designed in harmony with existing buildings.	Consistent. A Historical Resources Technical Report was prepared (EIR *Technical Appendix D2*) to evaluate the potential for the Project to cause direct or indirect substantial adverse impacts to historical resources, which determined that the Project's potential impacts to historic resources would be less than significant. The attention to design and architectural details required by the proposed 701 S. Myrtle Specific Plan and Area PD-28 would ensure that the Project is compatible with Old Town Monrovia. Select design features of the Project include (1) the setback design and the open public plaza proposed at the northeastern corner of the Project site; (2) sidewalk setbacks and pedestrian entrances along South Myrtle Avenue consistent with those existing in Old Town Monrovia; (3) clearly articulated ground-floor; and (4) compatible but differentiated variety of materials and color palette, differentiated bays/volumes throughout wall plane, stepped-back top stories.
Policy 9.7: Through the existing Planned Development (PD) designations control the architecture and site design of residential developments for compatibility with the existing neighborhood.	Consistent. The Project entails a proposed ZC application to change the Project site's zoning classification to Area PD-28 and to identify the Project site as part of the 701 S. Myrtle Specific Plan. The standards established by PD-28 and the Specific Plan related to setbacks, height, density, and required open space, would ensure that the Project is compatible with the existing neighborhood. No building permits would be issued by the City unless the City determines that the building plans fully conform to the applicable requirements.
Policy 9.8: Continue the street tree and sidewalk pattern in new development where Medium Density and PD neighborhoods have an established street tree and sidewalk pattern.	Consistent. In conformance with this policy, the Project's application materials include a conceptual landscape plan that would require the preservation of existing street trees along South Myrtle Avenue and the installation of new street trees along the site's frontage on West Olive Avenue in a manner that is consistent with existing street trees in the surrounding area. Additionally, the Project would reconstruct the existing sidewalks along the site's frontages on South Myrtle Avenue and West Olive Avenue.
Goal 10: Ensure that new development is sensitive to the City's natural and open space resources and constraints.	

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
Policy 10.3: Study the need for additional on-site open space in new multiple family development.	Consistent. The Project design features five common open areas, including a public plaza and arcade at the ground level, a private dog park at the ground level, two courtyards at the podium level (second floor) with one including a swimming pool and the second including a seating area, and roof deck on the top level. In total, the Project would offer 17,545 s.f. of outdoor private common area and 2,225 s.f. of outdoor public use area (701 S. Myrtle Specific Plan, Table 2-8). Additionally, the City will impose a fee on the Project, which would be deposited into the City's Recreation and Park Fund pursuant to MMC Chapter 3.12 (Recreation and Park Fund), which the City uses to provide recreation and park facilities and services in the community.
Policy 10.6: Encourage the conservation of water and energy resources in order to reduce the need for expansion of water reservoirs and distribution facilities, as well as energy generating plants and distribution facilities.	Consistent. The Project design includes a rooftop solar PV system and is required to comply with the 2022 CALGreen Code, the mandatory provisions of which address the efficient use of water and electricity in newly constructed buildings. Also in conformance with this policy, all landscaping that would be installed as part of the Project would comply with MMC Section 8.46.100 (Model Water Efficient Landscaping Ordinance Requirements). In addition, the analysis in EIR Subsection 4.4, *Energy*, demonstrates that the Project would be constructed with energy-efficient systems and would not result in the wasteful or inefficient use of energy resources.
Policy 10.9: Require water efficient landscaping in regard to plant selection and irrigation.	Consistent. In conformance with this policy, all landscaping that would be installed as part of the Project would comply with the provisions of MMC Section 8.46.100 (Model Water Efficient Landscaping Ordinance Requirements).
Policy 10.12: Consider the issue of noise on the existing and future environment when planning the location of residential areas and other noise sensitive land uses in Monrovia.	Consistent. As analyzed in EIR Subsection 4.9, *Noise*, Project-related construction noise levels are expected to range from 52.2 to 71.0 dBA L_{eq} at the nearest sensitive receivers and would not exceed the reasonable daytime 80 dBA L_{eq} significance threshold. The Project would generate operational noise level increases ranging from 0.0 to 0.1 dBA L_{eq} at the nearest receiver locations, which would not exceed daytime or nighttime operational noise thresholds at any sensitive receptor location.
Goal 11: The City of Monrovia shall provide its residents with a high-quality urban environment through the development and conservation of resources such as land, water, minerals, wildlife, and vegetation.	
Policy 11.7: Comply with the National Pollutant Discharge Elimination System regarding storm water management to reduce impacts from storm water run-off.	Consistent. In conformance with this policy, the Project would comply with all applicable National Pollutant Discharge Elimination System (NPDES) requirements during construction and long-term operation to ensure that impacts from stormwater runoff are reduced. Pertaining to

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
	stormwater, low impact development (LID) is a stormwater management strategy that addresses increases in runoff and stormwater pollution as close to its source as possible. The approval of a LID for the Project would be required prior to the commencement of construction activities and would comprise a set of site design approaches and Best Management Practices (BMPs) to address stormwater. The Project design includes the installation of drywells below the building foundation that would filter pollutants and infiltrate stormwater into the groundwater table. The drywells would extend to depths of at least 25 to 30 feet below the proposed building foundation (approximately 40 to 55 feet below existing grades) to provide stormwater infiltration at the site.
Goal 12: Expand recreational and park use opportunities.	
Policy 12.2: Maintain or increase multiple-family residential recreation space development standards as a supplement to park space.	Consistent. The Project design features five common open areas on the site to be used as recreation, including a public plaza and arcade at the ground level, a private dog park at the ground level, two courtyards at the podium level (second floor) with one including a swimming pool and the second including a seating area, and roof deck on the top level. In total, the Project would offer 17,545 s.f. of outdoor private common area and 2,225 s.f. of outdoor public use area. Additionally, the City will impose a fee on the Project, which would be deposited into the City's Recreation and Park Fund pursuant to MMC Chapter 3.12 (Recreation and Park Fund), which the City uses to provide recreation and park facilities and services in the community.
CIRCULATION ELEMENT	
Goal 1: Minimize traffic congestion on arterial and collector streets during peak hours in order to ensure a safe and efficient movement of people and goods within the City.	
Policy 1.9: Improve intersection and street sections wherever possible to maintain an acceptable level of service for peak traffic flows. With the recognition that the City is largely built out and that major physical improvements to the circulation system will be limited to certain areas, establish level of service (LOS) D as the minimum standard to be maintained, except at locations where LOS F conditions currently exist. When reviewing impacts at locations where existing development constrains the ability to widen or otherwise improve roadways to achieve the desired LOS, consider improvements to pedestrian and transit facilities as acceptable traffic mitigation measures. The City has determined that a project would have a significant traffic impact under California Environmental Quality Act (CEQA) at an intersection if the	Consistent. It should be noted that under CEQA, vehicle miles traveled (VMT) replaced LOS as the analysis metric for determining a significant transportation impact. Refer to EIR Subsection 4.13, *Transportation*. The Project does not include any street improvements in the public rights-of-way of South Myrtle Avenue or West Olive Avenue other than curb, gutter, and sidewalk reconstruction, and no improvements are needed because acceptable LOS is maintained on these roads with the addition of the Project's traffic as demonstrated in the Project's Traffic Study included as EIR *Technical Appendices J1 and J2*. The Traffic Study demonstrates that with the addition of Project traffic, in conjunction with traffic from cumulative developments and ambient growth, all study area intersections would operate at an acceptable LOS.

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
conditions in Table II-1 were found. For the purpose of applying these significance criteria, the V/C ratio shall be reported using the Intersection Capacity Utilization (ICU) methodology. LOS at two-way stop-controlled intersections shall be based on the Highway Capacity Manual (HCM) methodology and the incremental change in volume-to-capacity (V/C) ratio calculated by analyzing such intersections with the ICU methodology assuming a two-phase signal.	
Policy 2.7: Seek to maintain at least LOS E during peak hours at intersections, except at locations where LOS F currently exists.	Consistent. Please refer to the consistency analysis related to Policy 1.9 above.
Goal 3: Reduce the number of street accidents and maintain adequate traffic safety in the entire circulation system.	
Policy 3.6: Provide continuity to the sidewalk system, including wheelchair ramps, when new development occurs, to minimize pedestrian/vehicle conflicts.	Consistent. In conformance with this policy, the Project would reconstruct the existing sidewalks along the site's frontages on South Myrtle Avenue and West Olive Avenue. Sidewalks would be reconstructed in accordance with ADA requirements. Additionally, the Project would reduce the number of driveways from the Project site along West Olive Avenue from two to one, which would reduce potential pedestrian/vehicle conflicts when compared to existing conditions.
Goal 6: Protect and encourage non-motorized transportation such as bicycle and pedestrian travel.	
Policy 6.3: Maintain existing pedestrian facilities (sidewalks and trails) and encourage new development to provide pedestrian routes to adjacent developments. Respond in a timely manner to citizen requests regarding maintenance concerns on all public pedestrian facilities.	Consistent. In conformance with this policy, the existing curb, gutter, and sidewalks along West Olive Avenue and South Myrtle Avenue would be reconstructed along the Project site frontages as part of the Project, thus encouraging access between adjacent developments. Also, for public use, the Project design includes an outdoor public plaza to be provided at the corner of West Olive Avenue and South Myrtle Avenue and an outdoor public arcade space (to provide a wide sidewalk experience) along South Myrtle Avenue. The plaza would offer 1,495 s.f. of space, and the arcade would offer 760 s.f. of space, for a total of 2,255 s.f. of common outdoor space accessible to the general public, which would encourage pedestrian activity at the street level.
Policy 6.5: Encourage the provision of an accessible and secure area for bicycle storage at all new and existing developments.	Consistent. In conformance with this policy, the Project would provide for 112 long-term bicycle parking spaces inside the building and 22 short-term bicycle parking spaces outside the building for public use, placed near the building's entrances. The provided bicycle parking would exceed the required 102 long-term and 20 short-term bicycle parking spaces.
Policy 6.8: Require new developments to provide adequate pedestrian paths on adjacent streets, including wheelchair	Consistent. In conformance with this policy, the existing curb, gutter, and sidewalks along West Olive Avenue and

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
ramps, and through the development projects, where determined to be appropriate.	South Myrtle Avenue would be reconstructed as discussed in Policies 3.6 and 6.3, above and comply with ADA standards. ADA accessible paths of travel are required to be provided within the Project in compliance with applicable building codes. On the building exterior, ADA paths of travel would lead from the public sidewalks to the building entrances.
Goal 8: Provide an adequate supply of convenient parking for all developments in the City, in a manner consistent with the goals of managing transportation demand and providing efficient arterial traffic flows.	
Policy 8.2: Require all new developments to provide off-street parking in compliance with the City's Zoning Code and the requirements of the ADA.	Consistent. Refer above to Policies 3.6, 6.3, and 6.8.
HOUSING ELEMENT	
Goal 1: Encourage a variety of housing types to meet the existing and future needs of Monrovia residents.	
Policy 1.2: Provide site opportunities for development of housing that responds to diverse community needs in terms of housing types, cost, and location, emphasizing locations near services and transit that promote walkability.	Consistent. In conformance with this policy, the Project would provide a total of 20 studio units, 147 one-bedroom units, and 37 two-bedroom units, for a total of 204 apartment units, which would increase the City's housing inventory and contribute to the City's goal of meeting its obligation to provide housing pursuant to SCAG's 6th Cycle Final Regional Housing Needs Allocation, as discussed further in EIR Subsection 4.10, *Population and Housing*. Of the 204 residential units proposed, 17 units would be restricted to low-income households, and three units would be restricted to moderate-income households, for a total of 20 affordable housing units in the Project. The Project's proposed dwelling units, including the proposed affordable dwelling units, would be in close proximity to existing transit in the local area. The Project site is located in a developed area and provides residents access to nearby service commercial businesses and transit. The Project site is in close proximity to two Foothill Transit local bus stops, including the east/westbound Line 187, approximately 0.25 miles to the south along Huntington Drive, and the north/southbound Line 270, less than 600 feet southwest, along South Primrose Avenue. The Metro A Line Monrovia Station is approximately 0.7 miles south of the Project site.
Policy 1.3 Encourage and facilitate the development of mixed use and high-density residential development in appropriate areas (e.g., Station Square, Old Town Extension, along Huntington Drive).	Consistent. In conformance with this policy, the Project, which would be located in the Old Town Extension District, would develop a mixed-use building that would include 204 multi-family dwelling units and 2,370 s.f. of commercial uses on a 1.61-acre Project site.
Policy 1.4: Encourage infill development and recycling of land to provide needed housing.	Consistent. In conformance with this policy, the Project site is currently underutilized and developed with a one-story commercial/industrial office building and surface parking. In

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
	conformance with this policy, the Project would redevelop the Project site with needed housing.
Goal 2: Assist in the development of housing that meets the needs of the Monrovia community including low- and moderate-income and special needs households.	
Policy 2.2: Encourage the development of residential units and the provision of related services for special needs groups, including the elderly, large households, single parents, persons with disabilities, extremely low-income persons, and persons experiencing homelessness.	Consistent. In conformance with this policy, the Project entails a mixed-use development that would include 204 multi-family residential apartment, of which 17 units would be restricted to low-income households, and three units would be restricted to moderate-income households, for a total of 20 affordable housing units. The Project design is required to meet ADA accessibility requirements for path of travel inside and outside of the building, and the residential unit sizes would range from 490 s.f. to 1,070 s.f., in studio, one-bedroom, and two-bedroom configurations that could be occupied by a range of household types, sizes, and income levels.
Policy 2.3 Encourage the inclusion of housing affordable to lower-income households when reviewing proposals for new housing developments.	Consistent. In conformance with this policy, the Project's proposed mixed-use development would provide 17 units restricted to low-income households and three units restricted to moderate-income households, for a total of 20 affordable units in the Project.
Goal 4: Preserve and improve the quality of existing neighborhoods and existing housing, especially affordable housing. Support sustainable solutions which minimize reliance on natural resources and automobile use.	
Policy 4.1: Preserve the character, scale and quality of established residential neighborhoods and ensure that new housing is well-designed and compatible with the neighborhood context in which it is located.	Consistent. As part of future building permit application reviews, the City would ensure that building plans conform to all applicable standards and requirements of the City's General Plan, the proposed 701 S. Myrtle Specific Plan, Area PD-28, and the MMC. In conformance with this policy, no building permits would be issued by the City unless the City determines that the building plans fully conform to these applicable requirements to ensure that the character, scale, and quality of the existing surrounding residential neighborhoods are preserved and that the Project is well-designed and compatible with the surrounding neighborhood context.
Policy 4.9 Encourage energy conservation, water efficiency, and sustainable building measures in new and existing homes through adherence to the California Green Building Code.	Consistent. As discussed in further detail in EIR Subsection 4.4, *Energy*, the Project would be required to comply with all applicable provisions of the 2022 California Green Building Standards (CALGreen) Code. The CALGreen Code addresses requirements related to water conservation, energy conservation, bicycle parking, EV charging, PV solar systems, and building energy efficiency systems, such as insulation and HVAC units.
SAFETY ELEMENT	

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
Goal 1: Reduce to a minimum the loss of life, disruption of goods and services and destruction of property associated with an earthquake.	
Policy 1.3.1: Continue to adopt and implement the most recent uniform building code (with special attention to Chapter 23 and Chapter 70), and all supplements which include the latest most stringent earthquake regulations for new construction.	Consistent. The Project would be designed in compliance with the 2022 version of the California Building Code or the applicable version of the code in effect at the time of building permit application, including the latest and most stringent earthquake regulations for new construction.
Policy 1.3.2: If an EIR, or detailed geologic investigation confirms existence of seismic hazards, the City shall require special earthquake resistant design features or use limitations, as appropriate, to protect the public health and safety and to reduce the exposure of individuals and property to seismic risks.	Consistent. A Geotechnical Investigation technical report, provided as *Technical Appendix F* to this EIR, was prepared for the Project to ensure that the Project would be designed in accordance with the latest most stringent earthquake regulations for new construction. Additionally, the analysis in EIR Subsection 4.5, *Geology and Soils*, demonstrates that the Project would not expose future residents or tenants to substantial seismic-related hazards.
Goal 3: Reduce the risk of fire and minimize consequences from fire events in Monrovia.	
Policy 3.1.3: Ensure Monrovia's water supply and distribution system is adequate and appropriate to facilitate fire suppression.	Consistent. In conformance with this policy, the Project would be required to comply with all applicable provisions of the California Fire Code, as adopted by the City pursuant to MMC Chapter 15.20 (Fire Code). As part of future building permit application reviews, the City would ensure that an appropriate number of fire hydrants is provided and that all of the proposed fire hydrants would meet the required minimum fire-flow requirement (i.e., required gallons per minute), as required by Appendix CC (Fire Hydrant Locations and Distribution) of the 2022 version of the California Fire Code (CCR Title 24, Part 9). In addition, the analysis presented for Threshold b. in EIR Subsection 4.15, *Utilities and Service Systems*, demonstrates that the City would have adequate water supplies to serve the Project without the need for new or expanded entitlements or resources, including the Project's anticipated water demand associated with fire hydrants.
NOISE ELEMENT	
Program 2: The City will extend the California Building Code (California Code of Regulations, Title 24, Part 2, Appendix Chapter 12) requirements for noise mitigation in the design and construction of new multi-family residential developments, hotels, motels, dormitories, and apartment houses to include all types of residential developments.	Consistent. In conformance with this policy, the Project would comply with the 2022 version of the California Building Code requirements (or subsequent version in effect at the time of building permit application) related to noise mitigation. Additionally, the analysis in EIR Subsection 4.9, *Noise*, demonstrates that the Project's proposed residential uses would not be exposed to excessive amounts of noise, and also demonstrates that the Project would not result in any significant noise impacts affecting surrounding uses.
Program No. 6: Future projects within the City will reflect a consciousness on the part of the City regarding the	Consistent. The analysis in EIR Subsection 4.9, *Noise*, demonstrates that the Project would not result in any

Table 4.8-1 Project Consistency with the General Plan

Applicable General Plan Polices	Consistency Determination
reduction of unnecessary noise near noise-sensitive areas such as residences, schools, parks, hospitals, libraries, and convalescent homes.	significant noise impacts affecting surrounding uses. Project-related construction noise levels are expected to range from 52.2 to 71.0 dBA L_{eq} at the nearest sensitive receivers and would not exceed the reasonable daytime 80 dBA L_{eq} significance threshold. The Project would generate operational noise level increases ranging from 0.0 to 0.1 dBA L_{eq} at the nearest receiver locations, which would not exceed daytime or nighttime operational noise thresholds at any sensitive receptor location.
ENVIRONMENTAL JUSTICE ELEMENT	
Goal 2: Ensure residents of all ages have access to a range of safe and accessible opportunities for recreation and physical activities.	
Program 2.2.2: Continue to require multifamily residential development to provide active private open space for residents and their guests to offset the demands on neighborhood parks.	Consistent. In conformance with this policy, the Project would provide various recreational facilities and amenities in the building design for the residents, including a resort-style pool, rooftop deck, dog park, and courtyard gathering areas. An outdoor public plaza also is proposed at the site's northeastern corner at the intersection of West Olive Avenue and South Myrtle Avenue, and a public arcade is proposed at the site's frontage along South Myrtle Avenue.

B. City of Monrovia Zoning Ordinance

A ZC has been requested for the Project, which would amend Project site's existing zoning classification from O/RD/LM to Planned Development Area 28 (Area PD-28) and the 701 S. Myrtle Specific Plan. Approval of the requested ZC would eliminate any potential inconsistency between the Project and the site's underlying zoning classifications. The Project would not conflict with any development regulations and design standards in the Zoning Ordinance pertaining to the Area PD-28 designation, the Project has been designed to meet the requirements of the 701 S. Myrtle Specific Plan, and there are no components of the Project's proposed ZC that would result in impacts not already evaluated and disclosed by this EIR. No impacts would occur.

Pertaining to the required CUP findings, the Project site is adequate in shape and topography for the proposed use as the site is rectangular-shaped and is relatively flat. Regarding size, the Project site is approximately 1.61 acres and is of sufficient size for a mixed-use building. To address site efficiency, 1.5 levels of subterranean parking are proposed. The Project Applicant is proposing a ZC to change the Project site's zoning classification from O/RD/LM to Area PD-28 and to identify the Project site as part of the 701 S. Myrtle Specific Plan. The proposed zoning classifications of PD and Specific Plan would allow for redevelopment of the site in a manner that is consistent with the proposed 701 S. Myrtle Specific Plan. The PD zoning classification would allow for a maximum base density of 105 dwelling units per acre, which would yield a total of 170 dwelling units on the approximately 1.61-acre Project site. However, by incorporating 17 low-income affordable units (which constitute 10 percent of the 170 units), the Project would be eligible for a density bonus of 20 percent pursuant to California Government Code Sections 65915 - 65918. With the density bonus, the maximum number of

permitted dwelling units would be increased to 204 units, resulting in a density of 126 dwelling units per acre. In addition, the Project would restrict three of the 204 units as moderate-income affordable units, creating a total of 20 affordable units within the Project. Because the Project would not conflict with zoning requirements and meet the required CUP findings, no impact would occur.

C. SCAG 2024-2050 RTP/SCS

The goals included in the 2024-2050 SCS/RTP are meant to provide guidance for considering the Project within the context of regional goals and policies. The regional planning policies that are not related to the Project, that provide direction to City staff and/or decision makers, or that do not relate to avoiding or mitigating significant environmental effects are not discussed in Table 4.8-2. As shown in Table 4.8-2, *SCAG RTP/SCS Goal Consistency Analysis*, the Project would not result in any land use and planning conflict with the adopted goals of the 2024-2050 RTP/SCS that are applicable to the Project. No impact would occur.

Table 4.8-2 SCAG RTP/SCS Goal Consistency Analysis

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
Mobility	
System Preservation and Resilience	
Complete Streets	
03. Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit)	Consistent. The Project design includes reconstruction of site-adjacent sidewalks, curb, and gutter along South Myrtle Avenue and West Olive Avenue to meet ADA accessibility standards and improve pedestrian access. Bicycle racks would be provided near building entrances, and the site layout supports walkable access to existing Foothill Transit bus stops, including Line 187 (approximately 0.25 mile south) and Line 270 (approximately 600 feet southwest). These features would support a multimodal environment accommodating pedestrians, cyclists, and transit users, consistent with this policy.
04. Ensure the implementation of Complete Streets that are sensitive to urban, suburban, or rural contexts and improve transportation safety for all, but especially for vulnerable road users (e.g., people, especially older adults and children, walking and biking)	Consistent. The Project is designed with attention to pedestrian movement and urban context. The Project includes reconstruction of site-adjacent sidewalks to meet ADA accessibility requirements. The Project's design includes wide sidewalks and the separation of loading functions (which would occur in the alley on the south side of the site) from pedestrian frontages (which occur along West Olive Avenue and South Myrtle Avenue), which would improve safety, including for vulnerable groups such as older adults and children. These elements are consistent with a context-sensitive streetscape approach and would contribute to pedestrian safety.
05. Facilitate the implementation of Complete Streets and curb space management strategies that accommodate and optimize new technologies, micromobility devices and	Consistent. The Project site's proximity to regional transit options provides opportunity to support first/last mile connectivity. While dedicated micromobility infrastructure

Table 4.8-2 SCAG RTP/SCS Goal Consistency Analysis

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
first/last mile connections to transit and last-mile delivery.	and wayfinding are not currently proposed, the site layout could accommodate such features in the future and the Project design does not preclude these items.
06. Support implementation of Complete Streets improvements in Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety, and access to opportunities.	Consistent. Loading and delivery functions are designed to occur via the rear alley to the south of the building, which would reduce pedestrian-vehicle conflicts along primary frontages of West Olive Avenue and South Myrtle Avenue. While no specific ride-share zones are proposed at this time, potential curb space management strategies could be considered in the future, such as pick-up/drop-off areas or other curbside innovations, depending on operational needs and site constraints.
Transit and Multimodal Integration	
09. Encourage residential and employment development in areas surrounding existing and planned transit/rail stations.	Consistent. The Project entails the redevelopment of a property in an existing urban environment utilizing an existing pedestrian and bike friendly street network. The Project site is located in proximity to public transit, including an existing Foothill Transit stop located approximately 230 feet southwest of the Project site and the Metro A Line Monrovia Station, which is located approximately 0.7 miles south of the Project site.
11. Create a resilient transportation system by preparing for emergencies and the impacts of climate change.	Consistent. The Project site fronts two public streets and the Project would enhance local connectivity and accessibility by providing multiple access points for pedestrians, emergency services, and active transportation users. Access to public streets is a critical element in ensuring community resilience during natural disasters or other emergency situations. Furthermore, the project supports climate change adaptation by promoting a compact, walkable, and transit-accessible form of development that reduces reliance on single-occupancy vehicles. By situating new housing in an existing urbanized area with established infrastructure and transit access, the project helps reduce vehicle miles traveled (VMT), lowers greenhouse gas emissions, and contributes to a more sustainable and climate-resilient urban fabric.
Transportation System Management	
12. Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system instead of adding roadway capacity, where possible	Consistent. Related to this policy, the Project entails the redevelopment of a property in an existing urban environment that would make use of existing transportation assets. No roadway widening or vehicular capacity expansions are proposed as part of the Project. Refer to the Complete Streets and Transit and Multimodal Integration discussions above for information about how the Project would make efficient use of the transportation system

Table 4.8-2 SCAG RTP/SCS Goal Consistency Analysis

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
	through pedestrian and bicycle user enhancements.
Communities	
Priority Development Areas	
32. Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities	Consistent. The Project entails the redevelopment of a 1.61-acre property in an existing urban environment with existing, established infrastructure systems. The Project would provide 204 residential apartment units, ground floor commercial space, structured parking, and various common area amenities, supporting housing needs for population growth in Monrovia. The Project would provide additional housing options within walking and biking distance to Old Town Monrovia, which would increase the customer base for Old Town businesses as a destination. The Project and its pedestrian and bicycle design features discussed above in the Complete Streets and Transit and Multimodal Integration discussions would reduce vehicle trips and vehicle miles traveled by locating new housing within walking and biking distance of, and with pedestrian connections to, employment, shopping, entertainment, public services, and public transit. Walkability between origins and destinations also would be improved by locating a majority of parking underground and including active uses, such as the Project's commercial retail space, fitness center, and leasing office at the ground floor street level.
33. Promote the growth of origins and destinations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicle (SOV) dependency and vehicle miles traveled	Consistent. The Project entails the redevelopment of a 1.61-acre property in an existing urban environment with existing, established multi-model transportation options, including walking, biking, bus, and train. The Project would concentrate new housing development within a highly accessible, multimodal environment. Located in an existing urban area with established infrastructure, the Project site is within walking distance of multiple public transit options and is supported by a well-connected network of sidewalks and bicycle infrastructure. The site's location encourages the use of transit, walking, and bicycling for daily trips and commutes, thereby reducing reliance on single-occupant vehicles. By increasing the density of housing in this area, the Project contributes to the creation of a more balanced land use and transportation relationship—supporting the growth of both trip origins (residential units) and destinations (nearby jobs, services, and amenities).
34. Seek to realize scale economies or a critical mass of jobs and destinations in areas across the region that can	Consistent. As more fully discussed in EIR Subsection 4.10, *Population and Housing*, in 2023 the City of

Table 4.8-2 SCAG RTP/SCS Goal Consistency Analysis

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
support non-SOV options and shorter trip distances, combined trips and reduced vehicle miles traveled	Monrovia's jobs-housing ratio was estimated to be approximately 1.61 jobs per household, indicating that the City has disproportionately more jobs as a whole than there are housing units. The Project would entail demolishing the existing multi-tenant commercial/industrial office building and redeveloping the Project site with a mixed-use multi-family residential and commercial structure that would include 204 multi-family residential apartment units and 2,370 s.f. of commercial retail space. The Project would result in a net reduction in jobs on-site by approximately 46 jobs and would provide a total increase of 204 housing units, and, as such, the Project would assist the City in better balancing its number of jobs with number of residents, (an improved jobs-housing ratio), which, in turn, would assist the City in supporting non-SOV options, shorter trip distances, and reduced VMT. The Project site is within walking and biking distance to employment, shopping, entertainment, public services, recreation, and public transit.
Housing the Region	
35. Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to further fair housing access and equity across the region	Consistent. The Project would involve the demolition of an existing multi-tenant commercial/industrial office building and the redevelopment of the Project site with a mixed-use multi-family residential and commercial structure that would include 204 multi-family residential apartment units and 2,370 s.f. of ground floor commercial retail space. The areas surrounding the Project site are fully urbanized and provide access to important resources, amenities, and employment opportunities, such as service commercial and industrial businesses, retail shops, and restaurants. Of the 204 residential units, 17 of the units are proposed to be restricted for low-income households, and three units to moderate income households. Thus, the Project would promote fair housing access and equity by offering low- and moderate-income units within the City with access to important resources and amenities.
36. Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities	Consistent. Located within an established urban setting and fronting two public streets, the Project site benefits from strong connectivity to local and regional transit options, as well as access to an existing network of sidewalks, bike lanes, and nearby neighborhood-serving amenities. The Project's location and design promote active transportation and reduce reliance on personal vehicles by placing residents within convenient walking or biking distance of transit stops, employment opportunities, and commercial

Table 4.8-2 SCAG RTP/SCS Goal Consistency Analysis

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
	services. This fosters daily mobility without the need for single-occupancy vehicle use, contributing to reduced vehicle miles traveled (VMT) and lower greenhouse gas emissions. By increasing residential density in a well-connected, walkable area, the project also supports the development of a more resilient community—one that is better able to adapt to climate change impacts, economic shifts, and emergency response needs. The infill nature of the project avoids sprawl, maximizes the use of existing infrastructure, and strengthens the urban fabric.
37. Support local, regional, state, and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region	Consistent. The Project includes a total of 204 multi-family residential apartment units, of which 17 units would be restricted to low-income households and three units to moderate-income households. The Project's provision of 20 affordable housing on the site would assist the City in meeting its regional housing needs allocation for low-income housing.
15-Minute Communities	
42. Promote 15-minute communities as places with a mix of complementary land uses and accessible mobility options that align with and support the diversity of places (or communities) across the region. These are communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses	Consistent. The Project consists of a proposed mixed-use building that would include 204 multi-family residential dwelling units. The surrounding context is fully built out with a mix of urban uses, including residential, commercial, and light industrial uses. The Project's location in an urbanized setting would assist the City in promoting 15-minute communities because it is sited within close proximity to a range of daily necessities, including those in Old Town Monrovia which can be accessed within a 15-minute walk or bike ride, and many other destinations can be reached by a short transit trip. By increasing residential density in an area already supported by robust multimodal infrastructure, including sidewalks, bike lanes, and nearby public transit routes, the Project reduces the need for long-distance travel and supports shorter, more efficient trips. This not only helps to lower vehicle miles traveled (VMT) and greenhouse gas emissions but also enhances community resilience and quality of life by supporting active living and reducing transportation costs for residents.
Environment	
Sustainable Development	
48. Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption, and promote resilience	Consistent. As presented throughout this EIR, the Project's impacts to the environment would be less than significant or would be reduced to less than significant with the implementation of mitigation measures. Additionally, as explained in the analysis presented in EIR Subsection 4.4, *Energy*, with mandatory compliance with applicable federal

Table 4.8-2 SCAG RTP/SCS Goal Consistency Analysis

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
	and State regulations and requirements, including the provisions of the CALGreen Code, Project construction and operation would promote a sustainable development and utilize best practices to support energy and water conservation efforts to reduce the consumption of these resources. The CALGreen Code addresses requirements related to water conservation, energy conservation, bicycle parking, EV charging, PV solar systems, and building energy efficiency systems, such as insulation and HVAC units. All of these items would be addressed in the Project's construction design, including the installation of a rooftop PV solar system to provide on-site renewable energy generation.
Air Quality	
51. Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts	Consistent. The infill nature of the Project minimizes air pollutant and GHG emissions by avoiding greenfield development and leveraging existing infrastructure and public services, which contributes to more sustainable regional growth. The Project also promotes multimodal transportation options, including walking, biking, and public transit use—further reducing transportation-related emissions, one of the largest contributors to regional air pollution and GHGs.
52. Support investments that reduce hazardous air pollutants and greenhouse gas emissions	Consistent. By locating the Project in a transit-accessible, walkable urban location, the Project supports regional goals to reduce vehicle dependency and associated air pollutant emissions—key contributors to poor air quality and climate change. The Project represents a targeted investment in sustainable land use and transportation integration by promoting higher-density housing in proximity to jobs, services, and public transit. This encourages residents to choose lower-emission travel modes, resulting in fewer and shorter vehicle trips and reduced mobile-source pollution.
53. Reduce the exposure and impacts of emissions and pollutants and promote local and regional efforts that improve air quality for vulnerable populations, including but not limited to Priority Equity Communities and the AB 617 Communities	Consistent. The Project site is not located within a AB 617 Community but its Census Tract is considered a disadvantaged community because it is ranked by the State as being in the 98th percentile for pollution burden according to the Office of Environmental Health Hazard Assessment (OEHHA). As evaluated in EIR Subsections 4.2, *Air Quality*, and 4.6, *Greenhouse Gas Emissions*, the Project would be required to comply with applicable provisions of Title 24, including energy efficiency standards contained in the CALGreen Code, which reduce air pollutants and GHG emissions by lowering the Project's fossil fuel demand. The Project's design includes a rooftop

Table 4.8-2 SCAG RTP/SCS Goal Consistency Analysis

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
	PV solar system to provide renewable energy generation on-site and includes design features, such as ADA accessible sidewalks and short-term and long-term bicycle parking spaces, to promote non-vehicular forms of transportation, including pedestrian, bicycle, and accessibility to transit. The Project would result in less-than-significant impacts related to air quality, including hazardous air pollutants, and GHG emissions.

(SCAG, 2024, pp. 114-121)

D. Conclusion

Based on the analysis above, the Project would not 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, and no impacts would occur.

4.8.5 Cumulative Impact Analysis

Under existing conditions, the Project site and the surrounding area are fully developed with urban land uses. The Project's proposed residential and commercial uses and common amenity spaces would be a continuation of the existing and planned development patterns to the north, east, and south of the Project site. No cumulative development projects are proposed immediately adjacent to the Project site or in close enough proximity to affect the land use development pattern within 0.25 miles of the site, with the nearest cumulative project being located south of West Huntington Drive. With implementation of the Project, sidewalk connections along the Project site's frontages with South Myrtle Avenue and West Olive Avenue would be improved and maintained and would continue to afford multi-modal public access in the local area. Therefore, implementation of the Project would not physically divide any existing, surrounding community and would not cause or cumulatively contribute to the division of an established community. Accordingly, cumulative impacts would be less than significant.

As indicated under the analysis of Threshold (b), with approval of the Project's GPA, the Project would be fully consistent with the General Plan land use designations applied to the Project site. In addition, the Project would not conflict with any of the policies included in the City of Monrovia General Plan and the 2024-2050 RTP/SCS. Other developments within the region, including the cumulative development projects, similarly would be required to demonstrate compliance with the City's General Plan and the 2024-2050 RTP/SCS. Thus, cumulative impacts due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant.

4.8.6 Significance of Impacts Before Mitigation

Threshold a.: No Impact. The Project would not physically divide an established community; no impact would occur.

Threshold b.: No Impact. Although the Project proposes to change the General Plan land use designation and the zoning classification of the Project site, if approved, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including the City of Monrovia General Plan and the 2024-2050 RTP/SCS. Accordingly, no impact would occur.

4.8.7 Mitigation

No impacts would occur; therefore, mitigation is not required.

4.8.8 Design Features (DF) and Regulatory Requirements (RR)

Refer to AES DF-1 and AES RR-1 and AES RR-2 in Subsection 4.1, *Aesthetics*, AQ RR-1 through AQ RR-6 in Subsection 4.2, *Air Quality*, ENERGY DF-1 and ENERGY RR-1 through ENERGY RR-3 in Subsection 4.4, *Energy*, and NOISE RR-1 in Subsection 4.9, *Noise*, for a list of design features and regulatory requirements that are also applicable to ensuring that the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.9 NOISE

The analysis in this subsection addresses the environmental issue of noise. The information in this subsection is based in part on a technical report prepared by Urban Crossroads, Inc. (herein, "UXR"), titled "701 S. Myrtle Avenue Noise Analysis" (herein, "NA"), dated May 15, 2025, and included as *Technical Appendix I* to this EIR (UXR, 2025d). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.9.1 NOISE FUNDAMENTALS

Noise is simply 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 is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. Figure 4.9-1, *Typical Noise Levels*, presents a summary of the typical noise levels and their subjective loudness and effects that are described in more detail below (UXR, 2025d, p. 7).

Figure 4.9-1 Typical Noise Levels

COMMON OUTDOOR ACTIVITIES	COMMON INDOOR ACTIVITIES	A - WEIGHTED SOUND LEVEL dBA	SUBJECTIVE LOUDNESS	EFFECTS OF NOISE
THRESHOLD OF PAIN		140	INTOLERABLE OR DEAFENING	HEARING LOSS
NEAR JET ENGINE		130		
		120		
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110		
LOUD AUTO HORN		100	VERY NOISY	
GAS LAWN MOWER AT 1m (3 ft)		90		
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80		SPEECH INTERFERENCE
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	LOUD	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60		
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	MODERATE	SLEEP DISTURBANCE
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		
QUIET SUBURBAN NIGHTTIME	LIBRARY	30	FAINT	NO EFFECT
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20		
	BROADCAST/RECORDING STUDIO	10	VERY FAINT	
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0		

Source: Environmental Protection Agency Office of Noise Abatement and Control, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety (EPA/ONAC 550/9-74-004) March 1974.
(UXR, 2025d, Exhibit 2-A)

A. Range of Noise

The human ear can detect a large range of intensities; as such, the scale most frequently used to measure intensity is based on multiples of 10, the logarithmic decibel scale. Each interval of 10 decibels indicates a

sound energy ten times greater than before, which is perceived by the human ear as being roughly twice as loud. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at three feet is roughly at 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 100 feet, which can cause serious discomfort. Another important aspect of noise is the duration of the sound and the way it is described and distributed in time (UXR, 2025d, pp. 7-8).

B. Noise Descriptors

Environmental noise descriptors are generally based on averages, rather than instantaneous, noise levels. The most commonly used figure is the equivalent sound level (L_{eq}). Equivalent sound levels are not measured directly but are calculated from sound pressure levels typically measured in dBA. The L_{eq} represents a steady-state sound level containing the same total energy as a time varying signal over a given sample period and is commonly used to describe the "average" noise levels within the environment (UXR, 2025d, p. 8).

To describe the time-varying character of environmental noise, the statistical or percentile noise descriptors L_{50}, L_{25}, L_8 and L_2, are commonly used. The percentile noise descriptors are the noise levels equaled or exceeded during 50 percent, 25 percent, 8 percent, and 2 percent of a stated time. Sound levels associated with the L_2 and L_8 typically describe transient or short-term events, while levels associated with the L_{50} describe the steady state (or median) noise conditions. While the L_{50} describes the median noise levels occurring 50 percent of the time, the L_{eq} accounts for the total energy (average) observed for the entire hour. Therefore, the L_{eq} noise descriptor generally is 1 to 2 dBA higher than the L_{50} noise level (UXR, 2025d, p. 8).

While useful, peak hour or average noise levels do not completely describe a given noise environment. Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of 5 decibels to dBA L_{eq} sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA L_{eq} sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise sensitive time periods during the evening and night hours when sound appears louder. CNEL does not represent the actual sound level heard at any time but, rather, represents the total sound exposure. The City of Monrovia relies on the 24-hour CNEL level to assess land use compatibility with transportation related noise sources (UXR, 2025d, p. 8).

C. Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The way noise reduces with distance depends on the following factors (UXR, 2025d, p. 8).

1. Geometric Spreading

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and, hence, can be treated as a

line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source (UXR, 2025d, p. 9).

2. Ground Absorption

The propagation path of noise from a highway to a receptor is usually close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation associated with geometric spreading. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is usually sufficiently accurate for distances of less than 200 feet. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receptor, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receptor such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance from a line source (UXR, 2025d, p. 9).

3. Atmospheric Effects

Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors, such as air temperature, humidity, and turbulence, can also have significant effects (UXR, 2025d, p. 9).

4. Shielding

A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Shielding by trees and other vegetation typically only has an “out of sight, out of mind” effect. That is, the perception of noise impact tends to decrease when vegetation blocks the line-of-sight to nearby residents. However, for vegetation to provide a substantial, or even noticeable, noise reduction, the vegetation area must be at least 15 feet in height, 100 feet wide, and dense enough to completely obstruct the line-of-sight between the source and the receiver. This size of vegetation may provide up to 5 dBA of noise reduction. The Federal Highway Administration (FHWA) does not consider the planting of vegetation to be a noise abatement measure (UXR, 2025d, p. 9).

D. Noise Control

Noise control is the process of obtaining an acceptable noise environment for an observation point or receptor by controlling the noise source, transmission path, receptor, or all three. This concept is known as the source-path-receptor concept. In general, noise control measures can be applied to these three elements (UXR, 2025d, p. 10).

E. Noise Barrier Attenuation

Effective noise barriers can reduce noise levels by 10 to 15 dBA, cutting the loudness of traffic noise in half. A noise barrier is most effective when placed close to the noise source or receptor. Noise barriers, however, do have limitations. For a noise barrier to work, it must be high enough and long enough to block the path of the noise source (UXR, 2025d, p. 10).

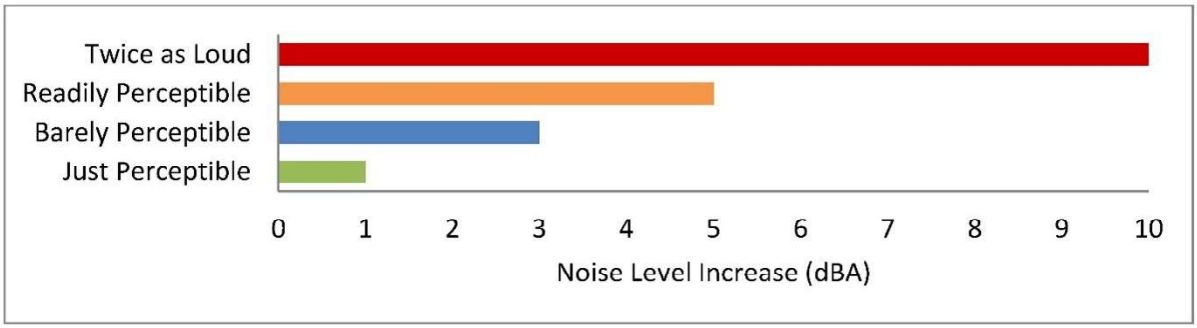
F. Land Use Compatibility with Noise

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are more sensitive to noise intrusion than commercial or industrial developments and related activities. As ambient noise levels affect the perceived amenity or livability of a development, so too can the mismanagement of noise impacts impair the economic health and growth potential of a community by reducing the area's desirability as a place to live, shop, and work. For this reason, land use compatibility with the noise environment is an important consideration in the planning and design process. The FHWA encourages State and local government to regulate land development in such a way that noise-sensitive land uses are either prohibited from being located adjacent to a highway or that the developments are planned, designed, and constructed in such a way that noise impacts are minimized (UXR, 2025d, p. 10).

G. Community Response to Noise

Approximately 16 percent of the population has a very low tolerance for noise and will object to any noise not of their making. Consequently, even in the quietest environment, some complaints may occur. Twenty to 30 percent of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to any given noise environment. Surveys have shown that community response to noise varies from no reaction to vigorous action for newly introduced noises averaging from 10 dB below existing to 25 dB above existing. According to research originally published in the Noise Effects Handbook, the percentage of high annoyance varies from 0 percent at 45 dB or less, 10 percent around 60 dB, and increases rapidly to approximately 70 percent at approximately 85 dB or greater. Despite this variability in behavior on an individual level, the population can be expected to exhibit the responses to changes in noise levels, as shown in Figure 4.9-2, *Noise Level Increase Perception*. A change of 3 dBA is considered barely perceptible, and changes of 5 dBA are considered readily perceptible (UXR, 2025d, pp. 10-11).

Figure 4.9-2 Noise Level Increase Perception



(UXR, 2025d, Exhibit 2-B)

H. Vibration

Per the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* (Guidance Manual), vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency (UXR, 2025d, p. 11).

Additionally, in contrast to airborne noise, ground-borne vibration outdoors is not a common environmental problem, and annoyance from ground-borne vibration is almost exclusively an indoor phenomenon. Therefore, the effects of vibrations should only be evaluated at a structure and the effects of the building structure on the vibration should be considered. Wood-frame buildings, such as typical residential structures, are more easily excited by ground vibration than heavier buildings. In contrast, large masonry buildings with spread footings have a low response to ground vibration. In general, the heavier a building is, the lower the response will be to the incident vibration energy. However, all structures reduce vibration levels due to the coupling of the building to the soil (UXR, 2025d, p. 11).

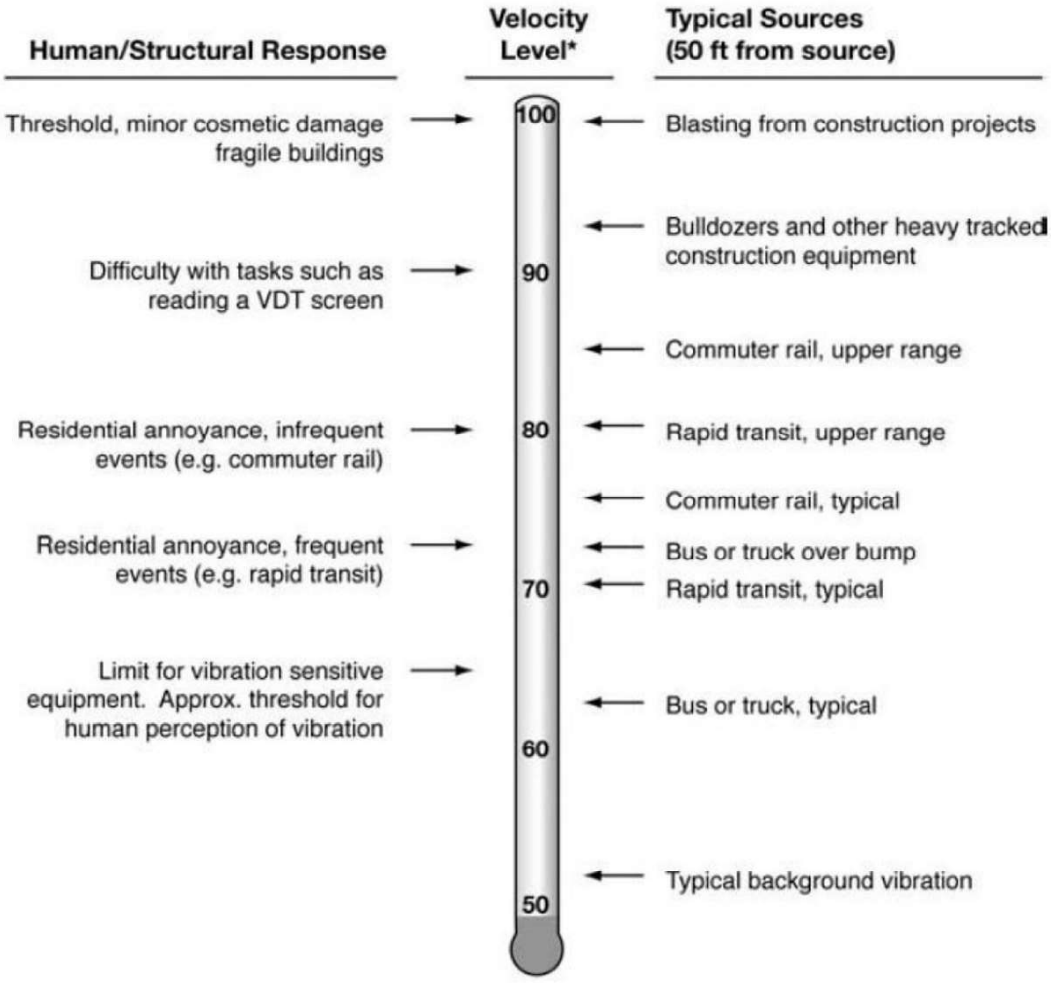
Several different methods are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. However, the RMS amplitude and PPV are related mathematically, and the RMS amplitude of equipment typically is calculated from the PPV reference level. The RMS amplitude is approximately 70 percent of the PPV. Thus, either can be used for the description of vibration impacts (UXR, 2025d, p. 11).

While not universally accepted, vibration decibel notation (VdB) is another vibration notation developed and used by the FTA in their Guidance Manual to describe vibration levels, provide a background of common vibration levels, and set vibration limits. VdB serves to reduce the range of numbers used to describe vibration levels and is used herein to describe vibration levels (UXR, 2025d, pp. 11-12).

As stated in the FTA Guidance Manual, the background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Figure 4.9-3, *Typical Levels of Ground-Borne Vibration*, illustrates common vibration sources and the human and structural response to ground-borne vibration (UXR, 2025d, p. 12).

Figure 4.9-3 Typical Levels of Ground-Borne Vibration



V*Source: Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual.*

(UXR, 2025d, Exhibit 2-C)

4.9.2 Existing Conditions

To assess the existing noise level environment, 24-hour noise level measurements were conducted at six locations in the Project study area on Wednesday, September 20, 2023. Figure 4.9-4, *Noise Measurement Locations*, shows the Project site and the noise level measurement locations. Appendix 5.1 to the Project's NA (*Technical Appendix I*) includes study area photos (UXR, 2025d, p. 19).

A. Measurement Procedures and Criteria

To describe the existing noise environment, the hourly noise levels were measured during typical weekday conditions over a 24-hour period. By conducting individual hourly noise level measurements, it is possible to describe the daytime and nighttime hourly noise levels and calculate the 24-hour CNEL. The long-term noise readings were recorded using Piccolo Type 2 integrating sound level meter and dataloggers. The Piccolo sound level meters were calibrated using a Larson-Davis calibrator, Model CAL 150. All noise meters were programmed in "slow" mode to record noise levels in "A" weighted form. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters (UXR, 2025d, p. 19).

B. Noise Measurement Locations

The long-term noise level measurements were positioned as close as possible to the nearest sensitive receiver locations to assess the existing ambient hourly noise levels surrounding the Project site. The existing noise level measurements describe the Project baseline conditions and were used to calculate the Project-related noise level contribution or increases at the nearest noise-sensitive receiver locations. Both the California Department of Transportation (Caltrans) and the FTA recognize that it is not reasonable to conduct noise level measurements that can fully represent every part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines, which indicate that "sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources." Further, the FTA Guidance Manual states "that it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community" (UXR, 2025d, p. 19).

Based on recommendations of Caltrans and the FTA, it is not necessary to conduct measurements at each individual building or residence because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent the location of noise-sensitive areas and are used to estimate the impact of future noise levels. Conducting reference ambient noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before and after Project noise levels and is necessary to assess potential noise impacts due to the Project's contribution to the ambient noise levels (UXR, 2025d, pp. 19-20).



Source(s): Urban Crossroads (06-16-2025)

Figure 4.9-4

Not to Scale

Noise Measurement Locations

C. Noise Measurement Results

The noise measurements presented below focus on average or L_{eq}. L_{eq} represents a steady-state sound level containing the same total energy as a time-varying signal over a given sample period. Table 4.9-1, *24-Hour Ambient Noise Level Measurements*, identifies the hourly daytime (7:00 a.m. to 9:00 p.m.) and nighttime (9:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. Appendix 5.2 to the Project's NA (*Technical Appendix I*) provides a summary of the existing hourly ambient noise levels. Table 4.9-1 provides the (energy average) noise levels used to describe the daytime and nighttime ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. Appendix 5.2 to the Project's NA provides summary worksheets of the noise levels for each hour, as well as the minimum, maximum, L_1, L_2, L_5, L_8, L_{25}, L_{50}, L_{90}, L_{95}, and L_{99} percentile noise levels observed during the daytime and nighttime periods. The background ambient noise levels in the Project study area are dominated by the transportation-related noise associated with nearby streets. This includes automobile and truck activities on roadway segments near the noise level measurement locations (UXR, 2025d, p. 20).

Table 4.9-1 Ambient Noise Level Measurements

Location[1]	Description	Land Use	Energy Average Noise Level (dBA L_{eq})[2]	
			Daytime	Nighttime
L1	Located South of the site near 120 W Walnut Ave	Multiple-family Residential	57.3	49.7
L2	Located East of the site near 700 S Myrtle Ave	Multiple-family Residential	62.8	57.7
L3	Located North of the site near 125 W Olive Ave	Multiple-family Residential	57.0	46.8
L4	Located Northwest of the site near 201 W Olive Ave	Single-family Residential	57.9	49.8
L5	Located West of the site near 703 S Primrose Ave	Single-family Residential	54.0	47.0
L6	Located Southwest of the site 201 W Walnut Ave	Single-family Residential	54.4	47.3

[1] See Figure 4.9-4 for the noise level measurement locations conducted on September 20, 2023.
[2] Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 4.2 of the Project's NA (*Technical Appendix I*).
"Daytime" = 7:00 a.m. to 9:00 p.m.; "Nighttime" = 9:00 p.m. to 7:00 a.m.
(UXR, 2025d, Table 4-1)

D. Sensitive Receiver Locations

Sensitive receiver locations, as shown in Figure 4.9-5, *Receiver Locations*, were identified as representative locations to describe the existing ambient noise environment and establish the baseline for the noise analysis below. Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally

considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, outpatient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals (UXR, 2025d, p. 23).

Six receiver locations in the vicinity of the Project site were identified. All distances are measured from the Project site boundary to the outdoor living areas (e.g., private backyards, front yards, side yards, or balconies) or at the building façade, whichever is closer to the Project site. Other sensitive land uses in the Project study area that are located at greater distances than those identified below and on Figure 4.9-5 would experience lower noise levels than those presented herein due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the Project boundary to each receiver location (UXR, 2025d, pp. 23-24).

- Receptor R1: Location R1 represents an existing noise-sensitive residence at 120 W Walnut Ave., approximately 235 feet south of the Project site. Receiver R1 is placed in the private outdoor living area (balcony) nearest the Project site. A 24-hour noise measurement was taken near this location, L1 (UXR, 2025d, p. 20).
- Receptor R2: Location R2 represents an existing noise-sensitive residence at 700 S Myrtle Ave., approximately 80 feet east of the Project site. Since no private outdoor living areas face the Project site, Receiver R2 is placed at the building façade nearest the Project site. A 24-hour noise measurement was taken near this location, L2 (UXR, 2025d, p. 20).
- Receptor R3: Location R3 represents an existing noise-sensitive residence at 125 W Olive Ave, approximately 85 feet north of the Project site. Receiver R3 is placed in the private outdoor living area (balcony) nearest to the Project site. A 24-hour noise measurement was taken near this location, L3 (UXR, 2025d, p. 20).
- Receptor R4: Location R4 represents an existing noise-sensitive residence at 201 W. Olive Ave., approximately 260 feet northwest of the Project site. Receiver R4 is placed in the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L4 (UXR, 2025d, p. 20).
- Receptor R5: Location R5 represents an existing noise-sensitive residence at 703 S. Primrose Ave., approximately 246 feet west of the Project site. Receiver R5 is placed in the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L5 (UXR, 2025d, p. 20).
- Receptor R6: Location R6 represents an existing noise-sensitive residence at 201 W. Walnut Ave., approximately 231 feet west of the Project site. Receiver R6 is placed in the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L6 (UXR, 2025d, p. 20).



Source(s): Urban Crossroads (06-16-2025)

Figure 4.9-5

Not to Scale

Receiver Locations

E. Airports

The Project site is located farther than two miles of an airport or airstrip and is not within an airport land use plan. The nearest airport is the San Gabriel Valley Airport, located approximately 3.9 southwest of the Project site, and the nearest major airport is the Hollywood Burbank Airport, located roughly 16 miles west of the Project site. According to information available from the Los Angeles County Airport Land Use Commission (ALUC), the 65 dBA noise contour for the San Gabriel Valley Airport extends less than 2,000 feet from the runways, thereby indicating that the Project site is not subject to airport-related noise levels(LA County ALUC, 2016, Sheet 8 of 9). Mapping from the ALUC also shows that the 65 dBA CNEL contour for the Hollywood Burbank Airport extends less than 1.25 miles from the runways, indicating that the Project site is not exposed to airport-related noise levels (LA County ALUC, 2003).

4.9.3 Regulatory Setting

The following is a brief description of the State and local environmental laws and related regulations related to noise.

A. State Regulations

1. OPR General Plan Guidelines

Though not adopted by law, the 2017 California General Plan Guidelines, published by the California Governor's Office of Planning and Research (OPR), provides guidance for local agencies in preparing or updating General Plans. The Guidelines provide direction on the required Noise Element portion of the General Plans. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. Local governments must "analyze and quantify" noise levels and the extent of noise exposure through actual measurement or the use of noise modeling. Technical data relating to mobile and point sources must be collected and synthesized into a set of noise control policies and programs that "minimizes the exposure of community residents to excessive noise." Noise level contours must be mapped and the conclusions of the element used as a basis for land use decisions. The element must include implementation measures and possible solutions to existing and foreseeable noise problems. Furthermore, the policies and standards must be sufficient to serve as a guideline for compliance with sound transmission control requirements. The noise element directly correlates to the Land Use, Circulation, and Housing Elements. The Noise Element must be used to guide decisions concerning land use and the location of new roads and transit facilities since these are common sources of excessive noise levels. The noise levels from existing land uses, including mining, agricultural, and industrial activities, must be closely analyzed to ensure compatibility, especially where residential and other sensitive receptors have encroached into areas previously occupied by these uses.

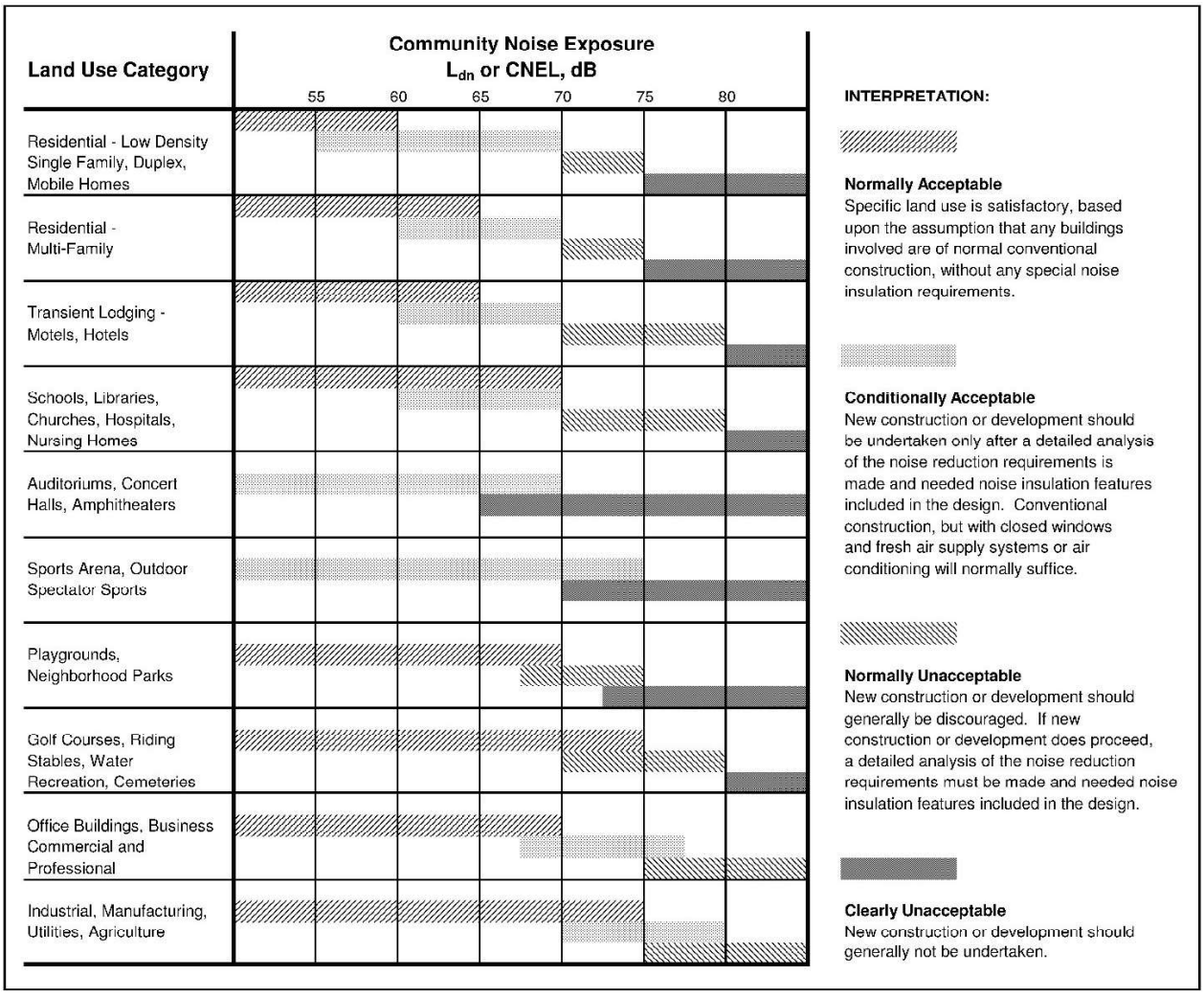
Appendix D to the OPR General Plan Guidelines also includes guidelines identifying the compatibility of various land use types with noise levels, as shown on Figure 4.9-6, *Land Use Compatibility Guidelines*. The compatibility criteria shown in Figure 4.9-6 also have been incorporated into the City of Monrovia General Plan Noise Element as Figure 2, *Land Use Compatibility Guidelines*. The Land Use Compatibility Guidelines given in Figure 4.9-6 describe categories of compatibility and not specific noise standards. The compatibility guidelines provide the City with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels and are based on consideration of the type of activity that would normally take

place for a particular land use. These include the requirements of that activity for speech communication, the typical sound insulation characteristics of buildings that might be found in these areas, and additional requirements for freedom from noise intrusions that might be imposed on other activities, such as sleep. As shown on Figure 4.9-6, the OPR General Plan Guidelines identify four categories of compatibility, each of which is described below (OPR, 2017a, pp. 131-132).

- **Normally Acceptable**. Specific land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

- **Conditionally Acceptable**. New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Figure 4.9-6 Land Use Compatibility Guidelines



(OPR, 2017a, Appendix D, Figure 2)

- **Normally Unacceptable**. New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

- **Clearly Unacceptable**. New construction or development should generally not be undertaken.

B. Local Regulations

1. City of Monrovia General Plan

The City of Monrovia General Plan Noise Element satisfies the State requirement that local General Plans contain a Noise Element. It is required that major noise sources and areas containing noise-sensitive land uses be identified and quantified by preparing generalized noise exposure contours for current and projected conditions. Contours may be prepared in terms of either the CNEL or Day-Night Average Level (L_{dn})[1], which are descriptors of total noise exposure at a given location for an annual average day. CNEL and L_{dn} are generally considered to be equivalent descriptors of the community noise environment within plus or minus 1 dB. To protect City of Monrovia residents from excessive noise, the Noise Element contains several programs. Provided below are those programs that are applicable to the proposed Project: (Monrovia, 2022d, pp. 19-20)

- Program No. 1: The City will continue to implement and enforce the City of Monrovia's noise ordinance for the control of unnecessary and unwanted noises.
- Program No. 3: The City may implement a noise zoning code, defining compatible land usage requirements based on the guidelines of Figure 2. The City would require an analysis of whether or not the proposed development would be in compliance with this code. If the development falls in the CNEL or Ldn range above that indicated for the normally acceptable category, noise control design steps must be included in the project plans.
- Program No. 6: Future projects within the City will reflect a consciousness on the part of the City regarding the reduction of unnecessary noise near noise-sensitive areas such as residences, schools, parks, hospitals, libraries, and convalescent homes.

The noise criteria identified in Figure 2 of the City of Monrovia Noise Element are guidelines to evaluate the land use compatibility of transportation related noise. The compatibility criteria, previously shown on Figure 4.9-6, provide the City with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels. The Land Use Compatibility for Guidelines matrix describes categories of compatibility and not specific noise standards. The Project's multi-family residential land use is considered *normally acceptable* with unmitigated exterior noise levels of less than 65 dBA CNEL. For *conditionally acceptable* exterior noise levels, approaching 70 dBA CNEL, *new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and the needed noise*

[1] L_{dn} is used to reflect a person's cumulative exposure to sound over a 24-hour period, with a 10-dB penalty added for noise during the nighttime hours of 10:00 p.m. to 7:00 a.m.

insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice (UXR, 2025d, p. 14).

2. City of Monrovia Municipal Code

❑ City of Monrovia Stationary Noise Standards

The City of Monrovia has set hourly average L_{eq} exterior noise limits to control unnecessary, excessive, and annoying noise in residential areas, pursuant to Monrovia Municipal Code (MMC) Chapter 9.44. Per MMC Section 9.44.040(A), no person shall create or allow the creation of noise on any residential property, which causes the noise level to exceed the actual measured median (L_{50}) base ambient noise level or the presumed ambient noise level provided in Table 4.9-2, *Monrovia Allowable Noise Levels at Residential Properties*. Pursuant to MMC Section 9.44.060, these standards cannot be exceeded by 5 dBA for a cumulative period of more than 15 minutes in any hour, or the standard plus 10 dBA for a cumulative period of more than 5 minutes in any hour, or the standard plus 15 dBA for a cumulative period of more than 1 minute in any hour, or the standard plus 20 dBA for less than one minute. Additionally, pursuant to MMC Section 9.44.070, these standards "shall be decreased by five dBA for any source of noise which emits impulsive sound." The City of Monrovia Municipal Code Noise Section is included in Appendix 3.1 to the Project's NA (*Technical Appendix I*) (UXR, 2025d, p. 14).

The percentile noise descriptors are provided to ensure that the duration of the noise source is fully considered. However, due to the relatively constant intensity of the Project operational activities, the median (L_{50}) or average (L_{eq}) noise level metrics best describe the roof-mounted air conditioning units, roof-mounted air handling unit, trash enclosure activity, and parking lot vehicle movements. In addition, the L_{eq} noise level metric accounts for noise fluctuations over time by averaging the louder and quieter events and giving more weight to the louder events. In addition, due to the mathematical relationship between the median (L_{50}) and the mean (L_{eq}), the L_{eq} will always be larger than or equal to the L_{50}. The more variable the noise becomes, the larger the L_{eq} becomes in comparison to the L_{50}. Therefore, the analysis in this subsection conservatively relies on the average L_{eq} sound level limits to describe the Project operational noise levels (UXR, 2025d, p. 16).

Table 4.9-2 Monrovia Allowable Noise Levels at Residential Properties

Receiving Land Use	Time Period	Base Ambient Noise Level (dBA L_{50})[1]	Exterior Noise Standards (dBA)[2]			
			L_{25} (15 mins)	L_8 (5 mins)	L_2 (1 min)	L_{max} (<1 min)
Residential	Daytime	55	60	65	70	75
	Nighttime	50	55	60	65	70

[1] Section 9.44.040[A] base ambient noise level of the City of Monrovia Municipal Code.
[2] Noise levels shall not exceed for the duration periods specified in Section 9.44.060 City of Monrovia Municipal Code. The percent noise level is the level exceeded "n" percent of the time during the measurement period. L_{25} is the noise level exceeded 25% of the time. "Daytime" = 7:00 a.m. to 9:00 p.m.; "Nighttime" = 9:00 p.m. to 7:00 a.m.
(UXR, 2025d, Table 3-1)

❑ City of Monrovia Construction Noise Standards

To address noise impacts associated with construction or demolition work, the City of Monrovia has established limits to the hours of operation for construction and demolition activities. MMC Section 9.44.080(F) provides that noise associated with any construction or demolition activity is considered exempt from noise limitations pursuant to MMC Chapter 9.44 between the hours of 7:00 a.m. and 7:00 p.m. during the weekdays and 9:00 a.m. and 6:00 p.m. on weekends and holidays. Neither the City's General Plan nor the MMC establishes numeric maximum acceptable construction source noise levels at potentially affected receivers for CEQA analysis purposes. Therefore, a numerical construction threshold based on the FTA Transit Noise and Vibration Impact Assessment Manual is used for the analysis of daytime construction impacts. Specifically, according to the FTA, local noise ordinances are typically not very useful in evaluating construction noise. They 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 impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA L_{eq} as a reasonable threshold for noise-sensitive residential land use (UXR, 2025d, p. 16).

4.9.4 Basis for Determining Significance

A. Significance Thresholds

According to Section XIII of Appendix G of the CEQA Guidelines, the Project would result in a potentially significant impact due to noise if the Project would:

a) *Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;*

b) *Result in the generation of excessive ground-borne vibration or noise levels; or*

c) *For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within `two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.*

B. Determination of Significance Methodology

1. Noise Level Increases

Noise level increases resulting from the Project are evaluated based on Appendix G of the CEQA Guidelines described above at the closest sensitive receiver locations. Under CEQA, consideration must be given to the magnitude of the increase, the existing baseline ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes that there is no single noise increase that renders the noise impact significant. This is primarily

because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted – the so-called ambient environment (UXR, 2025d, p. 27).

In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will typically be perceived. The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that consider the ambient noise level. The FICON recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (CNEL) and equivalent continuous noise level (L_{eq}) (UXR, 2025d, p. 27).

The FICON guidance provides an established source of criteria to assess the impacts of substantial temporary or permanent increase in baseline ambient noise levels. Based on the FICON criteria, the amount to which a given noise level increase is considered acceptable is reduced when the without Project (baseline) noise levels are already shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dBA or readily perceptible, 3 dBA or barely perceptible, and 1.5 dBA depending on the underlying without Project noise levels for noise-sensitive uses (UXR, 2025d, pp. 27-28).

2. Vibration

Since the Project does not include any substantial sources of operational vibration activities, which commonly are associated with heavy truck activities, the vibration analysis presented herein is limited to the evaluation of the vibration levels during construction of the Project. The Project's vibration-generating activities are evaluated by the thresholds of significance outlined in the FTA *Transit Noise and Vibration Impact Assessment Manual*. These guidelines identify the maximum acceptable continuous vibration building damage threshold of 0.5 PPV (in/sec) which is used in the analysis to assess the potential building damage impacts due to Project construction vibration levels.

Therefore, the FTA, *Transit Noise and Vibration Impact Assessment Manual*, construction vibration damage criteria presented below on Table 4.9-3, *FTA Ground-borne Vibration (GBV) Impact Criteria*, is used in this analysis to assess potential temporary construction-related impacts at adjacent building locations. The structural category of the buildings adjacent to the Project site can best be described as "Reinforced-concrete, steel or timber (no plaster)" with a maximum acceptable continuous vibration threshold of 0.5 PPV (in/sec).

Table 4.9-3 Construction Vibration Damage Criteria

Building/Structural Category	PPV (in/sec)
Reinforced-concrete, steel or timber (no plaster)	0.5
Engineered concrete and masonry (no plaster)	0.3
Non-engineered timber and masonry buildings	0.2
Buildings extremely susceptible to vibration damage	0.12

Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual
(UXR, 2025d, Table 3-2)

3. Significance Criteria Summary

Noise impacts shall be considered significant if any of the following occurs as a direct result of the proposed development. Table 4.9-4, *Noise Significance Criteria Summary*, shows the significance criteria summary matrix that includes the allowable criteria used to identify potentially significant incremental noise level increases (UXR, 2025d, p. 29)

Table 4.9-4 Noise Significance Criteria Summary

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
On-Site	Noise-Sensitive[1]	See Figure 4.9-6	See Figure 4.9-6	
Off-Site	Noise-Sensitive[2]	if ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		if ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL Project increase	
		if ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase	
Operational	Residential	Noise Level Threshold[3]	55 dBA L_{eq}	50 dBA L_{eq}
		if ambient is < 60 dBA L_{eq}	≥ 5 dBA CNEL Project increase	
		if ambient is 60 - 65 dBA L_{eq}	≥ 3 dBA CNEL Project increase	
		if ambient is > 65 dBA L_{eq}	≥ 1.5 dBA CNEL Project increase	
Construction	Noise-Sensitive	Construction activity is considered exempt between the hours of 7:00 a.m. and 7:00 p.m. during the weekdays and 9:00 a.m. and 6:00 p.m. on weekends and holidays [4]		
		Noise Level Threshold[5]	80 dBA L_{eq}	n/a[6]
		Noise Level Increase	≥ 12 dBA L_{eq}	n/a[6]
		Vibration Level Threshold[5]	0.3 PPV (in/sec)	n/a[6]

[1] City of Monrovia General Plan.
[2] FICON, 1992.
[3] City of Monrovia Municipal Code, Section 9.44.040 (Appendix 3.1).
[4] City of Monrovia Municipal Code, Section 9.44.080[F] (Appendix 3.1).
[5] Federal Transit Administration, Transit Noise and Vibration Impact Assessment.
[6] n/a: "not applicable", construction activities limited to the daytime hours outlined in MMC Section 9.44.080[F]. Prior authorization from the City of Monrovia is required for any construction activities outside the daytime hours in MMC Section 9.44.080[F].
"Daytime" = 7:00 a.m. - 7:00 p.m.; "Nighttime" = 7:00 p.m. - 7:00 a.m., "PPV" = Peak Particle Velocity
(UXR, 2025d, Table 6-1)

4.9.5 METHODOLOGY FOR CALCULATING PROJECT-RELATED NOISE IMPACTS

A. Construction Noise Methodology

To describe construction noise activities, the construction noise analysis presented herein was prepared using reference construction equipment noise levels from FHWA's Roadway Construction Noise Model (RCNM), which includes a national database of construction equipment reference noise emission levels. The RCNM equipment database provides a comprehensive list of the noise generating characteristics of specific types of construction equipment. In addition, the database provides an acoustical usage factor to estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. Table 4.9-5, *Construction Reference Noise Levels*, provides a summary of the loudest equipment modeled per phase (UXR, 2025d, p. 54).

Using the reference construction equipment noise levels in Table 4.9-6 and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at the nearby sensitive receiver locations were completed for the Project. For construction noise assessment, construction equipment can be considered to operate in two modes: stationary and mobile. As defined, stationary equipment operates in a single location for one or more days at a time, with either fixed-power operation (e.g., pumps, generators, and compressors) or variable-power operation (e.g., pile drivers, rock drills, and pavement breakers). Mobile equipment moves around the construction site with power applied in a cyclic fashion, such as bulldozers, graders, and loaders. The FTA and FHWA recommend noise impacts from stationary equipment be assessed from the center of the equipment location, while noise impacts from mobile construction equipment should be assessed from the center of the equipment activity area (e.g., construction site). Thus, to assess a more realistic and reasonable worst-case construction scenario while accounting for the dynamic nature of construction activities, this Project construction noise analysis conservatively models the equipment combination with the highest reference combined level at the nearest point within the construction area (Project site boundary) to the sensitive receptor. Construction impacts are based on the highest noise level calculated at each receiver location (UXR, 2025d, p. 55).

Table 4.9-5 Construction Reference Noise Levels

Construction Stage	Reference Construction Equipment[1]	Reference Noise Level @ 50 Feet (dBA L_{max})	Highest Reference Noise Level (dBA L_{max})	Reference Power Level (dBA L_w)
Demolition	Concrete Saw	83.0	86.1	117.7
	Jack Hammer	82.0		
	Chain Saw	77.0		
Site Preparation	Dozer	78.0	82.9	114.5
	Scraper	80.0		
	Front End Loader	75.0		
Grading	Vibratory Roller	73.0	82.7	114.3
	Grader	81.0		
	Compactor (ground)	76.0		
Building Construction	Rough Terrain Forklift	79.0	82.1	113.7
	Generator	78.0		

Table 4.9-5 Construction Reference Noise Levels

	Crane	73.0		
Paving	Paver	74.0	77.8	109.4
	Dump Truck	72.0		
	Roller	73.0		
Architectural Coating	Man Lift	68.0	76.5	108.0
	Compressor (air)	74.0		
	Pickup Truck	71.0		

[1] FHWA Road Construction Noise Model, 2006.
(UXR, 2025d, Table 11-1)

B. Construction Vibration Methodology

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures, and soil type. It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. Ground-borne vibration levels resulting from typical construction activities occurring within the Project site were estimated using data published by the FTA. However, while vehicular traffic is rarely perceptible, construction has the potential to result in varying degrees of temporary ground vibration, depending on the specific construction activities and equipment used. Ground vibration levels associated with various types of construction equipment are summarized in Table 4.9-6, *Vibration Source Levels for Construction Equipment*. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential for building damage using the following vibration assessment methods defined by the FTA, as more fully described in subsection 11.8 of the Project's NA (*Technical Appendix I*) (UXR, 2025d, p. 60). The reference power levels noted in Table 4.9-6 are the sound power levels of equipment or activities used in the analysis modeling to calculate the sound pressure levels (i.e., L_{eq}). While sound pressure levels (e.g., L_{eq}) quantify in decibels the intensity of given sound sources at a reference distance, sound power levels (L_w) are connected to the sound source and are independent of distance. Sound pressure levels vary substantially with distance from the source and diminish because of intervening obstacles and barriers, air absorption, wind, and other factors.

Table 4.9-6 Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Vibratory Roller	0.210

(UXR, 2025d, Table 11-6)

C. Operational Noise Methodology

The following is a summary of the methodology used to evaluate Project-related operational noise impacts. Refer to Section 10 of the Project's NA (*Technical Appendix I*) for a complete discussion of the methodology and modeling inputs and assumptions.

1. Operational Noise Sources

The Project is not expected to include any operational noise source activities that would impact existing residential land uses. Operational noise sources associated with a residential development are generally limited to Project construction and maintenance. However, to assess the potential operational noise source activities from the Project, an analysis of potential noise impacts resulting from the operation associated with the planned roof-mounted air conditioning units, roof-mounted air handling unit, trash enclosure activity, and parking lot vehicle movements was conducted. According to Section 21085 of the California Public Resources Code (PRC), noise effects on humans that are associated with "project occupants and their guests" within residential projects are not a significant impact on the environment. Consequently, the swimming pool/spa, dog park activities, and outdoor common spaces are not considered as part of this operational noise analysis. As such, for purposes of analysis herein operational noise level impacts would be limited to the roof-mounted air conditioning units, roof-mounted air handling unit, trash enclosure activity, and parking lot vehicle movements (UXR, 2025d, p. 48).

2. Reference Noise Levels

To estimate the operational noise impacts, reference noise level measurements were collected from similar types of sources to represent the noise levels expected with the development of the Project. Sound power is the acoustical energy emitted by the sound source and is an absolute value that is not affected by the environment. The reference Project operational sound power levels are summarized in Table 4.9-7, *Operational Reference Noise Levels* (UXR, 2025d, pp. 48-49).

Table 4.9-7 Operational Reference Noise Levels

Noise Source	Noise Source Height (Feet)	Min./Hour[4]		Reference Noise Level @ 50 feet (dBA L_{eq})	Sound Power Level (dBA)
		Day	Night		
Air Conditioning Units[1]	3'	45	30	44.4	76.0
Air Handling Unit[2]	3'	45	30	57.6	89.2
Trash Enclosure Activity[3]	8'	10	10	57.3	88.9
Vehicle Parking Activity[3]	5'	60	45	57.9	89.5

[1] Carrier 48VGB24 3-ton model packaged air conditioning unit, Appendix 10.1.
[2] Air-Hunt AHU 75,300 CFM, Appendix 10.2.
[3] As measured by Urban Crossroads, Inc.
[4] Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site. "Daytime" = 7:00 a.m. to 9:00 p.m.; "Nighttime" = 9:00 p.m. to 7:00 a.m.
(UXR, 2025d, Table 10-1)

❑ **Heating, Air Conditioning, and Ventilation Units**

To assess the noise levels created by the heating, air conditioning, and ventilation (HVAC) units, reference noise levels were taken from equipment specifications for a 3- to 5-ton residential packaged air conditioning unit (Carrier 24SCA5) and an air handling unit (AHU) capable of circulating air at 75,300 cubic feet per (CFM) minute. The manufacturer's specifications for the Carrier 24SCA5 are included on Appendix 10.1 of the

Project's NA, and the manufacturer's sound level ratings for the AHU are included in Appendix 10.2 of the Project's NA (*Technical Appendix I*). At a uniform reference distance of 50 feet, the Carrier 24SCA5 units would generate a reference noise level of 44.4 dBA L_{eq}. At a uniform reference distance of 50 feet, the AHU would generate a reference noise level of 52.1 dBA L_{eq}. All HVAC units were modeled 3 feet above the roof level, operating 45 minutes per hour during the daytime and 30 minutes at nighttime, which represents the typical maximum operating time for properly sized ventilation systems (UXR, 2025d, p. 50).

❑ **Trash Enclosure Activity**

To describe the noise levels associated with trash enclosure activity, a reference noise level measurement was conducted at an existing trash enclosure containing two dumpster bins. The trash enclosure noise levels describe metal gates opening and closing, metal scraping against concrete floor sounds, dumpster movement on metal wheels, and trash dropping into the metal dumpster. The reference noise levels describe trash enclosure noise activities when the trash is dropped into an empty metal dumpster, as would occur at the Project site. The measured reference noise level at the uniform 50-foot reference distance is 57.3 dBA L_{eq} for the trash enclosure activity. The reference noise level describes the expected noise source activities associated with the trash enclosures for the proposed building. Typical trash enclosure activities are estimated to occur for 10 minutes per hour (UXR, 2025d, p. 50).

❑ **Parking Lot Vehicle Movements**

To determine the noise level impacts associated with parking lot noise, Urban Crossroads collected reference noise level measurements at an existing 3-story parking garage during peak activity. The parking structure short-term noise level measurements indicate that the parking structure activity generates a noise level of 57.9 dBA L_{eq} at the uniform 50-foot reference distance. (UXR, 2025d, p. 51)

3. CadnaA Noise Prediction Model

To fully describe the exterior operational noise levels from the Project, a noise prediction model was developed using the CadnaA (Computer Aided Noise Abatement) computer program. CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict outdoor noise levels. Using the ISO 9613 protocol, CadnaA calculates the distance from each noise source to the noise receiver locations, using the ground absorption, distance, and barrier/building attenuation inputs to provide a summary of the noise level at each receiver and the partial noise level contributions by noise source. Consistent with the ISO 9613 protocol, the CadnaA noise prediction model relies on the reference sound power level (L_w) to describe individual noise sources. While sound pressure levels (e.g., L_{eq}) quantify in decibels the intensity of given sound sources at a reference distance, sound power levels (L_w) are connected to the sound source and are independent of distance. Sound pressure levels vary substantially with distance from the source and diminish because of intervening obstacles and barriers, air absorption, wind, and other factors. Sound power is the acoustical energy emitted by the sound source and is an absolute value that is not affected by the environment (UXR, 2025d, p. 37).

The operational noise level calculations provided herein account for the distance attenuation provided due to geometric spreading, when sound from a localized stationary source (i.e., a point source) propagates uniformly

outward in a spherical pattern. A default ground attenuation factor of 0.5 was used in the noise analysis to account for mixed ground representing a combination of hard and soft surfaces. Appendix 10.2 to the Project's NA (*Technical Appendix I*) includes the detailed noise model inputs used to estimate the Project operational noise levels (UXR, 2025d, p. 37).

D. Traffic-Related Noise Modeling Methodology

1. FHWA Traffic Noise Prediction Model

The estimated roadway noise impacts from vehicular traffic were calculated using a computer program that replicates the FHWA Traffic Noise Prediction Model FHWA-RD-77-108. The FHWA Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). In California, the national REMELs are substituted with the California Vehicle Noise (Calveno) Emission Levels. Adjustments are then made to the REMEL to account for the roadway classification (e.g., collector, secondary, major or arterial); 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); the travel speed; the percentages of automobiles, medium trucks, and heavy trucks in the traffic volume; the roadway grade; the angle of view (e.g., whether the roadway view is blocked); the site conditions ("hard" or "soft" relates to the absorption of the ground, pavement, or landscaping); and the percentage of total ADT which flows each hour throughout a 24-hour period (UXR, 2025d, p. 31).

2. Off-Site Traffic Noise Prediction Model Inputs

Based on the City of Monrovia General Plan Circulation Element Map, South Myrtle Avenue is classified as a collector, and West Olive Avenue is classified as a local roadway. Future average daily traffic volumes were obtained from the Project's Traffic Study (EIR *Technical Appendix J1*). The vehicle speed is based on the posted speed limits for West Olive Avenue and South Myrtle Avenue. Soft site conditions were used to analyze the traffic noise impacts within the Project study area to account for the sound propagation loss over natural surfaces, such as normal earth and ground vegetation. Research conducted by Caltrans has shown that, due to the mix of ground types in actual situations, assuming a hard site condition over-predicted traffic noise levels, and assuming soft site conditions is more appropriate for the application of the FHWA traffic noise prediction model. Table 7-2 of the Project's NA presents the time-of-day vehicle splits by vehicle type and roadway classification, and Table 7-3 of the Project's NA presents the total traffic flow distributions (vehicle mixes) used for the analysis. The vehicle mix provides the hourly distribution percentages of automobiles, medium trucks, and heavy trucks for input into the FHWA Model based on roadway types. The vehicle splits shown in Tables 7-2 and 7-3 of the Project's NA are reported as a percentage of the overall traffic (UXR, 2025d, p. 31).

Table 4.9-8, *Off-Site Roadway Parameters*, identifies the 12 off-site study area roadway segments, the distance from the centerline to the adjacent land use based on the functional roadway classifications per the City of Monrovia General Plan Circulation Element, and the posted vehicle speeds. Consistent with the Project's Focused Traffic Analysis (TA) (EIR *Technical Appendix K*), the off-site traffic noise analysis includes the following traffic scenarios: (1) Existing (2023) with Project; (2) Existing (2023) without Project; (3) Opening Year Cumulative (2027) without Project; and (4) Opening Year Cumulative (2027) with Project. The average daily traffic (ADT) volumes used for this study are presented in Table 4.9-9, *Average Daily Traffic Volumes*.

Based on the Project's TA, the Project is anticipated to generate a total of 1,238 trips per day. Table 7-2 and Table 7-3 of the Project's NA (*Technical Appendix I*) provide the time of day (daytime, evening, and nighttime) vehicle splits used for calculating CNEL values (UXR, 2025d, p. 33).[2]

Table 4.9-8 Off-Site Roadway Parameters

ID	Roadway	Segment	Classification[1]	Centerline Distance to Receiving Land Use (Feet)[2]	Vehicle Speed (mph)
1	W. Olive Ave.	w/o S. Primrose Ave.	Local	30	25
2	W. Olive Ave.	e/o S. Primrose Ave.	Local	30	25
3	W. Olive Ave.	e/o S. Myrtle Ave.	Collector	42	25
4	W. Walnut Ave.	w/o S. Primrose Ave.	Local	30	25
5	W. Walnut Ave.	e/o S. Primrose Ave.	Local	30	25
6	W. Walnut Ave.	e/o S. Myrtle Ave.	Local	30	25
7	S. Primrose Ave.	n/o W. Olive Ave.	Local	30	25
8	S. Primrose Ave.	s/o W. Olive Ave.	Local	30	25
9	S. Primrose Ave.	s/o W. Walnut Ave.	Local	30	25
10	S. Myrtle Ave.	n/o W. Olive Ave.	Collector	42	25
11	S. Myrtle Ave.	s/o W. Olive Ave.	Collector	42	25
12	S. Myrtle Ave.	s/o W. Walnut Ave.	Collector	42	25

[1] Based on a review of existing aerial imagery. Noise-sensitive uses are limited to existing residential land uses.
[2] Based upon the right-of-way distances for each roadway classification provided in the City of Monrovia General Plan Circulation Element.
(UXR, 2025d, Table 7-4)

[2] The Project's 2024 TA contained in EIR Technical Appendix J1 relied on traffic counts collected on November 2, 2023, as the baseline condition. The City released a Notice of Preparation (NOP) for the Project's Environmental Impact Report (EIR) on December 4, 2023, and as such, the traffic counts collected the month prior properly reflected the baseline existing condition for the Project's analysis under CEQA. Regardless, new counts were collected a on February 25, 2025, for informational purposes to present a comparison to the November 2, 2023 counts and to determine if the 2024 Traffic Study's conclusions would change if 2025 count data was used as the baseline condition. As demonstrated in Appendix 1 of EIR Technical Appendix J2, total daily traffic volumes are between 4% and 8% higher at the same two roadway segment count locations compared to the 2023 baseline. The differences in AM peak hour traffic ranged from 10% to 24% more traffic at the study area intersections and the differences in PM peak hour volumes ranged from 1% more traffic to 10% less traffic at the study area intersections. This means that that are more vehicles passing though the study area intersections in the morning peak hour and fewer vehicles passing though the study area intersections in the afternoon peak hour. As demonstrated in Technical Appendix J2, Urban Crossroads determined that the 2024 Traffic Study conclusions would not change if the February 25, 2025 count data was used as the baseline instead of the November 2, 2023 count data.

Table 4.9-9 Average Daily Traffic Volumes

ID	Roadway	Segment	Existing (2023)		Opening Year Cumulative (2027)	
			Without Project	With Project	Without Project	With Project
1	W. Olive Ave.	w/o S. Primrose Ave.	1,263	1,263	1,337	1,337
2	W. Olive Ave.	e/o S. Primrose Ave.	1,776	1,986	2,007	2,217
3	W. Olive Ave.	e/o S. Myrtle Ave.	1,539	1,581	1,613	1,655
4	W. Walnut Ave.	w/o S. Primrose Ave.	526	526	548	548
5	W. Walnut Ave.	e/o S. Primrose Ave.	1,460	1,460	1,519	1,519
6	W. Walnut Ave.	e/o S. Myrtle Ave.	1,184	1,184	1,232	1,232
7	S. Primrose Ave.	n/o W. Olive Ave.	4,420	4,462	4,709	4,751
8	S. Primrose Ave.	s/o W. Olive Ave.	4,170	4,338	4,407	4,575
9	S. Primrose Ave.	s/o W. Walnut Ave.	4,485	4,653	4,734	4,902
10	S. Myrtle Ave.	n/o W. Olive Ave.	8,353	8,437	9,975	10,059
11	S. Myrtle Ave.	s/o W. Olive Ave.	9,037	9,497	10,873	11,333
12	S. Myrtle Ave.	s/o W. Walnut Ave.	9,563	10,023	11,420	11,880

[1] Per the Project's Traffic Study (EIR *Technical Appendix K*)
(UXR, 2025d, Table 7-5)

4.9.6 IMPACT ANALYSIS

Threshold a.: ***Would the Project result in the 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 Project has the potential to generate elevated noise levels compared to existing conditions associated with construction activities, site operations, and Project-related traffic. Each is discussed below.

A. Construction Noise Impacts

1. On-Site Construction Activities

The following is an analysis of the potential average dBA L_{eq} impacts resulting from short-term construction activities associated with the development of the Project. Figure 4.9-5 (previously presented) shows the distance between construction noise source locations on the Project site in relation to the nearest sensitive receiver locations. MMC Section 9.44.080[F] states that construction activities are exempt from the City's noise ordinance if conducted between the hours of 7:00 a.m. to 7:00 p.m. on weekdays and 9:00 a.m. to 6:00 p.m. on weekends and holidays. Prior authorization from the City of Monrovia is required for any construction activities taking place outside the daytime hours specified in the MMC Section 9.4.080[F]. In addition, since the City of Monrovia has not established a numeric maximum acceptable construction source noise levels at potentially affected receivers for CEQA analysis purposes, a numerical construction threshold based on FTA *Transit Noise and Vibration Impact Assessment Manual* is used for analysis of daytime construction impacts.

The FTA considers a daytime exterior construction noise level of 80 dBA L_{eq} as a reasonable threshold for noise sensitive residential land use (UXR, 2025d, p. 54).

As shown in Table 4.9-10, *Construction Equipment Noise Level Summary*, the highest construction noise levels (during demolition) are expected to range from 62.5 to 70.9 dBA L_{eq} at the nearby receiver locations. Appendix 11.1 to the Project's NA (*Technical Appendix I*) includes the detailed CadnaA unmitigated construction noise model inputs (UXR, 2025d, p. 55).

Table 4.9-10 Construction Equipment Noise Level Summary

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})						
	Demolition	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	65.4	62.2	62.0	61.4	57.1	55.7	65.4
R2	69.8	66.6	66.4	65.8	61.5	60.1	69.8
R3	70.9	67.7	67.5	66.9	62.6	61.2	70.9
R4	62.5	59.3	59.1	58.5	54.2	52.8	62.5
R5	63.4	60.2	60.0	59.4	55.1	53.7	63.4
R6	63.3	60.1	59.9	59.3	55.0	53.6	63.3

[1] Noise receiver locations are shown on Figure 4.9-4.
[2] Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 11.1 of the Project's NA (*Technical Appendix I*).
(UXR, 2025d, Table 11-2)

To evaluate whether the Project would generate potentially significant short-term noise levels at the nearest receiver locations, a construction-related daytime noise level threshold of 80 dBA L_{eq} is used to assess the daytime construction noise level impacts. The construction noise analysis shows that noise levels at the nearest receiver locations would not exceed the reasonable daytime 80 dBA L_{eq} significance threshold during Project construction activities, as shown in Table 4.9-11, *Construction Noise Level Compliance*. Therefore, the noise impacts due to the absolute Project construction noise levels would be less than significant at all receiver locations based on this criterion.

To describe the temporary Project construction noise level contributions to the existing ambient noise environment, the Project construction noise levels were combined with the existing ambient noise levels measurements at the nearest off-site receiver locations. The difference between the combined Project-construction and ambient noise levels is used to describe the construction noise contributions. Temporary noise level increases that would be experienced at sensitive receiver locations when the Project construction-source noise is added to the ambient daytime conditions are presented in Table 4.9-12, *Daytime Construction Noise Level Increases – Unmitigated*. A temporary noise increase of 12 dBA is considered a potentially significant impact. The Project would contribute construction noise increases ranging from 5.9 to 14.1 dBA L_{eq} during the daytime hours at the nearest receiver locations. The unmitigated construction noise analysis during demolition and grading activities shows that construction noise would exceed the significance threshold of 12-dBA L_{eq} noise level increase over ambient noise levels at Receiver R3. Therefore, the construction-related temporary noise impact during grading activity would be significant.

Table 4.9-11 Construction Noise Level Compliance

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})			
	Highest Construction Noise Levels[2]	Land Use	Threshold[3]	Threshold Exceeded?[4]
R1	65.4	Residential	80	No
R2	69.8	Residential	80	No
R3	70.9	Residential	80	No
R4	62.5	Residential	80	No
R5	63.4	Residential	80	No
R6	63.3	Residential	80	No

[1] Noise receiver locations are shown on Figure 4.9-4.
[2] Highest construction noise level based on distance from the construction activity, which is measured from the Project site boundary to nearest receiver locations (Table 4.9-10).
[3] Federal Transit Administration, Transit Noise and Vibration Impact Assessment.
[4] Do the estimated Project construction noise levels exceed the construction noise level threshold?
(UXR, 2025d, Table 11-3)

Table 4.9-12 Daytime Construction Noise Level Increases – Unmitigated

Receiver Location[1]	Total Project Construction Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria	Increase Criteria Exceeded?
R1	65.4	L1	57.3	66.0	8.7	12	No
R2	69.8	L2	62.8	70.6	7.8	12	No
R3	70.9	L3	57.0	71.1	14.1	12	**Yes**
R4	62.5	L4	57.9	63.8	5.9	12	No
R5	63.4	L5	54.0	63.9	9.9	12	No
R6	63.3	L6	54.4	63.8	9.4	12	No

[1] Construction noise source and receiver locations are shown in Figure 4.9-4.
[2] Total Project daytime construction noise levels as shown in Table 4.9-10.
[3] Reference noise level measurement locations as shown in Figure 4.9-5.
[4] Observed daytime ambient noise levels as shown in Table 4.9-1.
[5] Represents the combined ambient conditions plus the Project construction activities.
[6] The noise level increase expected with the addition of the proposed Project construction activities.
(UXR, 2025d, Table 11-4)

2. Off-Site Construction Activities

Construction truck trips would occur throughout the construction period and would be associated with hauling soil from the Project site and delivering building materials, supplies, and concrete. Based on the EIR *Technical Appendix C*, construction traffic is estimated to generate a maximum of approximately 40 worker vehicle trips, four vendor trips, and approximately 57 haul truck trips per day during the grading phase. While building construction would have a greater number of total trips, there would be no haul trucks associated with building construction. Trucks generate substantially greater noise levels than passenger cars; thus, grading is considered

the worst-case from a noise assessment perspective (UXR, 2025d, p. 58). Construction activities are not proposed to occur during nighttime hours

As discussed in the Project's TA (EIR *Technical Appendix J1*), Project haul trucks (e.g., trucks hauling dirt) would be required to use City-approved haul truck routes. Myrtle Avenue is a City of Monrovia designated truck route, while Olive Avenue is not a designated truck route. Therefore, it is reasonably expected that all haul truck traffic would access the site via South Myrtle Avenue, which as previously shown in Table 4.9-9, has existing ADT volumes ranging from 8,353 to 9,563. Accounting for the increase in construction traffic, including haul vehicles, the Project is anticipated to result in a short-term construction traffic noise level increase of 0.5 dBA CNEL. This increase is considered "barely perceptible," and, therefore, the noise impacts due to Project off-site construction-related traffic noise would be less than significant. Off-site traffic noise calculations are included in Appendix 11.2 to the Project's NA (*Technical Appendix I*) (UXR, 2025d, p. 59).

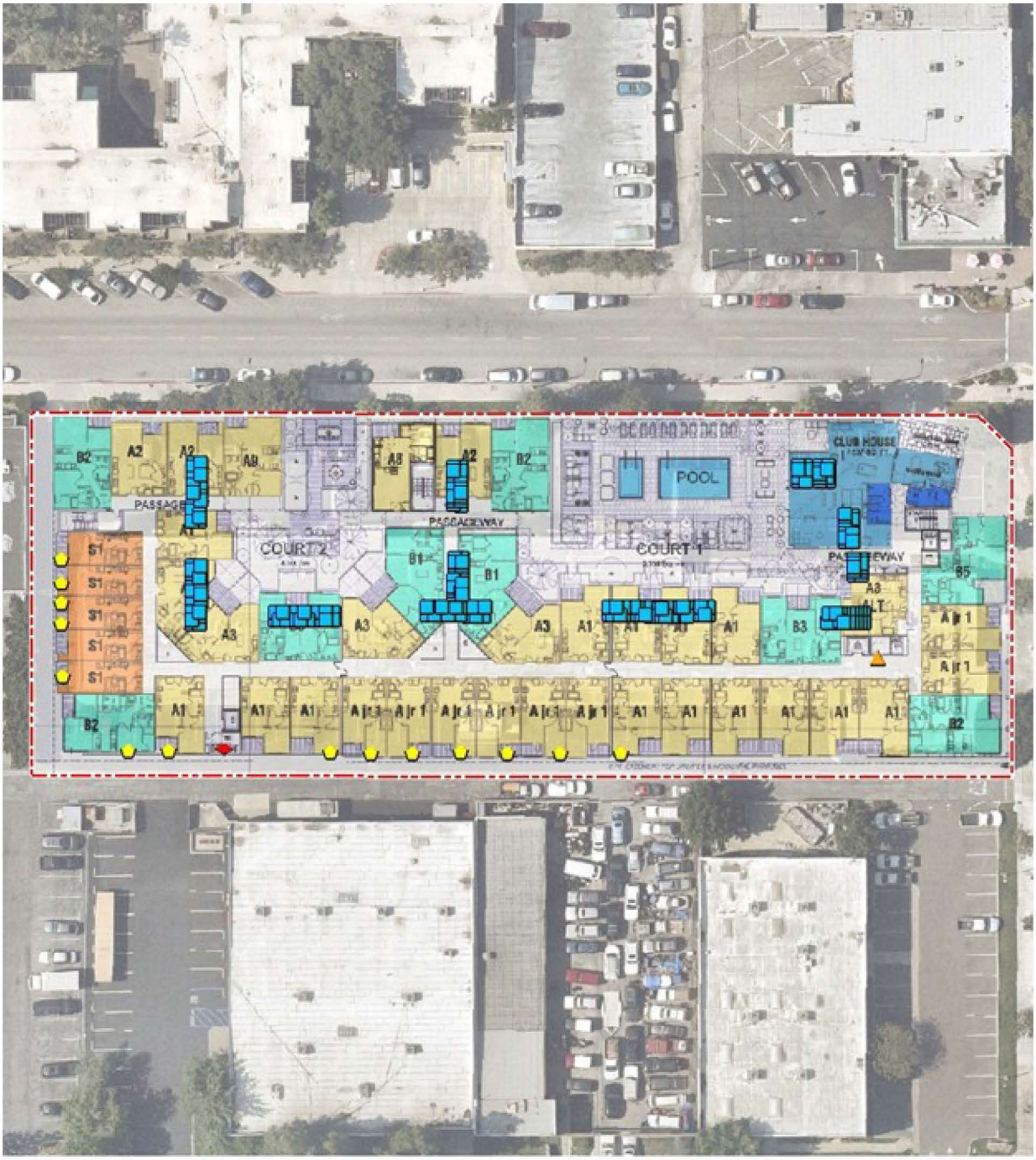
B. Operational Noise Impacts

The following is an analysis of the potential stationary-source operational noise impacts at the nearest receiver location resulting from the operation of the Project. Figure 4.9-7, *Operational Noise Source Locations*, identifies the representative noise source locations used to assess the operational noise levels. This subsection analyzes the potential operational noise impacts resulting from the operation of the Project's roof-mounted air conditioning units, roof-mounted air handling unit, trash enclosure activity, and parking lot vehicle movements.

1. Project Operational Noise Levels

Using the reference noise levels in Table 4.9-7 to represent the Project operations that include roof-mounted air conditioning units, roof-mounted air handling units, trash enclosure activity, and parking lot vehicle movements, the operational source noise levels that are expected to be generated at the Project site and the Project-related noise level increases that would be experienced at each of the sensitive receiver locations were calculated. Table 4.9-13, *Project Operational Noise Level Compliance*, shows the Project's daytime operational noise levels. The hourly noise levels at the off-site receiver locations are expected to range from 44.0 to 49.3 dBA L_{eq}. Appendix 10.2 to the Project's NA (*Technical Appendix I*) includes the detailed noise model inputs used to estimate the Project daytime operational noise levels. As shown in Table 4.9-13, the Project's daytime operational noise levels would not exceed the noise level standard of 55.0 dBA L_{eq} at any one of the off-site receiver locations.

Table 4.9-13 also shows the Project operational noise levels during the nighttime hours. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 42.3 to 48.0 dBA L_{eq}. Appendix 10.2 to the Project's NA (*Technical Appendix I*) includes detailed noise model inputs including the existing perimeter walls used to estimate the Project's nighttime operational noise levels. As shown in Table 4.9-13, the Project's nighttime operational noise levels would not exceed the noise level standard of 50.0 dBA L_{eq} at any one of the off-site receiver locations.



Source(s): Urban Crossroads (06-16-2025)

Figure 4.9-7

Not to Scale

Operational Noise Source Locations

Table 4.9-13 Project Operational Noise Level Compliance

Receiver Location[1]	Project Operational Noise Levels (dBA L_{eq})[2]		Noise Level Standards (dBA L_{eq})[3]		Noise Level Standards Exceeded?[4]	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	49.3	48.0	55	50	No	No
R2	47.0	45.4	55	50	No	No
R3	44.0	42.3	55	50	No	No
R4	45.2	43.8	55	50	No	No
R5	47.4	46.1	55	50	No	No
R6	48.2	46.9	55	50	No	No

[1] See Exhibit 5-A for the receiver locations.
[2] Project operational noise level calculations included in Appendix 10.1 of the Project's NA (*Technical Appendix I*).
[3] City of Monrovia Municipal Code, Section 9.44.040 (Appendix 3.1 of the Project's NA)
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:00 a.m. to 9:00 p.m.; "Nighttime" = 9:00 p.m. to 7:00 a.m.
(UXR, 2025d, Table 10-4)

2. Project Operational Noise Level Increases

To describe the Project operational noise level increases experienced by off-site receivers, the Project operational noise levels are combined with the existing ambient noise level measurements for the nearest receiver locations potentially impacted by Project operational noise sources. Since the units used to measure noise, decibels (dB), are logarithmic units, the Project-operational and existing ambient noise levels cannot be combined using standard arithmetic equations. Instead, they must be logarithmically added using the equation presented in Subsection 10.6 of the Project's NA (*Technical Appendix I*). The difference between the combined Project and ambient noise levels describes the Project noise level increases to the existing ambient noise environment. Noise levels that would be experienced at receiver locations when Project-source noise is added to the daytime and nighttime ambient conditions are presented in Table 4.9-14, *Daytime Project Operational Noise Level Increases*, and Table 4.9-15, *Nighttime Project Operational Noise Level Increases*.

As shown in Table 4.9-14, the Project will generate a daytime operational noise increase ranging from 0.1 to 0.9 dBA L_{eq} levels at the existing off-site receiver location. Table 4.9-15 shows that the Project will generate a nighttime operational noise increase ranging from 0.2 to 2.8 dBA L_{eq} at the existing off-site receiver locations. Based on the operational noise level increase significance criteria presented in Table 4.9-4, the Project-related operational noise level increases would not exceed the operational noise level increase criteria at the nearest sensitive receiver locations. Therefore, the Project's daytime and nighttime operational noise level increases would be less than significant (UXR, 2025d, p. 52).

Table 4.9-14 Daytime Project Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level (dBA L_{eq})[2]	Measurement Location[3]	Reference Ambient Noise Levels (dBA L_{eq})[4]	Combined Project and Ambient (dBA L_{eq})[5]	Project Increase[6]	Increase Criteria	Increase Criteria Exceeded?
R1	49.3	L1	57.3	57.9	0.6	5.0	No
R2	47.0	L2	62.8	62.9	0.1	3.0	No
R3	44.0	L3	57.0	57.2	0.2	5.0	No
R4	45.2	L4	57.9	58.1	0.2	5.0	No
R5	47.4	L5	54.0	54.9	0.9	5.0	No
R6	48.2	L6	54.4	55.3	0.9	5.0	No

[1] See Figure 4.9-4 for the receiver locations.
[2] Project operational noise level calculations are included in Appendix 10.2 of the Project's NA (*Technical Appendix I*).
[3] Noise level measurement locations as shown on Figure 4.9-4.
[4]. Observed daytime ambient noise levels as shown in Table 4.9-1.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
(UXR, 2025d, Table 10-3)

Table 4.9-15 Nighttime Project Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level (dBA L_{eq})[2]	Measurement Location[3]	Reference Ambient Noise Levels (dBA L_{eq})[4]	Combined Project and Ambient (dBA L_{eq})[5]	Project Increase[6]	Increase Criteria	Increase Criteria Exceeded?
R1	48.0	L1	49.7	51.9	2.2	5.0	No
R2	45.4	L2	57.7	57.9	0.2	5.0	No
R3	42.3	L3	46.8	48.1	1.3	5.0	No
R4	43.8	L4	49.8	50.8	1.0	5.0	No
R5	46.1	L5	47.0	49.6	2.6	5.0	No
R6	46.9	L6	47.3	50.1	2.8	5.0	No

[1] See Figure 4.9-4 for the receiver locations.
[2] Project operational noise level calculations are included in Appendix 10.2 of the Project's NA (*Technical Appendix I*).
[3] Noise level measurement locations as shown on Figure 4.9-4.
[4]. Observed nighttime ambient noise levels as shown in Table 4.9-1.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
(UXR, 2025d, Table 10-4)

C. Off-Site Transportation Noise

The Project's NA (*Technical Appendix I*) presents a summary of the exterior dBA CNEL traffic noise levels on the surrounding roadway network without and with the addition of Project-related traffic noise. Twelve roadway segments were analyzed in each of the following scenarios: Existing (2023) without and with the Project and Opening Year Cumulative (2027) without and with the Project.

Table 4.9-16, *Existing (2023) With Project Traffic Noise Increases*, shows that the Project off-site traffic noise level increases would range from less than 0.1 to 0.5 dBA CNEL. Based on the significance criteria for off-

site traffic noise previously presented in Table 4.9-4, land uses adjacent to the study area roadway segments would experience less-than-significant noise-level increases on receiving land uses due to the Project-related traffic. Therefore, Project traffic-related noise impacts under Existing Conditions would be less than significant (UXR, 2025d, p. 45).

Table 4.9-16 Existing (2023) Without and With Project Traffic Noise Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[2]			Incremental Noise Level Increase Threshold[3]	
				No Project	With Project	Project Addition	Significance Thresholds	Exceeded?
1	W. Olive Ave.	w/o S. Primrose Ave.	Sensitive	60.2	60.2	0.0	3.0	No
2	W. Olive Ave.	e/o S. Primrose Ave.	Sensitive	61.7	62.2	0.5	3.0	No
3	W. Olive Ave.	e/o S. Myrtle Ave.	Sensitive	58.8	59.0	0.2	5.0	No
4	W. Walnut Ave.	w/o S. Primrose Ave.	Sensitive	56.4	56.4	0.0	5.0	No
5	W. Walnut Ave.	e/o S. Primrose Ave.	Sensitive	60.8	60.8	0.0	3.0	No
6	W. Walnut Ave.	e/o S. Myrtle Ave.	Sensitive	59.9	59.9	0.0	5.0	No
7	S. Primrose Ave.	n/o W. Olive Ave.	Sensitive	65.7	65.7	0.0	1.5	No
8	S. Primrose Ave.	s/o W. Olive Ave.	Sensitive	65.4	65.6	0.2	1.5	No
9	S. Primrose Ave.	s/o W. Walnut Ave.	Sensitive	65.7	65.9	0.2	1.5	No
10	S. Myrtle Ave.	n/o W. Olive Ave.	Sensitive	66.2	66.2	0.0	1.5	No
11	S. Myrtle Ave.	s/o W. Olive Ave.	Sensitive	66.5	66.7	0.2	1.5	No
12	S. Myrtle Ave.	s/o W. Walnut Ave.	Sensitive	66.8	67.0	0.2	1.5	No

[1] Based on a review of existing aerial imagery. Noise-sensitive uses are limited to existing residential land uses.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.9-4)?
(UXR, 2025d, Table 9-1)

Table 4.9-17, *Opening Year Cumulative (2027) With Project Traffic Noise* Increases, shows that the Project's contribution to future off-site traffic noise level increases would range from less than 0.1 to 0.5 dBA CNEL. Based on the significance criteria for off-site traffic noise presented in Table 4.9-4, land uses adjacent to the study area roadway segments would experience less-than-significant noise-level increases on receiving land uses due to the Project-related traffic. Therefore, Project traffic-related noise impacts under Opening Year (2027) Conditions would be less than significant (UXR, 2025d, p. 45).

Table 4.9-17 Opening Year Cumulative (2027) Without and With Project Traffic Noise Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[2]			Incremental Noise Level Increase Threshold[3]	
				No Project	With Project	Project Addition	Significance Thresholds	Exceeded?
1	W. Olive Ave.	w/o S. Primrose Ave.	Sensitive	60.5	60.5	0.0	3.0	No
2	W. Olive Ave.	e/o S. Primrose Ave.	Sensitive	62.2	62.7	0.5	3.0	No
3	W. Olive Ave.	e/o S. Myrtle Ave.	Sensitive	59.0	59.2	0.2	5.0	No
4	W. Walnut Ave.	w/o S. Primrose Ave.	Sensitive	56.6	56.6	0.0	5.0	No
5	W. Walnut Ave.	e/o S. Primrose Ave.	Sensitive	61.0	61.0	0.0	3.0	No
6	W. Walnut Ave.	e/o S. Myrtle Ave.	Sensitive	60.1	60.1	0.0	3.0	No
7	S. Primrose Ave.	n/o W. Olive Ave.	Sensitive	65.9	66.0	0.1	1.5	No
8	S. Primrose Ave.	s/o W. Olive Ave.	Sensitive	65.6	65.8	0.2	1.5	No
9	S. Primrose Ave.	s/o W. Walnut Ave.	Sensitive	65.9	66.1	0.2	1.5	No
10	S. Myrtle Ave.	n/o W. Olive Ave.	Sensitive	67.0	67.0	0.0	1.5	No
11	S. Myrtle Ave.	s/o W. Olive Ave.	Sensitive	67.3	67.5	0.2	1.5	No
12	S. Myrtle Ave.	s/o W. Walnut Ave.	Sensitive	67.5	67.7	0.2	1.5	No

[1] Based on a review of existing aerial imagery. Noise-sensitive uses are limited to existing residential land uses.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.9-4)?
(UXR, 2025d, Table 9-2)

Threshold b.: Would the Project result in the generation of excessive ground-borne vibration or noise levels?

The physical and operational characteristics of the Project indicate that there would be no reasonable potential for substantial sources of operational vibration or ground-borne noise. For example, the Project would not attract high volumes of heavy truck traffic and would not include mechanical equipment that has any reasonable potential of measurable vibration or ground-borne noise. Thus, the Project only has the potential to result in impacts due to ground-borne noise or vibration during the Project's construction phase. As previously noted, Project construction-related vibration-generating activities are evaluated using the significance threshold established by the FTA as 0.3 PPV (in/sec) at off-site receivers.

Using the vibration source level of construction equipment previously presented in Table 4.9-6, estimated vibration levels that would be experienced by nearby receptors due to the Project's construction activities have been calculated and are presented in Table 4.9-19, *Project Construction Vibration Levels*. At distances ranging from 80 to 260 feet from Project construction activities, construction vibration velocity levels are estimated to range from 0.006 to 0.037 PPV (in/sec). Based on maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec), the typical Project construction vibration levels will fall below the building damage thresholds at all the receiver locations. Therefore, recognizing that ground-borne vibration is almost never a problem outdoors, the Project-related vibration impacts are considered less than significant during typical construction activities at the Project site. (UXR, 2025d, p. 60).

Table 4.9-18 Project Construction Vibration Levels

Location[1]	Distance to Const. Activity (Feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]						Thresholds PPV (in/sec)[4]	Thresholds Exceeded?[5]
		Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Vibratory Roller	Highest Vibration Level		
R1	235'	0.000	0.001	0.003	0.003	0.007	0.007	0.3	No
R2	80'	0.001	0.006	0.013	0.016	0.037	0.037	0.3	No
R3	85'	0.000	0.006	0.012	0.014	0.033	0.033	0.3	No
R4	260'	0.000	0.001	0.002	0.003	0.006	0.006	0.3	No
R5	246'	0.000	0.001	0.002	0.003	0.007	0.007	0.3	No
R6	231'	0.000	0.001	0.003	0.003	0.007	0.007	0.3	No

[1] Construction noise source and receiver locations are shown on Figure 4.9-4.
[2] Distance from receiver building facade to Project construction boundary (Project site boundary).
[3] Based on the Vibration Source Levels of Construction Equipment (Table 4.9-6).
[4] Federal Transit Administration, Transit Noise and Vibration Impact Assessment.
[5] Does the peak vibration exceed the acceptable vibration thresholds?
"PPV" = Peak Particle Velocity
(UXR, 2025d, Table 11-7)

Threshold c.: ***For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?***

The Project does not include an airport-related component, and the Project has no potential to contribute to or cause increased airport-related noise in the local area; thus, no direct impact would occur. As previously noted, the Project site is located farther than two miles of an airport or airstrip and is not within an airport land use plan or any noise contours established by the ALUC. Accordingly, the Project would not expose people residing or working in the Project area to excessive airstrip- or airport-related noise levels, and no impact would occur.

4.9.7 Cumulative Impact Analysis

The cumulative study area for the issue of noise includes the Project vicinity, as well as areas adjacent to roadways evaluated by the Project's TA (*Technical Appendix J1*). Areas outside of the cumulative study area are too far away to be adversely impacted by noise and ground-borne vibration generated as a result of the Project.

Cumulatively-Considerable Impacts due to Substantial Temporary or Permanent Noise Increases (Threshold a.)

As previously indicated in Table 4.9-11, the highest construction noise levels (during demolition) associated with the Project at the nearest sensitive receiver locations are anticipated to range from 62.5 to 70.9 dBA L_{eq}, which are below the identified threshold of significance of 80 dBA L_{eq}. However, the Project would contribute construction noise increases ranging from 5.9 to 14.1 dBA L_{eq} during the daytime hours during demolition and

grading at the nearest receiver locations, which would exceed the 12-dBA L_{eq} noise level increase significance threshold at Receiver R3, resulting in a significant direct impact. No known cumulative development projects are located within 0.25 miles of the Project site. As such, the Project has no reasonable potential to result in cumulatively significant construction noise level increases, and cumulative construction-related noise impacts would be less than significant. The Project does not entail off-site construction activities including for utility connections which are proposed to be site-adjacent.

With respect to operational noise, the Project would expose nearby sensitive receptors to daytime operational noise levels of up to 49.3 dBA L_{eq}, which are below the 55.0 dBA L_{eq} daytime noise level standard. The Project would expose nearby sensitive receptors to nighttime operational noise levels of up to 48.0 dBA L_{eq}, which are below the 50.0 dBA L_{eq} nighttime noise level standard. Moreover, as previously shown in Table 4.9-1, ambient noise levels at the nearest sensitive receptors under existing conditions range from 54.0 to 62.8 dBA L_{eq} during daytime hours and from 46.8 to 57.7 dBA L_{eq} during nighttime hours. Thus, because the Project's estimated operational noise levels would be below the ambient noise levels at the most impacted sensitive receptors, it can be concluded that the Project's operational noise, even when combined with noise from other existing and cumulative development projects, would not be cumulatively considerable to result in the exposure of any sensitive receptors to operational noise levels exceeding 55.0 dBA L_{eq} during the daytime hours or 50.0 dBA L_{eq} during the nighttime hours. Further, the Project's contribution to noise levels during the day would range from 0.1 to 0.9 and during the night would range from 0.2 to 2.8, which are well below the significance threshold of 5.0. No known cumulative development projects are located within 0.25 miles of the Project site. As such, cumulative operational-related noise impacts would be less than significant.

The Project's potential to result in cumulative impacts due to traffic-related noise previously was evaluated under Threshold a. under the discussion of Opening Year (2027) traffic noise level increases. As shown in Table 4.9-17, with the addition traffic from ambient growth and cumulative developments, the Project is calculated to result in traffic-related noise increases ranging from 0.1 dBA to 0.5 dBA CNEL, and none of the Project-related noise increases with cumulative growth would exceed the thresholds of significance previously identified in Table 4.9-4. Accordingly, cumulative traffic-related noise impacts off-site would be less than significant.

Cumulatively-Considerable Vibration Impacts (Threshold b.)

As previously shown on Table 4.9-18, at distances ranging from 80 to 260 feet from Project construction activities, construction vibration velocity levels are estimated to range from 0.006 to 0.037 PPV (in/sec) and would not exceed the maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec) established by the FTA. No known cumulative development projects are located within 0.25 miles of the Project site. As such, the Project has no reasonable potential to result contribute to any significant vibration increases, and, as such, cumulative ground-borne vibration impacts related to both building damage and human annoyance would be less than significant.

The Project does not include any substantial sources of operational vibration activities commonly associated with heavy truck activities. As such, the Project has no potential to result in cumulative impacts associated with operational vibration levels.

Cumulatively-Considerable Impacts from Airport-Related Noise (Threshold c.)

The Project does not include an airport-related component, and the Project has no potential to contribute to or cause increased airport-related noise in the local area. As such, cumulative impacts would not occur in association with airport-related noise.

4.9.8 Significance of Impacts Before Mitigation

Threshold a.: Significant Direct Impact. Project-related highest construction noise levels (during demolition) are expected to range from 62.2 to 70.9 dBA L_{eq} at the nearest sensitive receivers and would not exceed the reasonable daytime 80 dBA L_{eq} significance threshold. However, the Project would contribute construction noise increases ranging from 5.9 to 14.1 dBA L_{eq} during the daytime hours during the demolition and grading phases of construction at the nearest receiver locations, which would exceed the 12-dBA L_{eq} noise level increase significance threshold of 12.0 dBA at Receiver R3, resulting in a significant direct impact. The Project's operational noise level increases during the daytime and nighttime and the Project's traffic noise level increases would be less than significant.

Threshold b.: Less-than-Significant Impact. There is no reasonable potential for the Project to cause a significant vibration impact during Project operation because the Project does not entail the use of substantive vibration sources or activities. During the Project's construction, at receiver distances ranging from 80 to 260 feet, construction vibration levels are estimated to range from 0.006 to 0.037 PPV (in/sec) and would not exceed the maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec). As such, the Project's ground-borne vibration impacts would be less than significant.

Threshold c.: No Impact. The Project has no potential to contribute to or cause increased airport-related noise in the local area; thus, no airport-related noise impacts would occur.

4.9.9 Mitigation

The following mitigation measures address the potential for Project construction activities to impact noise-sensitive off-site receivers.

NOISE MM-1 Prior to issuance of demolition, grading or building permits, the Project Applicant shall prepare a detailed Construction Noise Management Plan (CNMP) for review and approval by the City of Monrovia. The required CNMP shall include measures that would serve to reduce the level of noise experienced at nearby residential properties to the maximum feasible extent. Measures that may be identified as part of the required CNMP include, but are not necessarily limited to, the following:

a. Construction activities should be scheduled to avoid the simultaneous operation of construction equipment so as to minimize noise levels resulting from operating several pieces of high noise level emitting equipment.

b. All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Enforcement shall be accomplished by random field inspections by

applicant personnel during construction activities, to the satisfaction of the City of Monrovia Building and Safety Division.

c. Construction noise reduction methods such as shutting off idling equipment, construction of a temporary noise barrier, maximizing the distance between construction equipment staging areas and adjacent residences, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible.

d. During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors.

e. Construction hours, allowed workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City of Monrovia receives a complaint, appropriate corrective actions shall be implemented and a report of the action provided to the reporting party.

NOISE MM-2 Noise monitoring during Project demolition and grading activities shall be required of the Project Applicant or construction contractor(s) to demonstrate that noise levels at nearby residential receptors do not exceed 80 dBA L_{eq} or an increase over ambient noise levels by 12 dBA L_{eq} or more. Should either of these exceedances occur, measures shall immediately be implemented to reduce noise levels below these performance standards. If noise levels cannot be reduced below these levels by methods outlined in the CNMP, the contractor shall install an 8-foot-high temporary noise barrier or comparable noise attenuation method at the eastern, northern, and western Project site boundary for the duration of construction activities occurring at the ground level. The noise control barrier shall include the following:

a. The noise control barriers must present a solid face from top to bottom.

b. The noise barriers shall be maintained, and any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired.

c. The temporary noise barrier shall be constructed using one of the following materials with no decorative cutouts or line-of-sight openings between shielded areas and the noise source: Masonry block; Glass (1/4-inch-thick), or other transparent material with sufficient weight per square foot; Earthen berm; Any combination of these construction materials.

4.9.10 Regulatory Requirements (RR)

NOISE RR-1 In accordance with Subsection 9.44.080 of Chapter 9.44 (Noise) of the City of Monrovia Municipal Code, all construction activities associated with the Project shall be limited to the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 6:00 p.m. on weekends and holidays.

4.9.11 Significance of Impacts After Mitigation

Threshold a.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measures NOISE MM-1 and NOISE MM-2 would ensure that construction noise abatement occurs and that a construction noise management plan is prepared and implemented as part of construction activities to reduce the Project's construction-related noise levels at nearby residential properties to less than significant. With mitigation, the resulting construction noise levels are shown below to be less than significant.

Table 4.9-19 Daytime Construction Noise Level Increases – Mitigated

Receiver Location[1]	Total Project Construction Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria	Increase Criteria Exceeded?
R1	65.4	L1	57.3	66.0	8.7	12	No
R2	69.8	L2	62.8	70.6	7.8	12	No
R3	66.0	L3	57.0	66.5	9.5	12	No
R4	60.5	L4	57.9	62.4	4.5	12	No
R5	63.3	L5	54.0	63.8	9.8	12	No
R6	63.3	L6	54.4	63.8	9.4	12	No

[1] Construction noise source and receiver locations are shown in Figure 4.9-7.
[2] Total Project daytime construction noise levels as shown in Table 4.9-12.
[3] Reference noise level measurement locations as shown in Figure 4.9-5.
[4] Observed daytime ambient noise levels as shown in Table 4.9-1.
[5] Represents the combined ambient conditions plus the Project construction activities.
[6] The noise level increase expected with the addition of the proposed Project construction activities.
(UXR, 2025d, Table 11-5)

4.10 POPULATION AND HOUSING

The analysis in this subsection discloses existing population and housing data for the City of Monrovia and assesses the potential for the Project to result in direct, indirect, or cumulative impacts on population and housing. The analysis in this subsection is based on information from the City of Monrovia General Plan and the population, employment, and housing projections published by the Southern California Association of Governments (SCAG). All references in this subsection are listed in EIR Section 7.0, *References*.

4.10.1 EXISTING CONDITIONS

A. Existing Site Conditions

Under existing conditions, the Project site is developed with a multi-tenant 25,191-s.f. commercial/industrial office building and associated parking, drive aisles, and landscaping. According to data available from SCAG, low-rise commercial office uses typically generate approximately one employee per 487 s.f. of building area (SCAG, 2001a, Table 4A). Thus, under existing conditions, the existing building on the Project site is calculated to provide approximately 52 jobs[1]. As previously described in Subsection 2.3, *Surrounding Land Use and Development*, the area surrounding the Project site is developed with a mix of commercial, industrial, and multi-family residential apartment complex uses, with most of the apartment units being on upper floors of mixed-use buildings above ground-level commercial uses. The nearest community of single-family homes is located west of South Primrose Avenue, west of the Project site.

B. Demographics

1. Regional Population, Household, and Employment Estimates

The Project site is located within the City of Monrovia, which is within the jurisdiction of the SCAG. Population projections according to SCAG's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) are shown in Table 4.10-1, *SCAG Region Projected 2020-2050 Growth Forecast*. Population within the SCAG region is expected to increase to 20,909,000 persons by 2050, reflecting an 11-percent increase in population over the 30-year period from 2020 to 2050. Over this same period, the number of households within the SCAG region is projected to increase from 6,265,000 in 2020 to 7,814,000 in 2050, representing an approximate 24.7-percent increase, while the number of jobs is anticipated to increase from 8,976,000 in 2019 to 10,276,000 in 2050, representing a 15-percent increase (SCAG, 2024, Demographics and Growth Forecast Technical Appendix, Table 12).

[1] 25,191 s.f. x 1 job/487 s.f. = 51.7 jobs

Table 4.10-1 SCAG Region Projected 2020-2050 Growth Forecast

	2020	2023[1]	2025	2030	2035	2040	2045	2050
Population	18,830,000	18,972,800	19,068,000	19,476,000	19,946,000	20,346,000	20,684,000	20,909,000
Households	6,265,000	6,485,200	6,632,000	7,006,000	7,311,000	7,538,000	7,701,000	7,814,000
Employment	8,937,000	9,115,800	9,235,000	9,581,000	9,885,000	10,097,000	10,190,000	10,276,000

1. Data for 2023 are interpolated from estimated growth reported between 2020 and 2025. Specifically, the average annual population growth between 2020 and 2025 is estimated at 47,600 persons per year; the average annual growth in households between 2020 and 2025 is estimated at 73,400 households per year; and the average annual growth in employment between 2020 and 2025 is estimated at 59,600 jobs per year. These values were multiplied by 3 to account for the three years between 2020 and 2023, and added to the data shown for 2020.

(SCAG, 2024, Demographics and Growth Forecast Technical Appendix, Table 12)

2. City of Monrovia Population, Household, and Employment Estimates

According to demographic data provided by the Demographics and Growth Forecast technical report that is included as part of the 2024-2050 RTP/SCS, and by interpolating data to estimate values for 2023 when the NOP for this EIR was released for public review thereby establishing the existing setting for purposes of CEQA compliance, Table 4.10-2, *City of Monrovia Population, Household, and Employment Forecast*, shows that the population in the City of Monrovia in 2023 is estimated at 40,986 people and is projected to increase to 46,092 people by 2050.[2] This represents an increase in the City's population of approximately 12.5 percent over the 27-year period of 2023 through 2050. Based on data compiled by SCAG, it is estimated that the City of Monrovia had 14,850 housing units in 2023, which is projected to increase to 16,700 housing units by the year 2050, representing an approximately 12.5-percent increase over the 27-year period between 2023 and 2050. Based on SCAG estimates, the City of Monrovia had a total of approximately 23,975 jobs in 2023, which is projected to increase to 24,900 jobs by 2050, representing a 3.9-percent increase over the 27-year period (SCAG, 2024, Demographics and Growth Forecast Technical Report, Table 13).

[2] Estimated future population is based on the number of households reported by Table 13 of the 2024-2050 RTP/SCS Demographics and Growth Forecast Technical Report for the City of Monrovia (16,700 households) and the average person-per-household (pph) value obtained from the United States Census Bureau of 2.76 pph; thus, the estimated future population in 2050 is 46,092 people (16,700 households x 2.76 persons/household = 46,092 persons) (USCB, 2023a; SCAG, 2024).

Table 4.10-2 City of Monrovia Population, Household, and Employment Forecast[1]

	2019	2023[3]	2035	2050
Population[1,2]	38,100	40,986	44,712	46,092
Households	14,400	14,850	16,200	16,700
Employment	23,700	23,975	24,800	24,900

1. The United States Census Bureau (USCB) reported a 2020 population in the City of Monrovia as 37,931 persons (City of Monrovia, 2024a). As the USCB-reported population is similar to SCAG's 2019 projection, SCAG's projection information is considered to be a reasonable forecast and is relied upon herein.
2. SCAG's 2024 Demographics and Growth Forecast Technical Report does not report estimated population for 2035 or 2050. Estimated population shown is based on the number of estimated households multiplied by the estimated number of persons per household (pph). As reported by USCB, the estimated number of pph in the City of Monrovia is 2.76 (USCB, 2023a).
3. Data for 2023 for households and employment are interpolated from estimated growth reported between 2019 and 2035. Specifically, the average annual growth in households between 2019 and 2035 is estimated at 112.5 households per year, and the average annual growth in employment between 2019 and 2035 is estimated at 68.75 jobs per year. These values were multiplied by 4 to account for the four years between 2019 and 2023, and added to the data shown for 2020 (SCAG, 2024, Demographics and Growth Forecast Technical Report, Table 13).

3. Jobs-Housing Ratio

The jobs-housing ratio is a general measure of the number of jobs as compared to housing in a defined geographic area, without regard to economic constraints or individual preferences. The jobs-housing ratio, as well as the type of jobs versus the price of housing, has implications for, among other things, mobility, air quality, and the distribution of tax revenues. A project's effect on the jobs-housing ratio is one indicator of how it will affect growth and quality of life in a project area. SCAG applies the jobs-housing ratio at the regional and subregional levels to analyze the fit between jobs, housing, and infrastructure. SCAG's April 2001 report titled, *The New Economy and Jobs/Housing Balance in Southern California*, states that (SCAG, 2001b):

> *. . a balance between jobs and housing in a metropolitan region can be defined as a provision of an adequate supply of housing to house workers employed in a defined area (i.e., community or subregion). Alternatively, a jobs-to-housing balance can be defined as an adequate provision of employment in a defined area that generates enough local workers to fill the housing supply.*

The concept of jobs-housing balance has been widely discussed by SCAG and the South Coast Air Quality Management District (SCAQMD) over the past few decades as a means of achieving regional air quality improvement goals. The basic concept is directed at minimizing commute distances, reducing infrastructure needs and costs, mitigating traffic congestion, conserving energy, and improving air quality. SCAG has incorporated jobs-housing balance into its growth forecast, transportation, and air quality policies. The term jobs-to-housing balance is the concept that if an area is balanced, it includes the correct number (or balance) of housing and employment opportunities so that the majority of the people living within a given subregion can also work in that same subregion. Job-rich subregions have ratios greater than the regional average, and housing-rich subregions have ratios lower than the regional average. An appropriate jobs-housing ratio for any

given geographic area is area specific, in that each locale presents differing demographic characteristics. Jobs-housing ratios also are dynamic and fluctuate over time. Generally, a ratio of less than 1 to 1 indicates a jobs-poor area, and a ratio of one or more than 1 to 1 indicates a jobs-rich area (SCAG, 2001b, p. 15).

Table 4.10-3, *Local and Regional Jobs-Housing Ratio*, provides an estimate of the existing and projected jobs-housing ratio in the SCAG region and in the City of Monrovia. As shown, in 2019 the SCAG region was estimated to have a jobs-housing ratio of 1.45, which is expected to decrease by 6.9 percent to 1.35 by 2050. As also shown in Table 4.10-3, in 2023, the City of Monrovia's jobs-housing ratio was estimated to be approximately 1.61 jobs per household, which is projected to decrease to 1.49 jobs per household by 2050. The existing and projected jobs-housing ratio for both the SCAG region and the City of Monrovia indicates that both the City and SCAG region are and would continue to be jobs-rich rather than housing-rich. In other words, there are and will continue to be disproportionately more jobs in the City of Monrovia and in the SCAG region as a whole than there are housing units.

Table 4.10-3 Local and Regional Jobs-Housing Ratio

	2023	2050	Increase/Decrease	Percent Change
SCAG Region[1]				
Jobs	9,115,800	10,276,000	+ 1,160,200	+ 12.7%
Households	6,485,200	7,814,000	+ 1,328,800	+ 20.5%
Jobs-Housing Ratio	**1.41**	**1.32**	**-0.09**	**-6.4%**
City of Monrovia[1]				
Jobs	23,975	24,900	+ 925	+ 3.9%
Households	14,850	16,700	+ 1,850	+ 12.5%
Jobs-Housing Ratio	**1.61**	**1.49**	**- 0.12**	**- 7.5%**

1. Data shown for 2023 are based on extrapolated data; refer to Table 4.10-1 for data for the SCAG region and Table 4.10-2 for data for the City of Monrovia.

(SCAG, 2024, Demographics and Growth Forecast Technical Report, Table 13)

4. Regional Housing Needs Assessment

SCAG is responsible for allocating housing needs to each jurisdiction in its region, including the City of Monrovia. A local jurisdiction's "fair share" of regional housing needs (also known as the Regional Housing Needs Allocation (RHNA)) is the number of additional housing units needed to accommodate the expected growth in the number of households and to replace expected demolitions and conversion of housing units to non-residential uses.

The allocation is divided into four income categories: very low-, low-, moderate-, and above moderate- income. Cities must also plan for the growth needs in the extremely low-income category, which is assumed to be a subset equal to 50 percent of the very low-income allocation. The RHNA allocation is not a requirement for jurisdictions to construct these units; it is only a requirement to create policies and programs to encourage the construction of units and to identify adequate sites to accommodate the jurisdiction's "fair share."

In October 2019, the State Department of Housing and Community Development (HCD) issued its final Regional Housing Need Determination to SCAG, stating that the minimum regional housing need for the six-

county region (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) is 1,341,827 new housing units. HCD then directed SCAG to develop a methodology for allocating all 1.34 million units throughout the region based on statutory guidelines for housing needs and development (HCD, 2019). This resulted in the City of Monrovia's RHNA allocation increasing from 389 units in the 5th Cycle to 1,670 units in the 6th Cycle, as shown in Table 4.10-4, *City of Monrovia Regional Housing Needs Allocation* (SCAG, n.d., p. 3; City of Monrovia, 2022b, Table 2.11).

On December 28, 2022, the City adopted its current version of the City's General Plan Housing Element to reflect the 2021-2029 RHNA allocation cycle. As shown in Table 4.10-4, the City's RHNA allocation is 1,670 housing units based on the SCAG 6th Cycle Final RHNA Allocation Plan. The City's Housing Element identifies a number of proposed and approved projects that would meet a portion of the City's RHNA allocations and a number of sites with future development potential that also could meet a portion of the City's RHNA allocations. As shown in Table 4.10-5, *City of Monrovia Projected RHNA Surplus/Shortfall*, accounting for proposed/approved developments and other site locations within the City that are capable of accommodating affordable housing, the City is expected to have a surplus in affordable housing units in all categories except for the "Low Income (51-80% AMI)" category, where the City is projected to have a shortfall of approximately 146 dwelling units.

Table 4.10-4 City of Monrovia Regional Housing Needs Allocation

Income Group	Percent of County AMI[1]	Number of Units Allocated	Percent of Total Allocation
Very Low[2]	0-50	519	31%
Low	>50-80	262	16%
Moderate	>80-120	254	15%
Above Moderate	>120	635	38%
Totals:	**--**	**1,670**	**100%**

1. AMI = Area Median Income
2. Pursuant to Assembly Bill (AB) 2634, local jurisdictions are also required to project the housing needs of extremely low-income households (0-30% AMI). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation or apportion the very low-income figure based on Census data. Monrovia's 3,360 extremely low- and very low-income households are broken down as follows: 46 percent are extremely low-income, and 54 percent are very low-income. Therefore, the City's very low-income RHNA of 519 can be split into 239 extremely low-income units and 280 very low-income units.

(SCAG, n.d., p. 3; City of Monrovia, 2022b, Table 2.11)

Table 4.10-5 City of Monrovia Projected RHNA Surplus/Shortfall

Location/Project Name	Number of Units				
	Extremely/ Very Low Income (0-50% AMI[2])	Low Income (51-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (121%+ AMI)	Total
Potential Sites (Not Proposed/Approved)					
Accessory Dwelling Units[1]	55	103	5	69	232
Site 1: 145 W. Duarte Rd.	95	0	41	0	136
Site 2: Evergreen West	137	0	58	0	195
Site 3: Evergreen East	242	0	103	0	345
Site 4: Mayflower Ave.	57	0	25	0	82
Site 5: 341 W. Duarte Rd.	25	0	10	0	35
Site 6: 429 Genoa St.	15	0	7	0	22
Site 7: 435 Genoa St.	17	0	7	0	24
Site 8: 800 S. Myrtle Ave.	85	0	36	0	121
Total Number of Units on Potential Sites:	***728***	***103***	***292***	***69***	***1,192***
Approved and Proposed Projects					
A. Avalon Monrovia	13	0	0	141	154
B. Alexan Foothills	0	0	0	436	436
C. 127 Pomona	0	13	12	207	232
D. Station Square South	0	0	0	296	296
E. Arroyo at Monrovia Station	15	0	0	287	302
F. 910 S. Ivy Ave. Townhomes	0	0	0	6	6
G. 425 W. Duarte Road	0	0	0	6	6
H. 715-721 W. Duarte Road	0	0	0	12	12
Total Number of Units from Approved & Proposed Projects:	***28***	***13***	***12***	***1,391***	***1,444***
Total Dwelling Units Accommodated:	756	116	304	1,460	2,636
City of Monrovia RHNA Allocations:	519	262	254	635	1,670
Surplus/Shortfall:	**+237**	**-146**	**+50**	**+825**	**+966**

1. Affordability for ADUs is divided according to SCAG-established and HCD-approved affordability estimates for ADUs in the Project region: 15% extremely low-income, 8.5% very low-income, 44.6% low-income, 2.1% moderate-income, and 29.8% above moderate-income.
2. AMI = Area Median Income

(City of Monrovia, 2022b, Tables 4.2 and 4.3)

4.10.2 Regulatory Setting

The following is a brief description of the State, and local environmental laws and related regulations governing environmental topics related to population and housing.

A. State and Regional Plans, Policies, and Regulations

1. State Housing Law

The State law regulating residential occupancies is entitled the "State Housing Law" and is found in California Health and Safety Code (HSC) Sections 17910 to 17998.3. Regulations implementing the State Housing Law mandate statewide residential building standards for new construction, which are found in Title 24 of the California Code of Regulations (CCR), also referred to as the California Green Building Standards (CALGreen) Code. The State Housing Law also mandates that local governments, through Council of Governments (COGs), identify existing and future housing needs in a Regional Housing Needs Assessment (RHNA). The RHNA provides recommendations and guidelines to identify housing needs within counties and cities. The City of Monrovia addresses its RHNA allocation through its General Plan Housing Element. The RHNA prepared by SCAG projects Monrovia's share of regional housing need for 2021-2029 as 1,670 dwelling units, with 519 units in the very low-income category, 262 units in the low-income category, 254 units in the moderate-income category, and 635 units in the above moderate-income category (SCAG, n.d.; SCAG, 2021; City of Monrovia, 2022b, Table 2.11) (CA Legislative Info, n.d.).

2. State Density Bonus Law

The State Density Bonus Law codified in Government Code Section 65915 to 65918 provides a mechanism that allows housing developers to increase density on a property above the maximum set under a jurisdiction's General Plan and reduce required development standards in exchange for offering to build or donate land for affordable or senior housing units. A developer who meets the requirements of the State law is entitled to receive the density bonus and other benefits as a matter of right, including up to a 50-percent increase in project densities for most projects and up to an 80-percent increase in density for project that are completely affordable (CA Legislative Info, n.d.).

3. Housing Accountability Act

California Government Code Section 65589.5, also known as the Housing Accountability Act, prohibits a local agency from disapproving, or conditioning approval in a manner that renders infeasible, a housing development project for very low-, low-, or moderate-income households or an emergency shelter unless the local agency makes specified written findings based on a preponderance of the evidence in the record. The act specifies that one way to satisfy that requirement is to make findings that the housing development project or emergency shelter is inconsistent with both the jurisdiction's zoning ordinance and general plan land use designation as specified in any element of the general plan as it existed on the date the application was deemed complete. The act requires a local agency that proposes to disapprove a housing development project that complies with applicable, objective general plan and zoning standards and criteria that were in effect at the time the application was deemed to be complete, or to approve it on the condition that it be developed at a lower density, to base its decision upon written findings supported by substantial evidence on the record that

specified conditions exist, and places the burden of proof on the local agency to that effect. The Housing Accountability Act was recently amended by the enactment of Senate Bill 330 in 2019, which also established the Housing Crisis Act of 2019 (CA Legislative Info, n.d.).

4. Sustainable Communities and Climate Protection Act (Senate Bill (SB) 375; 2008)

SB 375 of 2008 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, RHNA allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they are at least 50-percent residential, meet density requirements, and are within 0.5 miles of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences (CA Legislative Info, n.d).

5. Housing Crisis Act (Senate Bill 330; 2019 and Senate Bill 8; 2021)

On October 9, 2019, California Governor Gavin Newsom signed the Housing Crisis Act of 2019 (HCA) into law, commonly known as Senate Bill (SB) 330 (Chapter 654, Statutes of 2019) to respond to the California housing crisis. On September 16, 2021, Governor Newsom also signed SB 8 (Chapter 161, Statutes of 2021), which is an extension of the HCA. The HCA aims to increase residential unit development, protect existing housing inventory, and expedite permit processing, and applies only to "affected cities" and "affected counties." Under this legislation, municipal and county agencies are restricted in ordinances and policies that can be applied to residential development. For example, State law now prohibits a local agency from disapproving, or conditioning approval in a manner that renders infeasible, a housing development project for very low-, low-, or moderate-income households or an emergency shelter unless the local agency makes specified written findings based on a preponderance of the evidence in the record. SB 330 requires a local agency that proposes to disapprove a housing development project that complies with applicable, objective general plan and zoning standards and criteria that were in effect at the time the application was deemed to be complete, or to approve it on the condition that it be developed at a lower density, to base its decision upon written findings supported by substantial evidence on the record that specified conditions exist, and places the burden of proof on the local agency to that effect (CA Legislative Info, n.d.).

6. SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

SCAG established as an association of local governments and agencies that convene as a forum to address regional issues. In April 2024, SCAG's Regional Council adopted the 2024-2050 RTP/SCS, which is intended to create a plan for defining and solving regional problems, including housing, traffic, water, air quality, and other regional challenges. The 2024-2050 RTP/SCS builds upon the elements of existing local general plans and provides a blueprint for where and how the Southern California area will grow (SCAG, 2024).

B. City Plans, Policies, and Regulations

1. Monrovia General Plan Housing Element

The 2021-2029 certified Housing Element presents Monrovia's housing plan for the planning period and contains goals, policies, and implementation programs to maintain, preserve, improve, and develop housing for all economic segments of the community. The following goals are included in the Housing Element (City of Monrovia, 2022b):

- Goal #1: Encourage a variety of housing types to meet the existing and future needs of Monrovia residents.
- Goal #2: Assist in the development of housing that meets the needs of the Monrovia community including low- and moderate-income and special needs households.
- Goal #3: Reduce governmental constraints on the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities, while maintaining community character.
- Goal #4: Preserve and improve the quality of existing neighborhoods and existing housing, especially affordable housing. Support sustainable solutions which minimize reliance on natural resources and automobile use.
- Goal #5: Affirmatively further equal and fair access to housing opportunities for all residents.

4.10.3 Basis for Determining Significance

According to Section XIV of Appendix G to the CEQA Guidelines, the Project would result in a significant impact to population and housing if the Project would:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The methodology for evaluation of Threshold (a) considers the Project's contribution to the local housing stock, considered in context with SCAG population growth estimates and in the context of regional housing needs and the City's General Plan Housing Element. The analysis considers whether the addition of 204 residential apartment units would help meet the City's housing goals, particularly in relation to the RHNA established by SCAG and documented in the General Plan Housing Element.

The methodology for evaluation of Threshold (b) considers if the Project would displace people who could not be accommodated by existing housing and thereby trigger the need to construct new housing. If new housing

construction is triggered, the analysis would then consider whether the new housing would impact the environment.

4.10.4 Impact Analysis

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

As previously noted, under existing conditions, the Project site is occupied by an approximately 25,191-s.f. single-story multi-tenant commercial/industrial office building that is estimated to provide approximately 52 jobs. The Project entails demolition of the existing building and redevelopment of the Project site with a mixed-use multi-family residential and commercial structure that would include 204 residential apartment units and 2,370 s.f. of commercial retail space in addition to amenity spaces in the building available to residents and their guests.

Using an average of 2.5 residents per studio unit, 2.5 residents per one-bedroom unit, and 4 residents per two-bedroom unit, the Project is expected to house 556 residents.[3] This is a reasonable and conservative estimate compared to published United States Census data for the average number of persons per household in Monrovia, which for year 2022 was reported as 2.76 persons per household for all unit types including those with more than two bedrooms (USCB, 2023a). Additionally, the Project is expected to generate approximately six employees assuming one employee per 424 s.f. of commercial space[4] (SCAG, 2001, Table 4A). The Project also would eliminate approximately 52 jobs associated with the existing uses at the Project site, resulting in a net decrease of 46 job opportunities on the site and in the City. Thus, in total, the number of occupants on the Project site would change from approximately 52 employees/occupants under existing conditions to approximately 556 residents and six employees (562 total occupants) under proposed Project conditions.

The anticipated increase in the City's residential population by approximately 556 persons as a result of the Project would represent approximately 10.88 percent of the anticipated population growth within the City between 2023 and 2050[5]. Also, the Project's proposed 204 residential apartment units would represent approximately 11.0 percent of the projected number of new dwelling units anticipated in the City between 2023 and 2050[6].

The Project's anticipated increase in the City's population by approximately 556 residents and reduction in the number of employees on the site from approximately 52 to six would not comprise substantial unplanned population growth because the Project's anticipated increase in the number of occupants and in the number of

[3] The Project includes 163 studio and one-bedroom units and 37 two-bedroom units, resulting in an estimated resident population of 556 people.
[4] 2,370 s.f. ÷ 424 s.f./employee = 5.6 employees.
[5] 556 persons ÷ (46,092 persons – 40,986 persons = 5,106) x 100 = 10.88%. Refer also to Table 4.10-2.
[6] 204 dwelling units ÷ (16,700 dwelling units – 14,850 dwelling units = 1,850) x 100 = 11.03%. Refer also to Table 4.10-2.

residential dwelling units on the Project site are within the projections of growth anticipated for the City over the 2023-2050 timeframe.

Pertaining to affordable housing and as previously discussed and shown in Table 4.10-4, accounting for proposed and approved developments and other site locations within the City that are capable of accommodating affordable housing, the City is expected to have a surplus in affordable housing units in all categories except for the "Low Income (51-80% AMI)" category, where the City is projected to have a shortfall of approximately 146 dwelling units. The Project is proposing to provide 17 low-income restricted dwelling units and three moderate-income restricted dwelling units among the Project's 204 residential apartment units. Thus, the Project would provide 17 of the City's projected RHNA shortfall of 146 low-income dwelling units, which would contribute towards the City's goal of meeting its RHNA obligations per SCAG's 6th Cycle Final RHNA Allocation Plan.

As previously noted, the jobs-housing ratio is a general measure of the number of jobs versus housing in a defined geographical area and the recommended target is 1.0. As previously shown in Table 4.10-3, the City of Monrovia is "jobs rich" and, at a jobs-housing ratio of 1.61 in 2023, is currently above the target ratio of 1.0. At Project buildout, the Project would provide 204 dwelling units and would result in a net decrease of 46 jobs. Based on 2023 population and employment data (refer to Table 4.10-2), and taking into account the net reduction in the number of jobs on-site by 46, the Project would decrease the number of jobs in the City from 23,975 to 23,929 and would increase the number of dwelling units (households) in the City from 14,850 to 15,054, resulting in an improvement in the City's 2023 jobs-housing ratio from 1.61 to 1.59[7]. Thus, at Project buildout, the Project's addition of 204 dwelling units and net reduction of 46 jobs would be expected to beneficially affect the City's jobs-housing balance by providing more housing than jobs.

Therefore, the Project would not result in substantial direct unplanned population growth in the area because (1) the Project is within SCAG's growth projections for the City, (2) the Project's proposed residential units would help to meet the requirements of State Housing Law and to fulfill an existing unmet need for affordable housing, and (3) the Project improves the City's job-housing balance by developing housing in a currently jobs-rich area. Therefore, implementation of the Project would not directly result in substantial unplanned population growth, and impacts would be less than significant.

Additionally, the Project's proposed infrastructure improvements (e.g., water, sewer, storm drain, electric, gas, etc.) have been designed and sized to serve the Project and are not planned with excess capacity that could indirectly induce growth in the local area. Thus, the Project would not indirectly induce substantial unplanned population growth in the area, and impacts would be less than significant.

[7] 23,929 jobs ÷ 15,054 households = 1.5895 jobs-household ratio.

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

Under existing conditions, the Project site is developed with a 25,191-s.f. multi-tenant commercial/industrial office building. The Project would eliminate approximately 52 jobs associated with the existing uses at the Project site, and add six jobs, resulting in a net decrease of 46 job opportunities on the site. The displacement of employees to locations off the Project site has no reasonable potential to necessitate the construction of replacement housing, as the displacement of people is associated with their place of employment and not their home. There is no existing housing on the Project site; therefore, the Project would not displace housing necessitating the construction of replacement housing elsewhere. Conversely, the Project would provide 204 multi-family residential apartment units and would provide housing to accommodate demand for housing in Los Angeles County, including housing for low- and moderate-income households. Accordingly, implementation of the Project would not displace substantial numbers of people or housing and would not necessitate the construction of replacement housing elsewhere. As such, the impact would be less than significant.

4.10.5 Cumulative Impact Analysis

As previously indicated, the Project would eliminate a projected number of 52 existing jobs on the site and would introduce approximately 556 residents and six employees (563 total occupants). Based on the list of cumulative projects identified in EIR Table 4.0-1 and depicted on EIR Figure 4.0-1, Table 4.10-6, *Anticipated Population Increase from Cumulative Development*, provides an estimate of the anticipated population growth within the City as a result of the cumulative development projects analyzed in this EIR. As shown, the cumulative development projects would result in the addition of 3,710 residents and 89 jobs to the City. Based on the data presented in Table 4.10-2 and accounting for the Project's net loss of 46 jobs, the Project and other cumulative developments conservatively are anticipated to result in an increase in the number of residents in the City by approximately 4,266 residents[8] and would result in a cumulative net increase in the number of jobs within the City by approximately 43 jobs[9].

As also previously noted, and based on population forecasts included in 2024-2050 RTP/SCS Demographics and Growth Forecast Technical Appendix (refer to Table 4.10-2, previously presented), the population within the City of Monrovia is anticipated to increase by 5,106 persons between 2023 and 2050, while the number of jobs are anticipated to increase by 925 jobs over this same period (SCAG, 2024, Demographics and Growth Forecast Technical Report, Table 13). Thus, the increase of 4,266 residents as a result of the Project and other cumulative developments would represent 53.47 percent[10] of the anticipated resident growth within the City between 2023 and 2050, while the anticipated net increase of 43 jobs as a result of the Project and other cumulative developments would represent 4.6 percent[11] of the anticipated growth in the number of jobs within the City between 2023 and 2050. As such, it is concluded that the Project, even when considered in the context

[8] 556 Project residents + 3,710 cumulative project residents = 4,266 total new residents [9]
89 cumulative project jobs + (6 Project jobs – 52 existing jobs) = 43 net increase in jobs
[10] 4,266 residents ÷ 7,992 residents x 100 = 53.37%
[11] 95 jobs ÷ 1,200 jobs x 100 = 7.92%

of other cumulative development projects within the City, would not directly induce substantial unplanned population growth in the City, as the combined growth from the Project and other cumulative development projects within the City of Monrovia would be within the SCAG population forecasts for the City in 2050 in terms of population and employment projections.

With respect to the anticipated increase in the number of dwelling units, Table 4.10-6 shows that there would be an increase of 1,340 dwelling units in the City as a result of cumulative development. Including the Project's 204 dwelling units, the total number of dwelling units would increase by 1,544 dwelling units, representing approximately 83.4 percent of the anticipated increase in the number of dwelling units within the City between 2023 and 2050[12]. Thus, the cumulative increase in dwelling units within the City also would be within the SCAG projections for the City for 2050.

Table 4.10-6 Anticipated Population Increase from Cumulative Development

#	Cumulative Project Name	Land Uses	Anticipated Jobs/ Residents[1]
1	Alexan Foothills	436 du	1,203 residents
2	Arroyo at Monrovia	302 du	834 residents
		7,080 s.f. retail	17 jobs
3	Station Square South	296 du	817 residents
4	127 Pomona	310 du	856 residents
		10,000 s.f. retail	24 jobs
5	Townplace Suites Hotel	109 hotel rooms	36 jobs[2]
6	In-N-Out Restaurant	3,879 s.f. fast food w/ drive-thru	12 jobs
Total Cumulative Development Population Increase:			**3,710 Residents 89 Jobs**

1. Assumes 2.76 persons per household for residential uses, 424 s.f. per employee for retail uses, and 325 s.f. per employee for fast food with drive-thru uses (SCAG, 2001a, Tables 4A and 6A; USCB, 2023a; SCAG, 2001b).
2. Source: Initial Study/Mitigated Negative Declaration for the Monrovia Townplace Suite Project, dated June 2018, p. 4-131 (available on-line: https://www.cityofmonrovia.org/home/showpublisheddocument/18789/636712386799200000).

(UC, 2024e, Table 4-5)

In addition, Table 4.10-3, *Cumulative Increase in Jobs, Housing, and Affordable Housing*, shows the anticipated increase in the number of jobs and affordable dwelling units associated with the Project and the list of cumulative developments. As shown in Table 4.10-3, the Project and other cumulative developments would provide for 139 affordable dwelling units, including 43 Extremely/Very Low Income units, 81 Low Income units, and 15 Moderate Income units. Thus, the Project and other cumulative developments would accommodate 98 of the projected shortfall of 146 low-income dwelling units, which when combined with the extremely low-/very low-income and moderate-income dwelling units accommodated by cumulative developments, would contribute to the City's goal of meeting its RHNA obligations per SCAG's 6th Cycle Final RHNA Allocation Plan.

[12] 1,554 cumulative dwelling units ÷ 1,850 anticipated Citywide dwelling units x 100 = 83.4%.

In addition, Table 4.10-7 shows that the Project and other cumulative developments would provide for a net increase of approximately 43 jobs and approximately 1,470 housing units. Based on 2023 interpolated population and employment data (refer to Table 4.10-2), the Project and other cumulative development projects would result in a net increase the number of jobs in the City from 23,975 to 24,018 and would increase the number of dwelling units (households) in the City from 14,850 to 16,320, resulting in a cumulative reduction in the City's 2023 jobs-to-housing ratio from 1.61 to 1.47[13]. Thus, the cumulative increase in jobs and housing associated with the Project and other cumulative developments would be expected to beneficially affect the City's jobs-to-housing balance by providing more new households than jobs.

Table 4.10-7 Cumulative Increase in Jobs, Housing, and Affordable Housing

#	Cumulative Project Name	Affordability Level[1]					Jobs[2]
		Extremely/ Very Low Income (0-50% AMI)	Low Income (51-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (121%+ AMI)	Total Housing Units	
1	Alexan Foothills	--	--	--	436	436	0
2	Arroyo at Monrovia	15	0	0	287	302	17
3	Station Square South	0	0	0	296	296	0
4	127 Pomona	0	13	12	207	232	24
5	Townplace Suites Hotel	0	0	0	0	0	36
6	In-N-Out Restaurant	0	0	0	0	0	12
Total Cumulative:		**15**	**13**	**12**	**1,226**	**1,266**	**89**
Project		0	17	3	184	204	-46
Total Project + Cumulative:		**15**	**30**	**15**	**1,410**	**1,470**	**43**

1. Except where noted, data taken from City of Monrovia General Plan Housing Element, Table 4.2 (City of Monrovia, 2022b). AMI = Average Median Income.
2. Refer to Table 4.10-2 for explanation of cumulatively-considerable job increases.

For the reasons given above, the Project and the cumulative development projects would not result in adverse cumulative impacts related to substantial unplanned population growth in the area because (1) the Project and the cumulative development projects are within SCAG's growth projections for the City, (2) the planned housing from the Project and the cumulative development projects would help to meet the requirements of State Housing Law and would respond to an existing unmet need for affordable housing, and (3) the Project and the cumulative development projects would improve the City's job-housing balance by developing housing in a currently jobs-rich area. Therefore, cumulative impacts would be less than significant.

Additionally, the Project's proposed infrastructure improvements have been designed and sized to serve the Project and would not be oversized leading to potential unplanned induced growth in the local area. Based on a review of the cumulative developments, it is not anticipated that the cumulative development projects listed in Table 4.10-7 would require increased roadway capacity or installation of new infrastructure in a manner that

[13] 24,018 jobs ÷ 16,320 households = 1.47 jobs-to-household ratio

would remove obstacles that could lead to unplanned growth, and there are no components of the Project that would directly or indirectly remove obstacles to growth or that otherwise would contribute to cumulatively-considerable growth inducement. Therefore, cumulative impacts associated with direct and indirect inducement of unplanned population growth would be less than significant.

As discussed under the analysis of Threshold (b), there are no dwelling units or residents on the Project site under existing conditions. Therefore, the Project would not result in the displacement of substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere, and no cumulative impact would occur.

4.10.6 Significance of Impacts Before Mitigation

Threshold a: Less-than-Significant Impact. The Project and other cumulative development projects are within SCAG's growth projections for the City. The Project's anticipated population increase would comprise 10.88 percent of the anticipated population growth within the City between 2023 and 2050, while the Project plus cumulative developments would represent 53.37 percent of the anticipated population growth between 2023 and 2050. Additionally, the planned housing from the Project and other cumulative developments is a requirement of State Housing Law and in response to an existing unmet need for affordable housing. Furthermore, the Project's land uses would improve the City's jobs-housing ratio from 1.61 to 1.59, while the Project and other cumulative developments would improve the City's jobs-to-housing ratio from 1.61 to 1.47; thus, the addition of jobs and dwelling units from the Project and other cumulative developments would be expected to beneficially affect the City's jobs-housing balance by providing more new households than jobs. Therefore, implementation of the Project would not result in direct or cumulative substantial unplanned population growth, and impacts would be less than significant.

Threshold b: Less-than-Significant Impact. The Project site does not contain housing under existing conditions and therefore would not displace people in existing housing and would therefore not trigger the construction of replacement housing. The Project would eliminate approximately 52 jobs associated with the existing uses at the Project site, and add six jobs, resulting in a net decrease of 46 job opportunities on the site. The displacement of employees to locations off the Project has no reasonable potential to necessitate the construction of replacement housing, as the displacement of people is associated with their place of employment and not their home. As such, the impact would be less than significant.

4.10.7 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.11 Public Services

The analysis in this subsection provides information on existing public services and service levels for fire protection, police protection, schools, parks, and other public facilities and evaluates potential impacts to the environment that may result from the demand the Project may have on such services. All references used in this subsection are included in EIR Section 7.0, *References*.

4.11.1 Existing Conditions

A. Fire Protection

Fire protection services to the Project site and surrounding area are provided by Monrovia Fire and Rescue (MFR). Fire safety in the City is concentrated on suppression, prevention, and emergency care. Fire prevention is addressed primarily through enforcement of the Uniform Fire and Building Codes and State codes and City ordinances. Additionally, several other fire protection programs concentrate primarily on avoidance or impact reduction strategies. MFR has two fire stations and employs 52 personnel. The nearest fire station to the Project site is Station 101 (Headquarters) located approximately 0.2-mile northeast of the Project site at 141 East Lemon Avenue and the second fire station is located 1.1 miles south of the Project site at 2055 South Myrtle Avenue (Google Earth, 2023).

B. Police Protection

The Monrovia Police Department (MPD) provides police services to the Project site and surrounding areas. The nearest police station is located approximately 0.2 miles northeast of the Project site at 140 East Lime Avenue. MPD, which employs 80 full-time police personnel, is responsible for protecting and serving Monrovia's residents, in addition to the commuters, visitors, and daytime business population.

C. Schools

The Project site is located within the service area of the Monrovia Unified School District (MUSD), which provides Kindergarten through 12th Grade (K-12) education and includes 12 schools (MUSD, 2022, Table 1). The schools that currently serve the Project site are Monroe Elementary School, located approximately 0.3 miles northwest of the Project site at 402 West Colorado Boulevard; Santa Fe Middle School, located approximately 0.9 miles south of the Project site at 148 West Duarte Road; and Monrovia High School, located approximately 0.8 miles northwest of the Project site at 845 West Colorado Boulevard. The estimated student capacity and the 2022-2023 enrollment of these schools are shown in Table 4.11-1, *Schools Enrollment and Capacity*.

D. Library

The Monrovia Public Library is located at 321 South Myrtle Avenue, approximately 0.2 miles north of the Project site. The library is part of the Monrovia Public Services Department, which manages the Public Works and Community Services Divisions. The Community Services Division is the home of Library and Recreation Services. For the library operation specifically, there are 10 full-time and 19 part-time employees. The library is open Monday through Saturday (City of Monrovia, n.d., p. 4).

Table 4.11-1 Schools Enrollment and Capacity

School Name	School Student Capacity[1]	Student Enrollment 2022 - 2023
Monroe Elementary School	1,148	478
Santa Fe Computer Science Magnet (Middle) School	760	431
Monrovia High School	2,544	1,538

1. Student capacity data taken from the 2019 version of MUSD's Facilities Needs Assessment and utilizes the 95% utilization value for the gross capacity at each school.

(CA Dept of Education, 2023a; MUSD, 2019)

E. Parks

The City of Monrovia owns and maintains eight regional and local parks, seven of which are located within a two-mile radius of the Project site. These facilities are Library Park (a 13-acre local park located at 321 South Myrtle Avenue, approximately 0.2 miles north of the Project site); Rotary Park (a 0.9-acre local park located at 401 South California Avenue, approximately 0.3 miles northeast of the Project site); Julian Fisher Park (a 1.8-acre local park located at 915 South California and Almond Avenue, approximately 0.3 miles southeast of the Project site); Lucinda Garcia Park (a 1.5-acre local park located at 502 West Olive Avenue, approximately 0.4 miles west of the Project site), Recreation Park (a 15-acre local park located at 620 South Shamrock Avenue, approximately 0.6 miles east of the Project site); Station Square Park (a 0.5-acre local park located at 1629 South Myrtle Avenue, approximately 0.7 miles south of the Project site); Kiwanis Park at Grand Avenue is (a 3.5-acre local park located at 340 North Grand Avenue, approximately 1.1 miles northeast of the Project site); and Monrovia Canyon Park (an 80-acre park located at 1200 North Canyon Boulevard, approximately 2.2 miles northeast of the Project site).

4.11.2 Regulatory Setting

The following is a brief description of the State and local environmental laws and regulations related to public services.

A. State Plans, Policies, and Regulations

1. Fire and Police Protection Services Regulations and Plans

- California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directs the proceeds of a 0.5-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire and police protection services. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, the City is required to use Proposition 172 to supplement its local funds used on fire and police protection services, as well as other public safety services. In *City of Hayward v. Board of Trustees of*

California State University (2015) 242 Cal. App. 4th 833 (*City of Hayward*), the court found under Section 35 of Article XIII of the California Constitution that cities have "a constitutional obligation to provide adequate fire protection services."

2. School Services Regulations and Plans

❑ Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50)

The Leroy F. Greene School Facilities Act was enacted by the State Legislature in 1998, which permits the local school district to levy a fee, charge, dedication, or other requirement against any development project within its boundaries for the purpose of funding the construction or reconstruction of school facilities. The act also sets a maximum level of fees a developer may be required to pay. Pursuant to Government Code Section 65996, as amended by the Leroy F. Greene School Facilities Act, payment of fees by a developer is deemed to provide full and complete school facilities mitigation (CA Legislative Info, n.d.).

3. Parks

❑ Quimby Act, California Government Code Section 66477

The State of California's Quimby Act was established by the California Legislature for the purpose of preserving open space and providing park facilities for California's growing communities. The Quimby Act allows local agencies to establish ordinances requiring residential subdivisions to provide land or "in-lieu-of" fees for park and recreation purposes. This Quimby Act requires the dedication of land and/or imposes a requirement of fees for park and recreational purposes as a condition of approval of a tentative tract or parcel map (CA Legislative Info, n.d.).

B. Local Plans, Policies, and Regulations

1. Monrovia Municipal Code

Monrovia Municipal Code (MMC) Chapter 15.20, Fire Code, establishes the minimum requirements consistent with nationally recognized good practice for providing a reasonable level of life safety and property protection from the hazards of fire, explosions or dangerous conditions in new and existing buildings, structures and premises and to provide safety to firefighters and emergency responders during emergency operations.

Title 3 (Revenue and Finance) of the MMC establishes impact fees that are imposed on new developments in order to provide for public services throughout the City. Pursuant to MMC Chapter 3.21 (Fire Service Impact Fee), applicants for new development are required to pay a Fire Service Impact Fee as a condition of issuance of building permits. MMC Title 3 also establishes Citywide taxes to provide for certain public services and facilities.

MMC Chapter 3.32 (Dwelling Unit Tax) establishes a uniform fee to be paid to the City for the construction of any new dwelling unit in the City. Pursuant to Section 3.32.050 (Disposition of Proceeds from Tax), "[a]ll proceeds from the tax collected under this chapter shall be paid into the Project Resource Fund. Said fund shall be used for the purposes of purchasing land, constructing buildings and improvements, and purchasing

machinery, equipment and other capital-type facilities with which the city may develop, improve and expand public parks, recreational facilities, public services, police and fire protection, public utilities, water and the treatment and disposal of sanitary sewage, or may be transferred to any other fund to accomplish these purposes."

Chapter 3.12 (Recreation and Park Fund) governs how the City pays for recreation and park services. This Fund is a City-established fund into which all funds levied, collected, or derived for recreational programs, park maintenance, development and improvement, street, tree planting and maintenance, shall be deposited. Expenditures from the account are made in accordance with a budget established for the City's Parks and Recreation Department as adopted by the City Council.

Chapter 3.43 (Monrovia Library and Children's Reading Improvement Act Special Tax) of the City of Monrovia Municipal Code imposes a special tax to fund the design, construction, and furnishing of a new Monrovia public library facility in the City. The proceeds of this tax are to be used for the design, construction and furnishing of a new Monrovia library facility in Library Park.

2. Monrovia General Plan Open Space Element

The City of Monrovia General Plan Open Space Element creates a vision for an innovative, inclusive, and interconnected system of parks and open spaces and is consistent with the City's General Plan Land Use, Circulation, Housing, Safety, and Conservation Elements with its mutually reinforcing policies for ensuring a healthy livable community. The Open Space Element addresses multi-use parks and open spaces for aesthetic benefits, buffering for public health and safety, preservation of natural resources, and recreation. The primary purpose of the Open Space Element is to establish the goals and policies that guide the continual preservation of Monrovia's existing open spaces and ensure that opportunities for both active and passive recreation are available throughout the City in its parks and recreation facilities. The Open Space Element indicates that in order to maintain its existing improved parkland ratio of 3.0 acres per 1,000 residents, a total of approximately 6.8 acres of additional parkland will be needed in the City by 2035 (City of Monrovia, 2018a, pp. 1-9).

4.11.3 Basis for Determining Significance

Based on Section XV of Appendix G to the CEQA Guidelines, the Project would result in a significant impact to public services if the Project would:

a) *Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered 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 for fire protection services.*

b) *Result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered 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 for police protection services.*

c) Result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for school services.

d) Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for park facilities.

e) Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for library services.

The methodology for analysis is based on a review of applicable regulations, consultation with the City of Monrovia, and consideration of the Project's characteristics—such as size, location, and projected population growth. The analysis considers whether the Project would generate a need for new or physically expanded public service facilities, and whether the construction or operation of such facilities could result in significant environmental effects. This includes assessing the capacity of existing service providers to meet increased demand without requiring substantial physical alterations to their facilities. Population and student generation estimates, where applicable, are derived from Project-specific data, local planning documents, and/or relevant service provider ratios. The analysis also accounts for applicable development impact fees and other funding mechanisms intended to offset demand on public services.

4.11.4 Impact Analysis

Threshold a.:	***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered 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 for fire protection services?***

Under existing conditions, the Project site contains a 25,191-s.f. commercial/industrial office building and receives fire protection services from MFR. With implementation of the Project, the existing uses on the site would be demolished and replaced with a proposed mixed-use five-story building that would include 204 multi-family residential apartment units, 2,370 s.f. of commercial retail space, 2,782 s.f. fitness center space, 2,470 square feet of leasing office/lobby/mail room space on the ground floor, and 1.5 levels of subterranean parking, as well as parking on the ground level. The Project's proposed uses have the potential to increase the frequency of fire protection and emergency medical calls to the Project site during construction and operation as compared to existing conditions.

Service demand in and of itself is not an environmental impact under CEQA unless such demand causes a physical change to the environment. The increase in development intensity on the Project site is not anticipated

to result in an increase in demand for fire protection services high enough to trigger the need to physically alter an existing fire station or to construct new fire protection facilities; Station 101 already exists near the site and is adequate to service fire protection calls to the Project site during the Project's construction and after Project occupancy. Per correspondence with MFR, there are currently no deficiencies in fire protection service provided to the Project site. Additionally, response times would remain adequate and would not necessitate the need to physically alter Station 101 or to require the construction of a new fire station.

In order to maintain acceptable service ratios, MFR uses a fair share fee-based approach pursuant to Chapter 3.21 of the MMC to mitigate fire service response impacts and facility/equipment needs. Payment of fees pursuant to MMC Chapter 3.21 (Fire Service Impact Fee) would fully address the Project's incremental demand for new or expanded fire protection facilities and would ensure Project impacts to fire protection facilities would be less than significant. In addition, fees collected pursuant to MMC Chapter 3.32 (Dwelling Unit Tax) may be used by the City of Monrovia to develop, improve, and expand public services, including fire protection facilities and equipment. The Project Applicant's payment of Fire Service Impact Fees and the Dwelling Unit Tax, as well as increased standard property tax revenues that would result from development of the Project, would be used by the City to help pay for fire protection services and other public services.

Additionally, the Project would incorporate fire prevention and fire suppression design features to minimize the potential demand placed on MFR, including, but not limited to, Project components that meet or exceed requirements for access, water mains, fire flows, and fire hydrants. Construction documents would be reviewed by the City to confirm compliance with MFR requirements, including fire flow water delivery requirements based upon the tenant type, building size, and building type. The Project also would be designed in conformance with all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. In addition, access routes to the Project site are required to be maintained throughout construction and buildout of the Project. South Myrtle Avenue provides a 26-foot-wide fire access lane and West Olive Avenue provides a 24-foot-wide access fire lane.

In conformance with California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward* ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services. Thus, the need for additional fire protection and emergency medical services is not an environmental impact that CEQA requires a project proponent to mitigate.

Based on the above, adequate fire protection facilities exist in the local area to serve the Project, and the Project would not result in physical environmental effects due to the need for new or physically altered fire protection facilities. Therefore, impacts to fire protection facilities would be less than significant.

Threshold b.: ***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered 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 for police protection services?

The existing commercial building on the Project site receives police protection services from MPD. With implementation of the Project, the existing uses on-site would be demolished and replaced with a proposed mixed-use five-story building that would include 204 multi-family residential apartment units, 5,152 square feet of commercial and fitness center space, 2,470 square feet of leasing office/lobby/mail room space on the ground floor, and 1.5 levels of subterranean parking.

Implementation of the Project and the increase in development intensity on the Project site could result in an incremental increase in demands on service to address potential criminal activity, such as burglaries, thefts, vandalism, etc. However, police protection services are not "facility-driven," meaning that the provision of such services are not heavily reliant on facilities in order to effectively patrol a beat. An expansion or intensification of development within a patrol beat does not necessarily result in the need for additional facilities if police officers and patrol vehicles are equipped with adequate telecommunications equipment in order to communicate with police headquarters. Thus, the Project would not directly result in the need for any new or expanded facilities for police protection services.

Although new police protection facilities ultimately may be needed in the future, with or without the Project, that need is speculative at this point and it is not possible to identify environmental impacts that may be associated with the development of any new police protection facilities until a specific proposal and design for the facility is prepared by the MPD. Accordingly, impacts due to the construction of new or expanded police protection facilities are too speculative for evaluation in this EIR (CEQA Guidelines Section 15145).

The Project Applicant would be required to pay a dwelling unit tax in accordance with MMC Chapter 3.32. Payment of the required dwelling unit tax, as well as increased standard property tax revenues that would result from development of the Project, would ensure that the Project provides its fair share funds that the City may apply to police facilities and/or equipment to offset the incremental increase in the demand for police protection services that would be created by the Project.

In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward* ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including police protection services. Thus, the need for additional police facilities and/or equipment is not an environmental impact that CEQA requires a project proponent to mitigate.

Based on the above, the Project would not result in the need for new or physically altered police protection facilities. In addition, because the Project would contribute its fair share of fees towards police protection services, impacts would be less than significant.

Threshold c.: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts,

in order to maintain acceptable service ratios, response times, or other performance objectives for school services?

The Project site is located within the boundaries of Monroe Elementary School, Santa Fe Computer Science Magnet (Middle) School, and Monrovia High School. The Project would result in incremental population growth and potential associated growth in the student population within the MUSD. According to data available from the MUSD's Level I Developer Fee Study, residential uses generate approximately 0.7 students per dwelling unit; in addition, the Developer Fee Study estimates that commercial uses generate 0.2 households per employee. The Project would entail the demolition of the existing 25,191-s.f. single-story multi-tenant commercial/industrial office building and redevelopment of the Project site with a mixed-use multi-family residential and commercial structure that would include 204 multi-family residential apartment units and 2,370 s.f. of commercial retail space. The Project's 204 multi-family dwelling units and 2,370 s.f. of commercial space would generate approximately 556 residents[1] and approximately six employees[2]. The Project also would result in the elimination of approximately 52 jobs associated with the existing uses at the Project site. Thus, in total, the Project would result in a net increase of 204 households on-site and a net decrease in the number of jobs on-site by 46 jobs. Based on the rates provided by the MUSD, the Project's residential dwelling units and the net reduction in commercial uses on-site are anticipated to result in a net increase of approximately 195 households, resulting in the generation of approximately 137 net new students, as shown in Table 4.11-2, *Estimated Project-Related Households*. As shown in Table 4.11-3, *Excess School Capacity*, all of the schools that would serve the Project have more than sufficient capacity to accommodate the Project's anticipated 137 net new students (MUSD, 2022, pp. 10, 15; MUSD, 2019; MUSD, 2022).

Table 4.11-2 Estimated Project-Related Households School Student Generation

Project Proposed Land Uses	Proposed Intensity	Net Change in Future Population	Household Generation	Total Households	Est. Net Change in Students[2]
Residential	204 units	556 residents	1 household per unit	204 Households	143
Commercial Retail[1]	2,370 s.f.	-46 employees	0.2 households per employee	-9.2 Households	6.44
Totals:		**510 persons**	**--**	**195 Households**	**137 Students**

1. Although the Project includes 2,370 s.f. of commercial retail uses that would generate approximately six employees, the Project also would eliminate approximately 52 jobs associated with the existing uses at the Project site. Thus, in total, the Project would result in a net increase of 204 households on the site and a net decrease in the number of jobs on the site by 46 jobs.
2. Based on a student generation rate of 0.7 students per household, per Table 2 of the MUSD 2022 Fee Justification Study.

(MUSD, 2022, pp. 10, 15)

[1] Occupancy assumptions are 2.5 persons per studio unit and one-bedroom unit, and 4 persons per two-bedroom unit. The Project includes 163 studio and one-bedroom units and 37 two-bedroom units, resulting in an estimated resident population of 556 people.
[2] 2,370 s.f. ÷ 424 s.f./employee = 5.6 employees.

Table 4.11-3 Excess School Capacity

School	2022-2023 Enrollment	School Student Capacity	Remaining Capacity
Monroe Elementary School	478	1,148	670
Santa Fe Computer Science Magnet (Middle) School	431	760	329
Monrovia High School	1,538	2,544	1,006
Totals:	**2,447 Students**	**4,452 Students**	**2,005 Students**

(CA Dept of Education, 2023a; MUSD, 2019)

Although the Project may incrementally contribute to the need for new or expanded school facilities, it is not possible to identify environmental impacts that may be associated with the construction of new or expanded school facilities until a specific proposal and design for the facility is prepared by the MUSD, and an analysis of potential physical environmental impacts resulting from the construction and operation of new or expanded school facilities would be speculative in nature (CEQA Guidelines Section 15145). Environmental effects of such school facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded school facilities. Any mitigation measures required for new or expanded school facilities could be funded, in part, from property taxes and/or through payment of school impact fees (as discussed below).

Although the Project would not result in or require the construction or expansion of any existing or new schools, the Project Applicant would be required to pay developer fees to the MUSD pursuant to Leroy F. Greene School Facilities Act of 1988. According to the Act, payment of school impact fees constitutes full and complete mitigation for any Project-related indirect effects to school services. Mandatory payment of school impact fees pursuant to the Leroy F. Greene School Facilities Act would ensure that funding is available to address the Project's incremental impacts to school facilities and services. Therefore, Project impacts to school facilities would be less than significant.

Threshold d.: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for park services?

EIR Subsection 4.12, *Recreation*, includes a comprehensive discussion and analysis of the Project's potential impacts to recreation, including impacts associated with the construction or expansion of new park facilities, as necessary, to serve the Project. As discussed therein and as summarized in EIR Table 4.12-1, *Project Recreational Amenities Summary*, the Project's mixed-use building is designed to include 25,089 s.f. (0.57 acres) of indoor and outdoor amenity area that serve recreational functions. The physical construction of the on-site recreational amenities is inherent to the Project's construction phase, and impacts associated with Project implementation are addressed under the relevant environmental analysis subsections contained in Section 4.0 of this EIR. Under each relevant topic, the Project's impacts are determined to be less than significant, or mitigation measures are identified to reduce impacts to less than significant. There are no components of the proposed on-site recreational amenity features that would result in physical environmental

impacts that have not already been addressed and accounted for throughout this EIR. Accordingly, Project impacts due to recreational amenity development on the site would be less than significant, requiring no mitigation beyond that which is identified in other environmental analysis subsections of the EIR.

As also discussed in EIR Subsection 4.12, using the City of Monrovia General Plan Open Space Element standard of 3.0 acres of parkland per 1,000 residents, the Project's anticipated 556 residents would generate a demand for 1.67 acres of parkland[3]. As noted above, the Project would include 0.57 acres of on-site recreational amenities, resulting in an anticipated demand for an additional 1.1 acres of new or expanded parkland demand beyond what can be met on-site. The City may require the developer to contribute toward park facilities through in-lieu fees or formation of a Community Facilities District (CFD) to address long-term public service needs. However, absent a specific plan or proposal for how the City will satisfy off-site parkland demand, any potential environmental impacts from future park construction would be too speculative for analysis in this EIR. It is not possible to identify environmental impacts that may be associated with the development of any new or expanded off-site recreational facilities until a specific proposal and design for the facility is prepared. Accordingly, impacts due to the construction of new or expanded recreational facilities off-site are too speculative for evaluation in this EIR (State CEQA Guidelines Section 15145) and a less than significant impact would occur.

Threshold e.: ***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for library services?***

Development of the Project site with 204 multi-family apartment units would increase the City's population by approximately 563 residents, resulting in population growth that would incrementally affect library services provided by Monrovia Public Library. The City of Monrovia General Plan and the MMC do not establish standards related to the amount of library space required on a per capita basis. However, the Project Applicant would be required to contribute fees pursuant to MMC Chapter 3.43, which the City will use for the on-going construction of an enhanced Monrovia library facility in Library Park. Construction activities associated with the library enhancement currently are in progress, and the enhanced library is anticipated to be open in 2026. Improvements proposed as part of the enhancement would include an expansion of interior and exterior amenities and it is anticipated that the interior and exterior enhancements proposed as part of the library enhancement project would be adequate to accommodate the Project's incremental increase in demand for library space. Payment of the required tax pursuant to MMC Chapter 3.43, as well as increased standard property tax revenues that would result from the Project's development, would ensure that the Project contributes its fair share toward library facilities and would offset the Project's incremental increase in the demand for library facilities. Although the Project would place demand on library facilities and services, it would not result in the need for new or physically altered library facilities beyond what already is planned for the proposed improvements to the library within Library Park. Therefore, no impacts would occur.

[3] 563 residents x 3.0 acres parkland/1,000 residents = 1.69 acres

4.11.5 Cumulative Impact Analysis

Fire Protection Services

Although the Project would be adequately served by fire protection services based on the Project's proximity to the nearby fire station facility Station 101, the Project would potentially result in an incremental increase in requests for service during the Project's construction and operation. When considered in the context of on-going cumulative development projects throughout the City, the demand for fire protection services may increase; however, an increase in demand is not an environmental impact under CEQA unless such demand manifests into physical effects on the environment. As with the Project, cumulative development projects would be required by Building Code requirements to incorporate fire prevention and fire suppression design features, which would minimize the potential demand for fire protection services. New development and redevelopment projects are required to be designed in conformance with all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety.

In addition, the Project and all cumulative development projects within the City and the service area of MFR would be required to pay impact fees for fire protection services in accordance with MMC Chapters 3.21 (Fire Service Impact Fee) and 3.32 (Dwelling Unit Tax). If, in the future, MFR faces the need to physically alter existing fire protection facilities or to onboard new fire protection facilities, and such future activities are defined as a project under CEQA, an analysis under CEQA would be conducted at that time. It is not possible to identify environmental effects that may be associated with the physical alteration of existing facilities or the construction of new fire protection facilities unless or until a specific proposal and design for the facility are developed by MFR. Accordingly, environmental impacts due to the potential construction of new or expanded fire protection facilities in the future are too speculative for evaluation in this EIR (CEQA Guidelines Section 15145). Environmental effects of such fire protection facilities, if ultimately proposed, and any associated mitigation would be identified through a future CEQA process required in association with any future proposals in conjunction with MFR for new or expanded fire protection facilities.

Mandatory fire service impact fee and dwelling unit tax contributions by the Project and cumulative development projects would ensure that adequate funding is provided to MFR for the acquisition of additional facilities, equipment, and personnel as needed. In addition, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward* ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services. Accordingly, cumulative impacts related to fire protection services would be less than significant.

Police Protection Services

Although the Project site would be adequately served by police facilities, the increased population that would be generated by the Project, when considered in conjunction with other on-going development throughout Monrovia, has the potential to adversely affect service response times. The majority of police protection services are provided via patrolling police vehicles, and there is not a direct correlation between population growth and the need for new or expanded police protection services. As the population and use of an area increases; however, additional financing of equipment and workforce needs are required to meet the increased

demand. Nonetheless, the Project and all cumulative development projects would be required to contribute impact fees pursuant to MMC Chapter 3.32 (Dwelling Unit Tax), which the City may use in part to develop, improve, and expand police protection facilities and equipment. In addition, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward* ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including police protection services. Accordingly, cumulative impacts to police protection services would be less than significant.

School Services

As previously indicated in EIR Table 4.10-6, *Anticipated Population Increase from Cumulative Development*, cumulative development projects are anticipated to result in a net increase of 3,710 new residents and 89 new jobs. The Project would result in approximately 556 residents and would result in a net decrease in the number of jobs on-site by 46 jobs. Thus, the Project and known cumulative development projects would result in a net increase in the City's population by 4,266 persons and would result in a net increase in the number of jobs by 43 jobs. As summarized in Table 4.11-4, *Estimated Cumulative Households School Student Generation*, the 1,470 dwelling units and 43 net increase of jobs in the City that would result from the Project and known cumulative developments would generate approximately 1,035 students per year that would require school services. As previously indicated in Table 4.11-3, the MUSD has an estimated excess capacity of approximately 2,005 students. Thus, with implementation of the Project and other known cumulative development projects, the MUSD still would have the capacity for 970 additional students, indicating that the MUSD would have sufficient capacity to accommodate students generated by the Project and other known cumulative development projects. Although there is a potential that the Project, when considered in the context of ongoing growth and cumulative development projects ultimately could contribute to a need for new or expanded school facilities or services, the Project and other on-going and cumulative development projects would be subject to payment of fees pursuant to local ordinances implementing the requirements of the Leroy F. Greene School Facilities Act. Payment of school impact fees constitutes full and complete mitigation for Project-related impacts to school services. As such, and with mandatory fee payment, cumulative impacts to school services and facilities would be less than significant.

Table 4.11-4 Estimated Cumulative Households School Student Generation

Cumulative Development Land Uses	Net Change in Households/ Employees	Household Generation	Total Households	Est. Net Change in Students[2]
Residential	1,470 units	1 household per unit	1,470 Households	1,029
Commercial Retail[1]	43 employees	0.2 households per employee	8.6 Households	6.0
Totals:	**517 persons**	**--**	**1,621.6 Households**	**1,035 Students**

1. Although the Project includes 2,370 s.f. of commercial retail uses that would generate approximately six employees, the Project also would result in the elimination of approximately 52 jobs associated with the existing uses at the Project site. Thus, the 89 employees anticipated in association with known cumulative development projects combined with the Project's net reduction of 46 employees would result in a net increase in the number of jobs on site by 43 jobs.
2. Based on a student generation rate of 0.7 students per household, per Table 2 of the MUSD 2022 Fee Justification Study. (MUSD, 2022, pp. 10, 15)

Park Services

As discussed under the analysis of Threshold d., and taking into consideration the 0.57 acre of on-site recreational amenities, the Project would result in a demand for an additional 1.1 acres of new or expanded parkland within the City of Monrovia in order to meet the City's parkland standard of 3.0 acres per 1,000 residents. The 1,344 dwelling units associated with known cumulative development projects would generate a demand for approximately 12.1 acres of parkland[4], not taking into consideration any recreational amenities that may be accommodated within the cumulative development projects. In total, the Project and other cumulative development projects conservatively would result in a demand for approximately 13.23 acres of additional parkland. Although the Project and cumulative development projects would generate a demand for new or expanded parkland within the City of Monrovia, there is no specific plan or proposal for off-site park improvements, and any potential environmental impacts from future park construction would be too speculative for analysis under CEQA Guidelines Section 15145. Thus, a less than significant cumulative impact would occur.

Library Services

The Project would result in an increase in population and contribute to an increase in demand for library services. The Project and other cumulative development projects would result in an increase in population and contribute to an increase in demand for library services. However, it is not possible to identify environmental impacts that may be associated with such new or expanded library facilities until a specific proposal and design for such facilities are developed by the City. The Project and all cumulative development projects within the City would be required to pay fees in accordance with MMC Chapter 3.43 (Monrovia Library and Children's Reading Improvement Act Special Tax), which would provide funds for the City to support the on-going expansion of the existing Monrovia library. Although the Project and cumulative projects would generate a demand for additional public library space, there is no specific plan or proposal for physical library expansion or new construction improvements, and any potential environmental impacts from future library facility construction would be too speculative for analysis under CEQA Guidelines Section 15145. Thus, a less than significant impact would occur.

4.11.6 Significance of Impacts

Threshold a.: Less-than-Significant Impact: Although the Project would increase the demand for fire protection services provided by Monrovia Fire and Rescue, the Project Applicant would be required to pay impact fees pursuant to MMC Chapter 3.21 (Fire Service Impact Fee) in addition to the fees required pursuant to MMC Chapter 3.32 (Dwelling Unit Tax). Payment of fees pursuant to MMC Chapter 3.21 would address the Project's incremental demand for new or expanded fire protection facilities. Because Monrovia Fire and Rescue has no specific plans to physically alter existing fire stations or to build a new fire station to meet the demand created by the Project, potential environmental impacts from fire protection facility construction would be too speculative for analysis under CEQA Guidelines Section 15145. Thus, a less than significant impact would

[4] 1,344 dwelling units x 2.76 persons per dwelling unit x 3.0 acres parkland/1,000 persons = 12.096 acres.

occur. The Project would not result in physical environmental effects due to the need for new or physically altered fire protection facilities.

Threshold b.: Less-than-Significant Impact: Although the Project would increase the demand for police protection services provided by the City of Monrovia, the Project Applicant would be required to pay impact fees pursuant to MMC Chapter 3.32 (Dwelling Unit Tax), which the City may use in part to develop, improve, and expand police protection facilities and equipment. Payment of the required dwelling unit tax as well as increased standard property tax revenues that would result from development of the Project would ensure that the Project provides fair share funds that may be applied to police facilities and/or equipment to offset the incremental increase in the demand for police protection services that would be created by the Project. Because the City of Monrovia has no specific plans to physically alter existing police stations or to build a new police station to meet the demand created by the Project, potential environmental impacts from police protection facility construction would be too speculative for analysis under CEQA Guidelines Section 15145. Thus, a less than significant impact would occur. The Project would not result in physical environmental effects due to the need for new or physically altered police protection facilities.

Threshold c.: Less-than-Significant Impact: The Project is anticipated to result in the future net increase of approximately 137 school-age children on an annual basis. However, the schools that would serve the Project all have excess capacity under existing conditions, with a combined total remaining capacity of 2,005 students, which is adequate to serve students generated by the Project as well as students anticipated from known cumulative developments. The Project Applicant would be required to pay developer fees to the Monrovia Unified School District pursuant to pursuant to the Leroy F. Greene School Facilities Act. Payment of school impact fees constitutes full and complete mitigation for any Project-related indirect effects to school services. Accordingly, Project impacts to school facilities would be less than significant.

Threshold d.: Less-than-Significant Impact: Impacts associated with the construction of on-site recreational amenities are inherent to the Project's construction phase, and impacts associated with Project implementation are addressed under the relevant environmental analysis subsections identified throughout this EIR. Under each relevant topic, the Project's impacts are determined to be less than significant, or mitigation measures are identified to reduce impacts to less than significant. Additionally, although the Project would generate a demand for approximately 1.1 acres of new or expanded parkland within the City of Monrovia, there is no specific plan or proposal for off-site park improvements, and any potential environmental impacts from future park construction would be too speculative for analysis under CEQA Guidelines Section 15145. Thus, a less than significant impact would occur.

Threshold e.: No Impact: The Project would result in population growth that would incrementally affect library services provided by Monrovia Public Library. Pursuant to MMC Chapter 3.43 (Monrovia Library and Children's Reading Improvement Act Special Tax), the City of Monrovia imposes a fee for all new dwelling units in the City, which the City will use to help fund the on-going enhancements to the City of Monrovia Library. Payment of the required fee as well as increased standard property tax revenues that would result from development of the Project would ensure that the Project provides fair share funds that may be applied to library facilities and/or materials to offset the incremental increase in the demand for library services that would be created by the Project. Although implementation of the Project would place demand on library

facilities and services, it would not result in the need for new or physically altered library facilities beyond enhancements already underway at Library Park. Because implementation of the Project would not result in environmental impacts associated with new or expanded library facilities and would contribute its fair share of fees towards library facilities and services, no impacts would occur.

4.11.7 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.11.8 Regulatory Requirements (RR)

The City of Monrovia requires compliance with the following:

PS RR-1 The Project is required to comply with the provisions of City of Monrovia Municipal Code Chapter 3.32 (Dwelling Unit Tax), which imposes a fee on dwelling units that are used, in part, to provide for public services and facilities within the City.

PS RR-2 The Project is required to comply with the provisions of City of Monrovia Municipal Code Chapter 3.21 (Fire Service Impact Fee), which requires developers and builders to contribute their proportionate share of revenues necessary to provide for fire protection services within the City.

PS RR-3 The Project is required to comply with the provisions of City of Monrovia Municipal Code Chapter 3.43 (Monrovia Library and Children's Reading Improvement Act Special Tax), which requires developers and builders to contribute their proportionate share of revenues necessary to provide funding for the on-going expansion at the City of Monrovia Library.

PS RR-4 The Project is required to comply with the Leroy F. Greene School Facilities Act and make a fee payment to the Monrovia Unified School District (MUSD) as required under the Act.

4.12 RECREATION

The analysis in this subsection provides an overview of the existing parks and recreational facilities that exist within the Project site's vicinity and that could potentially be directly or indirectly physically affected by implementation of the Project. The analysis herein is based on the Project's application materials on file with the City of Monrovia and information contained in the City of Monrovia's General Plan Open Space Element.

4.12.1 EXISTING CONDITIONS

The City of Monrovia has 0.9 acres of urban park land per 1,000 residents, or 33.5 acres. The City owns and maintains eight regional and local parks, seven of which are located within a two-mile radius of the Project site. These facilities are described below (City of Monrovia, 2018c).

- **Library Park**. Library Park is a 13-acre local park located at 321 South Myrtle Avenue, approximately 0.2 miles north of the Project site. The park features a bandshell, playground, and parking.

- **Rotary Park**. Rotary Park is a 0.9-acre local park located at 401 South California Avenue, approximately 0.3 miles northeast of the Project site. The park features a tot lot, picnic tables, and an open play area.

- **Julian Fisher Park**. Julian Fisher Park is a 1.8-acre local park located at 915 South California and Almond Avenue, approximately 0.3 miles southeast of the Project site. The park features basketball courts, a playground, picnic area, and restrooms.

- **Lucinda Garcia Park**. Lucinda Garcia Park is a 1.5-acre local park located at 502 West Olive Avenue, approximately 0.4 miles west of the Project site. The park features a playground, barbecue area, and picnic tables.

- **Recreation Park**. Recreation Park is a 15-acre local park located at 620 South Shamrock Avenue, approximately 0.6 miles east of the Project site. The park features a basketball court, tennis courts, a baseball field, a beach volleyball court, a soccer field, a playground, picnic tables, and restrooms.

- **Station Square Park**. Station Square Park is a 0.5-acre local park located at 1629 South Myrtle Avenue, approximately 0.7 miles south of the Project site. The park features a bandshell, playground, picnic tables, parking, and restrooms.

- **Kiwanis Park at Grand Avenue**. Kiwanis Park at Grand Avenue is a 3.5-acre local park located at 340 North Grand Avenue, approximately 1.1 miles northeast of the Project site. The park features a soccer field, playground, and picnic tables.

- **Monrovia Canyon Park**. Monrovia Canyon Park is an 80-acre park located at 1200 North Canyon Boulevard, approximately 2.2 miles northeast of the Project site. The park features hiking trails, parking, picnic areas, a nature center, and restrooms.

4.12.2 Regulatory Setting

The following is a brief description of the state and local environmental laws and related regulations related to recreation.

A. State Regulations

1. Quimby Act, California Government Code Section 66477

The State of California's Quimby Act was established by the California Legislature for the purpose of preserving open space and providing park facilities for California's growing communities. The Quimby Act allows local agencies to establish ordinances requiring developers to provide land or "in-lieu-of" fees for park and recreation purposes as a condition of approval of tentative tract map or parcel map for residential subdivisions (CA Legislative Info, n.d.). The Project, however, is not subject to Quimby Act-based requirements because it does not involve a residential subdivision.

B. Local Plans, Policies, and Regulations

1. Monrovia General Plan Open Space Element

The City of Monrovia General Plan Open Space Element creates a vision for an innovative, inclusive, and interconnected system of parks and open spaces. The Open Space Element addresses multi-use parks and open spaces for aesthetic benefits, buffering for public health and safety, preservation of natural resources, and recreation. The primary purpose of the Open Space Element is to establish the goals and policies that guide the continual preservation of Monrovia's existing open spaces and ensure that opportunities for both active and passive recreation are available throughout the City in its parks and recreation facilities. The Open Space Element sets an improved parkland ratio of 3 acres per 1,000 residents (City of Monrovia, 2018a, pp. 1-9). The City's Park Master Plan, which implements the Open Space Element, includes a recommended aspirational goal of reaching the provision level of 1.5 acres per 1,000 residents (City of Monrovia, 2018c, p. 15).

2. Monrovia Municipal Code

Title 3 (Revenue and Finance) of the MMC establishes impact fees that are imposed on new developments in order to provide for public services throughout the City. MMC Title 3 also establishes Citywide taxes to provide for certain public services and facilities.

Development Impact Fees may be imposed on a development project pursuant to MMC Chapter 3.22. These fees may be used to support park and recreation facilities, consistent with the City's planning goal of 3 acres per 1,000 residents, as identified in the City's General Plan EIR (SCH No. 2007021135). For multi-family developments, the fee must be paid at the time a final occupancy permit is issued for the first dwelling in the development covered by that building permit.

MMC Chapter 3.12 (Recreation and Park Fund) is a City-established fund into which all funds levied, collected, or derived for recreational programs, park maintenance, development and improvement, street, tree

planting and maintenance, are deposited. Expenditures from the account are made in accordance with a budget established for the City's Parks and Recreation Department as adopted by the City Council.

4.12.3 Basis for Determining Significance

Based on Section XVI of Appendix G to the CEQA Guidelines, the Project would result in a significant impact to recreation if the Project would:

a) *Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated;*

b) *Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.*

4.12.4 Impact Analysis

Threshold a.: Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction of the Project would result in construction workers being on the Project site; however, it is reasonable to expect that the construction workers would be drawn from the existing and future labor market in the City and surrounding jurisdictions. The Project would be built using standard construction practices typical for construction contractors located in the region. Given time constraints during the workday, construction workers would likely use recreational facilities near their homes. Therefore, construction of the Project would not result in the need for new or physically altered park facilities, would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration would result, and would not require construction of recreational facilities that might have an adverse physical effect. As such, Project's construction impacts related to parks would be less than significant.

Under long-term operational conditions, the Project would increase population in the area by an estimated 556 residents[1] and, therefore, increase the demand for neighborhood and community parks and recreational space. Using the City of Monrovia General Plan Open Space Element standard of 3 acres of parkland per 1,000 residents, the Project's anticipated 556 residents would generate a demand for 1.67 acres of parkland.[2] To offset the Project residents' use of existing neighborhood and regional parks, the Project design includes various recreational facilities and amenities for its residents, including a resort-style pool, rooftop deck, dog park, al fresco dining area, courtyard gathering areas, and an outdoor public plaza and public arcade. As shown in Table 4.12-1, *Project Recreational Amenities Summary*, combining the Project's proposed indoor and

[1] Occupancy assumptions are 2.5 persons per studio unit and one-bedroom unit, and 4 persons per two-bedroom unit. The Project includes 163 studio and one-bedroom units and 37 two-bedroom units, resulting in an estimated resident population of 556 people.
[2] 556 residents x 3 acres parkland/1,000 residents = 1.668 acres.

outdoor recreational amenity areas, the Project would provide approximately 0.57 acres of recreational amenities on-site.

Table 4.12-1 Project Recreational Amenities Summary

Recreational Amenity	Size (s.f.)
Indoor Resident Amenities	
Clubhouse/Hearth Room	2,537 s.f.
Fitness Room	2,782 s.f.
Indoor Resident Recreational Amenities Subtotal:	**5,139 s.f.**
Outdoor Resident Amenities	
Courtyard 1 (with swimming pool)	9,330 s.f.
Courtyard 2 (with seating and dining area)	4,300 s.f.
Al Fresco Dining Area (California Room)	345 s.f.
Roof Deck	2,700 s.f.
Dog Park	870 s.f.
Outdoor Resident Recreational Amenities Subtotal:	**17,545 s.f.**
Outdoor Public Amenities	
Public Plaza	1,495 s.f.
Public Arcade	760 s.f.
Outdoor Recreational Amenities Subtotal:	**2,225 s.f.**
Total Project Recreational Amenities:	**24,909 s.f. (0.57-acre)**

The Project's provision of on-site recreational amenities would partially reduce the need for use of off-site recreational facilities; however, it is anticipated that an increase in the use of off-site recreational facilities by residents of the Project would still occur. Because the Project does not involve a subdivision, it is not subject to Quimby Act fees per MMC Section 16.32. Additionally, the Dwelling Unit Tax specified in MMC Section 3.32 is a general revenue mechanism and cannot be relied on for purposes of addressing recreation impacts under CEQA. The Project would be subject to Development Impact Fees under MMC Section 3.22 and the City can use Development Impact Fees for parks and recreation. Also, the Project can enter into a Community Facilities District (CFD) as a discretionary tool to offset park impacts. Through a combination of providing on-site recreational amenities and the Project's participation in City-directed funding tools for parks and recreation, there would be no foreseeable substantial physical deterioration or acceleration of deterioration at existing park facilities caused from use by the Project. As such, impacts would be less than significant.

Threshold b.: Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The Project would include various recreational facilities and amenities for its residents, as previously summarized in Table 4.12-1. These recreational amenities would be provided on the Project site for residents of the Project; the Project does not propose to provide or physically alter any public park facility off site. The physical construction of the on-site recreational facilities is addressed under the relevant environmental analysis subsections of this EIR. Under each relevant topic, the Project's impacts are determined to be less than significant, or mitigation measures are identified to reduce impacts to less than significant. There are no components of the proposed on-site recreational amenities that would result in physical environmental impacts

that have not already been addressed and accounted for throughout this EIR. Accordingly, Project impacts due to recreational facility development on-site would be less than significant, requiring no mitigation beyond that which is identified in other portions of this EIR.

Additionally, although the Project would result in a demand for increased parkland within the City of Monrovia, it is not possible to identify environmental impacts that may be associated with the development of any new or expanded recreational facilities until a specific proposal and design for the construction or expansion of recreational facilities is prepared by the City of Monrovia. Accordingly, impacts due to the construction of new or expanded recreational facilities off-site are too speculative for evaluation in this EIR (CEQA Guidelines Section 15145). Environmental effects of such future recreational facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded recreational facilities.

Therefore, 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 that has not already been evaluated and addressed throughout this EIR, and impacts would be less than significant.

4.12.5 Cumulative Impact Analysis

The cumulative study area for the issue of recreation includes all areas within 2.0 miles of the Project site. This cumulative study area was selected because future Project residents are most likely to utilize recreational facilities that are within 2.0 miles of the Project site.

As indicated under the analysis of Threshold (a)., although the Project would accommodate approximately 0.57 acres of recreational amenities on-site, the proposed amenities are not sufficient to meet the Project's anticipated parkland demand of 1.67 acres. Additionally, and as previously shown in Table 4.10-6 in EIR Subsection 4.10, *Population and Housing*, based on the list of cumulative development projects summarized in EIR Table 4.0-1 and depicted on EIR Figure 4.0-1, the cumulative development projects are anticipated to generate approximately 3,710 residents, which would generate a demand for approximately 11.1 acres of recreational resources within the City[3]. Thus, the Project and other cumulative development projects are anticipated to result in the demand for approximately 12.77 acres of new or expanded recreational facilities within the City of Monrovia. It should be noted that the estimated 12.77 acres of demand for new recreational facilities within the City does not account for recreational facilities that may be included within or provided by these cumulative development projects. Although the Project and other cumulative development projects would result in the demand for approximately 12.77 acres of new or expanded recreational facilities within the City in order to meet the General Plan Open Space Element target of 3.0 acres of parkland per 1,000 residents, the Project and other cumulative development projects within the City would be subject to Development Impact Fees under MMC Section 3.22 and the City can use Development Impact Fees for parks and recreation. Also, projects can enter into Community Facilities Districts as a discretionary tool to offset park impacts. Through a combination of providing on-site recreational amenities and participation in City-directed funding

[3] 3,710 residents x 3.0 acres ÷ 1,000 residents = 11.1 acres

tools for parks and recreation, there would be no foreseeable substantial physical deterioration or acceleration of deterioration of existing park facilities caused from use by cumulative development. As such, the cumulative impact would be less than significant.

As with the Project, impacts associated with the construction of the on-site recreational amenities included in each cumulative development project are an inherent part of each of those cumulative development projects' designs, which have been evaluated throughout their respective CEQA documentation under the appropriate environmental analysis topic. Where impacts have been identified associated with implementation of each cumulative development project, measures have been identified to reduce construction-related and operational-related impacts to less than significant. Although the Project and other cumulative development projects within the City would result in the demand for approximately 12.77 acres of new or expanded recreational facilities, it is not possible to identify environmental impacts that may be associated with the construction of any new or expanded recreational facilities until a specific proposal and design for the construction or expansion of recreational facilities is prepared by the City of Monrovia. Accordingly, cumulative impacts due to the construction of new or expanded recreational facilities off site are too speculative for evaluation in this EIR (CEQA Guidelines Section 15145). Cumulative effects of such future recreational facilities subject to CEQA compliance and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded recreational facilities. Therefore, the Project and cumulative development projects would not include recreational facilities or require the construction or expansion of recreational facilities which might have adverse physical effects on the environment that have not already been evaluated and addressed throughout this EIR or their respective CEQA documentation. As such, cumulative impacts associated with the construction or expansion of recreational facilities would be less than significant.

4.12.6 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The Project would provide approximately 0.57 acre of on-site recreational amenities. Through a combination of providing on-site recreational amenities and the Project's participation in City-directed funding tools for parks and recreation, there would be no foreseeable substantial physical deterioration or acceleration of deterioration of existing park facilities caused from use by Project residents. As such, impacts would be less than significant.

Threshold b.: Less-than-Significant Impact. The physical construction of on-site recreational amenities has been addressed under the relevant environmental topics analyzed throughout this EIR. Under each of these topics, Project impacts are determined to be less than significant, or mitigation measures have been identified to reduce impacts to less than significant.

4.12.7 Mitigation

Impacts would be less than significant; thus, mitigation is not required.

4.12.8 Design Features (DF) and Regulatory Requirements (RR)

The City of Monrovia requires compliance with the following:

REC DF-1: The 701 S. Myrtle Specific Plan calls for the provision of 0.57 acres of on-site recreational amenity space. Compliance with the Specific Plan is mandatory and will be ensured through the building permit and construction inspection process.

AES RR-1: MMC Section 3.22 requires payment of Development Impact Fees, which the City may use for park and recreation purposes.

AES RR-2: At the discretion of the City as condition of building permit or occupancy permit issuance, the Project may enter into a Community Facilities District (CFD) as a discretionary tool to fund parks and recreation.

4.13 TRANSPORTATION

The analysis in this subsection assesses the potential for transportation impacts resulting from implementation of the Project. The analysis in this subsection is based on a technical study prepared by Urban Crossroads, Inc. entitled, "701 S. Myrtle Focused Traffic Analysis" (herein, "TA"), dated June 25, 2024, which is included as *Technical Appendix J1* to this EIR (UXR, 2024). Section 7 of the Project's TA includes a vehicle miles traveled (VMT) screening evaluation, and this portion of the TA is used to assess the Project's potential impacts due to VMT. A supplement to the TA titled "701 S. Myrtle Supplemental Traffic Assessment ("TA Supplement"), dated April 6, 2025, is included as *Technical Appendix J2* (UXR, 2025b). The Project's TA and TA Supplement were prepared in conformance with the publication entitled, *City of Monrovia Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (herein, "City VMT & LOS Guidelines"), dated September 2020 (City of Monrovia, 2020).

4.13.1 EXISTING CONDITIONS

A. Existing Vehicle Miles Traveled (VMT)

The City VMT & LOS Guidelines note that the City of Monrovia utilizes the San Gabriel Valley Council of Governments (SGVCOG) VMT Tool (herein, "Screening Tool") for purposes of screening. The Screening Tool is designed to assist in screening and estimating project-generated VMT for certain types of land use projects in the San Gabriel Valley and calculating VMT reductions associated with certain VMT-reducing measures. According to the Screening Tool, under existing conditions, the City of Monrovia has an estimated 15.53 VMT per service population (SGVCOG, n.d.).

B. Existing Roadway System

The Project site is located west of South Myrtle Avenue and south of West Olive Avenue. The City of Monrovia General Plan Circulation Element classifies South Myrtle Avenue and West Olive Avenue along the Project site's frontages with these roadways as "Collectors," which is a roadway classification intended to accommodate two travel lanes with a center turn-lane within a 60- to 84-foot right-of-way (ROW) (UXR, 2024, p. 13). Under existing conditions, there are two private driveway connections from the Project site to West Olive Avenue and an alley that provides access to the Project site from the south.

The primary regional travel routes serving the Project site are Interstate 210 (I-210), which is located approximately 0.6 miles to the south, and Interstate 605 (I-605), which is located approximately 2.4 miles to the southeast.

C. Existing Transit Service

Foothill Transit Route 270 and the Los Angeles County Metropolitan Transportation Authority (Metro) provide public transit service in the vicinity of the Project site. The closest Foothill Transit stops are located at the intersection of Primrose Avenue and Walnut Avenue, approximately 230 feet southwest of the Project site. The Metro A Line Monrovia Station is located at 1675 S. Primrose Avenue, approximately 0.7 miles south of the Project site. The Foothill Transit stops located near the Project site have a service frequency of one hour in

both the northbound and southbound directions along Primrose Avenue. The Metro A Line Monrovia Station has a service frequency of 10 to 20 minutes during the peak commute hours.

D. Existing Bicycle and Pedestrian Facilities

Public sidewalks are located along West Olive Avenue and South Myrtle Avenue, including along the street frontage segments abutting the Project site. A Class III bikeway (a bikeway that shares the travel lane with vehicles) is located on West Olive Avenue.

4.13.2 Regulatory Setting

The following is a brief description of the federal, State, and local environmental laws and related regulations governing environmental topics related to transportation.

A. Federal Regulations

1. Americans with Disabilities Act (ADA)

The Americans with Disabilities Act (ADA) is a federal civil rights law enacted in 1990 that prohibits discrimination against individuals with disabilities in all areas of public life. The law consists of several titles; Title II is most relevant to public transportation and infrastructure. This title requires that state and local governments ensure that pedestrian facilities, transportation services, and public infrastructure are accessible to people with disabilities. Provisions related to sidewalks and pedestrian pathways require that all pedestrian routes must provide a continuous, unobstructed path that complies with ADA standards, including for width, surface materials, and cross slope. Curb ramps are required wherever a sidewalk or pedestrian path crosses a curb. Any alterations or new construction to public rights-of-way must comply with ADA requirements, including for resurfacing, adding ramps, or reconstructing sidewalks. ADA requirements also apply to bus stops, transit stations, and public transportation vehicles including busses and trains.

B. State Plans, Policies, and Regulations

1. Complete Streets Act (Assembly Bill 1358; 2008)

In September 2008, Governor Arnold Schwarzenegger signed into law Assembly Bill (AB) 1358, known as the Complete Streets Act. This legislation requires that cities and counties ensure their general plan circulation elements accommodate the needs of all users of the transportation system—including motorists, pedestrians, bicyclists, children, seniors, and individuals with disabilities—when they update their general plans. The intent of the Complete Streets Act is to foster the development of multimodal transportation networks that are safe, convenient, and accessible for all users, regardless of mode of travel. The law supports statewide goals to reduce greenhouse gas emissions, improve air quality, enhance public health, and reduce vehicle miles traveled. In compliance with the Complete Streets Act, local jurisdictions must integrate Complete Streets principles into planning and implementation efforts. As such, any transportation improvements, roadway redesigns, or circulation system modifications associated with a proposed project subject to the Act must consider and, where feasible, incorporate facilities for non-motorized users, consistent with local Complete Streets policies (CA Legislative Info, n.d.).

2. Public Resources Code (PRC) Section 21099 (Senate Bill 743; 2013)

Senate Bill 743 (SB 743, Steinberg, 2013), which was codified in Public Resources Code (PRC) Section 21099, required changes to the implementing CEQA Guidelines regarding the analysis of transportation impacts. As one appellate court explained: "During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy…" (*Covina Residents for Responsible Development v. City of Covina* (2018) 21 Cal.App.5th 712, 729.) Pursuant to PRC Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (PRC Section 21099(b)(1); see generally, adopted CEQA Guidelines Section 15064.3(b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency (CRNA) has certified and adopted changes to the CEQA Guidelines that identify VMT as the most appropriate metric to evaluate a project's transportation impacts. With the CRNA's certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by LOS and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA as of July 1, 2020 (PRC Section 21099 (b)(2)) (OPR, 2018).

3. California Manual on Uniform Traffic Control Devices

The California Manual on Uniform Traffic Control Devices (MUTCD) is the official standard for traffic control devices on all public roads in California. Developed and maintained by the California Department of Transportation (Caltrans), the MUTCD is based on the federal MUTCD issued by the Federal Highway Administration (FHWA), with modifications to reflect California-specific laws, policies, and conditions. The MUTCD provides standards, guidance, and options for the design, placement, and use of signs, signals, pavement markings, and other traffic control devices to promote safe and efficient travel for all roadway users, including motorists, pedestrians, bicyclists, and transit vehicles. Compliance with the MUTCD is required by law for all jurisdictions in California under the California Vehicle Code (CVC) Section 21400. Transportation improvements or modifications are expected to follow the applicable provisions of the MUTCD to ensure consistent and effective communication with roadway users and support the safe operation of the transportation network. Chapter 5G of the MUTCD identifies standards for Temporary Traffic Control Zones, which establishes measures and sequencing requirements for temporary traffic control devices used during construction activities, including standards related to signage and lane transitions. (Caltrans, 2024b).

C. Local and Regional Regulations

1. SCAG Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is a joint powers authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans including sustainable communities strategy and growth forecast

components, regional transportation improvement programs, regional housing needs allocations and other plans for the region (SCAG, n.d.).

As an MPO and public agency, SCAG develops transportation and housing strategies that transcend jurisdictional boundaries that affect the quality of life for Southern California as a whole. SCAG's *2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)* includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. The *RTP/SCS* also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning (SCAG, n.d.).

2. City of Monrovia General Plan Circulation Element

The Circulation Element of the Monrovia General Plan, which was adopted in 2008 and amended in 2012, guides the development of the City's circulation system in a manner compatible with the General Plan's Land Use Element. The Circulation Element is intended to provide the City a circulation system that is safe, sensible, and provides efficient movement of people and goods throughout Monrovia. The goals and policies presented in the Circulation Element regarding the City's transportation facilities address major components and aspects of the circulation system. Circulation Element goals and policies applicable to the Project are addressed later in this subsection (see analysis under Threshold "a" in Subsection 4.13.5) (City of Monrovia, 2012).

3. City of Monrovia Municipal Code

MMC Chapter 16.24, Design Standards, includes requirements for public street improvements, including, but not limited to, cross-sections, alignment, grade, curves, intersections, curbs, gutters, sidewalks, safety devices, streetlights, street signs, and street trees. All work in the public right-of-way is required to conform to MMC Design Standards.

4.13.3 Basis for Determining Significance

According to Section XVII of Appendix G of the CEQA Guidelines, the Project would result in a significant impact to transportation and traffic if the Project would:

a) *Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;*

b) *Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);*

c) *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or,*

d) *Result in inadequate emergency access.*

4.13.4 METHODOLOGY

A. VMT Screening Methodology

The City's VMT & LOS Guidelines list standardized VMT screening methods that can be used to identify when a proposed land use project is anticipated to result in a less than significant VMT impact, thereby eliminating the need to conduct a model based VMT analysis. The City of Monrovia VMT screening methods are listed below, and a land use project needs to only meet one of the screening criteria to result in a less than significant impact (City of Monrovia, 2020, pp. 13-17):

- Step 1: Transit Priority Area (TPA) Screening
- Step 2: Low VMT Area Screening
- Step 3: Project Type Screening

1. Transit Priority Area (TPA) Screening

Consistent with City's VMT & LOS Guidelines, projects located within a TPA (i.e., within ½ mile of an existing "major transit stop[1]" or an existing stop along a "high-quality transit corridor[2, 3]") may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project (City of Monrovia, 2020, pp. 13-14):

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

2. Low-VMT Area Screening

As noted in the City VMT & LOS Guidelines, residential and office projects that are located in areas with low VMT and that incorporate similar features (density, mix of uses, and transit accessibility) will tend to exhibit similarly low VMT. The Screening Tool uses the sub-regional SCAG travel forecasting model to measure

[1] PRC Section 21064.3 ('Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.).
[2] PRC Section 21155 (For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than [20] minutes during peak commute hours.).
[3] Assembly Bill 2553 (AB 2553), signed into law in 2022, amended various provisions of state law to align transportation planning efforts with updated service standards. Notably, the bill revised the definition of "high-quality transit corridors" for certain housing and land use programs by changing the required frequency of bus service from 15 minutes to 20 minutes during peak hours.

VMT performance in individual traffic analysis zones (TAZs) within the region. A project's physical location, based on parcel number, is input into the Screening Tool to determine the TAZ's VMT as compared to the Citywide average (City of Monrovia, 2020, pp. 14-15).

3. Project Type Screening

The City VMT & LOS Guidelines indicate that projects generating fewer than 110 daily vehicle trips may be presumed to have a less-than-significant impact. Additionally, the City VMT & LOS Guidelines identify that local serving retail uses less than 50,000 square feet and local essential services (e.g., local parks, day care centers, public schools, etc.) are presumed to have a less-than-significant impact absent substantial evidence to the contrary (City of Monrovia, 2020, pp. 15-17).

B. VMT Assessment for Non-Screened Development

The City VMT & LOS Guidelines note that projects not screened through the steps above should complete a VMT analysis and forecasting through the Screening Tool, the SCAG model, or appropriate sub-area model to determine if they have a significant VMT impact. The City VMT & LOS Guidelines state that this analysis should include 'project generated VMT' for the project TAZ (or TAZs) and 'project effect on VMT' estimates under baseline conditions, baseline plus project, cumulative no project, and cumulative plus project conditions. Per the City VMT & LOS Guidelines, project-generated VMT shall include the VMT generated by the site compared back to the CEQA threshold of significance. The project effect on VMT is the link based VMT for a geographic region, which is more appropriate to review to evaluate how these developments change travel behavior in the region (City of Monrovia, 2020, pp. 17-18).

4.13.5 IMPACT ANALYSIS

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

This threshold addresses a project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities. A project that generally conforms with, and does not obstruct, applicable development plans, programs, ordinances, and policies is considered to be consistent. The transportation plans, policies, programs, ordinances, and standards that are relevant to the Project include the City of Monrovia General Plan Circulation Element, the SCAG 2024-2050 RTP/SCS, and the Americans with Disabilities Act. As indicated in the analysis presented below and in EIR Subsection 4.8, *Land Use and Planning*, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including those related to transit, roadway, bicycle, and pedestrian facilities. Therefore, no impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system would occur (UXR, 2024, Appendix 1.1).

A. Monrovia General Plan Circulation Element

The Circulation Element of the Monrovia General Plan guides the development of the City's circulation system in a manner compatible with the General Plan's Land Use Element. The Circulation Element is intended to provide the City a circulation system that is safe, sensible, and provides efficient movement

of people and goods throughout Monrovia. An analysis of the Project's consistency with the General Plan Circulation Element goals previously was provided in EIR Table 4.8-1, *Project Consistency with the General Plan*, in EIR Subsection 4.8, *Land Use and Planning*. As indicated in EIR Table 4.8-1, to be approved the Project must be consistent with applicable goals included in the General Plan Circulation Element. Accordingly, no impacts to transportation due to a conflict with the General Plan Circulation Element goals would occur.

Specifically related to the General Plan Circulation Element's goal to protect and encourage non-motorized transportation such as bicycle and pedestrian travel, the Project would reconstruct the existing curb, gutter, and sidewalks along West Olive Avenue and South Myrtle Avenue and comply with ADA standards. As part of the Project's design and to encourage pedestrian activity, an outdoor public plaza would occur at the corner of West Olive Avenue and South Myrtle Avenue and an outdoor public arcade space (to provide a wide sidewalk experience) would occur along South Myrtle Avenue. Additionally, the Project would reduce the number of driveways from the Project site along West Olive Avenue from two to one, which would reduce potential pedestrian/vehicle conflict points when compared to existing conditions. Pertaining to bicycle use, the Project would provide for 112 long-term bicycle parking spaces inside the building for Project residents and 22 short-term bicycle parking spaces outside the building for public use, placed near the building's entrances.

B. SCAG 2024-2050 RTP/SCS Consistency Analysis

The fundamental goals of SCAG's 2024-2050 RTP/SCS are to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income class. As indicated in EIR Table 4.8-2, *SCAG RTP/SCS Goal Consistency Analysis*, in EIR Subsection 4.8, *Land Use and Planning*, implementation of the Project would not conflict with any of the goals or policies included in SCAG's 2024-2050 RTP/SCS. As such, no impacts due to a conflict with the regional planning policies in the 2024-2050 RTP/SCS would occur.

Specifically related to Complete Street principles, the Project is designed with attention to pedestrian and bicycle movement and urban context. The Project includes reconstruction of site-adjacent sidewalks to meet ADA accessibility requirements. The Project's design includes wide sidewalks and the separation of loading functions (which would occur in the alley on the south side of the site) from pedestrian frontages (which occur along West Olive Avenue and South Myrtle Avenue), which would improve safety, including for vulnerable groups such as older adults and children. For public use, the Project design includes an outdoor public plaza to be provided at the corner of West Olive Avenue and South Myrtle Avenue and an outdoor public arcade space (to provide a wide sidewalk experience) along South Myrtle Avenue. The plaza would offer 1,495 s.f. of space, and the arcade would offer 760 s.f. of space, for a total of 2,255 s.f. of common outdoor space accessible to the general public, which would encourage pedestrian activity at the street level. By virtue of the Project situating new housing in an existing urbanized area with established infrastructure and transit access, the Project helps to reduce VMT and greenhouse gas emissions, and contributes to a more sustainable and climate-resilient urban fabric.

C. *Americans with Disabilities Act (ADA)*

The Project is designed to meet all applicable requirements of the ADA. For example, Title II of the ADA requires the installation of curb ramps at pedestrian crossings and specifies a minimum width of 36 inches for sidewalks. Under existing conditions, there is an existing 7.5-foot-wide sidewalk adjacent to the Project site's frontage along West Olive Avenue and an approximately 10-foot-wide sidewalk adjacent to the Project site's frontage along South Myrtle Avenue, with a bulb-out provided at the intersection of South Myrtle Avenue and West Olive Avenue that includes existing curb ramps to accommodate crossings over both roadways. These existing sidewalks, inclusive of the bulb-out and curb ramps, would be reconstructed as part of the Project but retained in the same locations as the existing sidewalks. As such, the Project would not conflict with ADA requirements with respect to sidewalk widths or curb ramps. In addition, the Project's construction plans are required to be reviewed for compliance with the ADA by the City of Monrovia Building Division, which is obligated to ensure that the Project would fully comply with all applicable ADA requirements. Accordingly, the Project would not conflict with the ADA, and no impact would occur.

Threshold b.: Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

The City of Monrovia's VMT & LOS Guidelines set forth a two-step process for evaluating a project's impacts due to VMT. The first step is to review proposed developments for consistency with the screening thresholds identified by the City VMT & LOS Guidelines. The City VMT & LOS Guidelines note that projects not screened through the steps above should complete VMT analysis and forecasting through the Screening Tool, the SCAG model, or appropriate sub-area model to determine if they have a significant VMT impact. Provided below is an assessment of the Project in the context of the screening criteria identified by the City VMT & LOS Guidelines.

A. *TPA Screening*

Consistent with guidance identified in the City VMT & LOS Guidelines, projects located within a TPA (i.e., within 0.5 mile of an existing "major transit stop" or an existing stop along a "high-quality transit corridor") may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

In order to meet the TPA screening, the Project site would need to be located within 0.5 mile of an existing "major transit stop" or an existing stop along a "high-quality transit corridor." As defined in Appendix M to

the CEQA Guidelines, a "major transit stop" is defined as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with frequencies of service intervals of 15 minutes or less during the morning and afternoon peak commute periods.[4] As also defined by Appendix M of the CEQA Guidelines, "high-quality transit corridor" means an existing corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.[5] Although the Project site is located approximately 230 northeast of the nearest transit stop (Foothill Transit Route 270), Route 270 only provides service once per hour. Thus, Route 270 does not qualify as either a "major transit stop" or a "high-quality transit corridor." Therefore, the Project site is not located within a TPA and, as such, does not meet the TPA screening criterion (UXR, 2024, 39 and 40).

B. Low VMT Area Screening

As noted in the City VMT & LOS Guidelines, residential and office projects that are located in areas with low VMT and that incorporate similar features (density, mix of uses, and transit accessibility) will tend to exhibit similar low VMT. The Screening Tool uses the sub-regional SCAG travel forecasting model to measure VMT performance in individual TAZ's within the region. The Project's physical location, based on parcel number, was input into the Screening Tool to determine the TAZ's VMT as compared to the City-wide average. The parcels containing the Project were selected and the Screening Tool was run for VMT per capita (i.e., population) measure of VMT. Based on the Screening Tool results presented in Attachment B to the Project's TA (*Technical Appendix J*), the Project is located within a low-VMT generating TAZ. Accordingly, the Low VMT Area screening criterion is met by the Project. Because the Project meets the Low VMT Area screening criterion, the City VMT & LOS Guidelines do not require further analysis to demonstrate that impacts due to VMT would be less than significant (UXR, 2024, p. 40).

C. Conclusion

As indicated in the analysis above, the Project meets the Low VMT Area screening criterion. As stated in the City VMT & LOS Guidelines, a project need only meet one of the identified screening criteria in order to be determined to have a less-than-significant impact due to VMT (City of Monrovia, 2020, Attachment A). Because the Project meets one of the screening criteria, the Project is presumed to have a less-than-significant impact due to VMT. Accordingly, Project impacts due to VMT would be less than significant (UXR, 2024, p. 41).

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

The types of vehicle trips that would be generated during operation of the Project (i.e., passenger vehicles) would be compatible with the type of traffic observed along site-adjacent roadways under existing conditions

[4] Assembly Bill 2553 (AB 2553), signed into law in 2022, amended various provisions of state law to align transportation planning efforts with updated service standards. Notably, the bill revised the definition of "high-quality transit corridors" for certain housing and land use programs by changing the required frequency of bus service from 15 minutes to 20 minutes during peak hours.
[5] *Ibid.*

as the area surrounding the Project site is developed with a mixture of residential, commercial, and light industrial land uses, which also generate passenger vehicle traffic. As such, the Project would not substantially increase hazards due to incompatible uses. For more information, refer to EIR Subsection 4.10, *Land Use and Planning*. No roadway travel lane improvements are proposed as part of the Project's construction. In addition, under existing conditions there are two existing driveway access locations along the site's frontage with West Olive Avenue, while the Project is proposing only one driveway access location. Thus, by accommodating only one driveway access connection across the existing sidewalk, the Project would result in a reduced potential for conflict points between vehicles and pedestrians as compared to the existing driveway configurations.. The Project's driveway access design meets all applicable City standards and requirements related to design safety.

Construction conducted in public roadways is required to comply with the California MUTCD. Project-related construction activities that would occur in the public right-of-way and that could temporarily necessitate lane closures would be required to adhere to the applicable construction control practices that are specified in California MUTCD to minimize potential safety hazards. With adherence, less than significant transportation safety impacts would result during the Project's construction.

As concluded in the Project's TA and a TA Supplement included as T*echnical Appendices J1 and J2* to this EIR, the contribution of Project-related traffic to roadway intersections and I-210 freeway ramps would not cause any hazards related to queuing or level of service deficiencies. Specifically at I-210 ramps, ramp intersections at four locations (I-210 westbound on-ramp at Central Avenue; Myrtle Avenue at Central Avenue; Myrtle Avenue at Evergreen Avenue; and I-210 eastbound on-ramp at Central Avenue) were evaluated using the Highway Capacity Manual (HCM) 7th Edition analysis methodology (Synchro 12 Software) or Intersection Capacity Utilization (ICU) methodology (Traffix Software) for signalized intersections. At the I-210 westbound and eastbound on-ramps, there are no queuing issues with or without the Project and the ramps experience no additional delay with the Project's traffic added in 2027 conditions other than a 0.1 second additional delay in the PM peak hour at the eastbound on-ramp (UXR, 2025b, p. 11). At the Myrtle Avenue at Central Avenue and Myrtle Avenue at Evergreen Avenue intersections, delays with the Project's traffic added in 2027 would be increased only between 0.2 second and 0.3 second (UXR, 2025b, p. 11). As such, less than significant queuing and transportation hazard impacts would occur. Analysis was not conducted at the Huntington Drive and Mountain Avenue I-210 ramps due to low Project-related traffic volume increases at these locations. At the 210 and Huntington Drive ramps the Project would add only 13 net new PM peak hour trips and 7 net new AM peak hour trips. At the I-210 and Mountain ramps the Project would add only 11 net new PM peak hour trips and 6 net new AM peak hour trips. Analysis is warranted only when a project contributes at least 25 new trips to a freeway ramp location. There is no reasonable possibility of a significant impact occurring with the addition of fewer than 25 peak hour trips.

Based on the information above, the Project's construction and operation would not create or substantially increase safety hazards due to a design feature or incompatible use. Impacts would be less than significant.

Threshold d.: Would the Project result in inadequate emergency access?

The Project's design includes adequate access to and from the Project site for emergency vehicles. The Project site abuts West Olive Avenue, South Myrtle Avenue, and an alleyway, all of which would remain in place. Development of the Project would not alter existing public roadway travel lanes and, thus, would not interfere with the circulation of emergency vehicles along public streets that abut the Project site. The City also would review all future Project construction drawings to ensure that adequate emergency access is maintained along abutting public streets during construction activities. Mandatory compliance with the MUTCD standards for Temporary Traffic Control Zones, which establishes measures and sequencing requirements for temporary traffic control devices used during construction activities, including standards related to signage and lane transitions, would address conditions during the Project's construction phase. Based on the Project design and with required adherence to the California MUTCD and City requirements for emergency vehicle access, impacts related to emergency access would be less than significant.

4.13.6 Cumulative Impact Analysis

Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System

As described under the response to Threshold (a) the Project would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities and, thus, would not contribute to a conflict or obstruction with an applicable transportation-related program. In addition, each cumulative development project would be required, as part of their discretionary review processes, to provide a consistency analysis demonstrating compliance with all applicable programs, plans, and ordinances. Therefore, because the Project would not conflict with any applicable programs, plans, or ordinances, and because other cumulative development projects would be required to demonstrate consistency with such programs, plans, and ordinances, cumulative impacts would be less than significant.

Conflict or be Inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)

As discussed above, the Project would result in a less-than-significant VMT impact based on the Low VMT area screening criteria for the Project. Although it is possible that other cumulative developments could result in significant impacts with regard to VMT, because the Project is located within a Low VMT area, the Project's contribution to cumulative impacts regarding VMT would not be considerable and, as such, would be less than significant.

Increase Hazards Due to a Geometric Design Feature or Incompatible Uses

The Project site is located in a fully-developed area that contains a mixture of residential, commercial, and light industrial land uses. As such, the Project would not substantially increase hazards due to incompatible uses. Public right-of-way improvements proposed as part of the Project would be limited to reconstruction of sidewalk, curb, and gutter along the Project site's frontages with South Myrtle Avenue and West Olive Avenue and the construction of a driveway access along West Olive Avenue, with no proposed changes to the existing West Olive Avenue travel lanes beyond what is necessary to provide a connection to the proposed driveway. The City of Monrovia will review the Project's driveway access design, and ensure that it meets all applicable City standards and requirements prior to issuance of a building permit. Other cumulative development projects

similarly would be reviewed by the City of Monrovia or other public agencies to ensure that circulation improvements do not result in hazards due to geometric design. As concluded in the Project's TA and a TA Supplement included as T*echnical Appendices J1 and J2* to this EIR, the contribution of Project-related traffic to roadway intersections and I-210 freeway ramps would not cause any hazards related to queuing or level of service deficiencies in the cumulative year 2027 condition. Accordingly, cumulative impacts due to potentially unsafe geometric design features would be less than significant.

Emergency Access

Monrovia Fire & Rescue will review the Project's construction plans to ensure that the Project would provide adequate access to and from the Project site for emergency vehicles, and development of the Project would not interfere with the circulation of emergency vehicles along public streets that abut the Project site during either construction or long-term operations. Further, the Project and cumulative projects are required by law to comply with California MUTCD standards, including its standards for using temporary traffic control devices during construction activities to ensure adequate operation of the public roadway system. Other cumulative developments similarly would be reviewed by the City of Monrovia or other public agencies to ensure that adequate emergency access is accommodated. Accordingly, cumulative effects on emergency access during both construction and long-term operation would be less than significant.

4.13.7 Significance of Impacts Before Mitigation

Threshold a.: No Impact. The Project would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including the City of Monrovia General Plan Circulation Element and SCAG's RTP/SCS; therefore, no impact would occur.

Threshold b.: Less-than-Significant Impact. The Project meets the City's Low VMT Area screening criterion; therefore, pursuant to City VMT & LOS Guidelines, Project impacts would be less than significant.

Threshold c.: Less-than-Significant Impact. The Project would not introduce any significant transportation safety hazards due to a design feature or incompatible use; thus, impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. Adequate emergency access would be provided to the Project site during construction and long-term operation. The Project would not result in inadequate emergency access to the site or surrounding properties; therefore, a less than significant impact would occur.

4.13.8 Mitigation

Transportation impacts would not occur or would be less than significant; therefore, mitigation is not required.

4.13.9 Design Features (DF) and Regulatory Requirements (RR)

The City of Monrovia requires compliance with the following:

TRAN DF-1: The 701 S. Myrtle Specific Plan contains development standards and design guidelines to address the Project's pedestrian and bicycle features. Compliance with the Specific Plan is

mandatory and will be ensured through the building permit and construction inspection process.

TRAN RR-1: All construction work and improvements conducted in the public roadway right-of-way are required to comply the California Manual on Uniform Traffic Control Devices, which will address potential transportation safety hazards during construction. Compliance is required as a condition of building permits and will be ensured through the building permit and construction inspection process.

TRAN RR-2: All construction work and improvements conducted in the public roadway right-of-way are required to comply with MMC Chapter 16.24, Design Standards. Compliance is required as a condition of building permits and will be ensured through the building permit and construction inspection process.

4.14 TRIBAL CULTURAL RESOURCES

The analysis in this subsection evaluates the potential for Project-related activities to impact tribal cultural resources as defined in California Public Resources Code (PRC) Section 21074. The tribal cultural resources assessment for the proposed Project included a Sacred Lands File (SLF) search requested from the Native American Heritage Commission (NAHC), government to government consultation between the City of Monrovia and the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation), and an archaeological resources records search of the Project site and an area encompassing a one-mile radius around the Project site conducted through the South Central Coastal Information Center (SCCIC) at California State University (CSU), Fullerton (BFSA, 2023). The SLF and archaeological records search results and information shared during the Native American consultation process are confidential and not included as part of this EIR's Technical Appendices. The confidential information is on file at the City of Monrovia, Community Development Department, 415 South Ivy Avenue, Monrovia, CA 91016, and is available for review during the City's regular business hours by individuals with credentials to review confidential archaeological and tribal resource records. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (California Code of Regulations (CCR) Section 15120(d)).

4.14.1 EXISTING CONDITIONS

The Project site is developed with a 25,191-s.f. multi-tenant commercial/industrial office building, associated parking, and landscaping. As the Project site is developed, the entire site has previously been disturbed and is covered with hardscape, landscape, and commercial/industrial office building space. As such, there is no reasonable potential for tribal cultural resources to exist on the surface of the property. The existing building was constructed in 1979, and, due to its modern age, has no reasonable potential to be considered wholly or partly a historic resource of importance to a Native American tribe. Also, no prehistoric resource sites, features, places, or landscapes were identified on the Project site in the archaeological records search conducted through the SCCIC and no resources were identified on the site that are either listed or eligible for listing in the California Register of Historic Places (CRHR).

A Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC) to determine the presence of previously recorded sacred sites in the Project site's vicinity. The NAHC search yielded positive results, with a recommendation to contact the Kizh Nation for consultation.

As part of the Native American consultation processes required by State law, the City of Monrovia sent notification of the Project to Native American tribes with possible traditional or cultural affiliation to the Project area on December 4, 2023, consistent with PRC §21080.3.1. One tribal consultation request from the Gabrieleño Band of Mission Indians – Kizh Nation was received in response to the consultation invitations. A consultation meeting was tentatively scheduled, but did not occur. The City followed up with Kizh Nation multiple times in May and June 2025 to re-engage in consultation. Although no formal AB 52 consultation meeting has occurred, the City initiated and pursued consultation in good faith. The Kizh Nation are a California Native American tribe with ancestral ties to the Los Angeles Basin, including the entirety of what is now Los Angeles County. The Kizh are the original inhabitants of this region, with a continuous presence dating back thousands of years. Prior to European colonization, the Kizh people lived in well-organized

villages and maintained a complex society based on hunting, gathering, fishing, and trade, with spiritual connections to the surrounding land, water, and natural features. The term "Gabrieleño" was assigned during the Spanish colonial period, in reference to Mission San Gabriel Arcángel, established in 1771. The mission system forcibly relocated and assimilated the Kizh people and the Kizh identify by their own name, which derives from *kichire*, the traditional dome-shaped willow and tule dwellings they constructed. Throughout Los Angeles County, numerous tribal cultural resources remain significant to the Kizh Nation. These sites often lie beneath the ground surface and are not be visible at the surface or are underneath developed area.

4.14.2 Regulatory Setting

Following is a brief description of the State environmental laws and regulations related to tribal cultural resources.

A. State

1. California Administrative Code, Title 14, Section 4308

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: "No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value" (NPS, n.d.).

2. California Code of Regulations Title 14, Section 1427

CCR Title 14, Section 1427 provides that: "No person shall collect or remove any object or thing of archaeological or historical interest or value, nor shall any person injure, disfigure, deface or destroy the physical site, location or context in which the object or thing of archaeological or historical interest or value is found" (NAHC, n.d.).

3. Native American Consultation Requirements under the California Government Code and Public Resources Code (inclusive of Senate Bill 18; 2004, and Assembly Bill 52; 2008)

Pursuant to California Government Code Sections 65351 and 65352.3 and Senate Bill 18 of 2004 (SB 18), local governments are required to consult with California Native American tribes during the preparation or amendment of a general plan or specific plan. These provisions were established to help protect tribal cultural places and ensure that traditional tribal knowledge is considered in long-range land use planning. Local governments must provide formal written notice to tribes that are on the Native American Heritage Commission (NAHC) contact list and traditionally affiliated with the geographic area of the proposed plan. If a tribe responds and requests consultation, the lead agency must engage in good faith consultation to address the potential impacts of the proposed plan on places of cultural, sacred, archaeological, or historical significance to the tribe.

Assembly Bill 52 (AB 52), enacted in 2014, amended CEQA by adding provisions related to tribal cultural resources and is codified under the California Public Resources Code (PRC). PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, and 21084.3 establish a formal process for tribal consultation and evaluation of potential impacts to tribal cultural resources. Under PRC Sections 21080.3.1 and 21080.3.2, CEQA lead

agencies must notify California Native American tribes that are traditionally and culturally affiliated with the project area and have requested notification, once a Notice of Preparation (NOP) or other CEQA triggering document is filed. If a tribe responds and requests consultation within 30 days, the lead agency must engage in meaningful consultation to determine whether the project may cause a significant impact to a tribal cultural resource and, if so, to develop appropriate mitigation measures (OPR, 2017a).

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. PRC Section 20184.3(b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources. PRC Section 21074 defines "tribal cultural resources" as resources that must be either:

(1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or

(2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource (OPR, 2017a).

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the California Register of Historic Resources (CRHR). In applying those criteria, a lead agency must consider the value of the resource to the tribe (OPR, 2017a). To be eligible for listing in the CRHR, a property must be at least 50 years of age and possess significance at the local, State, or national level under one or more of four criteria (OHP, n.d.).:

- It is 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 (Criterion 1).
- It is associated with the lives of persons important to local, California or national history (Criterion 2).
- It embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values (Criterion 3).
- It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4).

4. Public Resources Code Sections 5097.9–5097.991

PRC Sections 5097.9–5097.991 provides protection to Native American historical and cultural resources and sacred sites and identifies the powers and duties of the NAHC. It also requires notification of discoveries of Native American human remains to descendants and provides for treatment and disposition of human remains and associated grave goods.

California PRC Section 5097.98 outlines procedures that must be followed in the event that human remains are discovered. The County Coroner shall determine within 2 working days from the time the person responsible for the excavation, or designee, notifies the County Coroner of the discovery or recognition of the

human remains. If the County Coroner identifies the remains to be of Native American origin or has reason to believe that the remains are those of Native American origin, the County Coroner must contact the California NAHC within 24 hours. The NAHC representative will then alert a Native American Most Likely Descendant (MLD) to conduct an inspection of the site and to determine the following course of treatment and action. Additionally, State CEQA Guidelines Section 15064.5 sets forth a procedure if human remains are found on land outside of federal jurisdiction.

5. California Health and Safety Code

California Health and Safety Code (HSC) Section 7050.5(b) requires that excavation and disturbance activities must cease "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery…" until the coroner can determine the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the code makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. HSC Section 7051 specifies that the removal of human remains from "interment or a place of storage while awaiting interment" with the intent to sell them or to dissect them with "malice or wantonness" is a public offense punishable by imprisonment in a state prison (CA Legislative Information, n.d.).

4.14.3 Basis for Determining Significance

Section XVIII of Appendix G to the CEQA Guidelines addresses typical adverse effects on tribal cultural resources and includes the following threshold question to evaluate the impacts of the Project on tribal cultural resources. The Project would result in a significant impact to tribal cultural resources if the Project would:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k).

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). In applying the criteria set forth PRC Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.

The methodology used to address potential impacts to tribal cultural resources included the notification of tribal governments that this EIR would be prepared and a response from Kizh Nation requesting consultation. Although the City made good faith efforts to consult, no consultation meeting has occurred. Information about the tribal history of Kizh Nation was obtained from internet-based sources and relied upon to determine the potential presence of subsurface tribal cultural resources.

4.14.4 Impact Analysis

Threshold a.: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). In applying the criteria set forth in PRC Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe?

The Project's construction activities would involve substantial ground disturbance, including but not limited to demolition, grading, excavation for subterranean parking levels, and trenching for utilities and dry well installation. These activities have the potential to disturb previously undisturbed subsurface soils that may contain tribal cultural resources associated with the Kizh Nation (Gabrieleño Band of Mission Indians), who are the ancestral inhabitants of the Los Angeles Basin, including the Project vicinity.

The Kizh Nation has identified this region as part of its traditional tribal territory, which includes known and undocumented cultural sites such as village areas, ceremonial places, burial grounds, and other culturally sensitive resources. Due to the potential for these resources to exist below the surface and be invisible at grade, there is a possibility that such resources could be encountered during Project-related excavation or other subsurface activities.

If previously unrecorded tribal cultural resources are discovered during construction and are determined, through consultation with Kizh Nation or other culturally affiliated California Native American tribe, to meet the definition of a Tribal Cultural Resource under PRC Section 21074, and if such resources are not appropriately identified, evaluated, and treated, a significant impact could occur. Therefore, mitigation is required to ensure the Project complies with the requirements of PRC Sections 21080.3.1, 21080.3.2, and 21082.3, and that any tribal cultural resources identified are afforded proper protection and management.

4.14.5 Cumulative Impact Analysis

As indicated under the analysis of Threshold (a), there is a possibility that significant tribal cultural resources could be encountered during the Project's ground-disturbing construction activities and significantly impacted if not properly identified and treated. The Project is located within the ancestral territory of the Kizh Nation, which encompasses a large portion of the Los Angeles Basin, including the surrounding valleys and river systems. This region is culturally and spiritually significant to the Kizh people and contains numerous known and undocumented tribal cultural resources. Many of these resources have been buried by development and are not be visible at the surface. Past, present, and reasonably foreseeable future development in the traditional ancestral territory of Kizh Nation that involve ground disturbance, deep excavation, and utility trenching, pose an ongoing risk of impact to subsurface tribal cultural resources. Although individual projects may incorporate mitigation measures to address direct impacts, the incremental loss or disturbance of tribal cultural resources

across multiple project sites within Kizh ancestral lands can contribute to a cumulative degradation of tribal cultural resources. The proposed Project would involve substantial subsurface construction activities that, when considered together with other similar development in the region, could contribute to a cumulatively significant impact on tribal cultural resources if such resources are encountered and not properly identified and treated.

As indicated below, mitigation is identified in EIR Subsection 4.3, *Cultural Resources*, to reduce the Project's potential impact to less than significant. Cumulative development projects subject to CEQA and involving subsurface ground disturbance would also require mitigation in order to reduce their potentially respective impact(s) to a less-than-significant level.

Other than for site-adjacent roadway and utility improvements, the Project does not include off-site ground disturbance that would affect potentially significant off-site tribal cultural resources or would otherwise result in an increase in the likelihood that such resource would be encountered when combined with the impacts of other cumulative projects. Therefore, cumulative impacts to tribal cultural resources would be less than significant.

4.14.6 Significance of Impacts Before Mitigation

Threshold a.: Potentially Significant Direct Impact. The Project site does not contain any known tribal cultural resources. However, there is a potential for tribal cultural resources to be located beneath the surface of the site and discovered and impacted during the Project's excavation activities; as such, a potentially significant impact could occur.

4.14.7 Mitigation

Mitigation Measures MM 4.3-1 through MM 4.3-3 included in EIR Subsection 4.3, *Cultural Resources*, would be implemented to address potential impacts to tribal cultural resources.

4.14.8 Significance of Impacts After Mitigation

Threshold a: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measures MM 4.3-1 through MM-4.3-3 would ensure the proper identification and subsequent treatment of any tribal cultural resources that may be encountered during ground-disturbing activities associated with Project construction. With implementation of the required mitigation measures, the Project's potential impacts to important subsurface tribal cultural resources (if such resources are unearthed during Project construction) would be reduced to less than significant.

4.15 Utilities and Service Systems

The analysis in this subsection addresses the topics of water service and supply, wastewater collection and treatment, stormwater management, solid waste collection and disposal, and dry utilities (i.e., electrical power, natural gas, and telecommunications) and relies on publicly available information provided by local service providers and a technical memorandum prepared by Kier Wright (K+W, 2025) that provides water and sewer generation estimates for the Project. A complete list of references for information relied upon to prepare this subsection can be found in EIR Section 7.0, *References*.

4.15.1 Existing Conditions

A. Water Service

The City of Monrovia provides water service to the City, including the Project site. The City adopted an Urban Water Management Plan (UWMP) pursuant to the requirements of the State of California Urban Water Management Planning Act and the California Water Code to describe existing and future water demands in its service territory and future availability of the water supply sources used by the City (City of Monrovia, 2021). Based on the City's UWMP, the City estimates its current and projected potable and non-potable water demands in five-year increments, with the projected demand in 2025 being approximately 6.6 million gallons per day (gpd).[1] The UWMP considers the existing use of the Project site as a 25,162-s.f. commercial/industrial office building, which receives water service from the City. The existing building has 15 tenant spaces, but because its water and sewer bills and usage records were not available for review, it is unknown how much water the tenants are consuming under existing conditions. As identified in Section 4.10, *Population and Housing*, of this EIR, existing uses on the Project site currently provide approximately 52 jobs (i.e., employees). As noted on page 4-14 of the UWMP, the City's per capita water usage in 2020 was 154 gallons per capita per day (gpcd). Accordingly, as a general point of reference, the existing 52 employees on-site are assumed to demand water at a rate of approximately 8,008 gpd[2] or approximately 8.97 acre-feet per year (AFY).

The City owns and maintains 111 miles of water lines. According to the Monrovia Construction Record W-133, an existing 8-inch water main runs adjacent to the Project site along West Olive Avenue and South Myrtle Avenue.

The Project site is located within the Main San Gabriel Groundwater Basin, which is the primary source of water for the City. The Main San Gabriel Basin Watermaster is a nine-person board responsible for the efficient management of the quantity and quality of the basin's groundwater. The Main San Gabriel Groundwater Basin, one of the largest groundwater basins in Southern California, covers an area of 167 square miles, providing over 1.2 million residents with approximately 168,400 AFY of water (Main San Gabriel Basin Watermaster, 2023, Appendix B). Although the City reduced its reliance on imported water supplies between 2015 and 2020 and is anticipated to continue to reduce its reliance on imported water through 2045, the City can purchase

[1] 7,469 acre feet per year (City of Monrovia, 2021, pp. 4-6) x 325,851 gallons (per acre foot) ÷ 365 days per year = 6,667,893 gpd.
[2] 52 employees x 154 gpcd = 8,008 gpd

treated, imported water from Metropolitan Water District of Southern California (MWD) through the Upper San Gabriel Valley Municipal Water District (Upper District). MWD imports water from the Colorado River through the Colorado River Aqueduct, owned and operated by MWD, and the State Water Project, which utilizes the California Aqueduct for transmission to Southern California. Water delivered to Upper District's member agencies can be treated at MWD's Weymouth Treatment Plant located in the City of La Verne (City of Monrovia, 2021, pp. 1-7 and 6-7).

B. Wastewater Service

The City provides wastewater conveyance service in the City, including the Project site. According to the Monrovia Construction Record S-133, an existing 10-inch sewer main runs adjacent to the Project site beneath South Myrtle Avenue. An existing 6-inch sewer lateral is located in the alley located south of the Project site that discharges into a manhole on South Myrtle Avenue. Wastewater generated by the 25,162-s.f. commercial/industrial office building currently located on the Project site flows into the sewer lateral and then into the sewer main located beneath South Myrtle Avenue. The existing building has 15 tenant spaces but because its water and sewer bills and usage records were not available for review, it is unknown how much wastewater the tenants are discharging under existing conditions. Using the Los Angeles County Sanitation District's (LACSD's) estimated average daily sewer flow of 200 gpd per 1,000 s.f. for offices (LACSD, n.d.), as a general point of reference, the estimated amount of wastewater generated from the existing use of the Project site is estimated at 5,032 gpd.[3]

The City operates the wastewater and collection system but does not own or operate a wastewater treatment plant. The City contracts with LACSD No. 15 for the treatment of wastewater transmitted through the City's sewer system. Wastewater from the City is conveyed to the San Jose Creek Water Reclamation Plant located at 1965 Workman Mill Road in the City of Whittier (City of Monrovia, 2016, p. 42). The San Jose Creek Water Reclamation Plant consists of two hydraulically interconnected facilities that are situated on the east and west side of Interstate 605 (I-605). It currently provides primary, secondary, and tertiary treatment for a design capacity of 100 million gallons per day (mgd) of wastewater (LACSD, n.d.). The 2022 average daily flow of wastewater received at the San Jose Creek Water Reclamation Plant was 62.9 mgd (LACSD, 2023, p. 1-1). The excess capacity is approximately 37.1 mgd.

C. Stormwater Conveyance Facilities

The City of Monrovia Public Works maintains the public stormwater system. Under existing conditions, the Project site's stormwater runoff surface flows to the alley on the south side of the Project site. From there, runoff flows west to South Primrose Avenue and is collected in a catch basin at the northeastern corner of South Primrose Avenue and West Walnut Avenue, where it connects to a 72-inch reinforced concrete pipe (RCP) in South Primrose Avenue. The 72-inch pipe drains southerly and connects to the Peck Road Channel, south of Duarte Road. From there, stormwater runoff is conveyed southeasterly to the Sawpit Wash. The Sawpit Wash outfalls into a stormwater basin that drains to the Rio Hondo Channel, which then drains to the

[3] 25,162 s.f. ÷ 1,000 x 200 = 5,032.4. "Office Building" is the LACSD land use category that most closely matches the Project site's existing use.

Los Angeles River and out to the Pacific Ocean. Peak runoff from the Project site during a 25-year storm event under existing conditions is approximately 5.17 cubic feet per second (cfs) (Readler, 2024). No known water quality management features are located on the Project site under existing conditions.

D. Solid Waste Collection and Disposal

Solid waste from the Project site is collected by Athens Trash Services. The existing building on the Project site has 15 tenant spaces but because its trash collection records were not available for review, it is unknown how much solid waste the tenants are disposing of under existing conditions. However, as identified in Section 4.10, *Population and Housing*, the existing uses on the Project site currently provide approximately 52 jobs (i.e., employees). Applying an average of 6.7 pounds (lbs)/person/day, it is estimated that 348.4 lbs of solid waste per day are generated at the Project site. In 2024, solid waste collected in the City of Monrovia requiring landfill disposal was sent to the Olinda Alpha Sanitary Landfill in Brea and the Chiquita Canyon Landfill in Castaic (CalRecycle, 2025). However, as of January 1, 2025, the Chiquita Canyon Landfill ceased accepting waste and thus is not further discussed herein. The Olinda Alpha Sanitary Landfill is permitted to accept 8,000 tons per day and as of January 1, 2004, had a remaining capacity of 9,832,064 cubic yards (OCWR, 2025).

E. Dry Utilities

Utility providers to the Project site under existing conditions are SoCal Gas, Southern California Edison (SCE), Frontier Communications, Time Warner Cable/Spectrum, Giggle Fiber, AT&T, and DirecTV. Refer to EIR Subsection 4.4, *Energy*, for a description of electricity and natural gas systems serving the Project site. An underground 2-inch gas main exists beneath South Myrtle Avenue adjacent to the Project site. Underground electrical and communication system lines serving the site are located in the rights-of-way of South Myrtle Avenue and West Olive Avenue.

4.15.2 Regulatory Setting

The following is a brief description of the federal, State, and local environmental laws and related regulations related to utilities and service systems.

A. Federal Plans, Policies, and Regulations

1. Clean Water Act

The Clean Water Act (CWA) established the basic structure for regulating discharges of pollutants into the waters of the U.S. and regulating quality standards for surface waters. The CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the act was substantially reorganized and expanded in 1972. "Clean Water Act" became the act's common name with amendments in 1972. Under the CWA, the U.S. Environmental Protection Agency (USEPA) has implemented pollution control programs, such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. USEPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances, such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface

discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters (USEPA, 2023e).

2. Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was established to protect the quality of drinking water in the U.S. This law focuses on all waters actually or potentially designed for drinking use, whether from above ground or underground sources. The act authorizes USEPA to establish minimum standards to protect tap water and requires all owners or operators of public water systems to comply with these primary (health-related) standards. The 1996 amendments to SDWA require that USEPA consider a detailed risk and cost assessment and best available peer-reviewed science, when developing these standards. State governments, which can be approved to implement these rules for USEPA, also encourage attainment of secondary standards (nuisance-related). Under the act, USEPA also establishes minimum standards for state programs to protect underground sources of drinking water from endangerment by underground injection of fluids (USEPA, 2023f).

B. State Plans, Policies, and Regulations

1. Applicable Water Supply Regulations

- ❑ Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act of 2006 (AB 1881) was established to ensure adequate water supplies are available for future uses. To promote the conservation and efficient use of water, the act requires local agencies to adopt a water efficient landscape ordinance. When such an ordinance had not been adopted, a finding as to why (based on the climatic, geologic, or topographical conditions) such an ordinance is not necessary must be adopted. In the absence of such an ordinance or findings, the policies and requirements contained in the "model" ordinance drafted by the State of California apply within the affected jurisdiction (CA Legislative Info, 2016).

- ❑ Government Code Section 66473.7(b)(2)

Government Code Section 66473.7(b)(2) approved under SB 221 in 2001 requires that when a city or county approves certain residential subdivisions, an affirmative written verification of sufficient water supply is required. Proof of the availability of a sufficient water supply must be requested by the subdivision applicant or local agency, at the discretion of the local agency, and is based on written verification from the applicable public water purveyor within 90 days of a request. SB 221 does not apply to the Project or any other residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses, or where the immediately contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses, or housing projects that are exclusively for very low and low-income households (DWR, 2003; CA Legislative Info, n.d.).

- ❑ California Water Code Sections 10910 - 10915

The California Water Code (Water Code) Sections 10910 through 10915 were amended by the enactment of SB 610 in 2002. The Water Code requires an assessment of whether available water supplies are sufficient to serve the demand generated by certain proposed projects, as well as the reasonably foreseeable cumulative

demand in the region over a 20 year period from the time of assessment under average normal year, single dry year, and multiple dry year conditions. Water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects (as defined in Water Code Section 10912 [a]) subject to CEQA (DWR, 2003; CA Legislative Info, 2021). The Project evaluated herein does not meet the definition given in the Water Code for a project that requires a water supply assessment because the Project proposes fewer than 500 dwelling units, will employ fewer than 1,000 persons, and would not generate a water demand equal to or greater than a 500 dwelling unit project.

❑ California Water Code Section 10610 et seq.

Signed into law on October 16, 1995 through SB 901, California Water Code Section 10610 et. seq. requires every urban water supplier to identify as part of its UWMP, the existing and planned sources of water available to the supplier over a prescribed five-year period. The law requires the water service purveyor to assess the projected water demand associated with a proposed project under environmental review. The Water Code requires compliance in the event that the project involved the adoption of a specific plan, amendment to, or revision of the land use element of a general plan or specific plan that would result in a net increase in the state population density. Upon completion of the water assessment, cities and counties may agree or disagree with the conclusions of the water service purveyors, but cannot approve projects in the face of documented water shortfalls without first making certain findings (CA Legislative Info, n.d.).

❑ Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) established a new structure for managing California's groundwater resources at a local level by local agencies. SGMA required, by June 30, 2017, the formation of locally-controlled groundwater sustainability agencies (GSAs) in the State's high- and medium-priority groundwater basins and subbasins (basins). A GSA is responsible for developing and implementing a groundwater sustainability plan (GSP) to meet the sustainability goal of the basin to ensure that it is operated within its sustainable yield, without causing undesirable results. The GSP Emergency Regulations for evaluating GSPs, the implementation of GSPs, and coordination agreements were adopted by DWR and approved by the California Water Commission on May 18, 2016 (DWR, n.d.).

When water users within a groundwater basin are in dispute over legal rights to the water, a court can issue a ruling known as an adjudication. Adjudications can cover an entire basin, a portion of a basin, or a group of basins and all non-basin locations between. The Main San Gabriel Basin is an adjudicated groundwater basin, where entities that use the groundwater basin as a water supply must pay their fair share of the cost to import supplemental water to recharge the basin. However, there is no limit on the quantity of groundwater that may be extracted, even during drought years. The Main San Gabriel Basin serves three water districts: the Upper San Gabriel Valley Municipal Water District (Upper District), San Gabriel Valley Municipal Water District (SGVMWD), and Three Valleys Municipal Water District (TVMWD). The City of Monrovia is located within Upper District's service area.

❑ California Code of Regulations, Title 24, Part 11 (CALGreen Code)

California Code of Regulations, Title 24, Part 11 is referred to as the California Green Building Standards (CALGreen) Code, which was adopted by the City through MMC Section 15.04.010(K). The CALGreen Code is applicable to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout the State of California (including residential structures and mixed use structures, such as the Project). The CALGreen Code requires sustainable water efficiency practices, including but not limited to, the use of low flow fixtures. Water conserving plumbing fixtures and fittings are required in water closets, showerheads, faucets, and valves per CALGreen Code Section 4.303.1 and to encourage individual responsibility to reduce water use, submeters are required to be installed to measure water use for individual dwelling units in accordance with the California Plumbing Code (CEC, 2022).

2. Applicable Solid Waste Regulations

❑ California Solid Waste Integrated Waste Management Act (AB 939, 1989)

The Integrated Waste Management Act (IWMA) established an integrated waste management hierarchy to guide the California Integrated Waste Management Board (CIWMB) and local agencies in implementation, in order of priority: (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal (it should be noted that the CIWMB no longer exists, and its duties have been assumed by CalRecycle). As part of the IWMA, the reduction of disposed waste is mandated. Every city and county is required to have a plan for the diversion of 50 percent of its solid waste through source reduction, recycling, and composting activities. The IWMA also requires CalRecycle in conjunction with an inspection conducted by a Lead Enforcement Agency (LEA), to conduct at least one inspection per year of each solid waste facility in California. Additionally, the IWMA established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities (CalRecycle, n.d.).

❑ Waste Reuse and Recycling Act

The California Solid Waste Reuse and Recycling Access Act (WRRA), codified in PRC Sections 42900 *et seq.*, requires CalRecycle to have a model ordinance for adoption by any local government for the transfer, receipt, storage, and loading of recyclable materials in development projects. The WRRA requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded, to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided prior to issuance of building permits (CalRecycle, n.d.). The City of Monrovia addresses the model ordinance in MMC Chapter 8.10.

❑ Mandatory Commercial Recycling Program

The Mandatory Commercial Recycling program, established under Public Resources Code Section 42649, requires businesses that generate four cubic yards or more of solid waste per week and multi-family residential dwellings of five units or more to arrange for recycling services. Organics and recycling containers must be provided at these businesses to collect waste generated from products purchased and consumed on the premises. The law is intended to reduce greenhouse gas emissions by diverting recyclable materials from landfills, in support of California's goal to achieve a statewide 75% solid waste diversion rate. Local

jurisdictions are required to implement commercial recycling programs through education, outreach, and monitoring efforts. The City of Monrovia addresses mandatory recycling requirements in MMC Chapter 8.10.

- ❑ California Code of Regulations, Title 24, Part 11 (CALGreen Code)

The CALGreen Code requires recycling practices, including, but not limited to, material conservation and resource efficiency. CALGreen Code Section 4.408.2 requires implementation of a construction waste management plan and Section 4.408.1 requires all projects that generate a total combined weight of construction and demolition waste disposed in landfills, which do not exceed 2 pounds per square foot of the building area, to meet a minimum 65-percent construction waste reduction requirement (CEC, 2022).

C. Local Plans, Policies, and Regulations

1. City of Monrovia Urban Water Management Plan (UWMP)

The Urban Water Management Planning (UWMP) Act requires water agencies to develop UWMPs over a 20-year planning horizon and further requires UWMPs to be updated every five years (DWR, 2016, p. 1-2). UWMPs provide a framework for long term water planning and inform the public of a water supplier's plans for long-term resource planning that ensures adequate water supplies for existing and future demands.

The City of Monrovia is classified as an urban water supplier because it serves more than 3,000 customers, and it supplies more than 3,000 AFY of water. The City's 2020 UWMP provides 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. Additionally, the 2020 UWMP incorporates water supply reliability determinations resulting from potential prolonged drought, regulatory revisions, and/or changing climatic conditions. The UWMP, Table 7, indicates that the City can meet water demands during normal years over the UWMP's planning period of 2025 to 2045. The UWMP also demonstrates that the City can meet water demands during drought years with the implementation of a Water Shortage Contingency Plan, which the City has adopted as MMC Chapter 13.20 (City of Monrovia, 2021). According to the projections, total water usage by land uses in the City in 2025 is projected to be 7,469 AFY and would increase to 8,282 AFY by 2045 (City of Monrovia, 2021, Table 4-2). This total water usage includes residential, commercial, industrial, institutional/ governmental, and landscape uses and includes any potential water losses. The City is capable of meeting all customers' water demands from 2025 through 2045, even with a drought lasting five consecutive years (City of Monrovia, 2021, Table 7-2, Table 7-3, and Table 7-4).

2. City of Monrovia Municipal Code (MMC)

MMC Section 8.46.100 outlines Monrovia's landscape ordinance regulating new residential and non-residential construction projects with a landscape area totaling more than 500 s.f. and rehabilitated residential and non-residential landscape projects with a landscape area totaling more than 2,500 s.f. In accordance with the State's Model Water Efficient Landscape Ordinance (MWELO), a project applicant shall submit a complete Landscape Documentation Package containing a Water Efficient Landscape Application containing a licensed landscape professional's statement that the proposed design and documentation package complies with State's regulations regarding water conservation (City of Monrovia, 2023a).

MMC Chapter 13.20, Water Conservation, establishes the City of Monrovia Emergency Water Conservation Plan. Upon declaration by the City Council that a water shortage emergency exists, this Plan shall be implemented to reduce the consumption of potable water over an extended period until the City Council declares the water shortage emergency has ended. The Plan outlines five water conservation phases mandating water use reductions ranging from a 10-percent usage reduction to a 50-percent usage reduction.

MMC Section 8.09.050 implements the City's Construction and Demolition (C&D) Recycling Program, requiring project applicants to prepare a Waste Management Plan for projects and recycling of at least 50 percent of C&D waste (City of Monrovia, n.d.). The City must review and approve the Waste Management Plan for projects, which requires submittal of Waste Management Reports, including receipts or weight tickets to document recycling of materials.

MMC Chapter 8.08 establishes the City's Residential Solid Waste, Green Waste, and Recyclable Materials Collection requirements. Further, MMC Section 8.46.090 requires compliance with all CALGreen Code recycling requirements. As it applies to the Project, accessible areas that serve occupants on the site are required to be identified for the storage and collection of blue container and green container materials, consistent with the collection program offered by the City.

4.15.3 Basis for Determining Significance

Based on Section XIX of Appendix G to the CEQA Guidelines, the Project would result in a significant impact to utilities and service systems if the Project would:

a) *Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;*

b) *Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;*

c) *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;*

d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or,*

e) *Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.*

The analysis methodology involves identifying the projected utility and service system demands of the Project and compares the projected demands against existing system capacities and regulatory requirements, including those related to water supply reliability, wastewater treatment capacity, dry utility systems, and landfill capacity. Potential impacts are analyzed in accordance with CEQA Guidelines Appendix G, with consideration of whether the Project would result in the need for new or expanded utility and service system infrastructure due to exceeding service capacities. The analysis considers whether the Project would generate a need for new

or physically expanded facilities, and whether the construction or operation of such facilities could result in significant environmental effects.

4.15.4 IMPACT ANALYSIS

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

The Project would redevelop the approximately 1.61-acre Project site with a proposed mixed-use five-story building. The installation of the infrastructure improvements proposed as part of the Project would result in physical environmental impacts; however, these impacts have already been considered in the analyses of construction-related effects presented throughout this EIR. In instances where the Project's construction phase would result in specific significant impacts, mitigation measures are provided in the applicable subsection of this EIR to lessen environmental effects to the extent feasible. The construction of infrastructure necessary to serve the Project would not result in any significant physical effects on the environment that are not already identified and disclosed elsewhere in this EIR. There are no components of the Project's infrastructure improvements that would result in impacts not already disclosed in this EIR and, accordingly, additional mitigation measures beyond those identified throughout this EIR would not be required. A summary discussion of each component of the Project's infrastructure system is provided below.

A. Water and Water Treatment Facilities

The Project would connect to existing water lines located beneath West Olive Avenue and beneath the alley along the southern boundary of the Project site. A proposed 6-inch water line would connect the Project to the existing 8-inch water line located beneath West Olive Avenue and a proposed 8-inch water line would connect to the existing 8-inch water line beneath the alley on the south side of the Project site. A number of additional connections to the existing water lines within West Olive Avenue and the alley on the south side of the Project site are proposed to provide water service to individual fire hydrants that are proposed along the northern and southern sides of the building. A fire flow test conducted at Fire Hydrant Nos. 769 and 768 near the Project site in May 2025 shows adequate fire flow (Legion, 2025). The Project's design would comply with the CALGreen Code requirements for water conservation, including requirements to install low flow fixtures in the building and efficient irrigation systems for watering of landscape material. Refer to the discussion below under Threshold b. for the Project's water demand estimates.

The Project is not anticipated to require the installation of new off-site water lines or the relocation or upsizing of any existing water lines off-site. While the Project would result in an incremental increase in demand for water treatment capacity, the Project's water demand, which is estimated to be 34.65 AFY (as discussed under Threshold b. below), would not result in or require new or expanded water treatment facilities beyond those facilities already planned as part of the Monrovia 2020 UWMP. A "will serve" commitment from the City of Monrovia Public Works Department will be required prior to water service being supplied to the Project. There are no components of the Project that would result in or require the expansion of any water treatment systems

beyond what already is planned by the City of Monrovia Public Works Department. Accordingly, Project impacts to water treatment capacity would be less than significant.

B. Wastewater and Wastewater Treatment Facilities

The Project would connect to an existing 10-inch sewer line that is located beneath South Myrtle Avenue and to an existing 6-inch sewer line that is located beneath the alley along the southern boundary of the Project site. The Project's design would comply with CALGreen Code requirements for water conservation, including requirements to install low flow fixtures in the building, which would lead to less wastewater generation. The Project is not anticipated to require the relocation or upsizing of any existing wastewater conveyance lines off-site. A "will serve" commitment from the City of Monrovia Public Works Department will be required prior to wastewater service being supplied to the Project.

Sewer generation rates for the Project were based on published values from the LACSD (LACSD, n.d.). Conservatively, a wastewater generation rate of 260 gpd per dwelling unit is applied, regardless of unit size or occupancy. The Project includes 204 residential units in studio, one-bedroom, and two-bedroom configurations, resulting in an estimated wastewater generation of approximately 53,040 gpd.[4] Also, conservatively applying LACSD's estimated average daily sewer flow of 200 gpd per 1,000 s.f. for offices, the Project's 1,080-s.f. leasing office, 1,390-s.f. residential lobby and mail room, 2,537-s.f. clubhouse and hearth room, and 2,782-s.f. fitness area (7,789 s.f. of total space) would demand 1,558 gpd.[5] The Project's estimated wastewater generation is thus 54,598 gpd (approximately 0.055 mgd).[6] It should be noted that LACSD's wastewater generation factors are used for planning and design capacity purposes. Because the Project's estimated water demand is approximately 43 percent lower than this amount (30,907 gpd, refer to Threshold b., below), and wastewater generated from a development project typically does not exceed its water consumption, the Project's actual wastewater discharge is anticipated to be lower than LACSD's 0.055 mgd design capacity estimate.

As previously stated, the San Jose Creek Water Reclamation Plant has an excess capacity of approximately 37.1 mgd. The Project's anticipated demand for wastewater treatment capacity would represent approximately 0.148 percent of the excess treatment capacity at the San Jose Creek Water Reclamation Plant.[7] Accordingly, the Project would not result in or require new or expanded wastewater treatment capacity, and, as such, impacts related to wastewater generation and treatment capacity would be less than significant.

C. Stormwater Drainage Facilities

As part of the Project's stormwater drainage plan, stormwater would be collected from the site during rain events by an on-site stormwater drainage system and directed to drywells that would be installed below the subterranean parking level, extending to depths of at least 25 to 30 feet below the proposed foundations (approximately 40 to 55 feet below existing grades) to provide stormwater infiltration at the site.

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[4] 204 units x 260 gallons per day (gpd) = 53,040 gpd.
[5] 7,789 s.f. x 200 gpd ÷ 1,000 = 1,557,8 gpd.
[6] 53,040 gpd + 1,558 gpd = 54,598 gpd.
[7] 0.055 mgd ÷ 37.1 mgd x 100 = 0.148 percent

Surface runoff would continue to be directed to the storm drain system in West Olive Avenue and the alley on the south side of the Project site. Existing peak runoff from the Project site during 25-year storm events is estimated to be 5.17 cubic feet per second (cfs). With development of the Project as proposed, peak runoff on the Project site during 25-year storm events would increase to approximately 5.75 cfs (an increase of 0.11 percent). Existing peak runoff from the Project site during 50-year storm events is estimated to be 6.46 cfs. With development of the Project as proposed, peak runoff on the Project site during 50-year storm events would increase to approximately 6.55 cfs (an increase of 0.014 percent). Although peak runoff would increase, the Project would not exceed the capacity of existing downstream stormwater facilities because the Project would be designed to retain a water volume of 6,000 cubic feet (cf) before overflowing to West Olive Avenue and the alley to the south. All first flush runoff would be directed to the drywells for water quality treatment and no first flush runoff would be discharged from the site without being filtered by the drywell system. Although the percent of impervious surface area would increase in the post-development condition, the Project would detain a minimum of 6,000 cf to ensure that the flow or volume of stormwater runoff from the site does not exceed the stormwater flow under existing conditions. The existing storm drain system would not be adversely affected by the Project and the Project would not result in or require any expansion of stormwater drainage infrastructure off site (Readler, 2024). As such, no impacts would occur.

D. Dry Utilities

The Project would connect with site-adjacent electric, gas, and telecommunication utility lines. Refer to EIR Subsection 4.4, *Energy*, for a discussion of the electricity and natural gas systems that would serve the Project. Sufficient energy resources exist in the service grid for SCE and SoCalGas to service the Project. The Project's proposed mixed-use building would be constructed in compliance with CALGreen Code Title 24 regulations, as implemented by the City of Monrovia. As such, the Project is required to accommodate a broad range of energy efficient design features. For example, under the 2022 version of Title 24, the Project would be required to accommodate photovoltaic (PV) systems to generate on-site renewable energy. The building's roof would include a rooftop solar system as required by the CALGreen Code. Based on a preliminary conceptual layout, if solar arrays were to be maximized on the building's roof area, the available roof space could accommodate 557 fixed-tilt modules in a 323.1-kilowatt (kW) system (Sprek, 2025). The CALGreen Code also requires the accommodation of short-term and long-term bicycle parking and the installation of EV chargers and additional EV-capable and EV-ready parking spaces. HVAC units and appliances also are required to be energy efficient (CEC, 2022). The existing dry utility system would not be adversely affected by the Project, and the Project would not result in or require any expansion of dry utility infrastructure off-site. As such, no impacts would occur.

Threshold b.: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

During construction of the Project, water would be required intermittently for dust control, equipment cleaning, and soil grading and preparation during the early phases of the Project. Construction water demands would be less than the long-term operational water demand of the Project and are temporary. It is anticipated that existing water infrastructure would be sufficient to meet the limited, temporary water demand associated with

construction of the Project. Therefore, impacts to water infrastructure due to construction activity are considered less than significant.

Water demand for the Project's long-term operation is calculated per capita (by person). As discussed in EIR Subsection 4.10, *Population and Housing,* the Project would generate approximately 556 residents. Taking into consideration that the Project would be required to be constructed in accordance with the CALGreen Code and incorporate all of the water-conserving measures required by the CALGreen Code and the most current version of the California Pluming Code, a water usage factor of 55 gpcd per day is assumed. This factor is lower than the UWMP's reported average factor of 154 gpcd, which accounts for existing buildings in Monrovia, many of which were constructed before the enactment of the CALGreen Code and are less water-efficient than newer structures. Also, 55 gpcd is a conservative factor and higher than what is reported by the California Department of Water Resources as a statewide median of 48 gpcd (DPR, 2021). The Project's residential units are thus calculated to demand 30,580 gpd[8], or 34 AFY.[9] The Project's commercial and amenity spaces and landscape irrigation needs are expected to demand an additional 0.65 AFY (K+W, 2025). In total, the Project's water demand is calculated as 34.65 AFY, or 30,907 gpd.[10]

Projected multi-family residential growth in the City of Monrovia is considered in the UWMP. Specifically, the UWMP, in Tables 4-1 and 4-2, indicates that the water demand for multi-family residential uses within the City is expected to increase from approximately 1,872 AFY in 2020 to 2,183 AFY by 2040, representing an increase of approximately 311 AFY. The Project's increased water demand accounts for approximately 11.14 percent of that growth. While the Project was not individually identified in the UWMP, the Project site is located within the South Myrtle Avenue Corridor, which is designated in the City's General Plan Land Use Element Update as an area anticipated for higher-density residential and mixed-use growth. The General Plan EIR assumed new development in this corridor and concluded that infrastructure impacts, including water supply, would be less than significant at the programmatic level. Therefore, the growth represented by the Project is consistent with the broader land use assumptions used to inform the UWMP's demand projections.

As such, it is concluded that the City of Monrovia would have adequate water supplies to serve the Project. Furthermore, the City has the option of purchasing imported treated water from MWD through the Upper District, which would further ensure that the City would have adequate water supplies to meet anticipated future demands. Because the UWMP demonstrates that there would be adequate water supplies within the City to serve reasonably foreseeable future development through at least year 2040 during normal, dry, and multiple dry years, it can be concluded that the City would have adequate water supplies to serve the Project without the need for new or expanded entitlements or resources. Accordingly, impacts related to water supply would be less than significant (City of Monrovia, 2021).

[8] 556 residents x 55 gpd = 30,580 gpd;
[9] 30,580 gpd ÷ 325,581 gallons per AF = 34 AFY.
[10] 34.65 AFY x 325,581 gallons per AF ÷ 356 days/year - 30,907 gpd.

Threshold c.: Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Construction activities for the Project would result in temporary wastewater generation on-site. However, such use would be temporary and nominal when compared with the wastewater generated by the Project's operation. In addition, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to direct wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities is not anticipated to cause any measurable increase in wastewater flows.

As previously discussed under Threshold a., the Project's estimated wastewater generation is 54,598 gpd (0.055 mgd) design capacity estimate. using LACSD's wastewater generation factors for planning and design capacity purposes. Because the Project's estimated water demand is approximately 43 percent lower than this amount (30,907 gpd, refer to Threshold b.), and wastewater generated from a development project typically does not exceed its water consumption, the Project's actual wastewater discharge is anticipated to be lower than LACSD's 54,598 gpd (0.55 mgd) design capacity estimate.

As previously stated, the San Jose Creek Water Reclamation Plant has an excess capacity of approximately 37.1 mgd. The Project's anticipated demand for wastewater treatment capacity would represent approximately 0.148 percent of the excess treatment capacity at the San Jose Creek Water Reclamation Plant.[11] Accordingly, the Project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments, and, therefore, impacts related to wastewater treatment would be less than significant.

Threshold d.: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The Project would be required to comply with mandatory waste reduction requirements of the CALGreen Code and MMC Chapter 8.08 (Residential Solid Waste, Green Waste and Recyclable Materials Collection). Notwithstanding, construction and operation of the Project would generate solid waste requiring disposal at a landfill.

A. Construction-Related Landfill Disposal

To accommodate the Project, demolition activities would occur to remove the existing commercial/industrial office development from the Project site. Recyclable demolished material would be recycled, and the materials requiring disposal would be transported to a landfill. Approximately 1,950 tons of demolition waste are reasonably expected from the removal of approximately 25,191 s.f. of building space associated with the existing development. Additionally, the Project's grading operation would excavate approximately 54,000 cubic yards of raw cut, all of which would be exported from the Project site to a receiving site that is reasonably

[11] 0.055 mgd ÷ 37.1 mgd x 100 = 0.148 percent

expected to be located within a 20-mile radius of the Project site. A large percentage of the C&D debris would be recycled per MMC Section 8.09.050. The Project would comply with federal, State, and local statutes and regulations related to solid waste, including the City's requirement to prepare and implement a Construction Waste Management Plan. With regulatory compliance and the City's implementation of this program, and considering sufficient capacity at the Olinda Alpha Sanitary Landfill, Project construction impacts to landfill capacity would be less than significant.

B. Operational-Related Landfill Disposal

As noted in EIR Subsection 4.10, *Population and Housing,* the Project would generate approximately 556 residents and approximately six employees, for a total of 562 persons. Thus, the Project is anticipated to generate approximately 3,765.4 pounds per day of solid waste[12], or approximately 1.88 tons per day (tpd) (CalRecycle, n.d.). The Project's waste would be disposed of at the Olinda Alpha Sanitary Landfill, which has a maximum daily permitted throughput of 8,000 tpd. Thus, the Project's net increase in solid waste generation represents 0.02 percent of the maximum permitted throughput and the landfill has sufficient capacity to handle the net increase in solid waste that would be generated by the Project.[13] Accordingly, the amount of solid waste expected to be generated during Project operation (1.88 tpd, not accounting for waste reduction associated with elimination of existing uses on the Project site) would neither exceed State or local disposal standards nor exceed the local infrastructure capacity to handle the waste disposal; therefore, impacts to landfill capacity associated with long-term Project operational activities would be less than significant.

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

The Project would be required by law to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. During construction, solid waste would be appropriately sorted and recycled per the requirements of the CALGreen Code and the City's C&D Recycling Program that requires recycling of at least 50 percent of C&D waste per MMC Section 8.09.050.

Per the requirements of the CALGreen Code and the MMC, the Project design includes accessible areas in the building's parking structure for the collection of trash, recyclable materials, and organic waste. Also, access for service vehicles would be accommodated in the parking structure and in the alley on the south side of the Project site for trash collection. Refer to Figure 3-9, *Conceptual Subterranean Level G2 Parking Floor Plan,* for the location and design of disposal and pick up area for trash, recyclable materials, and organic waste. The Project would comply with all applicable reduction statutes and regulations related to solid waste and no impact would occur.

[12] 562 persons x 6.7 pounds (lbs)/person/day = 3,765.4 lbs/day
[13] 3,765.4 lbs/day ÷ 2,000 (lbs in one ton) = 1.88 tpd. 1.88 tpd ÷ 8,000 tpd capacity x 100 = 0.0235 percent.

4.15.5 Cumulative Impact Analysis

The analysis of Threshold a. provided herein demonstrates that the Project would not result in or require new or expanded facilities for water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities beyond the Project's proposed site-adjacent connections to existing facilities in the local area. Prior to issuance of a building permit and based on the Project's construction-level building plans, the Project Applicant will be obligated obtain a commitment from the City of Monrovia Public Works Department to service the Project with domestic water and a determination from the Public Works Department that the water system has adequate capacity to service the Project in addition to other planned projects in the City's water service area. Similarly, prior to issuance of a building permit and based on the Project's construction-level building plans, the Project Applicant will be obligated to obtain a commitment from the City of Monrovia Public Works Department to provide wastewater conveyance services for the Project and a determination from the Public Works Department and LACSD that the wastewater conveyance and treatment system, respectively, have adequate capacity to service the Project in addition to other planned projects in the City and LACSD's service area for the San Jose Creek Water Reclamation Plant. While the number of residential units proposed by the Project (204) exceeds the density assumed in the City of Monrovia's 2007 General Plan EIR (54 units/acre (87 units)), the site was identified within the South Myrtle Avenue Corridor as an area planned for higher-density residential and mixed-use development. The City's 2020 UWMP projections reflect this pattern of intensification. Additionally, the increased density is permissible under the PD-28 standards and California Density Bonus Law due to the inclusion of affordable units. This makes the Project consistent with State law and with the City's broader land use strategy. Therefore, although the Project was not individually forecasted in the General Plan, upon which the City's UWMP was based, it is aligned with the City's planned growth framework as understood in the City's UWMP and the City's General Plan EIR. The same holds true for stormwater drainage, electric power, natural gas, telecommunications facilities, and landfill capacity As such, cumulative impacts would be less than significant (Thresholds a. through d.).

Related to compliance with waste reduction statutes and regulations (Threshold e.), the Project and cumulative projects are by law to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. As such, no cumulative impact would occur related to compliance with waste reduction statutes and regulations.

4.15.6 Significance of Impacts Before Mitigation

Threshold a: Less-than-Significant Impact. The Project would not result in or require the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities beyond the Project's proposed site-adjacent connections to existing utilities and facilities in the local area. The physical environmental effects associated with installing and operating the Project's utilities and service systems are evaluated throughout Section 4.0 this EIR and would result in either no impact or impacts that are less than significant.

Threshold b: Less-than-Significant Impact. The Project is within the growth assumptions identified in the Monrovia 2020 UWMP, and because the UWMP demonstrates that there would be adequate water supplies within the City to serve reasonably foreseeable future development through at least year 2040 during normal,

dry, and multiple dry years, it is concluded that adequate water supplies are available to serve the Project without the need for new or expanded entitlements or resources. Impacts would be less than significant.

Threshold c: Less-than-Significant Impact. Wastewater generated by the Project would be treated at the San Jose Creek Water Reclamation Plant. The San Jose Creek Water Reclamation Plant has sufficient treatment capacity to accommodate the Project and planned growth within its service territory. Accordingly, the Project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments, and impacts would be less than significant.

Threshold d: Less-than-Significant Impact. The Project's increase in solid waste generation represents 0.02 percent of the maximum permitted throughput at the Olinda Alpha Sanitary Landfill, which has a maximum daily permitted throughput of 8,000 tpd. The amount of solid waste expected to be generated by the Project would neither exceed State or local disposal standards nor exceed the local infrastructure capacity to handle the waste disposal; therefore, impacts to landfill capacity associated with the Project's construction and operational activities would be less than significant.

Threshold e: No Impact. The Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. During construction, solid waste would be appropriately sorted and recycled, when feasible, per the CALGreen Code. Operational waste from both residences and commercial uses would meet local standards of solid waste and recycling policies as defined in Chapter 8.08 of the City's Municipal Code. In addition, organic waste would be recycled in accordance with AB 1826. Accordingly, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, and no impact would occur.

4.15.7 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.15.8 Regulatory Requirements (RR)

The City of Monrovia requires compliance with the following regulatory requirement:

UTILITY RR-1 The location and design of Project's trash, recyclables, and organic waste receptacle areas will be as required by the MMC and CALGreen Code at the time of building permit application.

UTILITY RR-2 The Project's water, sewer, mechanical, and dry utility systems are required to comply with the requirements specified in the CALGreen Code at the time of building permit application.

UTILITY RR-3 The Project shall comply with MMC Section 8.46.100, which requires submittal of a complete Landscape Documentation Package containing a Water Efficient Landscape Application at the time of building permit application.

UTILITY RR-4 The Project Applicant and contractor(s) are required to prepare for City approval and comply with a Construction and Demolition (C&D) Waste Management Plan demonstrating recycling of at least 50 percent of C&D waste.

UTILITY RR-5 Prior to issuance of a building permit and based on the Project's construction-level building plans, the Project Applicant shall obtain a commitment from the City of Monrovia Public Works Department to service the Project with domestic water and a determination from the Public Works Department that the water system has adequate capacity to service the Project.

UTILITY RR-5 Prior to issuance of a building permit and based on the Project's construction-level building plans, the Project Applicant shall obtain a commitment from the City of Monrovia Public Works Department to provide wastewater conveyance services for the Project and a determination from the Public Works Department and LACSD that the wastewater conveyance and treatment system, respectively, have adequate capacity to service the Project.

5.0 Other California Environmental Quality Act Considerations

5.1 Significant Environmental Effects Which Cannot be Avoided if the Project is Implemented

The CEQA Guidelines require that an EIR disclose the significant environmental effects of a project that cannot be reduced to a less-than-significant level if the Project is implemented and, where impacts cannot be alleviated without imposing an alternative design, describe the reasons why the project is being proposed, notwithstanding its effect (CEQA Guidelines Sections 15126(b) and 15126.2(c)). As described in detail in EIR Section 4.0, *Environmental Analysis*, the Project would not result in significant impacts to the environment that cannot be reduced to a less-than-significant level after compliance with applicable federal, State, and local regulations and the implementation of feasible mitigation measures. All Project impacts were determined to be less than significant or mitigated to less than significant.

5.2 Significant Irreversible Environmental Changes Which Cannot be avoided if the Project is Implemented

The CEQA Guidelines require EIRs to address any significant irreversible environmental changes that would be involved in the Project should it be implemented (CEQA Guidelines Section 15126.2(c)). An environmental change would fall into this category if (a) the Project would involve a large commitment of non-renewable resources, (b) the primary and secondary impacts of the Project would generally commit future generations to similar uses, (c) the Project involves uses in which irreversible damage could result from any potential environmental accidents, or (d) the proposed consumption of resources are not justified (e.g., the Project results in the wasteful use of energy) (CEQA Guidelines Section 15126.2(d)).

Determining whether the Project may result in significant irreversible environmental changes requires a determination of whether key non-renewable resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Natural resources, in the form of construction materials and energy resources, would be used in the construction of the Project. The consumption of these natural resources would represent an irreversible change to the environment. However, development of the Project site would have no measurable adverse effect on the availability of such resources, including resources that may be non-renewable (e.g., construction aggregates, fossil fuels). Additionally, the Project is required by law to comply with the CALGreen Code in effect at the time of building permit application, which would minimize the Project's demand for energy, including energy produced from non-renewable sources. A more detailed discussion of Project energy consumption is provided in EIR Subsection 4.4, *Energy*.

Implementation of the Project would commit the approximately 1.61-acre Project site to a mixed-use five-story building, which would include 204 multi-family residential apartment units, 2,370 s.f. of commercial retail space, 2,782 s.f. of fitness center space, 2,470 s.f. of leasing office/lobby/mail room space on the ground floor, parking on a portion of the ground floor, and 1.5 levels of subterranean parking. Of the 204 residential apartment units, 17 of the units are proposed to be restricted for low-income households, and three of the units are proposed to be restricted for moderate-income households. The land use mix proposed for the Project site is compatible with the existing surrounding land uses, as discussed in EIR Subsection 4.8, *Land Use and Planning*. Accordingly, the Project and its environmental effects would not compel or commit surrounding

properties to land uses other than those that are existing today or those that were envisioned in the City's General Plan. For this reason, the Project would not result in a significant, irreversible change to nearby, off-site properties.

EIR Subsection 4.7, *Hazards and Hazardous Materials*, provides an analysis of the potential for hazardous materials to be transported to/from the Project site and/or used on the Project site during construction and operation. As concluded in Subsection 4.7, mandatory compliance with federal, State, and local regulations related to hazardous materials handling, storage, and use by all Project construction contractors (near term) and occupants (long-term) would ensure that any hazardous materials used on-site would be safely and appropriately handled to preclude any irreversible damage to the environment that could result if hazardous materials were released from the Project site. Also, a mitigation measure is presented to address the potential to discover an underground storage tank (UST) that may be present beneath the surface of the site. Implementation of the mitigation measure if a UST is discovered would reduce potential impacts to less than significant.

As discussed in detail under EIR Subsection 4.4, *Energy*, the Project would not result in a wasteful, inefficient, or unnecessary consumption of energy. Accordingly, the Project would not result in a significant, irreversible change to the environment related to energy use.

Based on the above, Project construction and operation would require the commitment of limited, slowly renewable and non-renewable resources. However, this commitment of resources would not be substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions, and such resources would not be used in an inefficient or wasteful manner. Project construction and operation would adhere to the sustainability requirements of CCR Title 24, including the CALGreen Code. Therefore, the Project would not result in the commitment of large quantities of natural resources that would result in significant irreversible environmental changes.

5.3 GROWTH-INDUCING IMPACT OF THE PROJECT

CEQA requires a discussion of the ways in which the Project could be growth inducing. The CEQA Guidelines identify a project as growth inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines Section 15126.2(e)). New employees and new residential populations represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with an increase in population or employment and, thus, reducing or removing the barriers to growth. This typically occurs in suburban or rural areas, where population growth results in increased demand for service and commodity markets or the extension or expansion of public services and utilities to respond to the new population of residents or employees.

The Project's 204 multi-family dwelling units and 2,370 s.f. of commercial space would generate approximately 563 residents[1] and approximately six employees[2], as discussed in EIR Subsection 4.10, *Population and Housing*. The Project also would result in the net reduction of approximately 46 jobs associated with the existing uses at the Project site[3].

As also discussed in EIR Subsection 4.10, the Project's anticipated population increase would comprise 11.0 percent of the anticipated population growth within the City between 2023 and 2050, while the Project plus cumulative development projects would represent 53.46 percent of the anticipated population growth between 2023 and 2050. Additionally, the planned housing from the Project and other cumulative development projects is a requirement of State Housing Law and in response to an existing unmet need for affordable housing. The Project's anticipated increase in the City's population by approximately 563 residents and six employees would not comprise substantial unplanned population growth because the Project's anticipated increase in the number of employees and residents on the Project site are within the projections of growth anticipated for the City of Monrovia over the 2023-2050 timeframe. Refer to EIR Subsection 4.10, *Population and Housing*, for more information.

The Project proposes to redevelop an approximately 1.61-acre property that is currently developed with a commercial/industrial office building. The area surrounding the Project site is also fully developed consisting of:

- North: West Olive Avenue forms the northern boundary of the Project site. To the north and northeast of West Olive Avenue across the street from the Project site is a mix of residential and commercial development, including, but not limited to, apartments, restaurants, retail shops, and service commercial businesses with building heights ranging from one story to three stories. North of West Olive Avenue is the heart of Old Town Monrovia, which contains an array of boutique shops, restaurants, and historic buildings with a north-facing view of the San Gabriel Mountains. No component of the Project would induce growth on these properties as they are fully built out, and the Project would not increase utility or service capacities that would trigger their redevelopment at higher intensities.

- East: South Myrtle Avenue forms the eastern boundary of the Project site. To the immediate east of South Myrtle Avenue across the street from the Project site is a three- and four-story mix-use structure (Paragon at Old Town). Beyond this building are lower-profile, one-, two-, and three-story structures containing a variety of residential, commercial, and service commercial uses. No component of the Project would induce growth on these properties as they are fully built out, and the Project would not increase utility or service capacities that would trigger their redevelopment at higher intensities.

- South: To the south of the Project site is an alley, beyond which are one- and two-story commercial, office, and industrial uses. To the south of these uses is West Walnut Avenue and a five-story apartment

[1] 204 dwelling units x 2.76 persons/dwelling unit = 563.0 persons
[2] 2,370 s.f. ÷ 424 s.f./employee = 5.6 employees
[3] 52 existing jobs – 6 proposed jobs = 46 net decrease in jobs

building (Avalon) with some ground floor retail and structured parking. No component of the Project would induce growth on these properties as they are fully built out, and the Project would not increase utility or service capacities that would trigger their redevelopment at higher intensities.

- West: To the west of the Project is a one-story industrial building, development, beyond which is South Primrose Avenue. To the west of South Primrose Avenue are one- and two-story single-family and multi-family residential structures. No component of the Project would induce growth on these properties as they are fully built out, and the Project would not increase utility or service capacities that would trigger their redevelopment at higher intensities.

Based on the analysis above, the Project would not result in substantial, adverse growth-inducing impacts.

5.4 Effects Not Found to be Significant During the EIR Scoping Process

CEQA Guidelines Section 15128 requires that an EIR *"...contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR."* During the preparation of this EIR, the Project was determined to have no potential to result in significant impacts related to thresholds under five environmental issue areas: agriculture and forest resources, biological resources, hydrology and water quality, mineral resources, and wildfire. Therefore, these issue areas were not required to be analyzed in detail in EIR Section 4.0, *Environmental Analysis*. A brief analysis of the Project's impacts to agriculture and forest resources, biological resources, hydrology and water quality, mineral resources, and wildfire is presented below.

5.4.1 Agriculture and Forestry Resources

Threshold a.:	***Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

According to the Farmland Mapping and Monitoring Program mapping information available from the California Department of Conservation (CDC), the Project site is designated as "Urban and Built-Up Land" and does not contain any soils mapped as "Prime Farmland," "Unique Farmland," or "Farmland of Statewide Importance" (CDC, 2018). As such, implementation of the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. No impact would occur.

Threshold b.:	***Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

The Project site is not zoned for agricultural use or surrounded by land zoned for an agricultural use. Therefore, implementation of the Project has no potential to conflict with existing zoning for an agricultural use.

According to information from the CDC, neither the Project site nor any land in the vicinity of the Project site is under a Williamson Act contract (CDC, 2017). As such, no impact would occur to property under a Williamson Act contract.

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

The Project site is not zoned as forest land, timberland, or Timberland Production or surrounded by forest land, timberland, or Timberland Production land. Therefore, implementation of the Project has no potential to conflict with or cause the rezoning of any areas currently zoned as forest, timberland, or Timberland Production and would not result in the rezoning of any such lands. As such, no impact would occur.

Threshold d.:	***Would the Project result in the loss of forest land or conversion of forest land to non-forest use?***

The Project site does not contain forest land and is not zoned or designated as such. Thus, implementation of the Project would not result in the loss of forest land or the conversion of forest land to non-forest use. As such, no impact would occur.

Threshold e.:	***Would the Project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?***

"Farmland" is defined in Section II(a) of Appendix G of the CEQA Guidelines to mean "Prime Farmland," "Unique Farmland," or "Farmland of Statewide Importance." As noted above in Response 5.4.1(a), the Project site does not contain any soils mapped by the CDC as "Farmland." Additionally, as described above in preceding responses under the "Agricultural Resources" topic, the Project site and surrounding areas do not contain forest lands or areas designated for forest land uses. Thus, implementation of the Project would not result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. No impact would occur.

5.4.2 Biological Resources

Threshold a.:	***Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

Under existing conditions, the Project site is fully developed with one 25,162-s.f. commercial building and associated parking, drive aisles, and landscaping. The surrounding area is also fully developed with urban uses. Accordingly, no candidate, sensitive, special status species, riparian habitat, other sensitive natural community, or federally protected wetlands occur on the Project site or the surrounding areas. Vegetation on the Project

site and the surrounding areas is limited to landscaping of ornamental trees, shrubs, and grasses. Because no candidate, sensitive, special status species, riparian habitat, other sensitive natural community, or federally protected wetlands occur on the Project site or the surrounding areas, there is no potential for redevelopment of the Project site as proposed to result in substantial adverse effects to sensitive biological resources recognized by the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Services (USFWS). No impact would occur.

Threshold b.: ***Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?***

The Project site is developed with one 25,162-s.f. commercial building and associated parking in a highly urbanized area. With the exception of ornamental landscaping, the entire Project site is paved or covered with an existing building. Vegetation on the Project site is limited to landscaping of ornamental trees, shrubs, and grasses. No known riparian area or other sensitive natural communities are located on the Project site. No impact would occur.

Threshold c.: ***Would the Project have substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

The Project site is developed with one 25,162-s.f. commercial building and associated parking in a highly urbanized area. With the exception of ornamental landscaping, the entire Project site is paved or covered with an existing building. There are no wetlands on the Project site. No impact would occur.

Threshold d.: ***Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

The Project site is located in a highly urbanized area and is not within any wildlife movement corridor. Accordingly, redevelopment of the Project site as proposed has no potential to interfere with the ground movement of any resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites. The Project site contains ornamental trees that could serve as nesting habitat that would be removed as part of the Project. If any migratory nesting birds are observed in any trees on or near the site during the Project's construction activities, the birds and their active nests would be protected pursuant to the federal Migratory Bird Treaty Act (MBTA), a federal law that prohibits impacts to migratory birds.

If active nests are present in vegetation that is to be removed during Project construction (direct impacts) or within 250 feet of construction activities (indirect impacts), implementation of the Project could result in substantial, adverse effects to biological resources (i.e., bird nests) that are protected by the MBTA and California Fish and Game Code. However, compliance with the federal MBTA is a mandatory regulatory requirement that ensures the protection of migratory birds, and compliance with mandatory regulatory

requirements is not considered mitigation under CEQA. The Project's potential to impact nesting birds would be less than significant with mandatory compliance with the federal MBTA.

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

The Project site is fully developed and does not contain any biological resources, including trees that are protected by a local policy or ordinance. As such, no impact would occur.

The Project proposed landscaping is illustrated on Figure 3-15, *Conceptual Landscape Plan*. The Project's landscaping would occur in full compliance with MMC Chapter 17.20, *Landscaping/Tree Preservation*. The final landscaping plans are subject to the review and approval of the Director.

Threshold f.: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There is no adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP) applicable to the Project site. Additionally, because the Project site is fully developed under existing conditions, redevelopment of the Project site as proposed would have no potential to conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.

5.4.3 Hydrology and Water Quality

Threshold a.: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Construction-Related Water Quality

Construction of the Project would involve demolition, site preparation, grading, utility installation, building construction, paving, and landscaping activities, which have the potential to generate water quality pollutants, such as silt, debris, organic waste, and chemicals (e.g., paints, solvents). Should these materials come into contact with water that reaches the groundwater table or flows off-site to a public storm drain, the potential exists for the Project's construction activities to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction in the absence of any protective or avoidance measures. However, pursuant to the requirements of the Los Angeles Regional Water Quality Control Board (RWQCB) and MMC Chapter 12.36, the Project Applicant would be required to obtain coverage under the National Pollutant Discharge Elimination System's (NPDES) Construction General Permit for construction activities on sites greater than one acre to reduce impacts to less than significant.

In addition, the Project Applicant would be required to comply with the Los Angeles RWQCB's Water Quality Control Plan. Compliance with the NPDES Construction General Permit and the Los Angeles RWQCB's Water Quality Control Plan involves the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for construction-related activities. The SWPPP would specify the best management practices

(BMPs) that the Project's construction contractors would be required to implement during construction activities to ensure that potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the Project site. Mandatory compliance with the SWPPP would ensure that the Project does not violate any water quality standards or waste discharge requirements during construction activities. Therefore, water quality impacts associated with construction activities would be less than significant.

Post-Development Water Quality

Pertaining to stormwater, low impact development (LID) is a stormwater management strategy that addresses increases in runoff and stormwater pollution as close to its source as possible. The approval of a LID for the Project will be required prior to the commencement of construction activities and will comprise a set of site design approaches and Best Management Practices (BMPs) to address stormwater. With respect to urban development and redevelopment projects, such as the Project, techniques are used to mimic the site's predevelopment drainage characteristics through the use of various infiltration techniques. Infiltration testing on the Project site was completed by Geotechnical Professionals, Inc. in March 2023, and the existing infiltration rate was determined at 3.3 inches per hour. Project plans show that drywells would be installed, extending to depths of at least 25 to 30 feet below the proposed building foundation (approximately 40 to 55 feet below existing grades) to provide stormwater infiltration at the site. Stormwater pollutants that may be discharged from the site during Project operation include pathogens (bacterial/virus), phosphorous, nitrogen, sediment, metals, oil/grease, trash/debris, pesticides/herbicides, and other organic compounds. As part of the Project's design, water pollutants would be reduced by BMPs before water is discharged from the site through the dry well system to meet the requirements of the City's NPDES permit and Chapter 12.36 of the MMC (Readler, 2024). Accordingly, impacts would be less than significant.

Based on the foregoing analysis, implementation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during long-term operation. Impacts would be less than significant.

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

The Project would be served with potable water from the City of Monrovia; the Project Applicant does not propose to use any water wells or other groundwater extraction activities. Therefore, the Project would not directly draw water from the groundwater supply. Accordingly, implementation of the Project would not directly deplete or decrease groundwater supplies, and the Project's impact to groundwater supplies would be less than significant.

The Project would entail the redevelopment of the Project site, which would include the demolition of the existing 25,191-s.f. commercial/industrial building and the construction of 204 multi-family residential apartment units, 2,370 s.f. of commercial retail space, 2,782 s.f. of fitness center space, and 2,470 square feet

of leasing office/lobby/mail room space on the ground floor, and 1.5 levels of subterranean parking, as well as parking on the ground level.

Under existing conditions, rainfall on the Project site flows on the surface as stormwater runoff to the alley on the south side of the Project site. From there, stormwater runoff flows west to South Primrose Avenue and is collected in a catch basin at the northeastern corner of South Primrose Avenue and West Walnut Avenue, where it connects to a 72-inch reinforced concrete pipe in South Primrose Avenue. The 72-inch pipe drains southerly and connects to the Peck Road Channel, south of Duarte Road. From there, stormwater runoff is conveyed southeasterly to the Sawpit Wash. The Sawpit Wash outfalls into a stormwater basin that drains to the Rio Hondo Channel, which then drains to the Los Angeles River and out to the Pacific Ocean.

Because the Project site is fully developed under existing conditions, the redevelopment of the site with the Project would not cause a significant increase in impervious surface coverage on the Project site and, therefore, would not reduce the amount of water percolating down into the underground aquifer that underlies the Project site. Instead of a majority of the site's stormwater running off the site as it does under existing conditions, the Project would include the installation of a dry well system that would allow a majority of the site's stormwater to be captured and directly infiltrate to the groundwater table below the building's foundation. Recharge of the San Gabriel Valley Groundwater Basin is mainly from direct percolation of precipitation and percolation of stream flow. Therefore, the Project would not result in any substantial, adverse effects to local groundwater levels.

For the reasons stated above, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede sustainable groundwater management of the basin. Impacts would be less than significant.

Threshold c.: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

Erosion and Siltation

Although the Project would alter the Project site's interior drainage patterns, such changes would not result in substantial erosion or siltation on- or off-site. As discussed under Threshold a. above, the Project Applicant would be required to obtain coverage under the State's Construction General Permit for construction activities (NPDES permit). In addition, the Project would be required to prepare and implement a SWPPP for construction-related activities, which would specify the BMPs that would be required to be implemented during construction activities. Examples of BMPs that may be utilized during construction include, but are not limited to, sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, and hydro-seeding. In addition, proposed construction activities would be required to comply with applicable

provisions of the MMC, including MMC Chapter 12.36 (Storm Water and Urban Runoff Pollution Control), which specifically requires compliance with all applicable NPDES Permit requirements related to construction activities. Mandatory compliance with the SWPPP and MMC Chapter 12.36 would ensure that the Project construction does not violate any water quality standards or waste discharge requirements. Based on the information above, water quality impacts associated with Project construction activities would be less than significant.

Stormwater Runoff Discharge

Under existing conditions, the Project site's stormwater runoff flows to the alley on the south side of the Project site. From there, the stormwater runoff flows west to South Primrose Avenue and is collected in a catch basin at the northeastern corner of South Primrose Avenue and West Walnut Avenue, where it connects to a 72-inch reinforced concrete pipe (RCP) in Primrose Avenue. From there, storm runoff is conveyed southeasterly to the Sawpit Wash. The Sawpit Wash outfalls into a stormwater basin that drains to the Rio Hondo Channel which then drains to the Los Angeles River and out to the Pacific Ocean.

Existing peak runoff from the Project site during 25-year storm events is estimated to be 5.17 cubic feet per second (cfs). With development of the Project as proposed, peak runoff on the Project site during 25-year storm events would increase to approximately 5.75 cfs. Existing peak runoff from the Project site during 50-year storm events is estimated to be 6.46 cfs. With development of the Project as proposed, peak runoff on the Project site during 50-year storm events would increase to approximately 6.55 cfs. Although peak runoff would increase, the Project would not exceed the capacity of existing downstream storm facilities because the Project would be designed to retain a water volume of 6,000 cf before overflowing to West Olive Avenue and the alleyway to the south. Although the percent of impervious surface area would increase in the post-development condition, the Project would detain a minimum of 6,000 cf to ensure that the flow or volume of storm runoff from the site does not exceed the stormwater flow under existing conditions. The existing storm drain system would not be adversely affected by the Project and impacts would be less than significant.

Stormwater Drainage System Capacity and Polluted Runoff

As discussed in detail earlier under Threshold a., the Project's construction contractors would be required to comply with a SWPPP to ensure that Project-related construction activities and operational activities do not result in substantial amounts of polluted runoff. Accordingly, impacts would be less than significant.

Flood Flows

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06037C1400F, the Project Site is located within "Flood Zone X (unshaded)," which includes "Areas determined to be outside the 0.2% annual chance floodplain" (FEMA, 2008). Accordingly, development on the Project Site would have no potential to place housing, or other structures, within a 100-year floodplain or impede or redirect flood flows within a 100-year floodplain. No impact would occur.

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

The Pacific Ocean is located 30 miles southwest of the Project site; consequently, there is no potential for the Project Site to be impacted by a tsunami as tsunamis typically only reach up to a few miles inland. Accordingly, the Project Site is not susceptible to impacts associated with tsunamis. In addition, there are no large bodies of water in the Project vicinity capable of producing seiches that could affect the Project Site. Therefore, the Project would not risk release of pollutants due to inundation. No impact would occur.

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

As discussed in Threshold a. above, the Project Site is located within the Los Angeles River Basin and Project-related construction and operational activities would be required to comply with the Los Angeles RWQCB's Water Quality Control Plan by preparing and adhering to a SWPPP. Accordingly, implementation of the Project would not conflict with or obstruct the Los Angles Water Quality Control Plan, and, as such, no impact would occur.

The Project Site is located within the San Gabriel Valley Groundwater Basin, which is an adjudicated groundwater basin. Adjudicated basins, such as the San Gabriel Valley Groundwater Basin, are exempt from the 2014 Sustainable Groundwater Management Act (SGMA) because such basins already operate under a court-ordered management plan to ensure the long-term sustainability of the subbasin. No component of the Project would obstruct with or prevent implementation of the management plan for the San Gabriel Valley Groundwater Basin. As such, the Project's construction and operation would not conflict with any sustainable groundwater management plan. No impact would occur.

5.4.4 Mineral Resources

Threshold a.: Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Threshold b.: Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The Project site is located within Mineral Resource Zone 4 (MRZ-4), which indicates areas where available information is inadequate for assignment to any other MRZ (CDC, 1982). Under existing conditions, the Project site and surrounding areas are fully developed. The Project site is zoned Office/Research and Development/Light Manufacturing, which provides for the development of a variety of commercial land uses, including administrative/professional services, athletic clubs/health spas, business support services, communication services, financial institutions, instructional services, medical laboratory services, light manufacturing, research and development, warehousing/wholesaling, and utility distribution facilities. No mineral resource extraction activities occur on the Project site. Accordingly, the Project site is not located within an area known to be underlain by regionally- or locally-important mineral resources and, implementation of the Project would not result in the loss of availability of a known mineral resource that

would be of value to the region or to the residents of the State of California or the loss of availability of a locally important mineral resource recovery site. Therefore, no impact would occur.

5.4.5 WILDFIRE

Threshold a.:	***Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?***
Threshold b.:	***Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, would the Project thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***
Threshold c.:	***Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***
Threshold d.:	***Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

The above thresholds only apply to projects located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The Project site is not located in or near a Very High Fire Hazard Severity Zone (CAL FIRE, 2025) or a state responsibility area; therefore, implementation of the Project would not exacerbate any existing wildfire hazard risks or expose people or the environment to adverse environmental effects related to wildfires.

6.0 ALTERNATIVES

An EIR must identify ways to mitigate or avoid the significant effects that a Project may have on the environment. In compliance with Section 15126.6(a) of the CEQA Guidelines, an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives." This section identifies potential alternatives to the Project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines Sections 15126.6(b)-(f) on alternatives are provided below to explain the foundation and requirements for the alternatives analysis in the EIR.

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objective, or would be more costly (CEQA Guidelines Section 15126.6(b)).

- The specific alternative of 'no project' shall also be evaluated along with its impact (CEQA Guidelines Section 15126.6(e)(1)).

- The "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)).

- The range of alternatives required in an EIR is governed by the "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. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent) (CEQA Guidelines Section 15126.6(f)).

- For alternative locations, "only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR" (Section 15126.6(f)(2)(A)).

- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location (Section 15126.6(f)(2)(B)).

- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (Section 15126.6(f)(3)).

As discussed in EIR Section 4.0, *Environmental Analysis*, the Project would not result in any significant adverse environmental effects that cannot be mitigated to less-than-significant levels after compliance with mandatory regulatory requirements and implementation of feasible mitigation measures. Notwithstanding, four alternatives to the Project are discussed herein. It should be noted that although the Project would not result in any significant and unavoidable impacts, Project-level mitigation measures are required to reduce potentially significant impacts to less-than-significant levels for the following environmental factors: Cultural Resources (due to the potential to encounter subsurface resources), Geology and Soils (due to potential impacts associated with encountering unstable soils), Hazards and Hazardous Materials (due to the potential to encounter an underground storage tank (UST)), Noise (due to construction activities affecting sensitive noise receivers) and Tribal Cultural Resources (due to the potential to encounter subsurface resources). These potentially significant impacts are temporary, would occur during Project construction, and would be reduced to less-than-significant levels with mitigation measures; no potentially significant impacts were identified during Project operation.

6.1 Alternatives Under Consideration

The following scenarios are identified by the City of Monrovia as potential alternatives to implementation of the Project.

6.1.1 No Project/No Redevelopment Alternative (NPA)

The No Project/No Development Alternative (NPA) considers no development or redevelopment on the Project site beyond that which exists under existing conditions. Under the NPA, there would be no demolition of the existing building on-site, there would be no construction activities, and the existing 25,191-square-foot (s.f.) single-story multi-tenant commercial/industrial office building would continue to operate similar to what occurs under existing conditions. Existing access, site conditions, landscaping, parking, and other site-specific details would not change from current conditions.

6.1.2 Redevelopment Alternative (RA)

The Redevelopment Alternative (RA) assumes redevelopment of the Project site consistent with the site's current General Plan designation and zoning classification. The Project site has a General Plan land use designation of "Office/Research and Development/Light Manufacturing (O/RD/LM)" with a "Specific Plan/Planned Development Overlay (SP/PD Overlay)." The RA considers redevelopment of the Project site with up to 52,925 s.f. of office space supported by surface parking.

6.1.3 Reduced Project Market Rate Residential Alternative (MRRA)

The Reduced Project Market Rate Residential Alternative (MRRA) considers development of the Project site with a project similar to the Project but with a smaller building and without any affordable housing units. Specifically, the MRRA would entail the construction and operation of a four-story, 156-unit market-rate apartment building with the same amenity and parking features as the Project other than a reduction in subterranean parking spaces by approximately 58 spaces.

6.1.4 Wrap Building Alternative (WBA)

The Wrap Building Alternative (WBA) considers development of the Project site with a six-story, mixed-use 204-unit apartment building with 2,370 s.f. of ground floor commercial space served by above ground structured parking in the center of the building, with the residential units wrapping around the structured parking on the east, west, north, and south sides of the structured parking (a 'wrap' building design). The same mix of studio, one-bedroom, two-bedroom, and affordable units would occur as compared to the Project. Amenity spaces would be reconfigured in location and would be located along the building's exterior edges and roof, instead of on a podium level. No subterranean parking would occur.

6.2 Alternatives Considered and Rejected

An EIR is required to identify any alternatives that were considered by the Lead Agency but were rejected as infeasible. Among the factors described by CEQA Guidelines Section 15126.6 in determining whether to exclude alternatives from detailed consideration in the EIR are (a) failure to meet most of the basic project objectives, (b) infeasibility, or (c) inability to avoid significant environmental impacts. With respect to the feasibility of potential alternatives to the Project, CEQA Guidelines Section 15126.6(f)(1) notes:

> *"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site…"*

6.2.1 Alternative Sites

CEQA does not require that an analysis of alternative sites always be included in an EIR. However, if the surrounding circumstances make it reasonable to consider an alternative site then this alternative should be considered and analyzed in the EIR. In making the decision to include or exclude analysis of an alternative site, the *"key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR"* (CEQA Guidelines Section 15126.6(f)(2)).

As documented throughout the analysis presented in EIR Section 4.0, *Environmental Analysis*, all environmental effects associated with the Project would be less than significant or would be reduced to less-than-significant levels with implementation of mitigation measures. The Project's five potential impacts that

require mitigation (cultural, geology and soils, hazards and hazardous materials, noise, and tribal cultural resources) are associated with construction activities, not operation of the Project, and the same potential impacts would occur on any other similar site with similar ground-disturbing construction and excavation characteristics as would occur on the Project site.

Development of the Project at an alternative site location would not avoid or substantially lessen any of the Project's environmental effects because the Project, with implementation of mitigation measures, would not result in any significant environmental effects. Further, the Project Applicant does not own any other properties in the area on which the Project could be implemented. For these reasons, the City of Monrovia finds that evaluation of an alternative site location is not required for the Project, Alternative site locations would not reduce or avoid the Project's potentially significant, construction-related environmental effects related to cultural resources, geology and soils, hazards and hazardous materials, noise, and tribal cultural resources.

6.3 ALTERNATIVE ANALYSIS

The following discussion compares the impacts of each alternative considered by the Lead Agency with the impacts of the Project, as detailed in EIR Section 4.0, *Environmental Analysis*. A conclusion is provided for each impact as to whether the alternative results in one of the following: (1) reduction or elimination of the Project's impact, (2) a greater impact than would occur under the Project, (3) the same impact as the Project, or (4) a new impact in addition to the Project's impacts. Table 6-1, *Alternatives to the Project – Comparison of Environmental Impacts*, located at the end of this section, compares the impacts of the alternatives with those of the Project and identifies the ability of the alternative to meet the basic objectives of the Project. As described in EIR Subsection 3.3, the underlying purpose and goal of the Project is to redevelop an underutilized property within a portion of the Old Town Extension District area with multi-family residential units located within walking distance to employment, shopping, entertainment, recreation, and public transit. The following objectives are intended to achieve the underlying purpose:

A. Provide needed new market rate and affordable housing units to help meet the City's Regional Housing Needs Assessment (RHNA) obligations.

B. Provide a variety of housing options with different price points by providing market rate and affordable housing units in a variety of unit sizes and configurations.

C. Reduce vehicle trips and vehicle miles traveled by locating new housing within walking and biking distance of, and with pedestrian connections to, employment, shopping, entertainment, public services, recreation, and public transit.

D. Redevelop an urban infill site with a project that makes efficient use of existing infrastructure.

E. Promote walkability by locating parking underground and including active uses at street level.

F. Maintain high-quality architectural design in the City of Monrovia by developing a building that has a recognizable architectural style and that complements existing architectural styles of buildings within and surrounding the Old Town Extension District.

G. Provide on-site amenities for residents to offset demand on public parks and recreation facilities.

6.3.1 No Project/No Redevelopment Alternative (NPA)

The NPA considers no development on the Project site beyond that which occurs under existing conditions. Under the NPA, there would be no demolition of the existing building on-site, there would be no construction activities, and the existing 25,191-s.f. single-story multi-tenant commercial/industrial office building would continue to operate with multiple tenants similar to what occurs under existing conditions. This alternative was selected by the Lead Agency to compare the environmental effects of the Project with an alternative that would leave the Project site in its existing condition.

A. Aesthetics

The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions. As such, the approximately 1.61-acre site would continue to operate as a 25,191-s.f. single-story multi-tenant commercial/industrial office building. Because implementation of the NPA would retain the site's existing condition, no aesthetic impacts would occur. In comparison, the Project would have less-than-significant aesthetic impacts, which the NPA would avoid.

B. Air Quality

The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions. Thus, there would be no new air pollutant emissions. In comparison, the Project would have less-than-significant air quality impacts, which the NPA would avoid.

C. Cultural Resources

The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions and no potential to impact cultural resources. In comparison, the Project would have less-than-significant impacts on historic and human remain resources and potentially significant impacts on archaeological resources resulting from the potential to encounter subsurface resources during ground-disturbing construction and excavation activities. The NPA would avoid these impacts.

D. Energy

Under the NPA, there would be no increase in demand for energy resources beyond what occurs under existing conditions. As such, the NPA would avoid the Project's less-than-significant impacts to energy resources.

E. Geology and Soils

The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions, resulting in no potential to result in geology and soils impacts. In comparison, the Project would

result in no impacts or less-than-significant impacts associated with geology and soils other than potentially significant impacts due to encountering unstable soils during grading and excavation activities. The NPA would avoid these impacts.

F. Greenhouse Gas Emissions

The existing uses at the Project site are estimated to generate approximately 726.69 metric tons of carbon dioxide equivalent per year ($MTCO_2e/yr$), while the Project's proposed land uses would generate approximately 2,101.52 $MTCO_2e/yr$ (UXR, 2025c, Table 3-5). Because the NPA would retain the existing uses at the Project site and would not generate any new GHG emissions, no impact associated with GHG emissions would occur and the NPA would avoid the Project's less-than-significant GHG emissions impact.

Both the Project and the NPA would be consistent with or otherwise would not conflict with the California Air Resources Board (CARB) 2022 Scoping Plan, the City of Monrovia Energy Action Plan (EAP), and SCAG's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which are the applicable plans adopted for the purpose of reducing the emissions of GHGs. Thus, impacts due to a conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions would be less than significant under the Project and NPA.

G. Hazards and Hazardous Materials

Based on the Project's Phase I Environmental Site Assessment (ESA) and Phase II ESA, there are no indications of on-site or off-site recognized environmental conditions (REC) on the Project site under existing conditions. The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions; therefore, there would be no potential for significant hazards or hazardous materials impacts to occur beyond the existing condition. In comparison, the Project would result in no impacts or less-than-significant impacts associated with hazards and hazardous materials other than potentially significant impacts associated with accidental upset of a subsurface UST and the potential need to transport and dispose of the UST during the Project's construction activities should a UST be encountered. The NPA would avoid this potential impact.

H. Land Use and Planning

The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions. Neither the Project nor the NPA would physically divide an established community; thus, no impacts would occur under either the Project or NPA, and the level of impact would be the same.

The NPA would not involve any changes to the site's zoning classification or General Plan land use designation. In comparison, the Project entails a General Plan Amendment and Chage of Zone, but would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including the City of Monrovia General Plan and the 2024-2050 RTP/SCS. While the number of residential units proposed by the Project (204) exceeds the density assumed in the City of Monrovia's 2007 General Plan EIR (54 units/acre (87 units)), the site is identified within the South Myrtle Avenue Corridor as an area planned for higher-density residential and mixed-use development. Additionally,

the increased density is permissible under the PD-28 standards and California Density Bonus Law due to the inclusion of affordable units. This makes the Project consistent with State law and with the City's broader land use strategy. The Project is, therefore, aligned with the City's planned growth framework and would have a positive impact upon the City's jobs-housing balance and vehicle miles traveled (VMT) reduction strategy. In comparison, the NPA would maintain the site's existing condition and is less aligned with the City's planned growth framework, potentially increasing land use and planning-based environmental effects. Nonetheless, both the NPA and the Project would have less-than-significant land use and planning impacts.

I. Noise

The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions, resulting in no potential to result in noise impacts. In comparison, the Project would have no impacts or less-than-significant noise impacts other than during the construction phase when noise levels may significantly impact nearby sensitive noise receivers. The NPA would avoid this impact.

J. Population and Housing

The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions, resulting in no potential to result in population and housing impacts. In comparison, the Project would have less-than-significant population and housing impacts. The NPA would avoid these impacts but also would not assist the City in meeting the existing unmet demand for affordable housing. Furthermore, the Project's land uses would improve the City's jobs-housing ratio from 1.61 to 1.59, whereas the NPA would not result in any improvement to the jobs-housing ratio.

K. Public Services

The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions, resulting in no potential to result in public service impacts. In comparison, the Project would have no impact on library services and less-than-significant impacts on fire protection, police, school, and recreational services. The NPA would avoid these impacts.

L. Recreation

The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions, resulting in no potential to result in recreation impacts. In comparison, the Project would have less-than-significant impacts associated with providing on-site recreational amenities and increased use of off-site public parks. The NPA would avoid these impacts.

M. Transportation

The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions, resulting in no potential to generate additional traffic, modify VMT, or cause transportation impacts. The NPA would also result in no improvements to the transportation system. Neither the NPA nor the Project would result in a conflict with an applicable program, plan, ordinance, or policy addressing the circulation system (including the City of Monrovia General Plan Circulation Element and SCAG's RTP/SCS),

but the NDA would be less compatible. The Project would improve sidewalks and ADA accessibility along the Project site's frontages with South Myrtle Avenue and West Olive Avenue, would reduce the number of driveways connecting with West Olive Avenue from two to one and thereby reducing the number of potential conflict points among vehicles, pedestrians, and bicyclists, and would encourage bicycle use by providing bicycle racks and lockers within the Project. In comparison, the NDA would not make these improvements. The Project would add more vehicles to the roadway system, resulting in less-than-significant impacts associated with VMT, transportation design hazards, and emergency access. The NPA would not generate any additional traffic and would avoid these impacts.

N. Tribal Cultural Resources

The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions and no potential to impact tribal cultural resources. In comparison, the Project would have potentially significant impacts on tribal cultural resources resulting from the potential to encounter subsurface resources during ground-disturbing construction and excavation activities. The NPA would avoid these impacts.

O. Utilities and Service Systems

The NPA assumes there would be no development on the Project site beyond that which occurs under existing conditions, resulting in no potential to result in utility and service system impacts. In comparison, the Project would have no impact associated with compliance to federal, State, and local regulations related to solid waste reduction, and less-than-significant impacts related to servicing the site with water, wastewater, stormwater drainage, dry utility, and landfill services. The NPA would avoid these impacts.

P. Conclusion

Implementation of the NPA would result in no physical environmental impacts. There would be no construction phase under the NPA; accordingly, implementation of the NPA would avoid all of the Project's short-term impacts, including potentially significant impacts requiring mitigation associated with Cultural Resources (due to the potential to encounter subsurface resources), Geology and Soils (due to potential impacts associated with encountering unstable soils), Hazards and Hazardous Materials (due to the potential to encounter an underground storage tank (UST)), Noise (due to construction activities affecting sensitive noise receivers), and Tribal Cultural Resources (due to the potential to encounter subsurface resources).

Under long-term conditions, the NPA would continue to operate as a 25,191-s.f. multi-tenant building, resulting in no environmental effects beyond which occur under existing conditions. The NPA would avoid all of the Project's less than significant operational-related impacts, but also would not realize environmental benefits brought by the Project including alignment with the City's planned growth framework that would have a positive impact upon the City's jobs-housing balance and vehicle miles traveled (VMT) reduction strategy. The NDA also would not improve sidewalks and ADA accessibility along the Project site's frontages with South Myrtle Avenue and West Olive Avenue, would not encourage additional pedestrian activity and bicycle use, and would not reduce the number potential conflict points (driveways) at the site's frontage with West Olive Avenue from two to one as would occur under the Project.

Because the NDA would reduce the Project's environmental impacts, it warrants consideration as the Environmentally Superior Alternative. However, because the NPA would not meet any of the Project's objectives, another alternative would need to be considered as the Environmentally Superior Alternative.

6.3.2 REDEVELOPMENT ALTERNATIVE (RA)

Similar to the NPA and pursuant to CEQA Guidelines Section 15126.6(e), the RA assumes redevelopment of the Project site consistent with the site's current General Plan designation and zoning classification. The Project site has a General Plan land use designation of O/RD/LM with a SP/PD Overlay. The O/RD/LM land use designation is intended to encourage high quality development of office, research and development uses, and support uses. The maximum FAR for this designation is 0.75:1. Accordingly, the RA considers redevelopment of the Project site with up to 52,925 s.f. of office space supported by surface parking areas. The RA includes sidewalk, curb, gutter, and ADA improvements along the site's frontages with South Myrtle Avenue and West Olive Avenue. The site would operate as an office use on private property with no areas reserved for general public use.

A. Aesthetics

The RA assumes development of the Project site with a single-story, 52,925-s.f. office building. The RA would result in less-than-significant impacts to scenic vistas, as it would be no taller than the existing building on the site, and avoid the Project's less-than-significant impact associated with the construction of a five-story building. The Project site is not located within or adjacent to an officially designated State scenic highway corridor and does not contain any scenic resources under existing conditions, such as trees of scenic value, rock outcroppings, or historic buildings. As such, impacts to scenic highways would not occur under either the RA or the Project. Although the RA would entail less development on-site as compared to the Project, no scenic quality impacts would occur because both the RA and the Project would confirm with applicable zoning regulations. Because the RA would introduce fewer sources of artificial light and glare to the site compared to the Project, the RA would reduce the Project's less than significant light and glare impact, although both the RA and the Project would be required to comply MMC Sections 17.32.080 and 17.32.090, which set standards for lighting and glare.

B. Air Quality

The RA would entail development of the Project site with a single-story, 52,925-s.f. office building. Air pollutant emissions would occur during construction and operation of the RA, but to a lesser amount than compared to the Project. During construction, the RA would result in the same demolition-related air pollutant emissions, but fewer emissions associated with grading and construction, due to the smaller building and no need for excavation of subterranean parking as is proposed with the Project. The RA would be consistent with the site's General Plan designation and thus would not conflict with the South Coast Air Quality Management District's (SCAQMD's) 2022 Air Quality Management Plan (AQMP). The Project would also not conflict with the AQMP, as it is within the region's growth assumptions. Thus, both the Project and the RA would result in less-than-significant impacts and not conflict with the AQMP. Under long-term Project operation, and assuming a similar trip generation rate as the existing building on-site, the RA would generate

approximately 885 daily vehicle trips[1], whereas the Project would generate approximately 1,258 daily vehicle trips. In addition, due to the reduced level of development intensity on-site, the RA would result in a substantial reduction in area source emissions associated with architectural coatings and use of consumer products. As the majority of the Project's operational air quality emissions are associated with vehicular traffic and area source emissions, the RA would result in reduced regional and localized operational air quality impacts in comparison to the Project, although such impacts would be less than significant under both the RA and Project. Due to the reduced development intensity on-site and associated reduced amount of trash that would be generated and temporarily stored in trash containers, implementation of the RA also would result in a reduction in the Project's less-than-significant impacts due to odors.

C. Cultural Resources

Under the RA, the Project site would be developed with a 52,925-s.f. office building with surface parking. Because there would be no subterranean parking levels under the RA, the RA would involve substantially less grading and excavation than would occur under the Project. Because the depth of excavation would be reduced, the RA would result in a reduced potential for impacts to subsurface archaeological resources, although mitigation would be required under both the Project and RA to reduce potential impacts to less-than-significant levels if subsurface archaeological resources are encountered. The same potential for discovery of human remains would occur under both the NA and the Project since, if present, they would be near-surface, and the impact would be less-than-significant considering mandatory compliance with State law would ensure that any discovered human remains are appropriately treated. In terms of potential impacts to the presumed Downtown Commercial Historic District, the architectural design of the RA would need to comply with the *Secretary's Standards*, as well as its associated guidelines, to ensure compatibility with the character of the presumed historic district. Therefore, no historical resources would be adversely indirectly affected by construction or operation of either the RA or the Project, and impacts to historical resources would be less than significant in either case.

D. Energy

Under the RA, the Project site would be developed with a single-story, 52,925-s.f. office building with surface parking, whereas under the Project, the site would be developed with a five-story mixed-use residential building with 1.5 levels of subterranean parking, as well as parking on the ground level. Because the RA would entail less development on-site, the RA would result in a substantial reduction in demand for energy resources during construction activities as compared to the Project. Similarly, under long-term Project operation, and assuming a similar trip generation rate as the existing building on-site, the RA would generate approximately 885 daily vehicle trips, whereas the Project would generate approximately 1,258 daily vehicle trips; thus, the RA would result in less demand for transportation-related energy sources. Additionally, due to the reduction in the amount of building area in comparison to the Project, the RA would result in a substantial reduction in the amount of energy that would be consumed on-site under long-term Project operation (e.g., due

[1] The existing-25,191 s.f. multi-tenant commercial building generates approximately 421 daily trips, as noted in Table 4-1 of the Project's Traffic Analysis (EIR *Technical Appendix J1*); commercial buildings generate approximately one trip per 59.8 s.f. Thus, the-52,925 s.f. office building would generate approximately 885 daily vehicle trips (52,925 s.f. x 1 trip/59.8 s.f. = 885 trips).

to site lighting, air conditioning, etc.). However, both the Project and the RA would be subject to compliance with applicable federal and State energy regulations, including the California Title 24 energy efficiency standards, during both construction and operation. Thus, with mandatory compliance with Title 24 regulations and other applicable regulations related to energy efficiency, neither the Project nor the RA would result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during construction or operational activities, although the RA would result in reduced impacts in comparison to the Project since the total amount of energy consumed on-site during construction and long-term operations would be substantially reduced under the RA in comparison to the Project. Neither the Project nor the RA would conflict with a State or local plan for renewable energy or energy efficiency, although impacts would be reduced under the RA in comparison to the Project because the RA would result in less demand for energy resources as compared to the Project.

E. Geology and Soils

The RA assumes development of the Project site with a single-story, 52,925-s.f. office building. Similar to the potential for impacts associated with the Project, the RA would result in no impacts or less-than-significant impacts associated with geology and soils other than potentially significant impacts due to encountering unstable soils during grading and excavation activities. The RA would reduce these potential impacts due to the need for less grading and excavation and the shorter amount of time that ground-disturbing activities would be occurring under the RA.

F. Greenhouse Gas Emissions

Due to the reduction in the amount of development that would occur on-site under the RA, the RA would result in a measurable reduction in the amount of GHGs generated during construction activities and long-term operation as compared to the Project. The existing 25,191-s.f. structure on the Project site is estimated to generate approximately 726.69 $MTCO_2e$/yr of GHG emissions. Assuming a similar rate of GHG emissions under the RA as compared to the existing use (i.e., approximately 0.0288 $MTCO_2e$/yr per s.f. of building area[2]), the RA would generate approximately 1,526.72 $MTCO_2e$/yr of GHG emissions, whereas the Project would result in operational emissions of approximately 2,101.52 MTCO2e/yr (UXR, 2025c, Table 3-5). Thus, the RA would reduce total amount of GHGs that would be produced on-site in comparison to the Project. Although impacts due to GHG emissions would be less than significant under both the Project and RA, impacts due to GHG emissions would be reduced with implementation of the RA due to the overall reduction in GHG emissions that would be generated on-site. Both the Project and the RA would be consistent with or otherwise would not conflict with the CARB 2022 Scoping Plan, the City of Monrovia EAP, and SCAG's 2024-2050 RTP/SCS, which are the applicable plans adopted for the purpose of reducing the emissions of GHGs. Thus, impacts due to a conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions would be less than significant under the Project and RA, and the level of impact related to policy plan consistency would be similar.

[2] 726.69 $MTCO_2e$/yr ÷ 25,191 s.f. = 0.028847 $MTCO_2e$/yr/s.f.; 52,925 s.f. x 0.028847 $MTCO_2e$/yr/s.f. = 1,526.72 $MTCO_2e$/yr.

G. Hazards and Hazardous Materials

Based on the Project's Phase I Environmental Site Assessment (ESA) and Phase II ESA, there are no indications of on-site or off-site recognized environmental conditions (REC) on the Project site under existing conditions. Similar to the potential for impacts associated with the Project, the RA would result in no impacts or less-than-significant impacts associated with hazards and hazardous materials other than potentially significant impacts due to encountering a subsurface UST during grading and excavation activities. Although the RA would require less excavation activity as compared to the Project due to lack of need to excavate for subsurface parking, the potential to encounter a subsurface UST would be the same or similar, as the UST would be discoverable below the near-grade surface if present and result in the same level of potential impact and need for removal and mitigation if discovered. The RA would reduce the Project's other less-than-significant impacts due to the smaller building size and less potential for generation of household hazardous waste due to the smaller building.

H. Land Use and Planning

Neither the Project nor the RA would physically divide an established community; thus, no impacts would occur under either the Project or RA, and the level of impact would be the same. The RA would not involve any changes to the site's zoning classification or General Plan land use designation. In comparison, the Project entails a General Plan Amendment and Chage of Zone, but would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including the City of Monrovia General Plan and the 2024-2050 RTP/SCS. While the number of residential units proposed by the Project (204) exceeds the density assumed in the City of Monrovia's 2007 General Plan EIR (54 units/acre (87 units)), the site is identified within the South Myrtle Avenue Corridor as an area planned for higher-density residential and mixed-use development. Additionally, the increased density is permissible under the PD-28 standards and California Density Bonus Law due to the inclusion of affordable units. This makes the Project consistent with State law and with the City's broader land use strategy. The Project is, therefore, aligned with the City's planned growth framework and would have a positive impact upon the City's jobs-housing balance and vehicle miles traveled (VMT) reduction strategy. In comparison, the RA would redevelop the Project site with 52,925 s.f. of office space supported by surface parking and is less aligned with the City's planned growth framework, potentially increasing land use and planning-based environmental effects. Nonetheless, both the RA and the Project would have less-than-significant land use and planning impacts.

I. Noise

The RA would entail development of the Project site with a single-story, 52,925-s.f. office building. While construction and operational activities would generate noise, overall noise levels would be lower than those associated with the proposed Project. This reduction is due to the smaller scope of construction (specifically, the absence of excavation for subterranean parking) and the less intensive use of the site during long-term operation, including fewer site occupants and vehicle trips. The Project would have no impacts or less-than-significant noise impacts other than during the grading and excavation construction phase when noise levels may significantly impact nearby sensitive noise receivers. The RA would have the same potential to result in a significant noise impact during grading; however, because excavation activities would not be required, the duration of construction-related noise would be shorter.

J. Population and Housing

The RA assumes development of the Project site with a single-story, 52,925-s.f. office building. Assuming an employment generation rate of one employee per 319 s.f. (SCAG, 2001), the RA would introduce approximately 166 employees or an increase of approximately 114 employees above the site's existing 52 employees. By comparison, the Project would generate a future population (residents plus employees) of 569 persons or a net increase in the site's population by 517 persons. While the RA's site population would be composed of entirely employees, the Project's site population would consist of 556 residents and six employees.

The RA's increase in employees on the site from approximately 52 to 166 would not comprise substantial unplanned population growth because the increase would fall within the projections of growth anticipated for the City over the 2023-2050 timeframe. However, the RA would not assist the City in providing for additional housing, including affordable housing, and would worsen instead of improve the City's jobs-housing balance. The Project is proposing to provide 17 low-income restricted dwelling units and three moderate-income restricted dwelling units among the Project's 204 residential apartment units. Thus, the Project would provide 17 of the City's projected RHNA shortfall of 146 low-income dwelling units, which would contribute towards the City's goal of meeting its RHNA obligations per SCAG's 6th Cycle Final RHNA Allocation Plan. In comparison, the RA would not assist the City in meeting its RHNA obligations.

The City of Monrovia is "jobs rich" and, at a jobs-housing ratio of 1.61 in 2023, is above the target ratio of 1.0. Based on 2023 population and employment data (refer to Table 4.10-2 in EIR Section 4.10, *Population and Housing*), and considering the RA's net increase in the number of jobs by 114, the Project would increase the number of jobs in the City from 23,975 to 24,089 and would not affect the number of dwelling units (households) in the City (14,850). This would worsen the City's jobs-housing ratio from 1.61 to 1.62. In comparison, the Project would improve the City's jobs-housing balance from 1.61 to 1.59. Although neither the RA nor the Project would result in substantial unplanned population growth or displace people or homes, the RA would have greater, albeit less than significant, impacts due to worsening of the City's jobs-housing balance.

K. Public Services

The RA assumes development of the Project site with a single-story, 52,925-s.f. office building, which would generate approximately 166 employees or a net increase of approximately 114 employees above the site's existing 52 employees. Demand for fire and police service would increase over existing conditions due to the larger building and higher number of people on the site compared to existing conditions, but would not trigger the need to physically alter or expand a police or fire protection facility. Under the RA, the applicant would be required pay impact fees pursuant to MMC Chapter 3.21 (Fire Service Impact Fee), whereas under the Project, fees would also be paid pursuant to MMC Chapter 3.32 (Dwelling Unit Tax). Payment of these fees would address the increased demand for new or expanded fire protection and police services. Because less demand would be generated by the RA in comparison to the Project, the Project's less-than-significant impacts to fire and police facilities would be reduced.

Under the RA, there would be no new residential uses that would generate a demand for school, parks and recreation, and library facilities. Thus, the RA would avoid the Project's less-than-significant impacts associated with school and park and recreational facility demand. No library impacts would occur under either the RA or the Project because enhancements are already underway to the library at Library Park.

L. Recreation

Under the RA, no residential units are proposed on the site, so there would be no potential to result in recreation impacts. In comparison, the Project would have less-than-significant impacts associated with providing on-site recreational amenities and increased use of off-site public parks. The RA would avoid these impacts.

M. Transportation

The RA assumes development of the Project site with a single-story, 52,925-s.f. office building. With redevelopment of the site, it is also assumed that the redevelopment activities would improve sidewalks and ADA accessibility along the Project site's frontages with South Myrtle Avenue and West Olive Avenue, that the locations of the two existing driveways connecting with West Olive Avenue would remain in place, and bicycle racks would be installed on-site per CALGreen Code requirements. Whereas the Project would reduce the number of potential conflict points between vehicles, pedestrians, and bicycles from two to one by eliminating a driveway connection at West Olive Avenue, the RA would retain the two driveways. Also, pedestrian, ADA, and bicycle improvements would be less than would occur under the Project, but would still reflect components of a Complete Street system, which are consistent with the City of Monrovia General Plan Circulation Element and SCAG's RTP/SCS. Compared to the existing condition, the RA would add more vehicle trips to the roadway system, but fewer trips than would occur under the Project, reducing the Project's less-than-significant impacts associated with VMT, transportation design hazards, and emergency access.

N. Tribal Cultural Resources

Under the RA, the Project site would be developed with a 52,925-s.f. office building with surface parking. Because there would be no subterranean parking levels under the RA, the RA would involve substantially less grading and excavation than would occur under the proposed Project. Because the depth of excavation would be reduced, the RA would result in a reduced potential for impacts to subsurface tribal cultural resources, although mitigation would be required under both the Project and RA to reduce potential impacts to less-than-significant levels if subsurface tribal cultural resources are encountered.

O. Utilities and Service Systems

The RA assumes development of the Project site with a single-story, 52,925-s.f. office building, which would generate approximately 166 employees or a net increase of approximately 114 employees above the site's existing 52 employees. Demand for water, wastewater, stormwater drainage, dry utility, and landfill disposal services would increase over existing conditions due to the larger building and higher number of people on the site compared to existing conditions, but no need for off-site utility and service system improvements are expected. Because less demand would be generated by the RA in comparison to the Project, the Project's less-than-significant impacts to utilities and service systems would be reduced. Both the Project and RA would be

required to comply with regulations related to solid waste reduction; thus, no impact related to solid waste reduction regulatory compliance would occur under either the RA or the Project.

P. Conclusion

Implementation of the RA would result in the same physical impact footprint as the Project, but because the depth of excavation would be reduced due to eliminating the need for subterranean parking, the RA would result in a reduced potential for construction-related impacts under the topics of cultural resources (due to the potential to encounter subsurface resources), geology and soils (due to potential impacts associated with encountering unstable soils), and tribal cultural resources (due to the potential to encounter subsurface resources). The potential to encounter a UST and result in potential risk of upset impacts associated with the USTs removal would be the same under the RA and the Project. Construction-related noise levels would be the same or similar as would occur under the Project, but the duration of construction-level noise would occur over a shorter period of time. Because the level of construction activity would be less than the Project due to the smaller building size, all of the Project's other construction-level impacts would be reduced by the RA.

Under long-term conditions, the RA would operate as a 52,925-s.f. office building with surface parking. Due to the smaller building size and fewer number of people occupying the site compared to that which would occur under the Project, the RA would reduce all of the Project's less-than-significant operational impacts, but would not realize environmental benefits brought by the Project including alignment with the City's planned growth framework that would have a positive impact upon the City's jobs-housing balance and vehicle miles traveled (VMT) reduction strategy. The RA also would not reduce the number potential conflict points (driveways) at the site's frontage with West Olive Avenue from two to one as would occur under the Project and would not implement Complete Street improvements to the same degree as would the Project.

Because this alternative would reduce most of the Project's construction-related and operational-related impacts, it warrants consideration as the Environmentally Superior Alternative. However, because the RA would not meet the Project's underlying purpose and goal to redevelop an underutilized property within a portion of the Old Town Extension District area with multi-family residential units, and would only meet or partially meet two of the Project's seven objectives (Objectives D and F listed above in Subsection 6.3), another alternative would need to be considered as the Environmentally Superior Alternative.

6.3.3 Reduced Project Market-Rate Residential Alternative (MRRA)

The MRRA considers development of the Project site with a four-story, mixed-use, 156-unit market-rate apartment building with 2,370 s.f. of ground floor commercial space. No affordable units would be provided. The market rate units would be comprised of 15 studio units, 109 one-bedroom units, and 32 two-bedroom units. The reduction in the number of dwelling units would result from the elimination of the fifth floor of the building, comprising 48 dwelling units, and would reduce the size of the proposed building by 41,570 s.f., from 201,571 s.f. under the Project to 160,001 s.f. under the MRRA. Due to the elimination of the fifth floor of the building, the MRRA would result in a building with four above-ground levels approximately 52.5 feet in height measured from average ground plane, a reduction of 12.5 feet when compared to the Project's height of 65 feet. Architectural features may reach up to 67.5 feet above average ground plane, compared to 80 feet

under the Project. As with the Project, the MRRA would have 1.5 subterranean parking levels, as well as parking on the ground level. However, due to the elimination of the 48 apartment units, the MRRA would provide 53 fewer parking spaces and, as such, the lower level of the parking garage would be reduced in size by approximately half.[3] The architectural style of the building would be the same as the Project, but with a four-story building. Also, the same ground floor, podium level (second floor) and rooftop (fourth floor) common and amenity spaces would be provided.

A. Aesthetics

The MRRA would result in less-than-significant impacts to scenic vistas, and at four stories would reduce the Project's less-than-significant impact associated with the construction of a five-story building. The Project site is not located within or adjacent to an officially designated State scenic highway corridor and does not contain any scenic resources under existing conditions, such as trees of scenic value, rock outcroppings, or historic buildings. As such, impacts to scenic highways would not occur under either the MRRA or the Project. Although the MRRA would entail the development of a smaller (in height) building as compared to the Project, no scenic quality impacts would occur because both the MRRA and the Project would confirm with applicable zoning regulations with approval of a Specific Plan. Because the MRRA would introduce fewer sources of artificial light and glare to the site due to elimination of the fifth story compared to the Project, the MRRA would reduce the Project's less than significant light and glare impact, although both the MRRA and the Project would be required to comply MMC Sections 17.32.080 and 17.32.090, which set standards for lighting and glare.

B. Air Quality

The MRRA would entail development of the Project site with a four-story, mixed-use, 156-unit market-rate apartment building with 2,370 s.f. of ground floor commercial space. Air pollutant emissions would occur during construction and operation of the MRRA, but to a lesser amount than compared to the Project. During construction, the MRRA would result in the same demolition-related air pollutant emissions, but fewer emissions associated with grading and construction, due to the smaller building and less of a need for excavation of subterranean parking compared to the Project. The MRRA would be consistent with the site's General Plan designation and thus would not conflict with the SCAQMD's 2022 AQMP. The Project would also not conflict with the AQMP, as it is within the region's growth assumptions. Thus, both the Project and the MRRA would result in less-than-significant impacts due to a conflict with the AQMP.

Under long-term operation, the MRRA would generate approximately 1,040 vehicle trips per day (a net increase of 619 average daily trips compared to existing conditions), whereas the Project would generate approximately 1,258 daily vehicle trips (or a net increase of 837 average daily trips compared to existing conditions)[4]. In addition, due to the smaller building, the MRRA would result in a slight reduction in area

[3] Assumes a required parking ratio of 1.0 for studio and one-bedroom apartments, 2.0 for two-bedroom apartments.
[4] As noted in the Project's Traffic Analysis (EIR *Technical Appendix J1*, Tables 4-2 and 4-3), multi-family housing generates 4.54 daily trips per dwelling unit, while the 2,370 s.f. of commercial uses proposed under both the Project and the MRRA would generate approximately 332 average daily trips. Thus, in total the MRRA would generated ([156 units x 4.54 trips/unit] + 332 commercial vehicle trips = 1,040.24 daily trips.

source emissions associated with architectural coatings and use of consumer products. As the majority of the Project's operational air quality emissions are associated with vehicular traffic and area source emissions, the MRRA would result in slightly reduced regional and localized operational air quality impacts in comparison to the Project, although such impacts would be less than significant under both the MRRA and Project.

C. Cultural Resources

Under the MRRA, the Project site would be developed with a four-story building and 1.5 levels of subterranean parking, although the lower level of parking would be approximately half the size of the Project's lower parking level. Because there would be less ground excavation under the MRRA, the MRRA would result in a reduced potential for impacts to subsurface archaeological resources, although mitigation would be required under both the Project and MRRA to reduce potential impacts to less-than-significant levels if subsurface archaeological resources are encountered. The same potential for discovery of human remains would occur under both the NA and the Project, as they are discoverable at near-surface, and the impact would be less-than-significant considering mandatory compliance with State law would ensure that any discovered human remains are appropriately treated. In terms of potential impacts to the presumed Downtown Commercial Historic District, the architectural design of the MRRA would be the same as the Project, but with one less story, and would comply with the *Secretary's Standards* to ensure compatibility with the character of the presumed historic district. Therefore, no historical resources would be adversely indirectly affected by construction or operation of either the MRRA or the Project, and impacts to historical resources would be less than significant in either case.

D. Energy

Under the MRRA, the Project site would be developed with a four-story, mixed-use, 156-unit market-rate apartment building with 2,370 s.f. of ground floor commercial space. Because the MRRA would result in a smaller building with fewer residential units as compared to the Project, the MMRA would result in a concomitant reduction in demand for energy resources during construction activities as compared to the Project. Similarly, under long-term Project operation, the MRRA would generate approximately 1,040 vehicle trips per day, whereas the Project would generate approximately 1,258 daily vehicle trips; thus, the MMRA would result in less demand for transportation-related energy sources. Additionally, due to the reduction in the amount of building area in comparison to the Project, the MMRA would result in a concomitant reduction in the amount of energy that would be consumed on-site under long-term operation (e.g., due to site lighting, air conditioning, etc.). Both the Project and the MRRA would be subject to compliance with applicable federal and State energy regulations, including the California Title 24 energy efficiency standards, during both construction and operation. Thus, with mandatory compliance with Title 24 regulations and other applicable regulations related to energy efficiency, the Project and the MRRA would result in less than significant environmental impacts and would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during construction or operational activities. Neither the Project nor the MRRA would conflict with a State or local plan for renewable energy or energy efficiency, although impacts would be reduced under the MRRA in comparison to the Project because the MRRA would result in less demand for energy resources as compared to the Project.

E. Geology and Soils

Under the MRRA, the Project site would be developed with a four-story building and 1.5 levels of subterranean parking, although the lower level of parking would be approximately half the size of the Project's lower parking level. Similar to the potential for impacts associated with the Project, the MRRA would result in no impacts or less-than-significant impacts associated with geology and soils other than potentially significant impacts due to encountering unstable soils during grading and excavation activities. The MRRA would reduce these potential impacts due to the need for less grading and excavation and the shorter amount of time that ground-disturbing activities would be occurring under the MMRA.

F. Greenhouse Gas Emissions

Because a smaller building with 48 fewer residential units would occur on-site under the MRRA as compared to the Project, the MRRA would result in an estimated approximately 18 percent reduction in the amount of GHGs generated during construction activities and long-term operation. Although impacts due to GHG emissions would be less than significant under both the Project and MRRA, both the Project and the MRRA would be consistent with the City's General Plan growth projects and as such would not conflict with the CARB 2022 Scoping Plan or SCAG's 2024-2050 RTP/SCS, which are the applicable plans adopted for the purpose of reducing the emissions of GHGs. Thus, impacts due to a conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions would be less than significant under the Project and MMRA, and the level of impact would be approximately 18 percent less under the MRRA.

G. Hazards and Hazardous Materials

Based on the Project's Phase I Environmental Site Assessment (ESA) and Phase II ESA, there are no indications of on-site or off-site recognized environmental conditions (REC) on the Project site under existing conditions. Similar to the potential for impacts associated with the Project, the MMRA would result in no impacts or less-than-significant impacts associated with hazards and hazardous materials other than potentially significant impacts due to encountering a subsurface UST during grading and excavation activities. Although the MRRA would require less excavation activity as compared to the Project due to the lower subsurface parking level being approximately half of the size of the Project's lower parking level, the potential to encounter a subsurface UST would be the same or similar, as the UST would be discoverable below the near-grade surface if present and result in the same level of potential impact and need for removal and mitigation if discovered. The MRRA would reduce the Project's other less-than-significant impacts due to the smaller building size and less potential for generation of household hazardous waste due to the smaller building and 48 fewer residential units.

H. Land Use and Planning

Under the MRRA, the Project site would be developed with a four-story, mixed-use, 156-unit market-rate apartment building with 2,370 s.f. of ground floor commercial space. There would be 48 fewer residential units provided compared to the Project, and no affordable residential units. Both the MMRA and the Project would provide six jobs and represent a loss of 46 on-site jobs compared to the site's existing 52 employees. Compared to the Project's estimated 556 residents, the MMRA would accommodate 438 residents using an average of

2.5 residents per studio unit, 2.5 residents per one-bedroom unit, and 4 residents per two-bedroom unit. Thus, compared to the Project, the MMRA would accommodate 118 fewer residents.

Like the Project, the MRRA would not comprise substantial unplanned population growth because the increase would fall within the projections of growth anticipated for the City over the 2023-2050 timeframe. However, the MRRA would not assist the City in providing for affordable housing, and would improve the City's jobs-housing balance to a lesser degree than would the Project. The Project is proposing to provide 17 low-income restricted dwelling units and three moderate-income restricted dwelling units among the Project's 204 residential apartment units. Thus, the Project would provide 17 of the City's projected RHNA shortfall of 146 low-income dwelling units, which would contribute towards the City's goal of meeting its RHNA obligations per SCAG's 6th Cycle Final RHNA Allocation Plan. In comparison, the MRRA would not assist the City in meeting its RHNA affordable housing obligations. The MMRA would improve the City's jobs-housing balance to a slightly lesser extent than would the Project.

I. Noise

Under the MRRA, the Project site would be developed with a four-story, mixed-use, 156-unit market-rate apartment building with 2,370 s.f. of ground floor commercial space. While construction and operational activities would generate noise, overall noise levels would be lower than those associated with the proposed Project. This reduction is due to the smaller scope of construction (specifically, one fewer story and a lesser extent of excavation needed for subterranean parking) and the less intensive use of the site during long-term operation, including fewer site occupants and vehicle trips. The Project would have no impacts or less-than-significant noise impacts other than during the grading and excavation construction phase when noise levels may significantly impact nearby sensitive noise receivers. The MRRA would have the same potential to result in a significant noise impact during grading and excavation; however, because excavation activities would not occur for as long as they would occur under the Project, the duration of construction-related noise would be shorter.

J. Population and Housing

Both the Project and the MRRA would include 2,370 s.f. of commercial space and would generate approximately six employees. However, the MRRA's 156 apartment units would generate a future on-site residential population of 431 persons, whereas the Project would generate a residential population of approximately 563 persons or approximately 132 more residents than would occur under the MRRA. The population of Monrovia is expected to increase by 20.1 percent between 2019 and 2050, from approximately 38,100 persons in 2019 to approximately 46,092 persons by 2050, representing an increase of approximately 7,992 persons over the 31-year period. Thus, the net increase in six employees and 431 residents on-site under the MRRA (437 total population) would represent 5.5% of the anticipated growth in population within the City of Monrovia through 2050, whereas the population that would be generated by the Project would account for approximately 7.0% of the anticipated growth within the City through 2050. Accordingly, both the Project and the MRRA would result in less-than-significant impacts due to unplanned population growth, although the level of impact would be slightly reduced under the MRRA due to the reduction in the number of residents on-site. Under existing conditions, the Project site does not contain any existing residents or housing; thus, no

impact due to the displacement of existing residents or housing would occur under the Project or the MRRA, and the level of impact would be the same.

K. Public Services

Under the MRRA, the Project site would be developed with a four-story, mixed-use, 156-unit market-rate apartment building with 2,370 s.f. of ground floor commercial space. Demand for fire and police service would increase over existing conditions, but would not trigger the need to physically alter or expand a police or fire protection facility. Under the MRRA, as well as under the Project, the applicant would be required pay impact fees pursuant to MMC Chapter 3.21 (Fire Service Impact Fee) and MMC Chapter 3.32 (Dwelling Unit Tax). Payment of these fees would address the increased demand for new or expanded fire protection and police services. Because less demand would be generated by the MRRA in comparison to the Project due the smaller building and fewer number of occupants, the Project's less-than-significant impacts to fire and police facilities would be reduced.

Under the MRRA, there would be 48 fewer residential units as compared to the Project, resulting a concomitant reduction in demand for school, parks and recreation, and library facilities. No library impacts would occur under either the MRRA or the Project because enhancements are already underway to the library at Library Park. Also, the MRRA and the Project would be subject to fee payment pursuant to MMC Chapter 3.43 (Monrovia Library and Children's Reading Improvement Act Special Tax). Compared to the Project, fewer school-aged students would be generated, resulting in less demand on school facilities. Developer fees would be paid to the Monrovia Unified School District pursuant to pursuant to the Leroy F. Greene School Facilities Act. Payment of school impact fees under the MRRA and under the Project constitutes full and complete mitigation for any impacts to school services. Accordingly, impacts to school facilities would be less than significant under either the MMRA or the Project.

In order to meet the City's parkland standard of 3.0 acres per 1,000 residents, the MRRA would generate a demand for 1.32 acres of parkland. [5] The MRRA would provide for the same 0.57-acre of on-site recreational amenities as would occur under the Project, thus resulting in a demand for an additional 0.75 acres off-site. In comparison, the Project would demand 1.1 acres of new or expanded parkland off-site. The MRRA would thus represent a lesser impact to park services than the Project. In either case, because there is no specific plan or proposal for off-site park improvements, and any potential environmental impacts from future park construction would be too speculative for analysis under CEQA Guidelines Section 15145, the impact would be less than significant.

L. Recreation

Under the MRRA, the Project site would be developed with a four-story, mixed-use, 156-unit market-rate apartment building with 2,370 s.f. of ground floor commercial space and 0.57-acre of on-site recreational space. In order to meet the City's parkland standard of 3.0 acres per 1,000 residents, the MRRA would generate a demand for 1.32 acres of parkland. The MRRA would provide for the same 0.57-acre of on-site recreational

[5] 441 residents x 3.0 acres ÷ 1,000 = 1.32 acres.

amenities as would occur under the Project, thus resulting in a demand for an additional 0.75 acres off-site. In comparison, the Project would demand 1.1 acres of new or expanded parkland off-site. The MRRA would thus represent a lesser impact to park services than the Project. In either case, because there is no specific plan or proposal for off-site park improvements, and any potential environmental impacts from future park construction would be too speculative for analysis under CEQA Guidelines Section 15145, the impact would be less than significant.

M. Transportation

The MRRA assumes development of the Project site with a four-story, mixed-use, 156-unit market-rate apartment building with 2,370 s.f. of ground floor commercial space. The MRRA would improve sidewalks, and ADA accessibility along the Project site's frontages with South Myrtle Avenue and West Olive Avenue, would provide one driveway connecting with West Olive Avenue, and provide outdoor bicycle racks for general public use and indoor bicycle lockers for resident use. Pedestrian, ADA, and bicycle improvements would be the same as would occur under the Project and reflect components of a Complete Street system, which are consistent with the City of Monrovia General Plan Circulation Element and SCAG's RTP/SCS. Compared to the existing condition, the MRRA would add more vehicle trips to the roadway system, but fewer trips than would occur under the Project, reducing the Project's less-than-significant impacts associated with VMT, transportation design hazards, and emergency access.

N. Tribal Cultural Resources

Under the MRRA, the Project site would be developed with a four-story building and 1.5 levels of subterranean parking, although the lower level of parking would be approximately half the size of the Project's lower parking level. Because there would be less ground excavation under the MRRA, the MRRA would result in a reduced potential for impacts to tribal cultural resources, although mitigation would be required under both the Project and MRRA to reduce potential impacts to less-than-significant levels if subsurface tribal cultural resources are encountered.

O. Utilities and Service Systems

Under the MRRA, the Project site would be developed with a four-story, mixed-use, 156-unit market-rate apartment building with 2,370 s.f. of ground floor commercial space. The MRRA would generate approximately six employees and 431 residents. Demand for water, wastewater, stormwater drainage, dry utility, and landfill disposal services would increase over existing conditions, but similar as would occur under the Project, no need for off-site utility and service system improvements are expected. Because less demand would be generated by the MRRA in comparison to the Project due the smaller building and 48 fewer residential units, the Project's less-than-significant impacts to utilities and service systems would be reduced. Both the Project and MRRA would be required to comply with regulations related to solid waste reduction; thus, no impact related to solid waste reduction regulatory compliance would occur under either the MMRA or the Project.

P. Conclusion

Implementation of the MRRA would result in the same physical impact footprint as the Project, but because the extent of subsurface excavation would be reduced due to eliminating the need for half of the Project's lower subterranean parking level, the MRA would result in a reduced potential for construction-related impacts under the topics of cultural resources (due to the potential to encounter subsurface resources), geology and soils (due to potential impacts associated with encountering unstable soils), and tribal cultural resources (due to the potential to encounter subsurface resources). The potential to encounter a UST and result in potential risk of upset impacts associated with the USTs removal would be the same under the MRRA and the Project. Construction-related noise levels would be the same or similar as would occur under the Project, but the duration of construction-level noise would occur over a shorter period of time. Because the level of construction activity would be less than the Project due to the smaller building size, all of the Project's other construction-level impacts would be reduced by the MMRA.

Under long-term conditions, the MRRA would operate as a four-story, mixed-use, 156-unit market-rate apartment building with 2,370 s.f. of ground floor commercial space. Due to the smaller building size and fewer number of people occupying the site compared to that which would occur under the Project, the MRRA would reduce all of the Project's less-than-significant operational impacts, but would not provide any affordable housing units. The MRRA would thus not contribute towards the City's goal of meeting its affordable housing RHNA obligations per SCAG's 6th Cycle Final RHNA Allocation Plan. The MMRA would also improve the City's jobs-housing balance to a slightly lesser extent than would the Project.

Because this alternative would reduce most of the Project's construction-related and operational-related impacts, and would achieve all of the Project's objectives, although to a lesser degree than would the Project, the MRRA is identified as the Environmentally Superior Alternative.

6.3.4 Wrap Building Alternative (WBA)

The Wrap Building Alternative (WBA) considers development of the Project site with a six-story, mixed-use 204-unit apartment building served by above ground structured parking in the center of the building, with the residential units wrapping around the structured parking on the east, west, north, and south sides of the structured parking (a 'wrap' building design). The building would be 80 feet tall as measured from the average grade plane to the middle of the sloped roof of an architectural tower element proposed on the building at the corner of West Olive Avenue and South Myrtle Avenue. Architectural projections on small portions of the roof would be permitted to extend up to 95 feet in height, primarily for architectural interest and to screen rooftop mechanical equipment. The same mix of studio, one-bedroom, two-bedroom, and affordable units would occur as compared to the Project. Amenity spaces would be reconfigured in location but would be the same sizes with the same features proposed by the Project and would be located along the building's exterior edges and on the roof, instead of on a podium level. The pool would occur on the building's roof, leaving less space for PV solar panels as compared to the Project design. No subterranean parking would occur. A six-story wrap building would require concrete or podium construction for the lower two levels, Type I or Type III construction under the International Building Code (IBC) and fire-rating separation between the garage and residential units.

A. *Aesthetics*

The WBA would result in less-than-significant impacts to scenic vistas. North-facing views toward the San Gabriel Mountains are scenic. From West Olive Avenue, the WBA has no potential to obscure or block views of the San Gabriel Mountains because the mountains are located north of West Olive Avenue while the Project is located to the south. From South Myrtle Avenue, views of the San Gabriel Mountains are due north, and the WBA would be located to the west of the road. As such, the WBA has no reasonable potential to block north-facing views from South Myrle Avenue. From public roads located south of the Project site, there is an alley to the immediate south and further beyond is West Walnut Avenue. North-facing views from the alley and West Walnut Avenue are already obstructed by the commercial/industrial office building located on the Project site and intervening industrial and office buildings located south of the Project site. With implementation of the WBA, views of the San Gabriel Mountains would continue to be available from publicly-available viewing locations in areas surrounding the Project site, including along South Myrtle Avenue and West Olive Avenue. Therefore, development of the WBA would not have a substantial effect on existing public views of scenic vistas, and impacts would be less than significant. However, at six stories, the WBA would increase the Project's less-than-significant impact associated with the construction of a five-story building.

The Project site is not located within or adjacent to an officially designated State scenic highway corridor and does not contain any scenic resources under existing conditions, such as trees of scenic value, rock outcroppings, or historic buildings. As such, impacts to scenic highways would not occur under either the WBA or the Project. Although the WBA would entail the development of a taller building as compared to the Project, no scenic quality impacts would occur because both the WBA and the Project would confirm with applicable zoning regulations with the City's approval of a Specific Plan. The WBA would be less compatible in character with surrounding building heights than would the Project. Because the WBA would introduce artificial light and glare sources to a greater height than would the Project, the WBA would increase the Project's less than significant light and glare impact, although both the WBA and the Project would be required to comply MMC Sections 17.32.080 and 17.32.090, which set standards for lighting and glare.

B. *Air Quality*

The WBA would entail development of the Project site with six-story, mixed-use 204-unit apartment building with 2,370 s.f. of ground floor commercial space served by above ground structured parking. Air pollutant emissions would occur during construction and operation of the WBA, to a similar degree as would occur under the Project. During construction, the WBA would result in the same demolition-related air pollutant emissions, but fewer emissions associated with grading and excavation, due to the elimination of need for excavation to accommodate subterranean parking, which would not occur under the WBA. The WBA would be consistent with the site's General Plan designation and thus would not conflict with the South Coast Air Quality Management District's (SCAQMD's) 2022 Air Quality Management Plan (AQMP). The Project would also not conflict with the AQMP, as it is within the region's growth assumptions. Thus, both the Project and the WBA would result in less-than-significant impacts due to a conflict with the AQMP.

Under long-term operation, the WBA would generate the same number of vehicle trips as would the Project (1,258 daily vehicle trips, or a net increase of 837 average daily trips compared to existing conditions). In addition, similar energy source and area source emissions would occur compared to the Project, as the WBA and the Project would accommodate the same number of residential units and amount of commercial and amenity space. As the majority of the Project's operational air quality emissions are associated with vehicular traffic and area source emissions, the WBA would result in the same or similar regional and localized operational air quality impacts in comparison to the Project; such impacts would be less than significant under both the WBA and Project.

C. Cultural Resources

Under the WBA, the Project site would be developed with a six-story, mixed-use 204-unit apartment building with 2,370 s.f. of ground floor commercial space served by above ground structured parking in the center of the building. No subterranean parking would occur. Because there would be less ground excavation under the WBA, the WBA would result in a reduced potential for impacts to subsurface archaeological resources, although mitigation would be required under both the Project and WBA to reduce potential impacts to less-than-significant levels if subsurface archaeological resources are encountered. The same potential for discovery of human remains would occur under both the NA and the Project because any remains would be discoverable near-surface, and the impact would be less-than-significant considering mandatory compliance with State law would ensure that any discovered human remains are appropriately treated. In terms of potential impacts to the presumed Downtown Commercial Historic District, the architectural design of the WBA would be the same as the Project, but with one additional story, and would comply with the *Secretary's Standards* to ensure compatibility with the character of the presumed historic district. Therefore, no historical resources would be adversely indirectly affected by construction or operation of either the WBA or the Project, and impacts to historical resources would be less than significant in either case.

D. Energy

Under the WBA, the Project site would be developed with a six-story, mixed-use 204-unit apartment building with 2,370 s.f. of ground floor commercial space served by above ground structured parking in the center of the building. Because the WBA would result in the same number of residential units and commercial and amenity spaces as compared to the Project, the WBA would result in the same or similar demand for energy resources during construction and operational activities as compared to the Project. Under the WBA, however, there would be less space on the building's roof to accommodate PV solar panels because the swimming pool amenity area would be located on the building's roof. Both the Project and the WBA would be subject to compliance with applicable federal and State energy regulations, including the California Title 24 energy efficiency standards, during both construction and operation. Thus, with mandatory compliance with Title 24 regulations and other applicable regulations related to energy efficiency, the Project and the WBA would result in less than significant environmental impacts and would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during construction or operational activities. Neither the Project nor the WBA would conflict with a State or local plan for renewable energy or energy efficiency, and impacts would be the same or similar under the WBA in comparison to the Project because the WBA would result in the same or similar demand for energy resources as compared to the Project.

E. Geology and Soils

Under the WBA, the Project site would be developed with a six-story, mixed-use 204-unit apartment building with 2,370 s.f. of ground floor commercial space served by above ground structured parking in the center of the building. No subterranean parking would occur. Similar to the potential for impacts associated with the Project, the WBA would result in no impacts or less-than-significant impacts associated with geology and soils other than potentially significant impacts due to encountering unstable soils during grading and excavation activities. The WBA would reduce these potential impacts due to the need for less grading and excavation and the shorter amount of time that ground-disturbing activities would be occurring under the WBA.

F. Greenhouse Gas Emissions

Because the WBA would provide for the same number of residential units, same amount of commercial and amenity space as the Project, and generate the same number of daily vehicle trips as the Project, the amount of GHGs generated during construction activities and long-term operation would be the same or similar. Although impacts due to GHG emissions would be less than significant under both the Project and WBA, both the Project and the WBA would be consistent with the City's General Plan growth projects and as such would not conflict with the CARB 2022 Scoping Plan or SCAG's 2024-2050 RTP/SCS, which are the applicable plans adopted for the purpose of reducing the emissions of GHGs. Thus, impacts due to a conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions would be less than significant under the Project and WBA, and the level of impact would be the same or similar.

G. Hazards and Hazardous Materials

Based on the Project's Phase I Environmental Site Assessment (ESA) and Phase II ESA, there are no indications of on-site or off-site recognized environmental conditions (REC) on the Project site under existing conditions. Similar to the potential for impacts associated with the Project, the WBA would result in no impacts or less-than-significant impacts associated with hazards and hazardous materials other than potentially significant impacts due to encountering a subsurface UST during grading and excavation activities. Although the WBA would require less excavation activity as compared to the Project due to lack of need for subsurface parking, the potential to encounter a subsurface UST would be the same or similar, as the UST would be discoverable below the near-grade surface if present and result in the same level of potential impact and need for removal and mitigation if discovered. The WBA would have the same potential for generation of household hazardous waste as the Project due to having the same number of residential units and same amount of commercial and amenity space as the Project.

H. Land Use and Planning

Under the WBA, the Project site would be developed with the same number of residential units and same amount of commercial and amenity space as the Project, accommodating the same number of employees and residents. Like the Project, the WBA would not comprise substantial unplanned population growth because the increase would fall within the projections of growth anticipated for the City over the 2023-2050 timeframe. Both the WBA and the Project would improve the City's jobs-housing balance to the same degree and would

provide 17 low-income restricted dwelling units and three moderate-income restricted dwelling units among the 204 residential apartment units. Thus, the WBA and the Project would provide 17 of the City's projected RHNA shortfall of 146 low-income dwelling units, which would contribute towards the City's goal of meeting its RHNA obligations per SCAG's 6th Cycle Final RHNA Allocation Plan. The WBA would assist the City in meeting its RHNA affordable housing obligations to the same degree as would the Project. Land use and planning impacts would be the same under the WBA and the Project.

I. Noise

Under the WBA, the Project site would be developed with a six-story, mixed-use 204-unit apartment building with 2,370 s.f. of ground floor commercial space served by above ground structured parking in the center of the building. No subterranean parking would occur. Construction and operational activities would generate noise, and produce the same or similar noise levels as would occur under the Project. The Project would have no impacts or less-than-significant noise impacts other than during the grading and excavation construction phase when noise levels may significantly impact nearby sensitive noise receivers. The WBA would have the same potential to result in a significant noise impact during grading and excavation; however, because excavation activity would not occur for as long as it would occur under the Project, the duration of construction-related noise during that construction phase would be shorter.

J. Population and Housing

Under the WBA, the Project site would be developed with the same number of residential units and same amount of commercial and amenity space as the Project, accommodating the same number of employees and residents. Like the Project, the WBA would not comprise substantial unplanned population growth because the increase would fall within the projections of growth anticipated for the City over the 2023-2050 timeframe. Both the WBA and the Project would improve the City's jobs-housing balance to the same degree and would provide 17 low-income restricted dwelling units and three moderate-income restricted dwelling units among the 204 residential apartment units. Accordingly, both the Project and the WBA would result in less-than-significant impacts due to unplanned population growth, and the level of impact would be the same.

K. Public Services

Under the WBA, the Project site would be developed with the same number of residential units and same amount of commercial and amenity space as the Project, accommodating the same number of employees and residents. As such, demand for fire and police services, school, parks and recreation, and library service facilities, which are population-based impacts, would be the same under the WBA and the Project.

L. Recreation

Under the WBA, the Project site would be developed with the same number of residential units and same amount of commercial and amenity space as the Project, accommodating the same number of employees and residents. As such, demand for parks and recreation facilities, which are population-based impacts, would be the same under the WBA and the Project.

M. Transportation

Under the WBA, the Project site would be developed with a six-story, mixed-use 204-unit apartment building with 2,370 s.f. of ground floor commercial space served by above ground structured parking in the center of the building. The WBA would improve sidewalks, and ADA accessibility along the Project site's frontages with South Myrtle Avenue and West Olive Avenue, would provide one driveway connecting with West Olive Avenue, and provide outdoor bicycle racks for general public use and indoor bicycle lockers for resident use in the same manner as would the Project. The WBA also would add the same number of vehicle trips to the roadway system as would the Project, resulting in the same less-than-significant impacts associated with VMT, transportation design hazards, and emergency access.

N. Tribal Cultural Resources

Under the WBA, the Project site would be developed with a six-story, mixed-use 204-unit apartment building with 2,370 s.f. of ground floor commercial space served by above ground structured parking in the center of the building. No subterranean parking would occur. Because there would be less ground excavation under the WBA, the WBA would result in a reduced potential for impacts to tribal cultural resources, although mitigation would be required under both the Project and WBA to reduce potential impacts to less-than-significant levels if subsurface tribal cultural resources are encountered.

O. Utilities and Service Systems

Under the WBA, the Project site would be developed with the same number of residential units and same amount of commercial and amenity space as the Project, accommodating the same number of employees and residents. As such, demand for water, wastewater, stormwater drainage, dry utility, and landfill disposal services would the same as would occur under the Project. No need for off-site utility and service system improvements are expected. Because the same amount of demand would be generated by the WBA in comparison to the Project, the Project's less-than-significant impacts to utilities and service systems would be the same under the WBA. Both the Project and MRRA would be required to comply with regulations related to solid waste reduction; thus, no impact related to solid waste reduction regulatory compliance would occur under either the WBA or the Project.

P. Conclusion

Implementation of the WBA would result in the same physical impact footprint as the Project, but because the need for subsurface excavation would be reduced due to eliminating the need for subterranean parking, the WBA would result in a reduced potential for construction-related impacts under the topics of cultural resources (due to the potential to encounter subsurface resources), geology and soils (due to potential impacts associated with encountering unstable soils), and tribal cultural resources (due to the potential to encounter subsurface resources). The potential to encounter a UST and result in potential risk of upset impacts associated with the USTs removal would be the same under the WBA and the Project. Construction-related noise levels would be the same or similar as would occur under the Project, but the duration of construction-level noise under the grading and excavation phase would occur over a shorter period of time. Because the level of construction

activity would be the same or similar other than in the excavation phase, all of the Project's other construction-level impacts would be the same or similar under the WBA.

Under long-term conditions, the WBA would operate a six-story, mixed-use 204-unit apartment building with 2,370 s.f. of ground floor commercial space served by above ground structured parking in the center of the building. Due to the same of people occupying the site compared to that which would occur under the Project, the WBA would have the same less-than-significant operational impacts compared to the Project.

Because this alternative would reduce the Project's construction-related impacts during the excavation phase, would have the same or similar operational-related impacts, and would achieve all of the Project's objectives other than one objective pertaining to subterranean parking, the WBA is environmentally superior than the Project, but is not identified as the Environmentally Superior Alternative because the WRRA is more environmentally superior than the WBA. Also, the WBA would have a greater aesthetic impacts as compared to the Project due to its six-story height compared to the Project's five-story height.

6.4 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6 requires the identification of the environmentally superior alternative. As discussed herein, implementation of the NPA would result in no physical environmental impacts. Because the NPA would avoid or reduce all of the Project's environmental impacts, it warrants consideration as the "environmentally superior alternative." Similarly, the RA would result in reduced impacts to the environment in comparison to the Project, and also warrants consideration as the "environmentally superior alternative." However, the NPA and the RA would not meet the underlying purpose of the Project would not achieve a majority of the Project's basic objectives. Pursuant to CEQA Guidelines Section 15126.6(e)(2), if a no project alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

The MRRA, as discussed above in Subsection 6.3.3, is identified as the Environmentally Superior Alternative pursuant to CEQA Guidelines Section 15126.6 because it would result in reduced environmental impacts in comparison to the Project, other than under the topics of Population and Housing and Land Use due to the MRRA not contributing towards the City's affordable housing RHNA goals, while meeting all of the Project's objectives other than the portions of Objectives A and B related to affordable housing.

Table 6-1 Alternatives to the Project – Comparison of Environmental Impacts

Environmental Topic	Project Significance of Impacts	Level of Impact Compared to the Project/Compliance with Project Objectives			
		No Project Alternative	Redevelopment Alternative	Reduced Project Market Rate Residential Alternative	Wrap Building Alternative
Aesthetics	Less than Significant	Less	Less	Less	Greater
Air Quality	Less than Significant	Less	Less	Less	Same
Cultural Resources	Less than Significant with Mitigation	Less	Less	Less	Same
Energy	Less than Significant	Less	Less	Less	Same
Geology and Soils	Less than Significant with Mitigation	Less	Less	Less	Same
Greenhouse Gas Emissions	Less than Significant	Less	Less	Less	Same
Hazards and Hazardous Materials	Less than Significant with Mitigation	Less	Less	Less	Same
Land Use and Planning	Less than Significant	Greater	Less	Greater	Same
Noise	Less than Significant with Mitigation	Less	Less	Less	Same
Population and Housing	Less than Significant	Greater	Greater	Greater	Same
Public Services	Less than Significant	Less	Less	Less	Same
Recreation	Less than Significant	Less	Less	Less	Same
Transportation	Less than Significant	Less	Less	Less	Same

Tribal Cultural Resources	Less than Significant with Mitigation	Less	Less	Less	Same
Utilities and Service Systems	Less than Significant	Less	Less	Less	Same

Table 6-2 Alternatives to the Project – Comparison of Ability to Meet Project Objectives

	Ability to Meet Project Objectives			
Objective	**No Project Alternative**	**Redevelopment Alternative**	**Reduced Project Market Rate Residential Alternative**	**Wrap Building Alternative**
Objective A: Provide needed new market rate and affordable housing units to help meet the City's Regional Housing Needs Assessment (RHNA) obligations.	No	No	Partially; no affordable units would be provided.	Yes
Objective B: Provide a variety of housing options with different price points by providing market rate and affordable housing units in a variety of unit sizes and configurations.	No	No	Partially; no affordable units would be provided.	Yes
Objective C: Reduce vehicle trips and vehicle miles traveled by locating new housing within walking and biking distance of, and with pedestrian connections to, employment, shopping, entertainment, public services, recreation, and public transit.	No	No	Yes	Yes
Objective D: Redevelop an urban infill site with a project that makes efficient use of existing infrastructure.	No	Yes	Yes	Yes
Objective E: Promote walkability by locating parking underground and including active uses at street level.	No	No	Yes	Partially; active uses would be provided at the street level but parking would not be underground.
Objective F: Maintain high-quality architectural design in the City of Monrovia by developing a building that has a recognizable architectural style and that complements	No	Yes	Yes	Yes

existing architectural styles of buildings within and surrounding the Old Town Extension District.				
Objective G: Provide on-site amenities for residents to offset demand on public parks and recreation facilities.	No	No	Yes	Yes

7.0 REFERENCES

7.1 PERSONS CONTRIBUTING TO EIR PREPARATION

7.1.1 CITY OF MONROVIA, COMMUNITY DEVELOPMENT DEPARTMENT

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7.2 DOCUMENTS APPENDED TO THIS EIR

The following reports, studies, and supporting documentation were used in preparing this EIR and are bound separately as Technical Appendices. The authors of these reports also contributed indirectly to EIR preparation through preparing the contents of the reports, studies, and supporting documentation, which is used and cited in the EIR.

A copy of the Technical Appendices is available for review at the City of Monrovia Community Development Department at 415 South Ivy Avenue, Monrovia, CA 91016.

Appendix A: Notice of Preparation (NOP) and Written Comments on the NOP

Appendix B: Architects Orange (AO), 2023. *Shadow Study*. October 23, 2023.

Appendix C: Urban Crossroads (UXR), 2025a. *701 S. Myrtle Air Quality Impact Analysis, City of Monrovia*. April 16, 2025.

Appendix D1: BFSA Environmental Services, 2023. C*ultural Resources Records Search Results for the 701 South Myrtle Avenue Project, Monrovia, California*. December 15, 2023.

Appendix D2: SWCA Environmental Consultants, 2025. *Historical Resources Technical Report, 701 S. Myrtle Avenue Mixed-Use Project, Monrovia, California*. April 2025.

Appendix E: Urban Crossroads (UXR), 2025b. *701 S. Myrtle Energy Analysis, City of Monrovia*. April 16, 2025.

Appendix F: Geotechnical Professional, Inc., 2022. *Geotechnical Design-Level Investigation*. November 3, 2022.

Appendix G: Urban Crossroads (UXR), 2025c. *701 S. Myrtle Greenhouse Gas Analysis, City of Monrovia*. April 16, 2025.

Appendix H1: Ramboll US Consulting, Inc., 2022. *Phase I Environmental Site Assessment*. December 8, 2022.

Appendix H2: Ramboll US Consulting, Inc., 2023. *Phase II Subsurface Investigation*. March 15, 2023.

Appendix I: Urban Crossroads (UXR), 2025d. *701 S Myrtle Noise Analysis, City of Monrovia*. May 15, 2025.

Appendix J1: Urban Crossroads (UXR), 2024. *701 S. Myrtle Focused Traffic Analysis*. June 25, 2024.

Appendix J2: Urban Crossroads (UXR), 2025b. *701 S. Myrtle Supplemental Traffic Assessment*. April 6, 2025

Appendix K: Urban Crossroads (UXR), 2025c. *701 S. Myrtle Vehicle Miles Traveled (VMT) Screening Evaluation.* March 27, 2025.

7.3 DOCUMENTS INCORPORATED BY REFERENCE

The following reports, studies, and supporting documentation were used in the preparation of this EIR and are incorporated by reference within this EIR. A copy of the following reports, studies, and supporting documentation is a matter of public record and is generally available to the public at the location listed.

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7.4 DOCUMENTS, WEBSITES AND PERSONS CONSULTED

The following reports, studies, and supporting documentation were used in the preparation of this EIR and are incorporated by reference within this EIR. A copy of the following reports, studies, and supporting documentation is a matter of public record and is generally available to the public at the location listed.

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