HELIX Environmental Planning

Azusa Greens Redevelopment Project

SCH No. 2023120720

Draft Environmental Impact Report

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Table of Contents

Table of Contents (cont.)

Table of Contents (cont.)

Table of Contents (cont.)

Table of Contents (cont.)

Table of Contents (cont.)

List of Appendices

List of Figures

Table of Contents (cont.)

List of Figures (cont.)

List of Tables

Table of Contents (cont.)

List of Tables (cont.)

Acronyms and Abbreviations

°F	degrees Fahrenheit
µg	micrograms
µg/m3	micrograms per cubic meter
µPa	micro-Pascals
AAM	annual arithmetic mean
AB	Assembly Bill
ACM	asbestos-containing materials
ADA	Americans with Disabilities Act
ADMRT	Air Dispersion Modeling and Risk Tool
ADT	average daily trips
AF	acre feet
ALW	Azusa Light and Water
AMI	area median income
amsl	above mean sea level
APD	Azusa Police Department
APNs	Assessor's Parcel Numbers
AQMP	Air Quality Management Plan
AR4	Fourth Assessment Report
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
AUSD	Azusa Unified School District
BMPs	best management practices
BSA	Biological Study Area
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CadnaA	Computer Aided Noise Abatement
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Division of Occupational Safety and Health
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CBSC	California Building Standards Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife

Acronyms and Abbreviations (cont.)

CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFG Code	California Fish and Game Code
CFR	Code of Federal Regulations
cfs	cubic feet per second
CGS	California Geological Survey
CH_4	methane
CHHSLs	California Human Health Screening Levels
CHP	California Highway Patrol
City	City of Azusa
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CORRACTS	Federal Corrective Action Report
County	County of Los Angeles
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CWA	Clean Water Act
CY	cubic yards
dB	decibels
dBA	decibels with A-weighting
DBH	diameter at breast height
DDT	Dichlorodiphenyltrichloroethane
DOC	California Department of Conservation
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
DU	dwelling unit
DWL	West End Light Industrial District
DWR	Department of Water Resources
EIR	Environmental Impact Report
EO	Executive Order
ESA	Environmental Site Assessment
EV	electric vehicle
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FICON	Federal Interagency Committee on Noise

Acronyms and Abbreviations (cont.)

FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
g	grams
g/L	grams per liter
GGE	gross gasoline equivalent
GHG	greenhouse gas
GLSF	gross leasable square feet
gpm	gallons per minute
GSF	gross square feet
GWh	gigawatt-hours
GWP	global warming potential
H&SC	Health and Safety Code
HELIX	HELIX Environmental Planning, Inc.
HFC	hydrofluorocarbon
HI	Hazard Index
HMBP	Hazardous Materials Business Plan
HRA	Health Risk Assessment
HU	Hydrologic Unit
HVAC	heating, ventilation, and air conditioning
Hz	Hertz
I-	Interstate
IBC	International Building Code
IPCC	United Nations Intergovernmental Panel on Climate Change
ISTEA	Intermodal Surface Transportation Efficiency Act
IWMA	Integrated Waste Management Act
IWMP	Integrated Waste Management Plan
kBTU	thousand British thermal units
kHz	kilohertz
km	kilometer
kWh	kilowatt hour
L	liter
LACDPW	Los Angeles County Department of Public Works
LACFCD	Los Angeles County Flood Control District
LACoFD	Los Angeles County Fire Department
LACSD	Los Angeles County Sanitation District
LA Metro	Los Angeles County Metropolitan Transportation Authority
LARWQCB	Los Angeles Regional Water Quality Control Board
LBP	lead-based paint

Acronyms and Abbreviations (cont.)

LCFS	Low Carbon Fuel Standard
LCM	lead-containing materials
L_{DN}	Day Night noise level
L_{EQ}	time-averaged noise level
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
LLG	Linscott, Law & Greenspan, Engineers
LOS	Level of Service
LRA	local responsibility area
LST	localized significance threshold
L_V	vibration velocity level
m^3	cubic meter
MBTA	Migratory Bird Treaty Act
mg	milligrams
mg/kg	milligrams per kilogram
MGD	million gallons per day
MLD	most likely descendant
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
mph	miles per hour
MPO	metropolitan planning organization
MRZ	mineral resource zone
MS4	Municipal Separate Storm Sewer System
MT	metric tons
MW	megawatts
MWELO	Model Water Efficient Landscaping Ordinance
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic and Safety Administration
NIOSH	National Institute for Occupational Safety and Health
NO_2	nitrogen dioxide
NOA	Notice of Availability
NOC	Notice of Completion
NOD	Notice of Determination
Non-CORRACTS	RCRA Treatment, Storage, and Disposal Facilities List
NOP	Notice of Preparation
NO_x	nitrogen oxides

Acronyms and Abbreviations (cont.)

NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSLU	noise-sensitive land use
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
OSHA	Occupational Health and Safety Administration
Pb	lead
PCB	Polychlorinated biphenyl
PCE	tetrachloroethylene
PFC	perfluorocarbon
PM	particulate matter
PM_{10}	Coarse PM, 10 microns or less in diameter
$PM_{2.5}$	Fine PM, 2.5 microns or less in diameter
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
Project	Azusa Greens Redevelopment Project
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
RHNA	Regional Housing Needs Assessment
ROG	reactive organic gas
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SF	square feet
SF_6	hexafluoride
SGMA	Sustainable Groundwater Management Act
SGVCOG	San Gabriel Valley Council of Governments
SIP	State Implementation Plan
SJCWRP	San Jose Creek Water Reclamation Plant
SLF	Sacred Lands File

Acronyms and Abbreviations (cont.)

SMFZ	Sierra Madre Fault Zone
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SPL	sound pressure level
SR	State Route
SRA	State Responsibility Area
STC	Sound Transmission Class
STIP	California Statewide Transportation Improvement Program
S_{WL}	sound power level
SWLF	Solid Waste Landfill Sites
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCE	trichloroethene
TDS	Total Dissolved Solids
TIS	Transportation Impact Study
TRU	transport refrigeration unit
UNFCCC	United Nations Framework Convention on Climate Change
U.S.	United States
U.S. Census Bureau	United States Department of Commerce Bureau of the Census
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	Urban Waste Management Plan
VdB	vibration velocity in decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WEAP	Workers Environmental Awareness Program
WSRCC	Western States Regional Council of Carpenters
WUI	Wildland Urban Interface

1.0 EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) for the proposed Azusa Greens Redevelopment Project (Project) has been prepared on behalf of the City of Azusa (City) in compliance with the California Environmental Quality Act (CEQA). The City is the CEQA Lead Agency for the EIR and, as such, has the primary responsibility for evaluating the environmental effects of the proposed Project and considering whether to approve the proposed Project in consideration of these effects.

As required by CEQA, this EIR includes the following information: (1) a description of the proposed Project, including its location, objectives, and features; (2) a description of the existing conditions at the Project site and surrounding areas; (3) an analysis of the direct, indirect, temporary, permanent, and cumulative adverse physical effects that would occur to existing conditions should the proposed Project be approved and implemented; (4) an identification of feasible means of avoiding or substantially lessening the significant adverse effects; (5) a determination of significance for each impact after mitigation is incorporated; and (6) an evaluation of a reasonable range of alternatives to the proposed Project that would meet the basic Project objectives and reduce a Project-related significant environmental impact.

This Executive Summary provides an overview of the Project and its objectives, summarizes the environmental impacts of the Project and recommended mitigation measures, discloses areas of controversy and issues to be resolved, and identifies Project alternatives.

1.1 Project Summary

The proposed Project generally involves three components: an industrial site, an age-restricted residential community, and a reconfigured 9-hole golf course and driving range. The Project site is located along Sierra Madre Boulevard in the City of Azusa and includes Assessor's Parcel Numbers (APNs) 8617-001-005, 0864-013-030, 8617-001-013, 8617-013-001, 8717-011-001, 8684-043-002, and 8684-013-014. Discretionary approval of two zone changes, a General Plan amendment, tentative parcel map, tentative tract map, minor variance, and various use permits would be required to allow the development of the proposed Project.

1.1.1 Project Location

The Project site is located in the northern portion of the City and totals 92.12 acres. The Project site has a General Plan land use designation of Recreation and is zoned as Recreation. The neighborhood around the Project site primarily contains industrial and residential uses. Industrial land uses are located west and south of the site. Two water conservation basins are located north of the site. Hodge Elementary School and Northside Park are also located at the southern edge of the southeastern portion of the golf course site. Single-family and multi-family residential land uses are located north, east, and south of the site as well as interspersed throughout the Project site.

The Project site is described in three portions, each associated with one of the proposed Project components. The 19.33-acre industrial site is located within APN 8617-001-005 in the southwestern portion of the Project site. The industrial site is bounded by Sierra Madre Avenue to the north, industrial and residential uses to the east, West 10th Street to the south, and North Todd Avenue to the west. The 19.82-acre residential site is located on APNs 8684-013-030 and 8617-001-013 and is bounded by water

conservation basins to the north, the Azusa Greens Country Club golf course to the east, Sierra Madre Avenue to the south, and residential uses to the west. A 52.97-acre portion of the existing golf course, including the existing golf course clubhouse, parking lot, and driving range, comprises the golf course site. The golf course site is located on APNs 8617-013-001, 8717-011-001, 8684-043-002, and 8684-013-014 at 919 Sierra Madre Avenue. The golf course site is bounded by residential uses and water conservation basins to the north, residential uses to the east and south, and existing golf course use proposed for residential uses to the west. The golf course site is also bisected by Sierra Madre Avenue.

1.1.2 Project Description

1.1.2.1 Industrial Site

The industrial portion of the Project would involve demolition of the existing golf-related improvements on the 19.33-acre industrial site and installation of six new, tilt-up concrete Class A industrial buildings with associated office space. The buildings would total 353,075 square feet (SF), reaching approximately 38 feet in height. The industrial site would include four access driveways along North Todd Avenue and four access driveways along West 10th Street. Parking, landscape, utility connection, and sidewalk improvements would also be installed on the industrial site. Approval of the proposed Minor Use Permit would allow business operations to occur 24 hours per day, 7 days per week on the industrial site, and approval of the proposed a minor variance would allow for outdoor storage, including shipping containers, mechanical equipment, or materials on the industrial site. A zone change and General Plan amendment would also be required to change the industrial site zoning from Recreation to West End Light Industrial District (DWL) and to revise the planned land use from Recreation to Light Industrial.

1.1.2.2 Age-Restricted Residential Community Site

Within the 19.82-acre residential site, existing golf-related improvements would be demolished and 38 residential buildings containing 230 dwelling units (within 330,101 SF) for individuals 55 years and older would be constructed. The units would be distributed between 32 single-story duplexes, 4 single-story triplexes, and 2 three-story stacked flat buildings 41.5 feet in height. A leasing/clubhouse building, cabana, and recreational amenities would also be provided throughout the residential community. There would be two residential community entrances along Sierra Madre Avenue that would connect and lead to an entry gate. Proposed development on the residential site would require a zone change from Recreation to Neighborhood General 3 Medium Density Residential and a General Plan amendment to change the land use designation from Recreation to Medium Density Residential. The residential site would be developed in accordance with the specific standards for senior citizen apartments provided in Azusa Municipal Code Section 88.42.200.

1.1.2.3 Golf Course Site

A total of 52.97 acres of the existing Azusa Greens Country Club golf course, inclusive of the golf course clubhouse, parking lot, and driving range, would remain in place with minor adjustments to golf holes and driving range, as well as renovation of the 10,032-SF golf course clubhouse to include a function room. The existing parking area for the golf course site would also be altered to accommodate the residential site driveway. Safety improvements consisting of signage and pavement markings would occur at existing golf cart crossings along Sierra Madre Avenue.

1.1.2.4 Project Construction

Construction of the Project would occur over three phases, each associated with one of the three major Project components. In total, construction is expected to occur over approximately 22 months. For the purposes of analysis in this EIR, construction is anticipated to begin in November 2025 and conclude in September 2027, with some phases of construction expected to occur concurrently.

1.1.2.5 Project Approvals

The following are the discretionary and ministerial actions anticipated to be required by the City to implement the proposed Project:

Industrial Site:

- General Plan amendment to change the land use designation from Recreation to Light Industrial;
- Zone change from Recreation to DWL;
- Design review;
- Minor variance for outdoor storage (including trailer parking);
- Minor use permit for 24-hour operations; and
- Tentative parcel map for approval of six separate parcels (one per building).

Residential Site:

- General Plan amendment to change the land use designation from Recreation to Medium Density Residential;
- Zone change from Recreation to Neighborhood General 3 Medium Density Residential;
- Lot line adjustment; and
- Tentative tract map.

Golf Course Site:

- Use permit; and
- Design review.

Overall Project:

- Certification of the EIR;
- Adoption of a Mitigation Monitoring and Reporting Program; and
- Adoption of CEQA Findings.

1.1.3 Project Objectives

The general purpose of the proposed Project is to provide age-restricted housing, construct industrial development with new job opportunities, and redevelop the Azusa Greens Country Club golf course for the City and region. The following specific objectives have been identified for the proposed Project:

1. Provide new infill senior housing within an established residential neighborhood that offers a mix of unit types and affordability levels, including low and moderate affordable units, to accommodate a range of household incomes and address the City's shortage of senior housing.

2. Offer an amenity-rich residential community for seniors that encourages physical and emotional health and wellness by providing project residents access to a community of their peers as well as private recreational facilities and a nearby golf course.

3. Reopen an upgraded and reconfigured Azusa Greens Golf Course to provide additional recreational and employment opportunities within the region.

4. Provide contemporary industrial spaces that accommodate a variety of business and operational activities, including local or regional headquarters, light manufacturing/assembly, and warehouse, while generating employment opportunities within the City.

5. Develop a project that helps the City achieve economic development goals and provides fiscal benefit through enhanced property taxes, sales taxes, and utility revenues.

6. Create a distinct project design that includes attractive architecture for buildings and landscaping and outdoor recreational spaces that are in harmony with the surrounding neighboring uses.

1.2 Summary of Environmental Effects and Mitigation Measures

This EIR examines the potential environmental effects of the proposed Project, considering information related to existing site conditions, analyses of the types and magnitude of individual and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid potential environmental impacts. Table 1-1, *Summary of Project Impacts and Mitigation Measures*, provides a summary of the environmental impacts that could result from implementation of the proposed Project, feasible mitigation measures that would reduce or avoid the potentially significant impacts, and conclusions as to whether the potentially significant impacts have been mitigated below a level of significance. Impacts related to agricultural and forestry resources and mineral resources were determined to not present a potentially significant environmental impact and are discussed further in Section 6.0, *Effects Found Not to be Significant*.

1.3 Areas of Known Controversy

CEQA Guidelines Section 15123 requires that an executive summary of an EIR include areas of controversy known to the Lead Agency, including issues raised by other public agencies and/or the public. A Notice of Preparation (NOP) was circulated to solicit agency and public comments on the scope and content of the environmental analysis with a state comment period from December 26, 2023, through January 24, 2024, and a local comment period from December 22, 2023, to January 22, 2024. The City also hosted an EIR scoping meeting on January 11, 2024.

Comments received during the NOP public scoping period and EIR scoping meeting were considered as part of the preparation of this EIR. Comments addressed topics including air quality, biological resources, greenhouse gas emissions, public services, transportation, and tribal cultural resources. A copy of the NOP and comments received during the NOP review period are contained in Appendix A of the EIR.

Table 1-1
SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Aesthetics						
Scenic Vistas	The proposed Project would not have a substantial adverse effect on a scenic vista.	LS	LS	No mitigation is required.	--	--
Scenic Resources	The proposed Project would not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	LS	LS	No mitigation is required.	--	--
Visual Character and Quality	The proposed Project would not conflict with applicable zoning and other regulations governing scenic quality.	LS	LS	No mitigation is required.	--	--
Light and Glare	The proposed Project would not create a new source of substantial light and glare which would adversely affect day or nighttime views in the area.	LS	LS	No mitigation is required.	--	--
Air Quality						
Air Quality Plans	The proposed Project could conflict with or obstruct implementation of the applicable air quality plan.	PS	PS	No feasible mitigation measures have been identified that would reduce this impact below a level of significance.	SU	SU

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Air Quality Standards	The proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard.	LS	LS	No mitigation is required.	--	--
Sensitive Receptors	The proposed Project could expose sensitive receptors to substantial pollutant concentrations during construction.	PS	PS	AQ-1, Tier 4 Construction Equipment AQ-2, Fugitive Dust Best Management Practices	LS	LS
Odors	The proposed Project would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people.	LS	LS	No mitigation is required.	--	--
Biological Resources						
Special-Status Species	The proposed Project could result in a substantial adverse effect on special-status species.	PS	PS	BIO-1, Nesting Bird Avoidance	LS	LS
Sensitive Habitats	The proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community.	LS	LS	No mitigation is required.	--	--
Wetlands	The proposed Project would not have a substantial adverse effect on state or federally protected wetlands.	N	N	No mitigation is required.	--	--
Wildlife Corridors	The proposed Project would not interfere substantially with wildlife movement, wildlife corridors, or the use of nursery sites.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Local Policies or Ordinances	The proposed Project could conflict with a local policy or ordinance protecting biological resources.	PS	PS	BIO-2, Tree Replacement Fees	LS	LS
Conservation Plans	The proposed Project would not conflict with the provisions of an adopted habitat conservation plan.	N	N	No mitigation is required.	--	--
Cultural Resources						
Historic Resources	The proposed Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	N	N	No mitigation is required.	--	--
Archaeological Resources	The proposed Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	PS	PS	CUL-1, Workers Environmental Awareness Program CUL-2, Archaeological and Native American Monitoring CUL-3, Unanticipated Discovery of Cultural Resources	LS	LS

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Human Remains	The proposed Project could disturb human remains.	PS	PS	CUL-4, Unanticipated Discovery of Human Remains and Associated Funerary Objects	LS	LS
Energy						
Energy Consumption	The proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.	LS	LS	No mitigation is required.	--	--
Energy Efficiency Plans	The proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	LS	LS	No mitigation is required.	--	--
Geology and Soils						
Seismic Hazards	The proposed Project would not directly or indirectly cause potential substantial adverse effects involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure; or landslides given adherence to applicable building codes and geotechnical recommendations.	LS	LS	No mitigation is required.	--	--
Soil Erosion	The proposed Project would not result in substantial soil erosion or the loss of topsoil given adherence to applicable erosion control requirements.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Geologic Instability	The proposed Project would not 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 given adherence to applicable building codes and geotechnical recommendations.	LS	LS	No mitigation is required.	--	--
Expansive Soil	The proposed Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property given adherence to applicable building codes and geotechnical recommendations.	LS	LS	No mitigation is required.	--	--
Septic Tanks	The proposed Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	N	N	No mitigation is required.	--	--
Paleontological Resources	The proposed Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Greenhouse Gas Emissions						
Greenhouse Gas Emissions	The proposed Project could generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment.	PS	PS	No feasible mitigation measures have been identified that would reduce this impact below a level of significance.	SU	SU
Greenhouse Gas Emission Reduction Plans	The proposed Project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.	PS	PS	No feasible mitigation measures have been identified that would reduce this impact below a level of significance.	SU	SU
Hazards and Hazardous Materials						
Routine Transport, Use, or Disposal of Hazardous Materials	The proposed Project would not result in substantial adverse effects related to the transport, use, or disposal of hazardous materials given adherence to applicable hazardous waste regulations.	LS	LS	No mitigation is required.	--	--
Accidental Release of Hazardous Materials	The proposed Project 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.	PS	PS	HAZ-1, Asbestos-Containing Materials and Lead-Based Paint Survey and Disposal	LS	LS

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Hazards to Schools	The proposed Project could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school.	PS	PS	HAZ-1, Asbestos-Containing Materials and Lead-Based Paint Survey and Disposal	LS	LS
Hazardous Materials Sites	The proposed Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment.	LS	LS	No mitigation is required.	--	--
Airport Hazards	The proposed Project would not result in a safety hazard or excessive noise for people residing or working in the Project area.	LS	LS	No mitigation is required.	--	--
Emergency Response Plans	The proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LS	LS	No mitigation is required.	--	--
Wildland Fires	The proposed Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.	LS	LS	No mitigation is required.	--	--
Hydrology and Water Quality						
Water Quality Standards	The proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Groundwater Supplies and Recharge	The proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	LS	LS	No mitigation is required.	--	--
Drainage Patterns	The proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site; 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.	LS	LS	No mitigation is required.	--	--
Inundation	The proposed Project, in flood hazard, tsunami, or seiche zones, would not risk release of pollutants due to Project inundation.	LS	LS	No mitigation is required.	--	--
Water Quality and Groundwater Management Plans	The proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	LS	LS	No mitigation is required.	--	--
Land Use and Planning						
Community Division	The proposed Project would not physically divide an established community.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Land Use Plans, Policies, and Regulations	The proposed Project could 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.	PS	PS	No feasible mitigation measures have been identified that would reduce this impact below a level of significance.	SU	SU
Noise						
Increase in Ambient Noise Levels	The proposed Project could generate 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.	PS	PS	NOI-1, Industrial Site Noise Barrier NOI-2, Construction Noise Best Management Practices NOI-3, Industrial Site Sound Wall Timing NOI-4, Nighttime Construction Notification	SU	LS
Ground-borne Vibration	The proposed Project would not result in generation of excessive ground-borne vibration or ground-borne noise levels.	PS	LS	NOI-5, Construction Vibration	LS	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Airport Noise Exposure	The proposed Project would not expose people residing or working in the Project area to excessive noise levels.	LS	LS	No mitigation is required.	--	--
Population and Housing						
Population Growth	The proposed Project would not 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).	LS	LS	No mitigation is required.	--	--
Displacement	The proposed Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	N	N	No mitigation is required.	--	--
Public Services						
Fire Protection	The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities or the need for new or physically altered fire protection facilities.	LS	LS	No mitigation is required.	--	--
Police Protection	The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities or the need for new or physically altered police protection facilities.	LS	LS	No mitigation is required.	--	--
Schools	The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Parks	The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities or the need for new or physically altered park facilities.	LS	LS	No mitigation is required.	--	--
Other Public Facilities	The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities.	LS	LS	No mitigation is required.	--	--
Recreation						
Use of Existing Recreational Facilities	The proposed Project would not increase the use of existing parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	LS	LS	No mitigation is required.	--	--
Expansion of Recreational Facilities	The proposed Project would not result in adverse physical effects beyond those identified in the relevant sections of this EIR as a result of the construction or expansion of recreational facilities.	LS	LS	No mitigation is required.	--	--
Transportation						
Circulation Programs, Plans, Ordinances, and Policies	The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Vehicle Miles Travelled	The proposed Project could conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).	PS	PS	TR-1, Pedestrian Crossing Repairs TR-2, Bicycle Parking Facilities TR-3, Commute Trip Reduction Marketing and Education TR-4, Ride-Sharing Program	SU	SU
Hazardous Design Features	The proposed Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	LS	LS	No mitigation is required.	--	--
Emergency Access	The proposed Project would not result in inadequate emergency access.	LS	LS	No mitigation is required.	--	--
Tribal Cultural Resources						
Historical Resources	The proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k).	N	N	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Significant Tribal Cultural Resources	The proposed Project could cause a substantial adverse change in the significance of a tribal cultural resource, that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1.	PS	PS	CUL-1, Workers Environmental Awareness Program CUL-2, Archaeological and Native American Monitoring CUL-3, Unanticipated Discovery of Cultural Resources CUL-4, Unanticipated Discovery of Human Remains and Associated Funerary Objects TCR-1, Unanticipated Discovery of Tribal Cultural Resources	LS	LS

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Utilities and Service Systems						
Relocation or Construction of Utilities	The proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities resulting in significant environmental effects.	LS	LS	No mitigation is required.	--	--
Water Supplies	The proposed Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years.	LS	LS	No mitigation is required.	--	--
Wastewater Treatment	The proposed 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.	LS	LS	No mitigation is required.	--	--
Solid Waste Generation	The proposed Project would not generate solid waste in excess of state or local standards, or in excess of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	LS	LS	No mitigation is required.	--	--
Solid Waste Regulations	The proposed Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	LS	LS	No mitigation is required.	--	--
Wildfire						
Emergency Plans	The proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Wildfire Risks	The proposed Project would not exacerbate wildfire risks and would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	LS	LS	No mitigation is required.	--	--
Infrastructure Installation	The proposed Project would not 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.	LS	LS	No mitigation is required.	--	--
Post-Fire Risks	The proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	LS	LS	No mitigation is required.	--	--

LS = Less than Significant; PS = Potentially Significant; SU = Significant and Unavoidable; N = No Impact

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1.4 Issues to Be Resolved

An EIR is an informational document intended to inform the public agency decision makers and the public of the significant effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The issues to be resolved by the decision makers for the proposed Project include the choice among alternatives and whether or how to mitigate the significant effects. Table 1-1, above, identifies potential environmental effects of the proposed Project and feasible mitigation measures that could reduce or avoid the identified environmental impacts. Section 1.5, *Project Alternatives*, below describes potential alternatives to the Project that avoid or reduce environmental impacts associated with the Project.

The City decision makers must decide how to reduce significant and unavoidable environmental impacts of the Project to the maximum extent feasible while achieving Project objectives, through the adoption of mitigation measures and/or alternatives to the Project identified in this EIR. If the proposed Project is selected for adoption, the City Council would be required to certify the Final EIR, determine whether and how to mitigate significant impacts, and adopt associated Findings and a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15091 for the significant and unavoidable air quality, greenhouse gas emissions, land use and planning, noise, and transportation impacts identified in the EIR. In addition, the decision makers must determine if the potentially significant impacts associated with air quality, biological resources, cultural resources, hazards and hazardous materials, noise, and tribal cultural resources have been mitigated below a level of significance. Lastly, the decision makers must determine whether the Project alternatives would substantially reduce significant effects while still meeting key objectives of the Project.

1.5 Project Alternatives

The following alternatives are analyzed in detail in Section 6.0, *Project Alternatives*, of this EIR. The objective of the alternatives analysis is to consider a reasonable range of potentially feasible alternatives to foster informed decision-making and public participation in the environmental review process. The considered alternatives to the proposed Project are summarized below, followed by a discussion of the environmentally superior alternative.

1.5.1 Alternatives Evaluated in Detail

No Project Alternative

CEQA Guidelines Section 15126.6(e) requires that a "no project" alternative be evaluated along with its impacts to allow decision makers to compare the impacts of approving the Project with the impacts of not approving the Project. The "no project" analysis is required to discuss the existing conditions at the time the NOP is published, as well as what would be reasonably expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services.

As the proposed Project site has existing entitlements to operate as a 9-hole golf course and driving range, reopening of the golf course use is evaluated under this No Project Alternative. While the golf course was not operating at the time the NOP was published, it has since reopened and would be expected to continue operating if the proposed Project is not approved. The No Project Alternative assumes alterations to the driving range, interior golf course clubhouse renovations, and light course

renovations proposed under the Project would proceed to improve the existing golf course use. However, the interior golf course clubhouse renovations would not result in the creation of a banquet space, as this would require additional discretionary approvals. Rather, the golf course clubhouse would be reopened with its existing capacity for food and drink service with minor interior upgrades requiring ministerial building and safety permits.

The remaining seven golf course holes, identified as the industrial site and residential site under the proposed Project, would remain as open space zoned for Recreation but would not reopen as part of the golf course use. As is proposed under the Project, hole 8 would be shortened from its existing configuration, the tee box for hole 7 would be relocated, and adjustments to the driving range would occur. The golf cart crossing safety improvements would also be implemented. These minor improvements would be allowed under existing entitlements for the site and would involve only minor grading and landscaping activity. As the same number of golf holes would be opened as proposed by the Project, this alternative is anticipated to generate 273 average daily trips (ADT), consistent with the number of vehicle trips generated by the golf course site under the Project. The No Project Alternative assumes no residential buildings, industrial uses, or associated off-site improvements would be constructed.

Reduced Residential Density Alternative

The Reduced Residential Density Alternative would involve industrial and golf course improvements consistent with the proposed Project but would construct only 162 dwelling units within the residential site. Under this alternative, the residential site would require a zone change to the Low Density Residential zone in Neighborhood General 3, which allows 8 units per acre, resulting in up to 162 dwelling units for the residential site. The increased density allowed for age-restricted apartment uses would not be utilized. To achieve this density, single-story duplex and triplex buildings similar to those proposed with the Project would be constructed in the northeast portion of the residential site in place of the stacked flat and community buildings. Under the Reduced Residential Density Alternative, approximately 698 ADT would be generated by the residential land use, for a total of 2,690 ADT under this alternative.

Reduced Industrial Alternative

The Reduced Industrial Alternative would involve residential and golf course improvements consistent with the proposed Project but would eliminate the construction of Building 6 on the industrial site. Therefore, this alternative would result in the construction of 296,585 SF of industrial space, a reduction of approximately 15 percent of the proposed industrial space. This would also result in the nearest industrial building (Building 5) being located approximately 150 feet from the existing residential land uses to the northeast and approximately 600 feet from those to the east. Under this alternative, the remainder of the industrial site would be finished with a mix of hardscape and landscape, allowing for vehicle parking and storage. With the reduction in industrial building space, this alternative would generate approximately 1,444 vehicle trips from the industrial site, including 74 truck trips, for a total of 2,548 ADT for this alternative.

1.5.2 Comparative Environmental Analysis

Detailed analysis of each alternative is provided in Section 6.0, *Project Alternatives*, of this EIR. Table 1-2, *Comparison of Project and Alternative Impacts*, provides a summary of the potential impacts that would

occur under each alternative and, where the alternative would result in the same impact conclusion as the proposed Project, whether the alternative would reduce, increase, or keep consistent the degree of that impact.

Table 1-2
COMPARISON OF PROJECT AND ALTERNATIVES IMPACTS

Environmental Issue Area	Proposed Project	No Project	Reduced Residential Density	Reduced Industrial
Aesthetics	LS	LS<	LS=	LS=
Air Quality	SU	SM	SU<	SU<
Biological Resources	SM	SM<	SM=	SM=
Cultural Resources	SM	LS	SM=	SM=
Energy	LS	LS<	LS<	LS<
Geology and Soils	LS	LS=	LS=	LS=
Greenhouse Gas Emissions	SU	LS	SU<	SU<
Hazards and Hazardous Materials	SM	SM=	SM=	SM=
Hydrology and Water Quality	LS	LS<	LS=	LS=
Land Use and Planning	SU	LS	SU<	SU<
Noise	SU	SU<	SU<	SU<
Population and Housing	LS	LS<	LS<	LS=
Public Services	LS	LS<	LS<	LS<
Recreation	LS	LS<	LS<	LS<
Transportation	SU	LS	SU<	SU<
Tribal Cultural Resources	SM	LS	SM=	SM=
Utilities and Service Systems	LS	LS<	LS<	LS<
Wildfire	LS	LS<	LS=	LS=

SU = significant and unavoidable impacts; SM = significant but mitigable impacts; LS = less than significant impacts;
N = no impacts
< represents comparatively reduced impact relative to the Project (if impact designation is the same and impact varies)
> represents comparatively greater impact relative to the Project (if impact designation is the same and impact varies)
= represents same/similar impacts relative to the Project

1.5.3 Environmentally Superior Alternative

The CEQA Guidelines require the identification of an environmentally superior alternative among the alternatives analyzed in an EIR, which is typically selected based on an ability to avoid or substantially reduce significant environmental effects associated with the Project. CEQA Guidelines Section 15126.6(e)(2) also requires that if the No Project Alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on a comparison of the overall environmental impacts for the described alternatives, the No Project Alternative is identified as the environmentally superior alternative. This alternative would avoid the significant and mitigable and less than significant impacts that would occur with the proposed Project. However, the No Project Alternative does not meet five of the Project objectives.

Of the remaining alternatives, the environmentally superior alternative is the Reduced Industrial Alternative. This alternative would meet the Project objectives, although to a lesser degree than the

proposed Project, given the reduced industrial building space that would be provided. This alternative would not eliminate any significant and unavoidable impacts of the Project but would have the lowest trip generation of the alternatives, thereby resulting in the greatest decrease in VMT. No increase in the severity of impacts would occur under the Reduced Industrial Alternative.

2.0 INTRODUCTION

This Environmental Impact Report (EIR) has been prepared to evaluate the potential environmental impacts associated with construction and operation of the proposed Azusa Greens Redevelopment Project (Project). The Project involves three components: an industrial site, an age-restricted residential community, and a reconfigured 9-hole golf course and driving range. The Project site is located along Sierra Madre Boulevard in the City of Azusa (City) and includes Assessor's Parcel Numbers (APNs) 8617-001-005, 0864-013-030, 8617-001-013, 8617-013-001, 8717-011-001, 8684-043-002, and 8684-013-014. Refer to Section 3.0, *Project Description*, for further discussion of the proposed Project site and components.

2.1 Purpose of the EIR

The City of Azusa is the Lead Agency for the Project under the California Environmental Quality Act (CEQA) and has determined that an EIR is required for the proposed Project. Preparation of an EIR is required when it can be fairly argued, based on substantial evidence, that a proposed program may result in a significant environmental impact. An EIR is an informational document used to inform public agency decision-makers and the general public of the significant environmental impacts of a project, identify possible ways to minimize the significant impacts, and describe reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. The mitigation measures that are specified herein shall be adopted as conditions of approval of the Project to minimize the significance of impacts resulting from the implementation of the Project. In addition, this EIR is the primary reference document in the formulation and implementation of a Mitigation Monitoring and Reporting Program (MMRP) for the Project. Public agencies are required to consider the information presented in an EIR when determining whether to approve a project.

This EIR has been prepared in conformance with CEQA (California Public Resources Code [PRC] Section 21000 et seq.); the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines; California Code of Regulations [CCR], Title 14, Section 15000 et seq.); and the rules, regulations, and procedures for implementation of CEQA, as adopted by the City.

This EIR is an informational document prepared by the City for the following purposes:

- To satisfy the requirements of CEQA (PRC Section 21000 et seq.) and the CEQA Guidelines (CCR Title 14, Section 15000 et seq.).
- To inform the general public, the local community, and responsible and interested public agencies of the scope of the Project, the potential environmental effects of the Project, measures to mitigate potentially significant environmental effects, and alternatives to the Project.
- To provide the City information to consider potential environmental consequences in deciding whether to approve the Project.
- To serve as a source document for Responsible and Trustee Agencies to issue permits and approvals, if required, for development of the Project.

As described in CEQA and the CEQA Guidelines, public agencies are charged with the duty of avoiding or substantially lessening significant environmental effects where feasible. In satisfying this duty, a public agency has an obligation to balance a project's significant effects on the environment with its benefits, including economic, social, technological, legal, and other benefits. The Lead Agency is required to consider the information in the EIR, along with any other relevant information, in making its decisions on the Project. Further, CEQA requires the City to consider the information in the EIR and make findings regarding any significant and unavoidable effects identified in the EIR. The City will review and consider certification of the Final EIR prior to any decision on whether to approve the proposed Project.

This EIR has been prepared utilizing information from City planning and environmental documents, technical studies prepared for the Project, and other publicly available data. As permitted under the CEQA Guidelines (Section 15084[d-e]), this EIR has been prepared by a consultant under the direction of City planning staff. However, prior to certification, the City has undertaken an independent review of this EIR by having City planning staff work with the consultant on the EIR and by employing a third-party consultant to independently review the EIR. If certified by the City, the information included, and the conclusions reached in the EIR will therefore represent the City's independent judgment as the Lead Agency regarding the potential environmental impacts of the Project.

2.2 Environmental Review Process

2.2.1 Notice of Preparation

In accordance with CEQA Guidelines Section 15082, after deciding that an EIR is required, the Lead Agency must file a Notice of Preparation (NOP) with the Office of Planning and Research (OPR) State Clearinghouse (SCH) and the NOP must be posted at the County Clerk's office for at least 30 days. The NOP is provided to solicit input on the scope of the EIR from responsible and trustee agencies, other concerned agencies or organizations, and interested parties.

On December 26, 2023, the NOP for the Project was filed at the Los Angeles County Clerk's Office. The City also distributed the NOP to federal, state, regional, and local government agencies and interested parties for a 30-day public review period. The NOP provided a description of the proposed Project, identified potential environmental effects associated with Project implementation, and invited agencies and the public to review and comment on the NOP. The NOP state comment period began on December 26, 2023, and ended on January 24, 2024, and the NOP local comment period began on December 22, 2023, and ended on January 22, 2024. A public scoping meeting was held on January 11, 2024, at the Azusa Auditorium. Further discussion of the comments received is provided in Section 2.4.2 below, and a copy of the NOP and responses received are included in Appendix A of this EIR.

2.2.2 Public Review of the Draft EIR

A Draft EIR must contain information required by CEQA Guidelines Sections 15122 through 15131, including: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) consideration of and discussion of environmental impacts (direct, indirect, cumulative, growth-inducing, and unavoidable impacts); f) discussion of alternatives to the proposed project; g) mitigation measures; and h) discussion of irreversible changes. As described further in Section 2.3, *Organization of the EIR*, this information is provided within the EIR for consideration during the public review process and by the Lead Agency.

Upon completion of the Draft EIR, the Lead Agency must file a Notice of Completion (NOC) with the State Clearinghouse and prepare a public Notice of Availability (NOA) of a Draft EIR. The NOA must be posted in the County Clerk's office for 30 days (PRC Section 21092), and the Lead Agency must send a copy of the NOA to anyone who has requested it (CEQA Guidelines Section 15087). Additionally, a public NOA of a Draft EIR must be provided through at least one of the following procedures: a) publication in a newspaper of local circulation; b) posting on and off the project site; or c) direct mailing to owners and occupants of contiguous properties. The Lead Agency must solicit input from other agencies and the public and respond in writing to all comments received (PRC Sections 21104 and 21253).

This Draft EIR will be available for review by the public and interested parties, agencies, and organizations for a 45-day comment period. During the comment period, the public is invited to submit written or email comments on the Draft EIR to the City of Azusa Community Development Department. Written comments on the Draft EIR should be submitted by mail or email to:

Knarik Vizcarra, Planning Manager
City of Azusa Community Development Department (Planning Division)
213 East Foothill Boulevard
Azusa, CA 91702
AzusaGreensComment@azusaca.gov

2.2.3 Final EIR

Following the conclusion of the 45-day public review period for the Draft EIR, the City will review all comments received and prepare written responses to comments regarding the environmental analysis in the Draft EIR. A Final EIR will then be prepared, which contains the comments received, responses to comments raising environmental issues, and any changes to the Draft EIR (if necessary). The Final EIR will then be presented to the City's Planning Commission for consideration and the City Council for certification. All agencies, organizations, and individuals who commented on the Draft EIR will be notified of the availability of the Final EIR and the date of the public hearings before the Planning Commission and City Council.

Responses to comments submitted on the Draft EIR by public agencies will be provided to those agencies at least 10 days prior to certification of the EIR. Public input is encouraged at all public hearings before the City. The City Council will also make findings regarding each significant environmental impact of the proposed Project as identified in the Final EIR. For each significant impact of the Project identified in the EIR, the Lead Agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (CEQA Guidelines Section 15091). If an agency approves a project with unavoidable significant environmental impacts, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.

The Final EIR will need to be certified by the City as having been prepared in compliance with CEQA prior to deciding whether to approve or deny the proposed Project. After the City Council certifies the Final EIR, it may then consider whether to approve the Azusa Greens Redevelopment Project. If the Project is approved, the City Council will also adopt all feasible mitigation measures identified in the EIR and apply them as conditions of Project approval.

2.2.4 Notice of Determination

The Lead Agency must file a Notice of Determination (NOD) after deciding to approve a project for which an EIR is prepared (CEQA Guidelines Section 15094). A local agency must file the NOD with the County Clerk within five working days after approval of the project by the Lead Agency. If the project requires discretionary approval from any state agency, then the local Lead Agency shall also file a copy of the NOD with the State Clearinghouse within 5 working days after project approval. The NOD must be posted for 30 days and retained by the Lead Agency for 12 months. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (PRC Section 21167[c]).

2.2.5 Mitigation Monitoring and Reporting Program

PRC Section 21081.6 requires that the Lead Agency adopt an MMRP for any project for which it has adopted mitigation measures. An MMRP is intended to track compliance with the adopted mitigation measures during project implementation. If the Project is approved, mitigation measures identified in the Final EIR and MMRP, which will be attached to the Final EIR, will be made conditions of Project approval that must be implemented by the applicable parties identified in the MMRP and verified by the City.

2.3 Organization of the EIR

This EIR contains the information required to be included in an EIR by CEQA Guidelines Sections 15122 through 15131. In summary, the content and format of this EIR is as follows:

- **Section 1.0, Executive Summary**, provides an overview of the EIR document in accordance with CEQA Guidelines Section 15123. 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 the potential areas of controversy related to the Project and identifies the potential alternatives to the proposed Project as required by CEQA. Finally, the Executive Summary provides a summary of the Project's impacts, mitigation measures, and conclusions.

- **Section 2.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of the City in serving as the Lead Agency, an overview of the EIR format, and a description of environmental issues discussed in the EIR.

- **Section 3.0, Project Description**, serves as the EIR's Project Description for the purpose of fulfilling the requirements of CEQA Guidelines Section 15124 and contains a level of specificity commensurate with the level of detail proposed by the Project. This section provides a detailed description of the Project, including its purpose, main objectives, design features, construction characteristics, and operational characteristics expected over the Project's lifetime, should development occur on the property. In addition, the discretionary actions required of the City and other government agencies to implement the Project are discussed. The section also describes the environmental setting as required by CEQA Guidelines Section 15125, including descriptions of the Project site's physical conditions and surrounding context used as the baseline for analysis in this EIR.

- **Section 4.0, Environmental Analysis**, provides an analysis of potential direct, indirect, and cumulative impacts that may occur with implementation of the proposed Project in accordance

with CEQA Guidelines Sections 15126, 15126.2, and 15130. In the environmental analysis subsections of Section 4.0, the existing conditions pertinent to the subject area being analyzed are disclosed and accompanied by a specific analysis of physical impacts that may be caused by implementing the proposed Project. As applicable, impacts are evaluated on a direct, indirect, short-term, long-term, and cumulative basis. A conclusion concerning the significance of potential impacts is reached for each discussion, and mitigation measures are presented as warranted with a discussion of the significance of the potential impact with the implementation of the identified mitigation measures. 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 impact, for which a Statement of Overriding Considerations would need to be adopted by the City pursuant to CEQA Guidelines Section 15093. The analyses in Section 4.0 are based in part on technical reports appended to this EIR.

- **Section 5.0, Other CEQA-Required Sections**, includes specific topics that are required by CEQA Guidelines Section 15126 but not covered in Section 4.0. These include a summary of the Project's significant and unavoidable impacts, a discussion of the significant and irreversible environmental changes that would occur if the Project is implemented, and potential growth-inducing aspects of the proposed Project.

- **Section 6.0, Project Alternatives**, describes and evaluates alternatives to the proposed Project that could reduce or avoid the Project's significant environmental effects in accordance with CEQA Guidelines Section 15126.6. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives to foster informed decision making and public participation. Three alternatives, including the CEQA-required No Project Alternative, are evaluated in detail in Section 6.0.

- **Section 7.0, Effects Found Not to be Significant**, includes a discussion of the potential environmental effects found not be significant during preparation of the Initial Study for the Project and that, therefore, do not require a detailed evaluation in this EIR. This section fulfills the requirements of CEQA Guidelines 15128. Other effects found not to be significant during preparation of the Initial Study are summarized in the applicable subsections of Section 4.0. Additionally, discussions of the effects found not to be significant are contained in the Initial Study provided in Appendix A to the EIR.

- **Section 8.0, Individuals and Agencies Consulted**, lists the persons who authored or participated in preparing this EIR pursuant to CEQA Guidelines Section 15129.

- **Section 9.0, References,** provides a list of the reference material used in preparation of this EIR.

2.4 Scoping Process

2.4.1 Effects Found Not Significant

As identified in the NOP included in Appendix A of this EIR, the City concluded that the Project would have no impact or a less than significant impact related to agriculture and forestry resources and mineral resources, and that no further analysis of these topics is required in the EIR. Refer to Section 7.0, *Effects Found Not to be Significant*, for a discussion of these topical issues.

2.4.2 NOP Responses

The Project NOP was made available for a state comment period from December 26, 2023, to January 24, 2024, and for a local comment period beginning on December 22, 2023, and ending on January 22, 2024. In addition, a public scoping meeting was held on January 11, 2024, at the Azusa Auditorium. The City received six responses to the NOP, which are summarized in Table 2-1, *NOP Comment Summary*, along with notes regarding where the CEQA-related issues raised are addressed in this EIR. A copy of the NOP and responses received are included in Appendix A of this EIR.

Table 2-1
NOP COMMENT SUMMARY

Commenter	Date	Comment Summary	Location Addressed in the EIR
Public Agencies			
Native American Heritage Commission (NAHC)	January 5, 2024	NAHC recommended consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area as early as possible to avoid inadvertent discoveries. NAHC provided a summary of Assembly Bill (AB) 52 and Senate Bill (SB) 18 and provided recommendations for conducting cultural resource assessments.	Refer to Section 4.16, *Tribal Cultural Resources*.
Los Angeles County Metropolitan Transportation Authority (LA Metro)	January 22, 2024	LA Metro noted that the Project site is adjacent to LA Metro-owned right-of-way for freight rail service and advised the applicant that rail service may operate in both directions for 24 hours per day, seven days per week. LA Metro noted that due to the proximity to the freight rail right-of-way, the EIR must analyze potential effects on rail operations. LA Metro noted that at-grade crossings impacts should be studied and provided a recommended mitigation measure. LA Metro also recommended that the applicant review the Transit Supportive Planning toolkit and encouraged the applicant to install Project features that help facilitate safe and convenient connections for pedestrians, bicyclists, and transit users to/from the Project site.	Refer to Section 4.15, *Transportation*.
South Coast Air Quality Management District (SCAQMD)	January 22, 2024	The SCAQMD requested that a copy of the Draft EIR, including all appendices and technical documents, be sent directly to them. The SCAQMD	Refer to Sections 4.2, *Air Quality*, and 4.7, *Greenhouse Gas Emissions*. SCAQMD is on the list of

Commenter	Date	Comment Summary	Location Addressed in the EIR
		recommended that the SCAQMD's CEQA Air Quality Handbook and website be used as guidance when preparing the air quality and greenhouse gas (GHG) emissions analyses. The SCAQMD also recommended that the California Emissions Estimator Model (CalEEMod) be used to estimate pollutant emissions. It was also recommended that the Lead Agency quantify criteria pollutant emissions and compare emissions to SCAQMD's CEQA regional pollutant emissions significance thresholds and localized significance thresholds (LSTs) to determine air quality impacts. The SCAQMD provided mitigation measures to be considered in the Draft EIR.	agencies to be notified of the availability of the EIR and other Project-related notices.
California Department of Transportation (Caltrans)	January 24, 2024	Caltrans noted they look forward to reviewing the Project and cumulative projects impact analysis. Caltrans also noted that encroachment and/or transportation permits may be required for the Project.	Refer to Section 4.0, *Environmental Analysis*, for both Project and cumulative impact analyses. No improvements within Caltrans property are proposed and no Caltrans permits are anticipated to be required.
Organizations			
Western States Regional Council of Carpenters (WSRCC)	January 11, 2024	The WSRCC requested that the City provide them with all notices referring to the Project. The WSRCC made two recommendations: (1) that the City should require the use of local workforce to benefit the community's economic development and environment, and (2) that the City should impose training requirements for the Project's construction activities to prevent community spread of COVID-19 and other infectious diseases. The WRSCC included attachments to their letter consisting of a letter regarding local hiring requirements and considerations for GHG emissions modeling as well as two resumes for air quality and GHG experts.	Refer to Sections 4.2, *Air Quality*, and 4.7, *Greenhouse Gas Emissions*. Project notices will be provided to WSRCC.

Commenter	Date	Comment Summary	Location Addressed in the EIR
Public			
Meghan Luera and Anthony Avila	January 15, 2024	The commenters asked about the impact on traffic on Sierra Madre Boulevard caused by golf cart traffic and the impact on traffic on West Todd Avenue and Sierra Madre Boulevard during construction. The commenters also asked about the impact on the City's existing senior services and asked how much the developer would be required to pay in fees to the City. The commenters also asked how many trees would be removed as part of the Project. The commenters requested that the gate to the softball field remain open and asked the City to consider a public access easement for the paths on the golf course during non-operating hours.	Refer to Sections 4.3, *Biological Resources*, 4.13, *Public Services*, and 4.15, *Transportation*.

2.4.3 Potentially Significant Impacts of the Proposed Project

The NOP and comments received on the NOP were used to establish the scope of the issues addressed in this EIR. The City identified that additional Project-level analysis was required to evaluate potential impacts associated with the implementation of the Project for the following environmental issue areas. Section 4.0, *Environmental Analysis*, of this EIR provides the environmental analysis and outlines the mitigation program, where applicable, for each of the following topical issues.

- Aesthetics (Section 4.1)
- Air Quality (Section 4.2)
- Biological Resources (Section 4.3)
- Cultural Resources (Section 4.4)
- Energy (Section 4.5)
- Geology and Soils (Section 4.6)
- Greenhouse Gas Emissions (Section 4.7)
- Hazards and Hazardous Materials (Section 4.8)
- Hydrology and Water Quality (Section 4.9)
- Land Use and Planning (Section 4.10)
- Noise (Section 4.11)
- Population and Housing (Section 4.12)
- Public Services (Section 4.13)
- Recreation (Section 4.14)
- Transportation (Section 4.15)
- Tribal Cultural Resources (Section 4.16)
- Utilities and Service Systems (Section 4.17)
- Wildfire (Section 4.18)

2.5 Responsible and Trustee Agencies

Responsible Agencies include public agencies other than the Lead Agency which have discretionary approval power over a project. Trustee Agencies are state agencies with jurisdiction by law over natural resources affected by a proposed project that are held in trust of the people of the State of California. The analysis and findings in this EIR reflect the independent judgment of the City; however, Responsible and Trustee Agencies may use this EIR to fulfill their legal authority to issue permits for the Project.

2.6 Incorporation by Reference

In accordance with Section 15150 of the CEQA Guidelines, an EIR may incorporate by reference all or portions of another document that is a part of public record or is generally available to the public. The previously prepared Azusa General Plan EIR was relied upon and consulted in the preparation of this EIR, and is hereby incorporated by reference. The City of Azusa General Plan and Development Code Environmental Impact Report (SCH No. 2003081144) is available at: https://www.azusaca.gov/160/General-Plan.

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3.0 PROJECT DESCRIPTION

This section provides a brief background of the Project and a detailed description of the Project and its environmental setting, pursuant to CEQA Guidelines Sections 15124 and 15125, respectively. This includes a description of the Project location, geographic setting, environmental setting, Project objectives, Project components, and discretionary actions required to implement the Project. This Project description is used as the basis for analyzing the Project's potential impacts on the existing physical environment in Section 4.0, *Environmental Analysis*, of this EIR.

3.1 Project Location

The City of Azusa is located in the eastern portion of the County of Los Angeles (County), approximately 27 miles northeast of Downtown Los Angeles; refer to Figure 3-1, *Regional Location*. The Project site is located in the northern portion of the City and is generally located north of Interstate (I-) 210 and west of State Route (SR) 39 at the base of the San Gabriel Mountains. The Project site totals 92.12 acres and is shown in Figure 3-2, *Aerial Photograph*. The Project site is comprised of seven parcels, APNs 8617-001-005, 0864-013-030, 8617-001-013, 8617-013-001, 8717-011-001, 8684-043-002, and 8684-013-014. The Project involves three primary components: an industrial site, an age-restricted residential community, and reconfiguration of an existing golf course site. Refer to Figure 3-3, *Project Land Use*, for an overview of the site breakdown by use.

3.1.1 Industrial Site

The 19.33-acre industrial site is located within the southwestern portion of the Project site and is surrounded primarily by warehousing/distribution uses. The industrial site is bounded by Sierra Madre Avenue to the north, industrial and residential uses to the east, West 10th Street to the south, and North Todd Avenue to the west. The industrial site would be located on APN 8617-001-005. The industrial site encompasses existing holes 3, 4, 5, and 6 of the Azusa Greens Country Club golf course.

3.1.2 Residential Site

The 19.82-acre residential site is located on APNs 8684-013-030 and 8617-001-013 and is surrounded primarily by existing residential uses. The residential site encompasses existing holes 1, 18, and 8, as well as a small portion of hole 17. The residential site is bounded by water conservation basins to the north, the Azusa Greens Country Club golf course to the east, Sierra Madre Avenue to the south, and residential uses to the west.

3.1.3 Golf Course Site

A 52.97-acre portion of the existing golf course, including the clubhouse, parking lot, and driving range, comprises the golf course portion of the Project site and would remain with the Project. The golf course site is located on APNs 8617-013-001, 8717-011-001, 8684-043-002, and 8684-013-014 at 919 Sierra Madre Avenue. The golf course site is bounded by residential uses and water conservation basins to the north, residential uses to the east and south, and existing golf course use proposed for residential uses to the west. The golf course site is also bisected by Sierra Madre Avenue.

3.2 Environmental Setting

The existing conditions at the Project site are described briefly here. Further descriptions of the environmental setting related to individual environmental issue areas are provided in the applicable subsections of Section 4.0, *Environmental Analysis*. In accordance with Section 15125 of the CEQA Guidelines, the baseline conditions described herein reflect the environmental setting at the time the NOP was released in December 2023. Since the NOP was released in December 2023, separate approvals for the re-opening of the Azusa Greens County Club golf course and associated clubhouse have occurred, and golf-related activities are currently occurring on-site; however, this analysis conservatively assumes the golf course was not open for use as part of the baseline conditions. Although the EIR analysis assumes no vehicle trips associated with the golf course site were occurring as part of the baseline conditions, operation of existing security lighting and ongoing watering of the golf course for maintenance purposes were assumed as part of the baseline conditions.

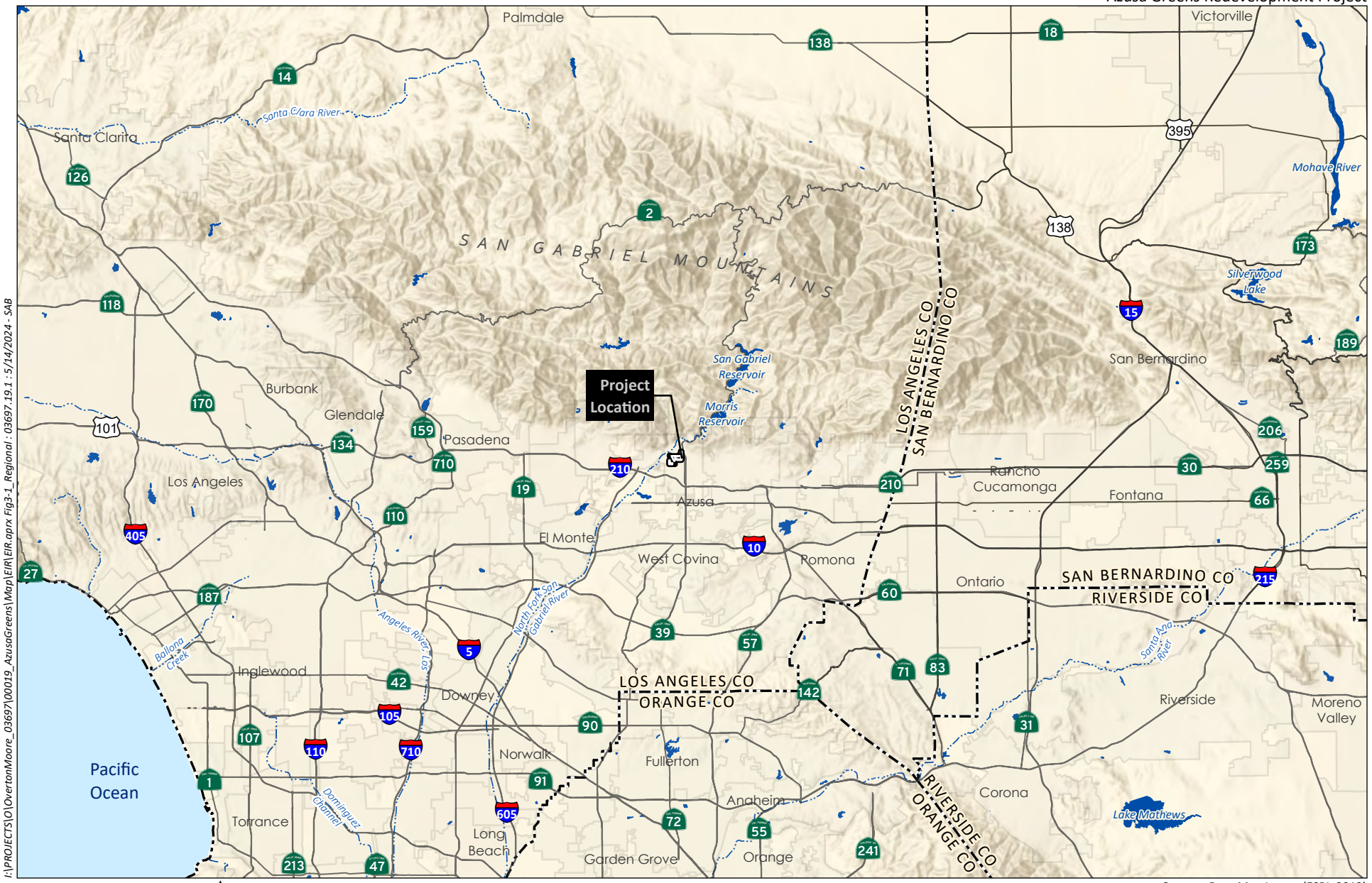
3.2.1 Project Site History

In the 1960s, there was contention over water rights in the northern area of the San Gabriel Valley and the mouth of the San Gabriel River, commonly known as the spreading grounds. The Los Angeles County Flood Control District (LACFCD) allowed for the operation of four mining pits in this area that would eventually be handed over as water conservation basins. As conditions of approval for that project, 135 to 150 acres of land were required to be devoted for a golf course, and 50 acres of land were required to be devoted to two school sites.

In 1963, the final plans included, but were not limited to, two water conservation basins that would be excavated by Rodeffer Industries and Owl Rock Products over the course of 20 years, an 18-hole golf course as a buffer between the City and the mining operations, and one 10-acre school site donated to the Azusa School Board. The golf course, now known as Azusa Greens Country Club, was required to be constructed first and began construction in 1964. The course opened later in 1965 and included a driving range and clubhouse.

Once mining operations began winding down in the early 1980s, two proposals regarding the future of the golf course were rejected, one for the redevelopment of the golf course into a housing development and one for the City to raise taxes to buy the course. In 1990, the land encompassing two holes of the golf course (west of the residential site) was sold to New Owl Rock Products, who leased it back to continue operating the 18-hole course. Sometime between 1985 and 1998, mining concluded and on December 3, 1998, the mining pits were officially owned by the LACFCD. In 2018, process entitlements for a 253-unit luxury independent senior housing project were allowed on a small portion of the course, described currently as a portion of the industrial site; however, this proposal was ultimately rejected by the Azusa City Council.

Soon after the beginning of the Covid-19 pandemic in 2020, the Azusa Greens Country Club golf course ceased operations. In 2022, Overton Moore Properties purchased the entire property, except for the two holes previously sold to New Owl Rock Products (now owned by a successor). Before the sale was finalized, Overton Moore Properties received approval from the City Council in accordance with the City Council Pre-Hearing process to proceed with the submittal of an application for the development of the proposed Project.



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Source: Base Map Layers (ESRI, 2013)

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Regional Location

Figure 3-1

Source: Aerial (Maxar, 2021)

HELIX Environmental Planning

Aerial Photograph

Figure 3-2

Source: Aerial (Maxar, 2021)

HELIX Environmental Planning

Project Land Use

Figure 3-3

3.2.2 Physical Setting

The Project site is currently developed with 16 holes of an 18-hole golf course and associated amenities, including a clubhouse, parking lot, and driving range. The clubhouse, which is conservatively assumed to be non-operational as part of the baseline condition, is 10,032 square feet (SF) and contains a kitchen and food service area, restrooms, retail area, and other operational facilities supporting the golf course use. Concrete paths throughout the golf course provide for golf cart circulation with three designated crossings at Sierra Madre Avenue, which bisects the golf course. Small, concrete structures provide restrooms throughout the course. Refer to Figure 3-2.

Elevations at the Project site range from approximately 631 to 665 feet above mean sea level (amsl). Habitat and land cover types within the Project site consist of developed, disturbed, ruderal, and Golf Course Greens (lawns), interspersed with landscaped/ornamental trees and shrubs. No waterways or wetlands are found on the Project site.

The Project site is located within the Transverse Ranges physiographic province of California and within the San Gabriel Mountains area, which are bounded to the north by the San Andres Fault Zone and to the south by the Sierra Madre Fault Zone (SMFZ). An Alquist-Priolo Earthquake Fault Zone traverses the southwestern portion of the industrial site. The Project site is located within the San Gabriel Hydrologic Unit (HU) and the San Gabriel Valley Groundwater Basin.

3.2.3 Land Use and Zoning

Based on the City of Azusa General Plan Land Use Map, the Project site is designated Recreation (City 2017). As described above, the site has operated as a private golf course and is not designated or zoned for public open space. The Azusa General Plan also splits the City into a number of districts, corridors, and neighborhoods to guide land use planning for each area at a higher level, with individual properties having more specific land use designations within these areas (City 2004a). The residential and golf course sites are within the boundary of the Foothills Neighborhood area, and the majority of the industrial site (excluding a small area at the eastern side) is within the boundary of the City's West End Light Industrial District (DWL); however, the General Plan Urban Form Diagram (Azusa General Plan Figure CD-2) does not assign the Project site a more specific land use designation within these neighborhoods or districts.

Based on the City's Zoning Map (2023a), the Project site is zoned Recreation. The residential and golf course sites are within the boundary of the Neighborhood General 3 zone area of the City, while the majority of the industrial site (excluding a small area at the eastern side) is within the boundary of the City's DWL. Similar to its land use designation, however, the Project site is not assigned a subzone related to these zoning areas as it is zoned for Recreation.

The neighborhood around the Project site is dominated by industrial and residential uses. Industrial land uses are located west and south of the Project site, with additional industrial uses northeast of the industrial site. Specifically, these industrial uses occur within the Light Industrial General Plan land use designation and DWL zone (City 2004a). Two water conservation basins are located north of the site within the Recreation land use designation and zone. Hodge Elementary School and Northside Park are also located at the southern edge of the southeastern portion of the golf course site.

Single-family and multi-family residential land uses are located north, east, and south of the site as well as interspersed throughout the Project site. These residential uses have land use designations and zoning varying between low density, medium density, and moderate density residential. The majority of the residential uses surrounding the Project site are also located within the Neighborhood General 3 area, with the residences southeast of the Project site within the Neighborhood General 1 area.

3.3 Project Objectives

CEQA Guidelines Section 15124(b) requires that an EIR contain a statement of the objectives sought by a project and states, "a clearly written statement of objectives will help the Lead Agency develop a reasonable range of alternatives to evaluate the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations." The general purpose of the proposed Project is to provide age-restricted housing, construct industrial development with new job opportunities, and redevelop the Azusa Greens Country Club golf course for the City and region. The following specific objectives have been identified for the proposed Project:

1. Provide new infill senior housing within an established residential neighborhood that offers a mix of unit types and affordability levels, including low and moderate affordable units, to accommodate a range of household incomes and address the City's shortage of senior housing.

2. Offer an amenity-rich residential community for seniors that encourages physical and emotional health and wellness by providing project residents access to a community of their peers as well as private recreational facilities and a nearby golf course.

3. Reopen an upgraded and reconfigured Azusa Greens Golf Course to provide additional recreational and employment opportunities within the region.

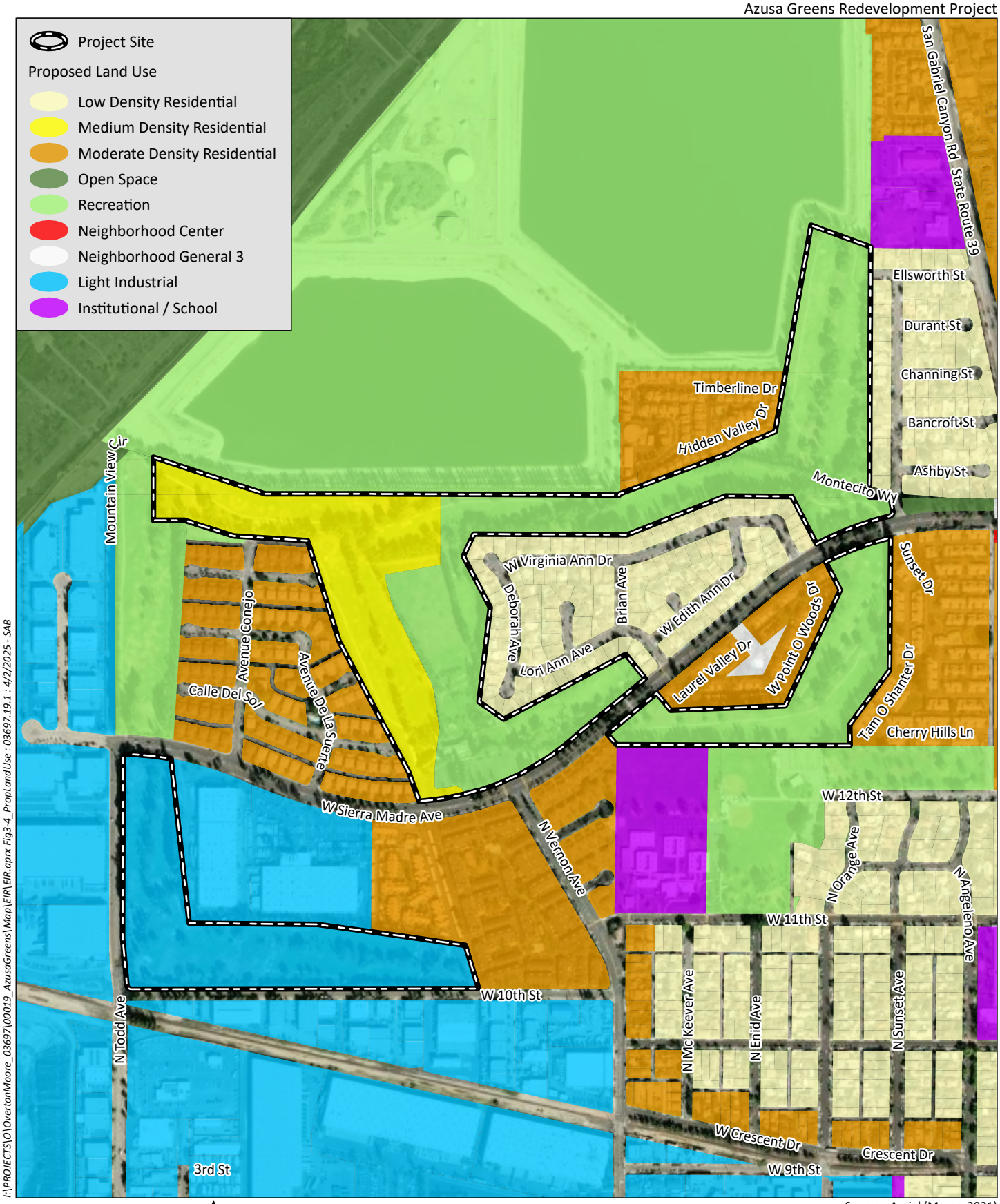
4. Provide contemporary industrial spaces that accommodate a variety of business and operational activities, including local or regional headquarters, light manufacturing/assembly, and warehouse, while generating employment opportunities within the City.

5. Develop a project that helps the City achieve economic development goals and provides fiscal benefit through enhanced property taxes, sales taxes, and utility revenues.

6. Create a distinct project design that includes attractive architecture for buildings and landscaping and outdoor recreational spaces that are in harmony with the surrounding neighboring uses.

3.4 Project Components

As previously described, the Project generally consists of three components: redevelopment of the Azusa Greens Country Club golf course as an industrial site, an age-restricted residential community, and a reconfigured 9-hole golf course and driving range. The Project involves discretionary approval of two zone changes, a General Plan amendment, tentative parcel map, tentative tract map, and various use permits to allow development of the proposed uses. Figure 3-4, *Proposed Land Use Map*, shows the proposed General Plan land use designations for the Project in the context of surrounding properties, and Figure 3-5, *Proposed Zoning Map*, shows the proposed zoning changes in the context of existing zoning for surrounding properties.



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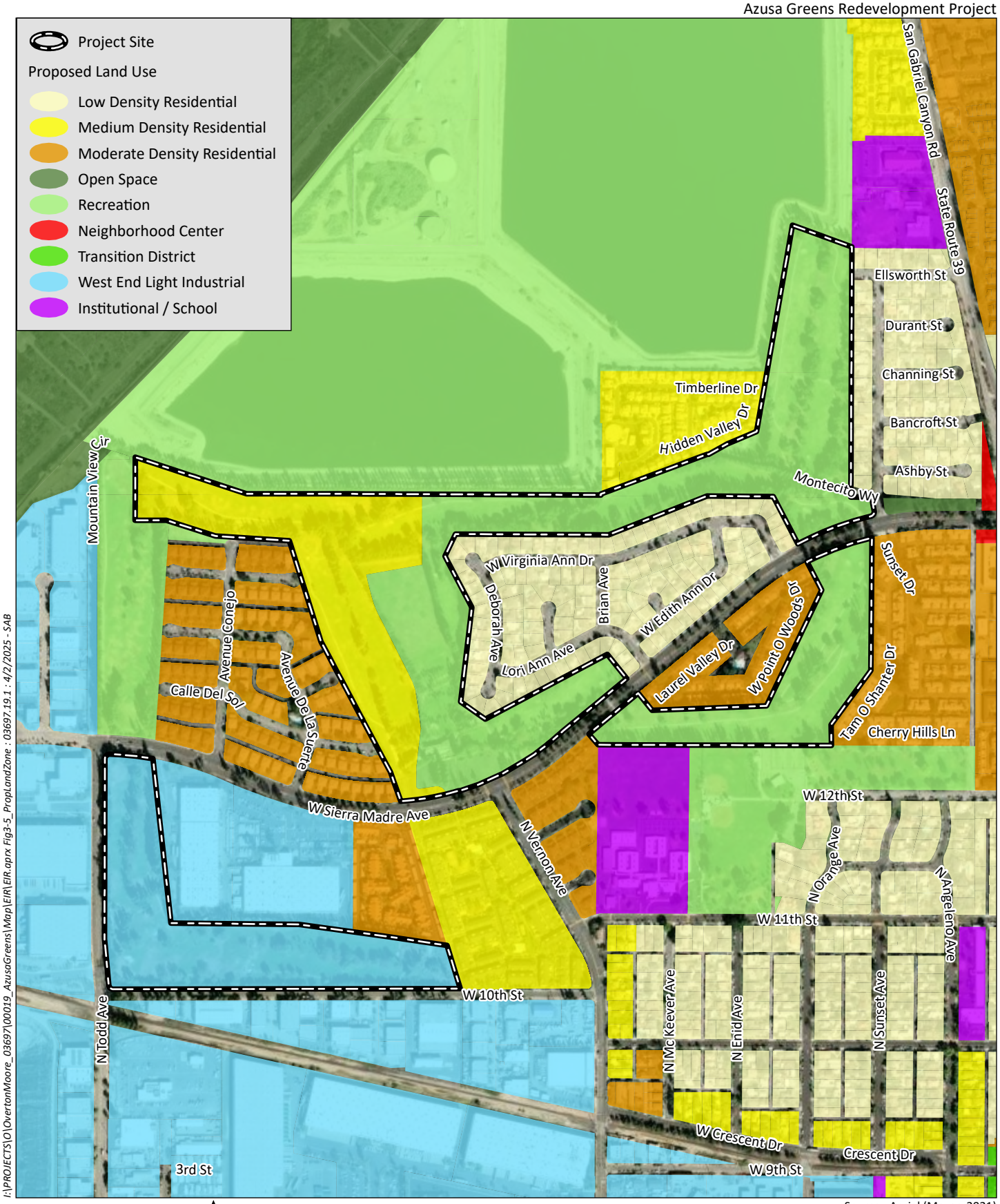
Proposed Land Use Map

Figure 3-4



Source: Aerial (Maxar, 2021)

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Proposed Zoning Map

Figure 3-5

3.4.1 Industrial Site

Implementation of the industrial portion of the Project would involve demolition of the existing golf-related improvements on the 19.33-acre industrial site (existing golf course holes 3 through 6) and installation of six new, tilt-up concrete Class A industrial buildings totaling 353,075 SF. Building 1 would be 33,598 SF, Building 2 would be 45,716 SF, Building 3 would be 53,422 SF, Building 4 would be 54,342 SF, Building 5 would be 109,507 SF, and Building 6 would be 56,490 SF. Each building would include a two-story office space between 5,000 and 8,000 SF for a total of 38,600 SF of office space. The total building area would encompass 41.8 percent of the total site area. Outdoor storage of equipment, materials, and/or containers could occur at each building. The industrial buildings would be approximately 38 feet in height above the finished floor. Refer to Figure 3-6, *Industrial Site Plan*, for an overview of the industrial site and Figure 3-7, *Industrial Site Elevations,* for sample elevations of the proposed industrial buildings.

To accommodate the proposed industrial land uses, the Project requires a zone change from Recreation to DWL and a General Plan amendment from Recreation to Light Industrial for the 19.33-acre industrial site. The Project also proposes a tentative parcel map to create six separate parcels, one for each of the proposed industrial buildings. A minor variance to allow outdoor storage and trailer parking and a Minor Use Permit to allow 24-hour operations are also proposed by the Project.

Access, Circulation, and Parking

The industrial site would include four access driveways along North Todd Avenue and four access driveways along West 10th Street. A shared driveway would be located between Buildings 5 and 6 to minimize changes to existing overhead utility lines. The southernmost driveway on North Todd Avenue would be limited to right-turning inbound and outbound movements enforced through signs, on-site pavement markings, and/or physical measures, while the remaining driveways would provide full access. The Project would provide 446 automobile parking stalls, 72 trailer parking stalls, and 28-foot-wide fire lanes throughout the industrial site. Of the 446 automobile parking stalls, 71 would be electric vehicle (EV) Capable stalls and 22 would be EV Ready stalls.

New sidewalk, curb, and gutter improvements would be constructed along North Todd Avenue and West 10th Street adjacent to the Project site. The sidewalks would include Americans with Disabilities Act (ADA)-compliant curb ramps and high-contrast tactile warning strips (i.e., yellow truncated dome pads). In addition, ADA-compliant walkways would connect the proposed public sidewalks to the entryway of each industrial building. No alterations to the rail crossing located south of the North Todd Avenue/West 10th Street intersection are proposed by the Project.

Landscaping and Walls/Fences

Landscaping would be provided along the industrial site roadway frontages, interior property lines, and within parking areas. Landscaping would include varied trees, shrubs, accents, and groundcover plant species that are consistent with the surrounding area and meet drought-tolerant requirements. The 564 existing trees on the industrial site would be removed, and 225 new trees would be planted throughout the site. In accordance with the Azusa Municipal Code, all truck courts and areas designated for outdoor storage would be screened with six- to eight-foot-tall screening walls. Additional building setbacks along property lines adjacent to residential housing have been incorporated into the Project design.

Lighting and Utilities

The proposed Project would comply with the City's requirements for outdoor lighting. Night lighting would be provided for parking areas, walkways, and driveways, including new City-owned streetlights along North Todd Avenue and West 10th Street. Outdoor lighting would cast downward and away from surrounding residential land uses.

Utility connections for the proposed industrial buildings would be made primarily to existing infrastructure within the rights-of-way surrounding the industrial site. Changes to existing utility infrastructure that would be required to serve the proposed industrial buildings include the relocation of two power poles and replacement of a 12-inch water main within the same disturbance footprint as an existing water main. The 12-inch water main would extend from the intersection of West 10th Street and North Todd Avenue approximately 1,000 feet to the east (to the central portion of proposed Building 5) and approximately 500 feet to the north (to the southern end of Building 3).

Operational Characteristics

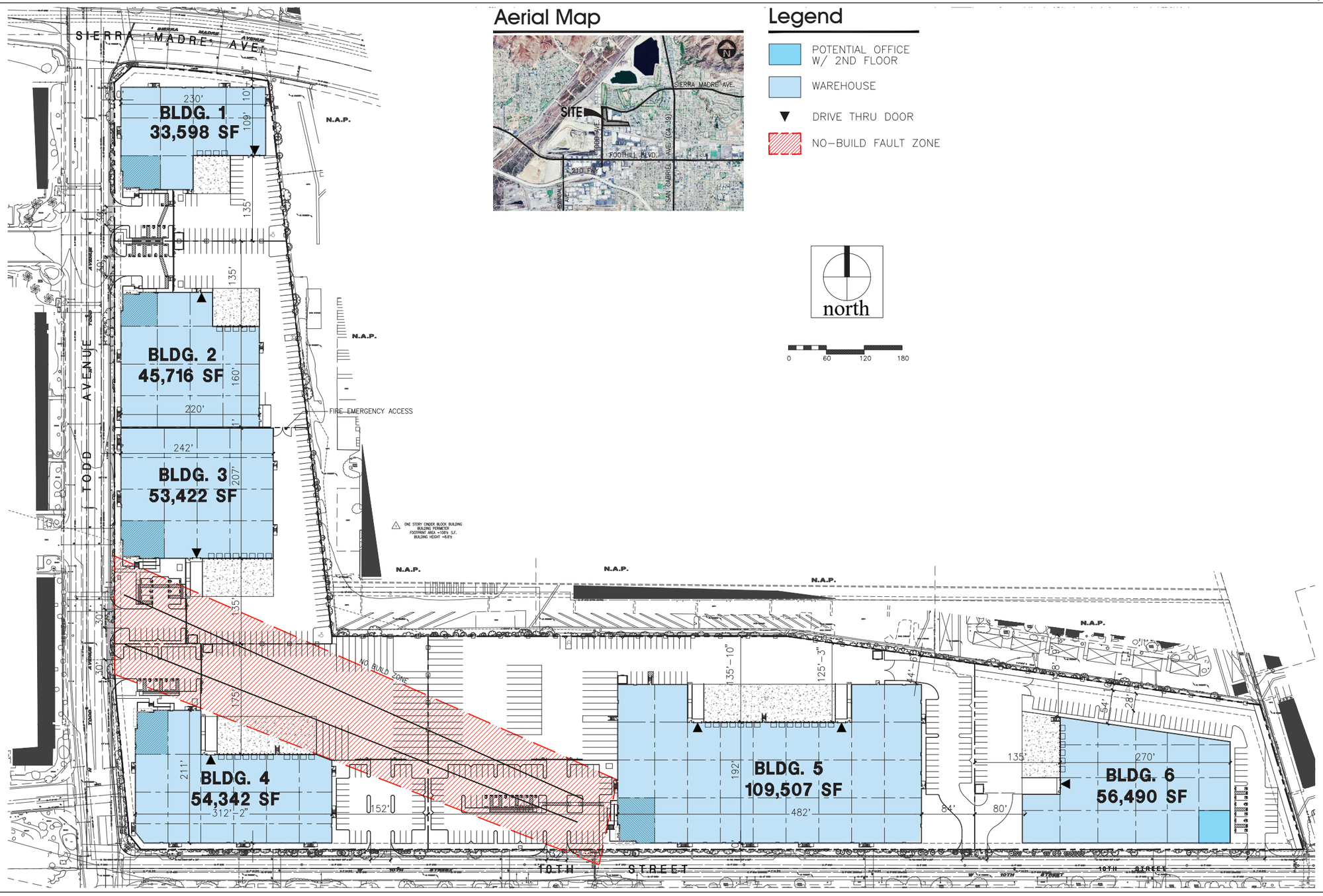
The Project applicant is seeking a Minor Use Permit to allow business operations to occur 24 hours per day, 7 days per week on the industrial site. No industrial site tenants are currently chosen for the Project. Unrestricted limits on operating hours would allow flexibility to receive and ship products or schedule employee shifts to begin or end at off-peak traffic hours and weekends to reduce the overall traffic during peak hours in the area. Potential uses of the proposed industrial buildings could include light manufacturing, warehouse retail, repair services, and other uses permitted within the City's DWL zone.

While future tenants of these industrial buildings are unknown, the EIR analysis conservatively assumes 95 percent of the industrial building space would be general light industrial (approximately 298,751 SF) and 5 percent of the industrial building space would be refrigerated warehouse (approximately 15,724 SF).

The Project applicant is also seeking a minor variance for outdoor storage, including shipping containers on the industrial site. Potential tenants would use the minor variance to store shipping containers, mechanical equipment, or materials.

3.4.2 Residential Site

The Project proposes the demolition of existing golf-related improvements on holes 1, 18, and 8, as well as a small portion of hole 17, within the 19.82-acre residential community site. The proposed residential community would be age-restricted to individuals 55 years and older. The residential site would include 38 residential buildings containing 230 dwelling units in 32 single-story duplexes, 4 single-story triplexes, and 2 three-story stacked flat buildings. The three-story stacked flat buildings would be approximately 41.5 feet in height. A leasing/clubhouse building, cabana, and recreational amenities would also be provided throughout the residential community. The residential buildings would total 330,101 SF, and the leasing/clubhouse and cabana would total 10,932 SF. The leasing/clubhouse building would be located centrally within the site and would provide meeting areas, fitness rooms, an outdoor pool and spa, outdoor recreation areas, and dining areas. See Figure 3-8, *Residential Site Plan*, Figures 3-9a-b, *Residential Building Elevations*, and Figures 3-10a-b, *Residential Community Renderings*. Table 3-1, *Proposed Residential Buildings*, also provides more detail regarding each of the buildings proposed on the residential site.



Aerial Map

Legend

- POTENTIAL OFFICE W/ 2ND FLOOR
- WAREHOUSE
- DRIVE THRU DOOR
- NO-BUILD FAULT ZONE

north

0 60 120 180

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Source: HPA Architects, 2024

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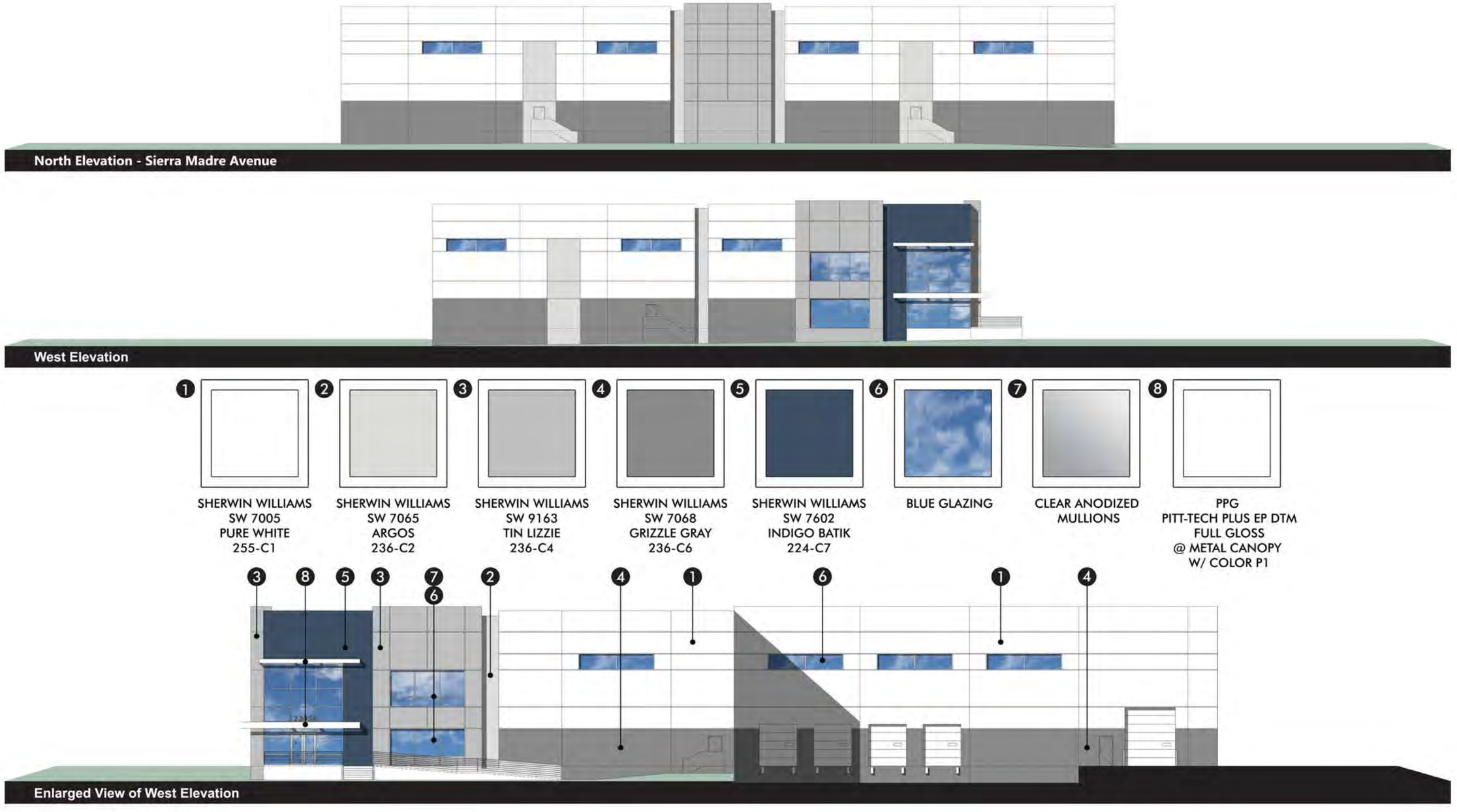
Industrial Site Plan

Figure 3-6



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Source: Overton Moore Properties, 2024

Industrial Site Elevations

Figure 3-7

Source: Overton Moore Properties, 2025

Residential Site Plan

Figure 3-8

SOUTH ELEVATION 2

WEST ELEVATION 1

Source: Overton Moore Properties, 2025

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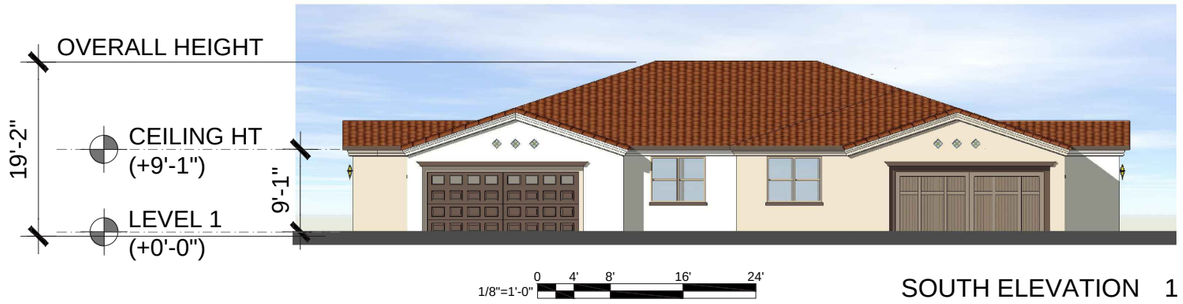
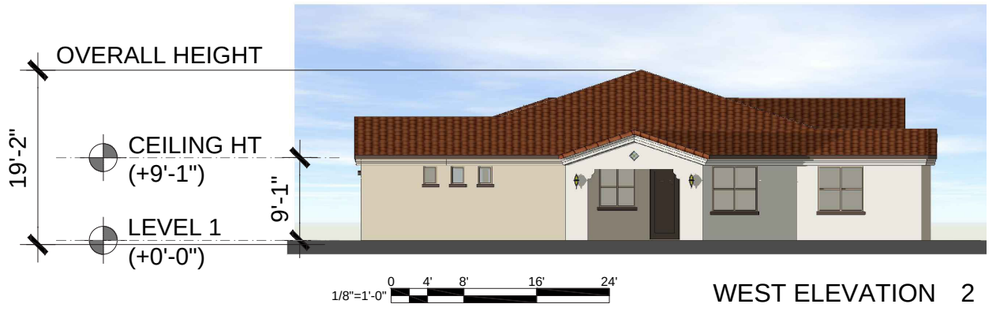
Residential Building Elevations – Stacked Flats

Figure 3-9a

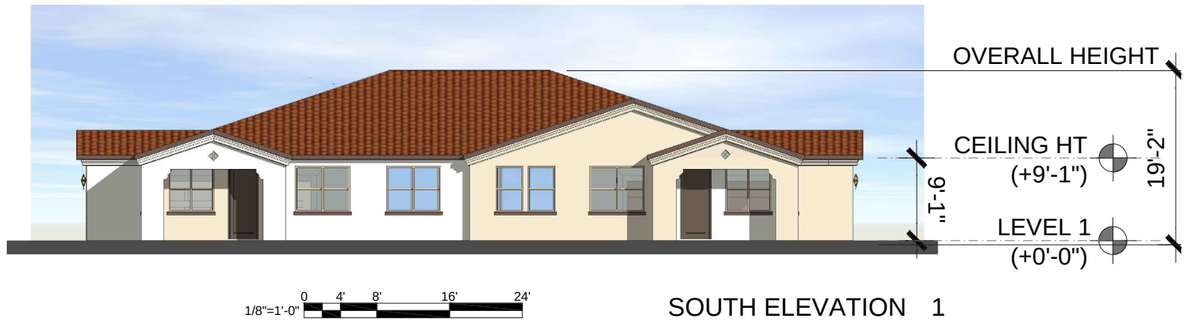


SOUTH ELEVATION 1

EAST ELEVATION 3



WEST ELEVATION 2



SOUTH ELEVATION 1

Source: Overton Moore Properties, 2024

VIEW FROM SIERRA MADRE LOOKING NORTH

Source: Overton Moore Properties, 2024

Residential Community Renderings – Entrance

Figure 3-10a

VIEW FROM MAIN INTERNAL DRIVE LOOKING NORTHEAST TOWARDS CLUBHOUSE

Source: Overton Moore Properties, 2025

Residential Community Renderings – Clubhouse

Figure 3-10b

Table 3-1
PROPOSED RESIDENTIAL BUILDINGS

Building Identifier	Building Type	Number of Buildings	Number of Dwelling Units (Total)	Building Square Footage (Total)
A	Stacked Flats	1	83	103,647
B	Stacked Flats	1	71	87,777
C	Duplex	7	14	28,868
E	Duplex	11	22	36,113
F	Duplex	14	28	52,892
G	Triplex	4	12	20,804
--	Leasing/Clubhouse	1	--	9,360
--	Cabana	1	--	1,572
	Total		**230**	**341,033**

The total unit mix would consist of 60 percent two-bedroom units and 40 percent one-bedroom units. Unit size would range from 706 SF to 1,592 SF. A total of ten percent of the units would be provided for rent at rates affordable to low-income households (50 to 80 percent of area median income [AMI]), and five percent of the units would be provided for rent at rates affordable for moderate-income households (80 to 120 percent of AMI).

The age-restricted residential component of the Project requires a zone change from Recreation to Neighborhood General 3 Medium Density Residential, which allows a density of 15 dwelling units per acre. However, as the residential site would be developed with age-restricted housing (senior citizen apartments), the specific zone standards for this use per Azusa Municipal Code Section 88.42.200 would apply, including an allowable density of up to 40 dwelling units per acre. A General Plan amendment is proposed to revise the planned land use from Recreation to Medium Density Residential for the 19.82-acre residential site. The Project also proposes a lot line adjustment and tentative tract map.

Access, Circulation, and Parking

Two main entrance driveways would be located at the southern end of the proposed residential site along Sierra Madre Avenue. The two main residential community entrances would connect and lead to an entry gate and turnaround. The westerly driveway would be approximately 24 feet wide and accommodate one inbound and one outbound lane. Due to the presence of an existing median island along Sierra Madre Avenue, this driveway would be restricted to right-turning inbound and outbound movements that would be enforced by signs, pavement markings, and/or physical measures, including bollards or channelizing islands. The easterly driveway would be approximately 36 feet wide and accommodate one inbound and one outbound lane. The driveway aligns with an existing median break and eastbound left-turn lane, thereby providing full access.

North of the entry gate, a drive aisle would be provided along the eastern residential site boundary and eventually along the northern site boundary, providing access to each of the proposed buildings. Internal private roadways would be constructed to the applicable City standards for local roads and would adequately accommodate emergency vehicles. Sidewalks separated from the internal roadways by curbs and gutters would be provided along all of the internal roadways and would include ADA-compliant curb ramps and high-contrast tactile warning strips (i.e., yellow truncated dome pads) at intersections. The residential site would provide 212 parking stalls for Buildings A and B (stacked flats), and 234 parking stalls for Buildings C, E, F, and G (duplex and triplex buildings), for a total of 446 parking

stalls on the site. The parking stalls would include a combination of uncovered, covered, detached garage, and attached garage spaces. The residential site would include 12 ADA-accessible parking stalls, including 10 standard ADA parking stalls and 2 ADA van parking stalls. In addition, a total of 180 EV Capable stalls and 45 Level 2 EV chargers would be provided on the residential site.

Landscaping and Walls/Fences

Landscaping would be provided along the residential site boundaries, along drive aisles, and surrounding each of the proposed buildings. The residential site would include multi-use lawns near each building and a recreation area with a dog park, pool, bocce ball courts, and seating areas. Enhanced landscape screening would be provided along the property lines that border residential areas to the east and west, as well as along the driving range area to the east. A hedge is proposed along the northern property line. Approximately 151 existing trees would remain within the residential site and golf course shared entrance/parking area and would be incorporated into the proposed Project design. Another 281 existing trees would be removed from this area, and 843 new trees would be planted within the residential site and neighboring golf course parking area. A monument sign is proposed between the two main entrance driveways along Sierra Madre Avenue.

Lighting and Utilities

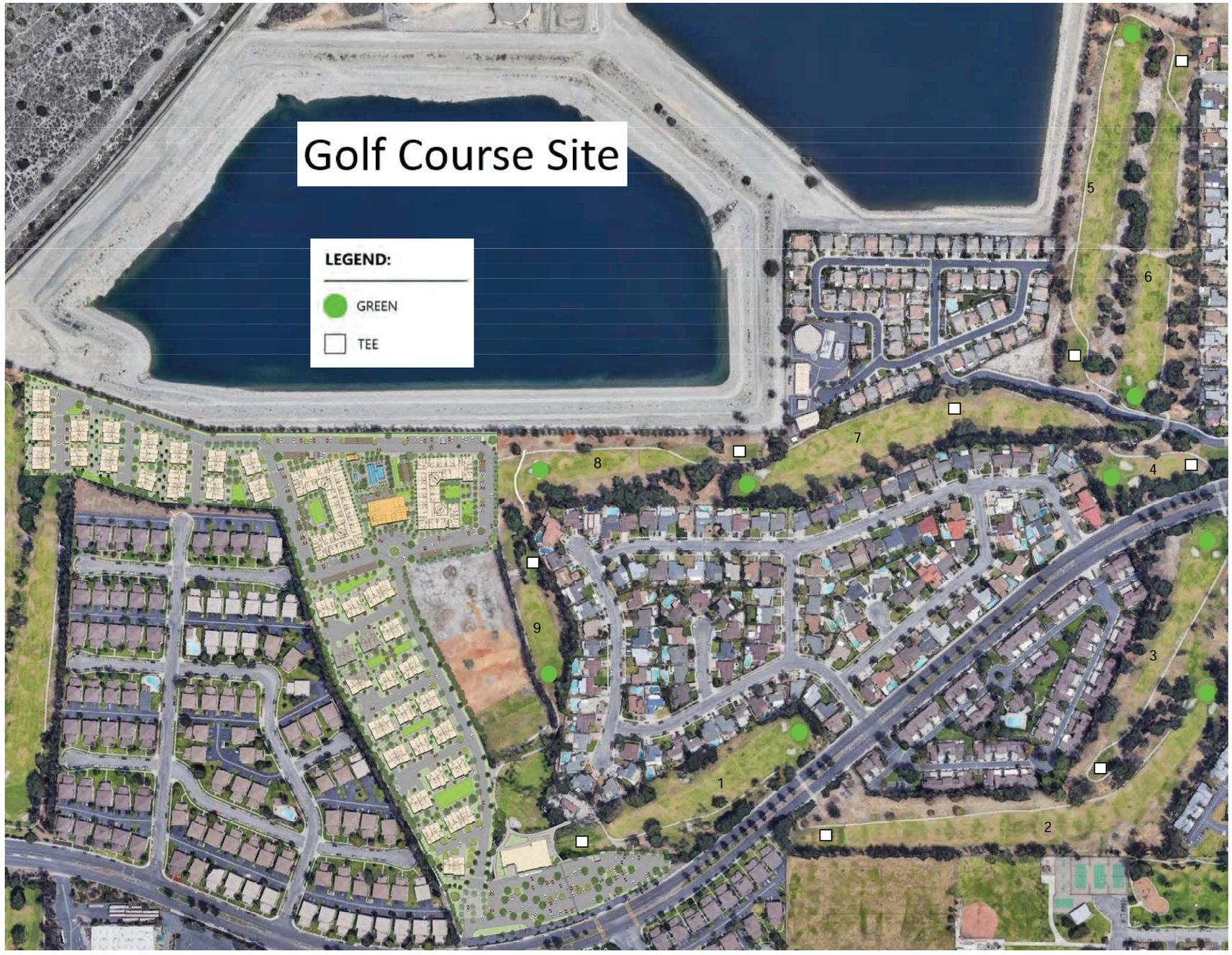
The proposed Project is required to comply with the City's requirements for outdoor lighting. Night lighting would be provided for parking areas, walkways, and driveways. Outdoor lighting would be cast downward and away from the residential areas to the east and west.

The Project includes the construction of a 6-inch domestic water pipeline, 8-inch fire water pipeline, and 8-inch sewer pipeline from existing mains in Sierra Madre Avenue through the residential drive aisles. These pipelines would provide the connection points for laterals to individual buildings within the residential site. Existing electrical distribution lines and equipment would be relocated and undergrounded to serve the proposed buildings. Natural gas would only be provided to the residential clubhouse building.

3.4.3 Golf Course Site

A total of 52.97 acres of the Azusa Greens Country Club golf course, inclusive of the golf course clubhouse, parking lot, and driving range, would remain with minor adjustments to accommodate the proposed Project. The clubhouse would be lightly renovated and maintained in working order. Existing holes numbered 10 through 17 and hole 9 would be re-numbered to create a 9-hole golf course with minimal change to the design of existing holes and current views. To accommodate the flow of the 9-hole course, hole 8 would be shortened from its existing configuration, and the tee box for hole 7 would be relocated. The driving range would also be adjusted along its boundary with the proposed residential site. Refer to Figure 3-11, *Golf Course Layout*, for an overview of the proposed course layout.

The clubhouse renovation would feature an updated interior site plan that relocates the golf check-in area to the east, updating two of the entries on the north-facing frontage of the building and adding one new set of doors on the east-facing side of the building. A bag drop would be located on the eastern side of the clubhouse and the function room would be opened by removing interior partitions. Refer to Figure 3-12, *Golf Course Clubhouse Site Plan*.



Source: Overton Moore Properties, 2025

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Golf Course Layout

Figure 3-11

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Source: Overton Moore Properties, 2024

Golf Course Clubhouse Site Plan

Figure 3-12

The parking lot would also be redesigned to work in conjunction with the existing curb cuts and new residential site entrance on Sierra Madre Avenue. The parking lot would also be redeveloped to achieve current City Municipal Code and Fire Department requirements, featuring new landscaping, ADA paths of travel, and more efficient traffic flow.

As described in Section 3.2.1, the land west of the residential site encompasses two holes of the prior golf course and is under separate ownership than the Project site. While this land was leased to Azusa Greens Country Club for a period to continue operating the 18-hole course, such operations have ceased and no physical change to this area is proposed with the Project. The two holes on this property are not part of the Project site and would not be incorporated into the proposed 9-hole golf course or otherwise used as part of the Project.

Access, Circulation, and Parking

The golf course clubhouse, parking lot, and driving range would be accessible from an existing entrance driveway along Sierra Madre Avenue as well as the residential site entry described above. Internal drive aisles would be located throughout the parking lot to access the clubhouse. The parking lot would include 158 parking stalls and 8 drop-off spaces.

Golf cart crossings between the portions of the golf course site north and south of Sierra Madre Avenue would remain in their existing locations approximately 250 feet west of the Lori Ann Avenue-Point O Woods Drive/Sierra Madre Avenue intersection and approximately 85 feet west of the Sunset Avenue/Sierra Madre Avenue intersection. Safety improvements would be made at these existing crossings and would include the addition of pedestrian crossing ahead signs, yield signs and roadway lines ahead of the crossings, and pedestrian crossing signs with rectangular rapid flashing beacons at the crossings. The other existing golf cart crossing location at the North Todd Avenue/Sierra Madre Avenue intersection would no longer serve the golf course site but would remain as a pedestrian crossing for Sierra Madre Avenue.

Landscaping and Walls/Fences

Landscaping, including trees and vegetation, is proposed throughout the parking lot and surrounding the golf course clubhouse. Around the clubhouse perimeter, existing hardscape would be refinished, and plantings would be updated as needed. Existing trees surrounding the parking lot would remain on-site, and trees within the parking lot would be removed to accommodate the reconfiguration of the area. Once constructed, approximately 35 new trees would be added within the parking lot.

Lighting and Utilities

The proposed Project is required to comply with the City's requirements for outdoor lighting. Night lighting is proposed for the driving range and renovated golf course clubhouse, and parking lot lighting would be relocated within the reconfigured parking area. Outdoor lighting would be cast downward and away from surrounding residential land uses.

Existing utilities for the golf course clubhouse and restroom facilities throughout the golf course would be maintained in place. A new infiltration gallery would be installed within the golf course parking area and would connect to the storm drains proposed within the shared entry area with the residential site.

3.4.4 Project Construction

Construction of the Project would occur over three phases, each associated with one of the three major Project components. In total, construction is expected to occur over approximately 22 months. For the purposes of this analysis, construction was assumed to begin in November 2025 and conclude in September 2027. As described below, some phases of construction are expected to occur concurrently. Construction of all Project components would be required to comply with South Coast Air Quality Management District (SCAQMD) Rule 403 requiring implementation of dust suppression best management practices (BMPs), and Rule 1113 limiting the volatile organic compound content of building coatings to 50 grams per liter (g/L).

3.4.4.1 Industrial Site

Construction of the industrial site would occur during Phase 1. It is anticipated that construction would begin in November 2025 and would be completed in December 2026, taking approximately 13 months to complete. The construction staging area would be located on the northeastern corner of North Todd Avenue and West 10th Street, within the existing golf course. Construction activities would include site preparation (clearing and grubbing), grading, underground infrastructure/utilities, physical building construction, paving, and architectural coatings. Grading of the industrial site would not require import or export of soil materials, as soil quantities would be balanced within the site.

Some nighttime construction activities are proposed for the industrial site to facilitate proper concrete curing during hot weather. Proposed nighttime construction work for the pouring of building foundation slabs and tilt-up walls could occur over approximately 10 nights. Nighttime pours would typically begin around 12:00 a.m. with pouring completed by mid-morning and concrete finishing work continuing into the afternoon. Nighttime construction would require approval with the Project via conditions of approval.

3.4.4.2 Age-Restricted Residential Community Site

Construction of the residential site would occur during Phase 2. It is anticipated that construction would begin in January 2026 and would be completed in September 2027, taking approximately 19 months to complete. The construction staging area would be located on the northwestern corner of the Project site, within the existing golf course. Construction activities would include site preparation (clearing and grubbing), grading, underground infrastructure/utilities, physical building construction, paving, and architectural coatings. Grading of the residential site would require 31,060 cubic yards (CY) of cut and 22,450 CY of fill, resulting in the export of 8,610 CY of soil material.

As described above, large building slabs can require nighttime concrete pours for proper curing during hot weather. Proposed nighttime construction work for the residential site could occur over approximately four nights for the pouring of the stacked flat building foundation slabs. Nighttime construction would require approval with the Project via conditions of approval.

3.4.4.3 Golf Course Site

Construction of the golf course site would occur during Phase 3. It is anticipated that construction would begin in January 2026 and last approximately one month. Construction of the golf course site would include paving the proposed 83,105-SF parking area. Construction activities would include site preparation (clearing and grubbing) and paving.

3.5 Intended Use of the EIR

Implementation of the proposed Project would require a number of discretionary approvals. In accordance with CEQA Guidelines Section 15125(d), the EIR must describe the intended uses of the EIR, which include providing the City with the necessary information to decide whether to approve the proposed Project as well as providing necessary information to other agencies with approval authority for the Project. The City of Azusa is the Lead Agency for the proposed Project and has the primary approval authority related to the Project. The following are the discretionary and ministerial actions anticipated to be required by the City to implement the proposed Project:

Industrial Site:

- General Plan amendment to change the land use designation from Recreation to Light Industrial;
- Zone change from Recreation to DWL;
- Design review;
- Minor variance for outdoor storage (including trailer parking);
- Minor use permit for 24-hour operations; and
- Tentative parcel map for approval of six separate parcels (one per building).

Residential Site:

- General Plan amendment to change the land use designation from Recreation to Medium Density Residential;
- Zone change from Recreation to Neighborhood General 3 Medium Density Residential;
- Lot line adjustment; and
- Tentative tract map.

Golf Course Site:

- Use permit; and
- Design review.

Overall Project:

- Certification of the EIR;
- Adoption of an MMRP; and
- Adoption of CEQA Findings.

Responsible Agencies and Trustee Agencies may also use the EIR to support permit issuance related to the Project. The following are the discretionary and ministerial actions anticipated to be required by other agencies to implement the proposed Project:

Los Angeles Regional Water Quality Control Board (LARWQCB):

- Construction General Permit

South Coast Air Quality Management District (SCAQMD):

- Permit to construct/operate stationary sources

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4.0 ENVIRONMENTAL ANALYSIS

In accordance with CEQA Guidelines Section 15126(a), the Project impact analysis considers potential direct, indirect, short-term, long-term, and cumulatively considerable impacts that could occur from planning, constructing, and/or operating the proposed Project. Sections 4.1 through 4.18 of this EIR provide an analysis of impacts for those environmental topics where it was determined that the Project could result in "potentially significant impacts." Each topical section includes the following information:

- A description of the existing setting including a discussion of the applicable regulatory framework.
- Identification of thresholds of significance.
- Analysis of potential Project effects.
- Identification of Project-specific mitigation measures, if required, to reduce the identified Project impacts.
- Identification of the level of significance of impacts after mitigation, including significant and unavoidable impacts.
- Evaluation of potential cumulative impacts.

As described in Section 3.0, *Project Description*, of this EIR, the Project proposes three components: an industrial site, an age-restricted residential community, and a reconfiguration of an existing golf course to a 9-hole course. Unless otherwise noted, the analysis presented in Sections 4.1 through 4.18 of this EIR addresses the entire Project including all three components.

Summary of EIR Scope

In compliance with the procedural requirements of CEQA, an NOP was prepared to determine the scope of environmental analysis for this EIR. With the NOP, an Initial Study checklist was provided to describe the environmental issues that could have potentially significant impacts as a result of Project implementation. The City distributed the 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 an EIR Scoping Meeting to solicit input from the public on the scope of the EIR.

Taking all known information and public comments into consideration, 18 primary environmental issue areas are evaluated in detail in this section of the EIR, while two issue areas were determined by the City to clearly have no potential to be significantly impacted by the Project. The two environmental issue areas excluded from further analysis in this EIR are Agriculture and Forestry Resources and Mineral Resources. These two subjects are discussed briefly in Section 7.0, *Effects Found Not to be Significant*. The 18 environmental issue areas evaluated in detail are 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.

- Aesthetics (Section 4.1)
- Air Quality (Section 4.2)
- Biological Resources (Section 4.3)
- Cultural Resources (Section 4.4)
- Land Use and Planning (Section 4.10)
- Noise (Section 4.11)
- Population and Housing (Section 4.12)
- Public Services (Section 4.13)

- Energy (Section 4.5)
- Geology and Soils (Section 4.6)
- Greenhouse Gas Emissions (Section 4.7)
- Hazards and Hazardous Materials (Section 4.8)
- Hydrology and Water Quality (Section 4.9)
- Recreation (Section 4.14)
- Transportation (Section 4.15)
- Tribal Cultural Resources (Section 4.16)
- Utilities and Service Systems (Section 4.17)
- Wildfire (Section 4.18)

Identification of Impacts

Sections 4.1 through 4.18 of this EIR evaluate the 18 environmental issue areas warranting detailed analysis as identified in the Project NOP and in consideration of public comments. The format of discussion is standardized as much as possible in each section for ease of review. The environmental setting is discussed first, followed by applicable regulations, CEQA thresholds, and finally, a discussion of the potential environmental impacts that would result from implementation of the Project (based on the 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.

Serving as the CEQA 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. The standards of significance used in this EIR are based on the independent judgment of the City, taking into consideration CEQA Guidelines Appendix G, the Azusa General Plan, the Azusa Municipal Code and adopted City policies, performance standards adopted, implemented, and monitored by regulatory agencies, and other significance standards recommended by regulatory agencies.

As required by CEQA Guidelines Section 15126.2(a), Project-related direct, indirect, cumulative, short-term (temporary), and long-term (permanent) effects on the environment are considered in this EIR. The environmental changes identified throughout this EIR are referred to as “effects” or “impacts” interchangeably. Direct impacts are those that would occur directly as a result of the proposed 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.” Cumulative impacts are described further in the introduction to the cumulative analysis provided below.

A summarized impact statement is provided following the analysis for each threshold. Each subsection also includes a discussion or listing of the applicable regulatory criteria (laws, policies, regulations) that the Project and its implementing actions are required to comply with (if any). Where 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. For the impacts identified as significant and unavoidable, the City would be required to adopt a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 if the City decides 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 Project's administrative record, that outweigh the significant and unavoidable environmental impacts identified in the EIR.

Mitigation Program

Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation measure(s) are recommended to reduce or avoid the significant effect. Mitigation measure(s) must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be "roughly proportional" to the impacts of the Project. Following the mitigation measure(s) identified to reduce potential impacts, a discussion of whether the identified mitigation measure(s) would reduce impacts to below a level of significance is provided. In most cases, implementation of the mitigation measure(s) would reduce the adverse environmental impacts below a level of significance. However, in some cases, feasible mitigation may not be available, and the EIR provides a discussion of the infeasibility to reduce potential impacts in support of a significant and unavoidable impact determination.

If the Project proponent requests a modification, substitution, or change in timing for a mitigation measure because the mitigation measure as proposed proves to be impracticable or unworkable, the City may modify, substitute, or change the timing for the mitigation measure so long as: (1) the modification, substitution, or change in timing would achieve the same or greater reduction in potential impacts of the Project as the original mitigation measure; (2) the modification, substitution, or change would not cause any impacts that were not otherwise analyzed in this EIR; and (3) the City publicly provides a legitimate reason for making the modification, substitution, or change in timing and supports the reason with substantial evidence. The City Community Development Department (Planning Division), in conjunction with any appropriate agencies or City departments, will determine the adequacy of any proposed modification, substitution, or change in timing and may refer its determination to the Planning Commission. The Project proponent will bear any costs associated with providing information that any department or decision-making body for the City requires to make the determination.

Identification of Cumulative Impacts

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), an EIR shall discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. A cumulative impact is an impact that 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.*

The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone (CEQA Guidelines Section 15130[b]).

Two approaches for cumulative impact analysis are provided in CEQA Guidelines Section 15130(b) and are referred to herein as the list method and the projections method. The list method evaluates cumulative impacts based on 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 projections method bases the cumulative impact analysis on a summary of projections contained in an adopted planning document that describes or evaluates conditions contributing to the cumulative effect.

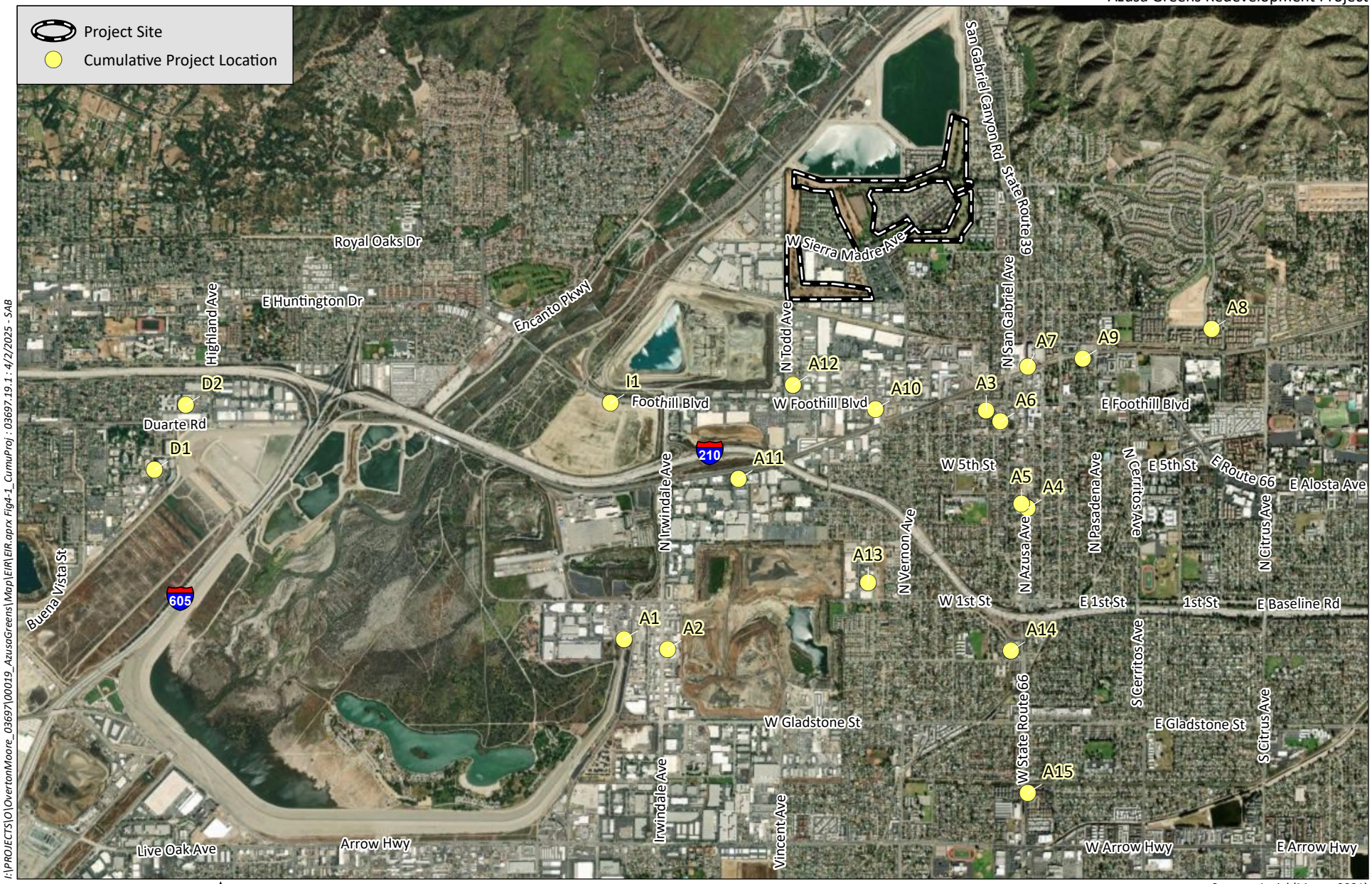
The list method is primarily used as the method of cumulative impact analysis for the Project, given the lack of a comprehensive planning document related to the current development of the Project area. The list of projects evaluated within the cumulative impact analysis is based on the list of cumulative projects identified in the Project's Transportation Impact Study (TIS; LLG 2024; Appendix R). This list of projects was compiled for the TIS based on information on file with the cities of Azusa, Duarte, and Irwindale, and with the County related to probable future development in the vicinity of the Project. However, because of the nature of individual environmental factors, the cumulative study area for each topical issue is not the same. The geographic scope of the cumulative study area is identified within the cumulative impact analysis for each issue area. For some issue areas, the cumulative study area may address regional or area-wide conditions. For localized cumulative impacts, Table 4-1, *Cumulative Projects*, and Figure 4-1, *Cumulative Project Locations*, provide the list of projects used to evaluate cumulative impacts. Projects identified as "A" are other projects proposed within the City, while those identified with an "I" or "D" are projects proposed within the neighboring cities of Irwindale and Duarte, respectively.

Table 4-1
CUMULATIVE PROJECTS

Map Identifier	Project Name/Address	Distance from Project Site (miles)	Proposed Land Use	Proposed Size	Status
A1	198 South Peckham Road	1.57	Warehousing	12,184 GSF	Proposed
A2	230 South Irwindale Avenue	1.54	Industrial	6,380 GSF	Proposed
A3	300 West Foothill Boulevard	0.72	Townhomes Commercial	7 DU 633 GLSF	Proposed
A4	326 North Azusa Avenue	1.17	Townhomes	8 DU	Proposed
A5	333 North Azusa Avenue	1.14	Townhomes Retail	4 DU 1,000 GLSF	Proposed
A6	619 North San Gabriel Avenue	0.79	Townhomes Retail	6 DU 888 GLSF	Under Construction
A7	Lumina/800 North Azusa Avenue	0.61	Residential Retail	127 DU 12,000 GLSF	Under Construction
A8	Azusa Great Park and Residential/807 East Promenade	1.10	Single Family Residential Park	23 DU 9 Acres	Proposed

Map Identifier	Project Name/Address	Distance from Project Site (miles)	Proposed Land Use	Proposed Size	Status
A9	820 North Soldano Avenue	0.71	Townhomes	6 DU	Under Construction
A10	Azusa Self-Storage/ 900 West Foothill Boulevard	0.47	Self-Storage	138,454 GSF	Under Construction
A11	OneLegacy/ 1303 Optical Drive	0.93	Office	45,000 GSF	Under Construction
A12	742 North Todd Avenue	0.35	Warehousing	16,040 GSF	Proposed
A13	120 North Aspan Avenue	1.19	Single Family Residential	22 DU	Proposed
A14	229 South Azusa Avenue	1.58	Hotel	23 Rooms	Proposed
A15	710 South Azusa Avenue	2.17	Starbucks	1,055 GSF	Proposed
I1	Reliance II/ 15990 Foothill Boulevard	0.85	Industrial Retail	1,853,500 GSF 10,000 GLSF	Proposed
D1	City of Hope/ 1500 Duarte Road	2.85	Medical Outpatient Clinic	356,000 GSF	Under Construction
D2	Solana/1750 Business Center Drive	2.55	Apartments	292 DU	Under Construction

Source: LLG 2024
GSF = gross square feet; DU = dwelling unit; GLSF = gross leasable square feet



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Source: Aerial (Maxar, 2021)

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Cumulative Project Locations

Figure 4-1

4.1 Aesthetics

This section assesses the potential for aesthetic impacts related to scenic views and vistas, scenic highways, and light and glare, as well as the potential for conflicts with applicable zoning and other regulations governing scenic quality. The analysis of potential aesthetics impacts in this section is primarily based on information provided by the City and a desktop review of visual resources. Existing conditions, regulatory framework, and an evaluation of the potential impacts related to aesthetics that could occur with implementation of the proposed Project are discussed below.

4.1.1 Existing Conditions

4.1.1.1 Visual Setting and Site Characteristics

The City is an urbanized community in southeastern Los Angeles County in the San Gabriel Mountain foothills. The Project site is in the northern part of the City and includes most of the existing Azusa Greens Country Club golf course. The site is a developed golf course with 16 holes and associated amenities, including a clubhouse, parking lot, and driving range with ornamental vegetative cover, grass fairways, several sand traps, and ornamental trees surrounding the golf course, which provide a visual barrier from the Project site onto and from surrounding areas. The driving range is enclosed with netting to contain golf balls near the center of the Project site. Topography is generally level, with minor grade changes typical of golf courses, and ranges 629 to 707 feet amsl. Both the land use designation and zoning for the Project site are Recreation.

Surrounding land uses include a mixture of residential, light industrial, and recreational development. The Project site is bisected by Sierra Madre Avenue, which curves in an east-west direction between North Todd Avenue in the light industrial area and near Sunset Drive in the residential area. Sierra Madre Avenue near the Project site generally decreases in elevation from east to west about 40 feet between Sunset Drive and North Todd Avenue. Residential buildings occur along both sides of most of Sierra Madre Avenue, with the exception of light industrial buildings and a large parking lot at the south side of Sierra Madre Avenue near North Todd Avenue (Rain Bird Corporation). The area south of the Project site, along the south side of West 10th Street, is also developed with light industrial buildings, similar to those along North Todd Avenue.

Residential development occurs east and west of the Project site and includes single-family residences one and two stories in height. Trees line the golf course boundary on the Project site between most of the residences. A mix of single- and multi-family residential development occurs further east. Some residential development, including a multi-family residential complex to the north (La Med Apartment Homes) and attached single-family residences (Sierra Village) to the east, occurs near the proposed industrial site where existing golf course holes are located. Existing single-family residences in this area are also one and two stories in height.

Light industrial development surrounding the Project site includes concrete tilt-up buildings and parking lots along North Todd Avenue (World Depot Incorporated and GCE Group), West 10th Street (Azusa Light and Power Electric Division, Perfect Green Artificial Grass Supplier), and Sierra Madre Avenue (Rain Bird Corporation). Parking lots and light industrial buildings include existing night lighting. West 10th Street and North Todd Avenue are both straight roadways and light industrial buildings are set close to the street with driveways occurring between buildings. Areas further south of the light industrial

development and the Project site include similar light industrial development, as well as open pit mining along Foothill Boulevard west of North Todd Avenue.

Nearby recreational developments include Northside Park, Azusa Rockery and Geology Park, and the San Gabriel River Trail. Northside Park is located at West 12th Street and North Orange Avenue, just south of the southeastern portion of the golf course site, and includes a soccer field, lighted softball fields, picnic areas, playground equipment, lighted tennis courts, basketball and volleyball courts, and a disc golf course (City 2024a). The Azusa Rockery and Geology Park is located at the northern end of North Todd Avenue at the end of the surrounding light industrial area, near the northwestern corner of the Project site. The park is a geology interpretive park with thematic interpretive signage focusing on the societal benefits of rock, sand, and gravel. Development is limited to native landscaping, seating areas, bike racks, and signage (City 2015a). The San Gabriel River Trail occurs along the northern edge of Azusa Rockery and Geology Park, which is a regional bike path between Azusa and Seal Beach that spans a total length of 39.6 miles (AllTrails 2024). Other surrounding development includes two water conservation basins north of the Project site, which consist of two flat water bodies just north of a line of trees lining the northern edge of the existing golf course. Areas further north include the undeveloped San Gabriel River and San Gabriel Mountains.

4.1.1.2 Visual Character/Quality

The visual character of the Project area is diverse and composed of light industrial and residential buildings with parking lots and streets intermixed with some natural features such as trees, parks, and the golf course at the Project site. Distant views towards the San Gabriel Mountains and the foothills provide views of natural features from the Project area. The most prominent factors influencing the character of the Project site and its surroundings are the urban development in the area and the backdrop of the San Gabriel Mountains.

The Azusa Greens Country Club has functioned as a transition area between industrial, manufacturing, and technological uses since the 1960s. Uses and building forms differ between the light industrial and residential uses. The industrial buildings appear as large concrete tilt-up structures without windows and little architectural interest, while the residential structures differ in color, shape, and mass, and have more interest architecturally. Residential areas have trees, sidewalks, curved streets, and cul-de-sacs to provide a more natural and visually interesting development, whereas the light industrial areas are located along straight and long roadways with limited landscaping.

Due to the convergence of uses at and around the Project site, the existing visual character depends on the exact location within the immediate vicinity. From within the Project site, the visual character is dominated by the fairways and golf course, as well as associated golf course development, including a clubhouse, parking lot, and driving range. The golf course is a typical golf course with large grassy areas, including a driving range, fairways, and putting areas, on a relatively flat site. Views towards the San Gabriel Mountains and foothills to the north are not available from within the golf course due to mature trees that line the golf course perimeter. Views towards surrounding light industrial and residential uses are also screened by these trees.

Residential areas in the Project vicinity are developed in pockets around the golf course with one and two-story homes, sidewalks, curved streets, cul-de-sacs, and street trees typical of 20th-century suburban residential development. The EIR prepared for the Azusa General Plan characterizes the visual character of the City as primarily of a residential nature with a variety of housing types, including tract

residential development (City 2004b). Once out of any of the residential areas near the Project site, the visual character and quality changes to views of industrial buildings with long, straight roadways that are typical of industrial and warehouse areas. The visual character and quality of the light industrial areas are primarily influenced by the concrete tilt-up buildings along North Todd Avenue and West 10th Street, which are built close to the street and are dominant visual elements that preclude views of the larger surrounding areas.

4.1.1.3 Scenic Views and Vistas

There are no General Plan-designated scenic views, vistas, or roadways within the City. Additionally, there are no unique or unusual features in the Project vicinity that comprise a dominant portion of a viewshed.[1] However, the San Gabriel Mountains, located approximately 0.7 mile north of the Project site, are considered scenic resources, since they consist of undisturbed natural areas and offer distant vistas of mountain backdrops from portions of the City. The San Gabriel Mountains are aesthetically valuable to the City's residents, visitors, and recreational users. Distant views of the San Gabriel Mountains can be seen from the Project site and surrounding areas, including from North Todd Avenue and Sierra Madre Avenue, along the San Gabriel River Trail, and from the Azusa Rockery and Geology Park and Northside Park. The following is a discussion of the quality of existing views towards the San Gabriel Mountains from these locations and how they relate to the Project site.

North Todd Avenue. North Todd Avenue is not identified as a scenic roadway by the General Plan or other planning documents; however, motorists traveling north along North Todd Avenue until its intersection with Sierra Madre Avenue (along the Project site's western boundary) experience mostly unobstructed views of the San Gabriel Mountains to the north and northwest. Views towards the Project site from North Todd Avenue are precluded by tall and closely spaced trees lining the eastern edge of the roadway. Nearby industrial users at locations along North Todd Avenue also have north and northwest-facing views towards the San Gabriel Mountains. There are no readily available sidewalk/bike paths along the Project site's perimeter, suggesting that there is little scenic value as a public view corridor for this section of North Todd Avenue. Thus, other than motorists traveling along North Todd Avenue and the nearby industrial users, residents, visitors, and/or recreational users do not have scenic views toward the San Gabriel Mountains from North Todd Avenue.

Sierra Madre Avenue. Sierra Madre Avenue is not identified as a scenic roadway by the General Plan or other planning documents; however, motorists traveling west along Sierra Madre Avenue (which bisects the Project site) experience limited and obstructed views of the San Gabriel Mountains and the Project site. Most of Sierra Madre Avenue along the Project site is lined with trees and decreases in elevation from east to west by about 30 feet, limiting views towards the San Gabriel Mountains as buildings and landscaping further preclude views.

San Gabriel River Trail. The San Gabriel River Trail is not identified as a scenic vista or viewpoint by the General Plan or other planning documents; however, existing public views in the Project site vicinity, which also include views toward visual resources (San Gabriel Mountains), include pedestrian/bicyclist views along the San Gabriel River Trail. The San Gabriel River Trail is about 540 feet northwest of the northwestern corner of the Project site, and areas between the trail and the San Gabriel Mountains

[1] For the purposes of this analysis, a viewshed is defined as the geographical area that is visible from a specific location. This includes all surrounding points that are in line-of-sight with that location and excludes points that are beyond the horizon or obstructed by terrain and other features (e.g., buildings, trees, topography). Conversely, a viewshed can also refer to the area from which an object can be seen.

include natural and undeveloped hillsides. Pedestrians and bicyclists facing north and west on this trail have large and expansive uninterrupted views of the San Gabriel Mountains and surrounding natural areas. As these views are oriented opposite of the Project site, scenic views from the San Gabriel River Trail do not include any of the Project site. Views towards the Project site from the San Gabriel River Trail are facing south and include views of the City and urban development; they do not include scenic views of the San Gabriel Mountains.

Azusa Rockery and Geology Park. Located adjacent to the San Gabriel River Trail, the Azusa Rockery and Geology Park is not identified as a scenic viewpoint or vista by the Azusa General Plan or other planning documents. While there are large and expansive views of the San Gabriel Mountains and surrounding natural areas from this area, views from the Azusa Rockery and Geology Park do not include any of the Project site, similar to the discussion for the San Gabriel River Trail above.

Northside Park. Northside Park is not identified as a scenic viewpoint or vista by the City's General Plan or other planning documents; however, northwestern views from areas of the park include obstructed views of the San Gabriel Mountains. As Northside Park is located south of the southeastern part of the Project site and views towards the San Gabriel Mountains are northwest facing, recreation users at Northside Park have views onto the trees lining the southern part of the golf course with views of the San Gabriel Mountains above and between the trees.

4.1.1.4 State Scenic Highways

The State Scenic Highway System includes a list of highways that are designated as scenic highways by the state or are eligible for that designation. Neither Caltrans nor the County identify designated scenic highways within the City or in its immediate vicinity. However, San Gabriel Canyon Road, which becomes Azusa Avenue and San Gabriel Avenue (SR 39) between Sierra Madre Avenue and I-210, is eligible to become a state scenic highway, but has not been officially designated (Caltrans 2024). Due to the distance of this segment of SR 39 from the Project site (about 800 feet east of the Project site at San Gabriel Avenue and Sierra Madre Avenue) and intervening structures and vegetation, the Project site is not located in the viewshed of this eligible state scenic highway.

4.1.1.5 Light and Glare

Lighting effects are associated with the use of artificial light during the evening and nighttime hours. There are two primary sources of light: light emanating from building interiors passing through windows and light from exterior sources (i.e., street lighting, building illumination, security lighting, parking lot lighting, and landscape lighting). Light introduction can be a nuisance to adjacent residential areas, diminish the view of the clear night sky, and, if uncontrolled, can cause disturbances. Uses such as residences and hotels are considered light-sensitive, since occupants have expectations of privacy during evening hours and may be subject to disturbance by bright light sources. Light spill is typically defined as the presence of unwanted light on properties adjacent to the property being illuminated. With respect to lighting, the degree of illumination may vary widely depending on the amount of light generated, height of the light source, presence of barriers or obstructions, type of light source, and weather conditions.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light by highly polished surfaces such as window glass or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Perceived glare is the unwanted and potentially objectionable

sensation observed by a person as they look directly into the light source of a luminaire. Daytime glare generation is common in urban areas and is typically associated with buildings with exterior facades largely or entirely comprised of highly reflective glass. Glare can also be produced during evening and nighttime hours by the reflection of artificial light sources such as automobile headlights. Glare-sensitive uses include residences, hotels, transportation corridors, and aircraft landing corridors.

The Azusa Greens Country Club does not offer nighttime golf rounds; however, there are some light sources at the Project site related to the golf course clubhouse, parking areas, and driving range that do exist even when not in active operation. As a result, the Project site currently emits light sources. In addition, no substantial sources of glare exist within the golf course site. Existing sources of light and glare within the Project's vicinity include safety-oriented exterior and interior lighting sources produced from surrounding industrial and residential development, which contribute to existing lighting conditions in the area. Car headlights and street lighting are present along Sierra Madre Avenue, West 10th Street, and North Todd Avenue in the Project vicinity. Traffic signals are also present to the west of the Project site along North Todd Avenue.

4.1.2 Regulatory Setting

4.1.2.1 State Regulations

California Scenic Highway Program

Caltrans manages the California Scenic Highway Program, which was created in 1963 by the California Legislature to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. The program includes a list of highways that are eligible for designation as scenic highways or that have been designated as such. The designation of a highway as scenic is based on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes on the travelers' enjoyment of the view. State laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263.

4.1.2.2 Local Regulations

Azusa General Plan

Chapter 3 of the Azusa General Plan, *The Built Environment*, outlines various goals and policies related to aesthetics in the City. The following aesthetics goals and policies in the City Design section are relevant to the proposed Project:

Policy 3.2. Multi-family and mixed-use units and sites are designed to convey a high level of quality and character and reflect and complement surrounding neighborhood character. This includes, but is not limited to:

- using "living space forward" design concepts;
- modulation and building elevation articulation and masses (avoiding undifferentiated "boxlike structures");
- incorporating well-defined roof lines;

- using extensive site landscape to complement the architectural design of the structure;
- conveying the visual character of individual units rather than a singular building mass and volume for multi-family structures; including separate, well-defined entries for each residential unit;
- locating the first occupiable floor at or near the predominate grade elevation, ensure subterranean parking facilities are not visible from the street frontage; and
- siting and design of parking areas and facilities to be integrated with and not dominate the architectural character of the structure.

Policy 4.9. Require buildings within the West End Industrial District to be uniquely identifiable, distinguished in their architecture and site planning, and compatible with adjacent uses and districts.

Policy 6.2. Require all industrial buildings to be distinctive, constructed of high-quality materials, and be of interesting and strong design. All buildings shall be visually attractive from the street, and from adjacent or nearby properties.

Policy 6.3. Require rooflines and building elevations to be visually attractive from all vantage points.

Policy 6.4. Require site development plans to:

- incorporate physical and visual design elements that buffer industrial use from any nearby residential neighborhood or use;
- provide elements that link commercial and industrial uses (sidewalks and paths, common architectural design, signage, landscape, etc.);
- site commercial buildings around common open spaces and plazas accessible to the public; and
- require single-level, “at grade” parking facilities to be generously landscaped with shrubs and trees.

Policy 8.9. Require developers of any use whose scale may significantly impact existing open space resources to allocate sufficient lands as permanent open space for recreation, visual amenity, and/or environmental resources protection (by dedication, easement, or other City approved technique).

Policy 10.1. Require the consideration and mitigation of noise, light, vehicular, and other impacts on residential properties in the design of commercial and industrial development.

Policy 10.2. Require on-site lighting of institutional, commercial, and industrial uses be constructed or located so that only the intended area is illuminated, off-site glare is minimized, and adequate safety is provided.

Policy 10.3. Require that the elevation of all parking structures facing residential parcels be lined with residential or commercial uses, enclosed, or controlled to prevent adverse noise and air emissions impacts on residences. Incorporate architectural design elements, such as surface treatments, off-set

planes, and structural articulation and landscape, to provide visual interest and to be compatible with adjacent residences.

Policy 10.6. Work with public and private organizations and individuals to minimize the land use impacts in and around the river, the canyons, and foothills, such impacts may include but not be limited to noise generation, natural resources encroachment, air quality degradation, aesthetic degradation, etc.

In addition, Chapter 3 of the Azusa General Plan outlines various goals and policies related to urban form in the City. The following urban form policies in the City Design section are relevant to the proposed Project:

Policy 4.4. Require signage to be designed considering the scale and materials of adjacent buildings, the desired character of the neighborhood, district, or corridor where the site is located, and pedestrian orientation.

Policy 5.1. Encourage new residential projects to be built in a form and scale compatible with and appropriate to their surroundings.

Policy 8.1. Support the development of multiple housing types in corridors and the districts, require high-quality design, construction methods, materials, and maintenance.

Azusa Municipal Code

Outdoor Lighting

Azusa Municipal Code Section 88.31.030, *Outdoor Lighting*, includes outdoor lighting requirements on private property. Outdoor light fixtures are limited to a maximum height of 14 feet or the height of the nearest building, whichever is less, and lighting shall not produce levels greater than one footcandle on any adjacent properties. Other requirements include installing light fixtures directed downwards and away from adjoining properties and public right-of-way and restricting permanently installed flashing or unusually bright lighting.

Design Review

Azusa Municipal Code Section 88.51.032, *Design Review*, outlines the City's design review requirements that are applicable to residential projects, among others. The purpose of design review is to ensure that the design of proposed development and new land uses maintains and enhances the City's attractive appearance. Design review recognizes the aesthetics of the community, encourages the harmonious appearance of development, ensures that new uses enhance their sites and are compatible with surrounding uses, retains and strengthens the visual quality and attractive character of the City, assists developers in understanding the City's concerns for the aesthetics of development, and ensures that development complies with all applicable City standards and guidelines.

Landscape Standards

The City's landscape and irrigation standards are contained in Azusa Municipal Code Chapter 78, Article VI, Division 7, *Landscape and Irrigation Standards*. Pursuant to these standards, no building permit shall be issued for a proposed development until the public works superintendent, or designee, reviews and approves a landscape plan for the development. A certificate of occupancy shall be issued

only if landscaping and an irrigation system are installed in compliance with the approved landscape plan consisting of the elements set forth in these standards. The landscape plan shall include the following elements: a calculation of water consumption for the landscaped area, a planting scheme, an irrigation plan, and a grading plan if found to be necessary by the Community Development Director. Projects that must adhere to these standards include apartments, condominiums, any multiple-unit residential developments, commercial developments, industrial developments, single-family residential, and recreational developments. In addition to other minimum development requirements, Azusa Municipal Code Section 78-539, *Street Trees*, requires every development project to install one tree of the specified minimum gallon size every 35 feet of the property road frontage.

Walls and Screening

Azusa Municipal Code Section 88.30.020, *Fences, Walls, Hedges, and Screening*, outlines the City's requirements for fences and walls within the City. In zones other than the DWL, the maximum height of walls is between three and six feet, depending on the setback location. Within the DWL, a maximum wall height of eight feet is allowed outside of the required front setback. Modifications to these requirements are provided in subsection D of this section. Subsection G of this section further provides standards for screening and separation of adjoining residential and non-residential land uses, equipment and outdoor storage areas, and surface parking areas. The maximum wall heights previously described apply to screening treatments; however, additional landscape buffers and decorative components are required.

Construction Hours of Operation

Azusa Municipal Code Section 46-409, *Construction*, establishes limits on the hours of construction to allow construction schedules to take advantage of the weather and normal daylight hours, and to ensure that nearby residents, as well as nonresidential activities, are not disturbed by early morning or late night construction activities, including potential sources of light or glare. As specified in this section, construction is generally permitted Monday through Saturday, 7:00 a.m. to 6:00 p.m. Extended construction hours and workdays may be allowed by the review authority.

4.1.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential aesthetics impacts are based on Appendix G of the CEQA Guidelines. A significant impact to aesthetics could occur if implementation of the proposed 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 nonurbanized 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, conflict with applicable zoning and other regulations governing scenic quality; or

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

4.1.4 Methodology and Assumptions

Aesthetics impacts are identified through describing the existing visual setting, assessing the amount of change that would occur as a result of the proposed Project, and interpreting how the affected public would respond to or perceive those changes. The assessment utilized data from observations, a spatial analysis, and a desktop review of the Project site and larger visual environment of the Project area.

4.1.5 Impact Analysis

4.1.5.1 Scenic Vistas

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

As discussed in the existing conditions above, there are no designated or identified scenic vistas identified in the City's General Plan; however, the San Gabriel Mountains are identified in the Built Environment Chapter of the Azusa General Plan as scenic resources, since they consist of undisturbed natural areas and offer distant vistas of mountain backdrops from portions of the City. Locations near the Project site with some views of the San Gabriel Mountains include roadways (i.e., North Todd Avenue and Sierra Madre Avenue) and recreational areas (i.e., San Gabriel River Trail, Azusa Rockery and Geology Park, and Northside Park). The following is a discussion of changes to existing views of the San Gabriel Mountains from these locations and an analysis of whether visible Project elements would obstruct available views, resulting in significant impacts to scenic resources.

North Todd Avenue. Motorists traveling north along North Todd Avenue and industrial users at buildings along North Todd Avenue have views of the San Gabriel Mountains to the north but do not have views to the northeast, which are blocked by the existing stands of mature trees along the golf course on the eastern side of North Todd Avenue. Existing views from North Todd Avenue of the San Gabriel Mountains would not be obscured or hindered by the proposed Project; however, views of the mature trees on the east side of North Todd Avenue would be replaced with views of light industrial buildings. The light industrial buildings would appear in similar height and scale to the existing light industrial buildings along North Todd Avenue and would not obstruct views of the San Gabriel Mountains.

Sierra Madre Avenue. The limited and obstructed views of the San Gabriel Mountains and the Project site from Sierra Madre Avenue when traveling west would remain similar to existing conditions once developed. Most of Sierra Madre Avenue along the Project site is lined with trees that would not be replaced as these areas would be reconfigured into the proposed 9-hole golf course and golf course parking area. The proposed residential buildings would be set back from the roadway and would not be visible to motorists traveling on Sierra Madre Avenue; however, the shared entry driveway and associated signage would be new visible features along this roadway. Views towards the San Gabriel Mountains would include frontage improvements associated with the Project and would not further obstruct views of scenic resources from Sierra Madre Avenue.

San Gabriel River Trail. The San Gabriel River Trail includes northern and western facing views of the San Gabriel Mountains. None of the Project elements would be within views of the San Gabriel Mountains from the San Gabriel River Trail, as they would occur to the south and east. Pedestrians and bicyclists heading south may have some views of the Project buildings and associated development from areas further north on the San Gabriel River Trail; however, views toward the Project site as pedestrian and

bicyclists continue southward would remain blocked by existing trees along a portion of the golf course that is not a part of the Project. These southern views also include views of the urbanized and developed City and do not include scenic resources.

Azusa Rockery and Geology Park. Similar to the San Gabriel River Trail, the Azusa Rockery and Geology Park includes northern and western-facing views of the San Gabriel Mountains. None of the Project elements would be within view as they would similarly be blocked by existing trees along a portion of the golf course that is not a part of the Project site.

Northside Park. From Northside Park, northwestern views toward the Project site include views of the San Gabriel Mountains that are obstructed by the trees lining the southern part of the golf course. These views would be unaffected as the existing golf course near Northside Park would be reconfigured but remain visually similar to existing conditions as the existing stand of trees along the golf course would not be removed as part of the Project.

Views of the light industrial buildings along North Todd Avenue would be visible from North Todd Avenue, where views of the San Gabriel Mountains are also available; however, none of the Project elements would obstruct existing views towards the San Gabriel Mountains from local streets and recreational areas where views are currently available near the Project site.

Level of Significance Prior to Mitigation

Implementation of the Project would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.1.5.2 Scenic Resources

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

There are no designated state scenic highways within the City or in its immediate vicinity; however, San Gabriel Canyon Road, which becomes Azusa Avenue and San Gabriel Avenue (SR 39) between Sierra Madre Avenue and I-210, is eligible to become a state scenic highway. The closest officially designated state scenic highway is SR 2 in La Canada Flintridge, about 17 miles west of the Project site. Due to distance and intervening structures and vegetation, the Project site is not located in the viewshed of these listed and eligible state scenic highways.

There are large mature trees along the existing golf course which would mostly remain; however, in the residential and industrial sites, proposed residential and light industrial buildings, respectively, would replace the golf course and existing trees. However, these are not considered protected visual resources. There are no rock outcroppings within the Project site. No historic buildings or structures

would be affected, and no other notable scenic resources occur on the site or in the immediate vicinity. Therefore, the Project would not substantially damage scenic resources.

Level of Significance Prior to Mitigation

Implementation of the Project would not substantially damage scenic resources and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.1.5.3 Visual Character and Quality

Would the Project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). 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 in a developed area that meets the criteria of an "urbanized area" as defined in PRC Section 21071, which defines the term "urbanized area" for the purposes of CEQA to mean an incorporated city that has a population of at least 100,000 persons or has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons. According to U.S. Department of Commerce Bureau of the Census (U.S. Census Bureau) data from 2023, the City has a population of 48,272 (U.S. Census Bureau 2023a). The cities of Glendora and Covina are contiguous to the City. The City of Glendora has an estimated 49,934 people and the City of Covina has an estimated 48,728 people (U.S. Census Bureau 2023a). Thus, under CEQA, the Project site would be considered within an urbanized area as defined by PRC Section 21071, with an applicable threshold for evaluation of visual character and quality impacts based on consistency with applicable zoning and other regulations governing scenic quality. The applicable regulations governing scenic quality include relevant policies in the Azusa General Plan and Municipal Code.

General Plan

The Project would be consistent with applicable General Plan goals and policies, including those that govern scenic quality, as summarized in Table 4.10-1 in Section 4.10, *Land Use and Planning*. Specifically, the Project would include light industrial, residential, and recreational development in an area where these uses exist under existing conditions and buildings would have similar and complementary appearances to existing development in the area. Building height, materials, site layout, and landscaping features for all Project components would appear as similar visual elements to existing developed areas adjacent to and surrounding the Project site. As discussed above in Section 4.1.5.1, existing views of the San Gabriel Mountains are identified in the Azusa General Plan as important visual resources in the area and would not be substantially altered by the Project. As a result, the Project would not conflict with the Azusa General Plan policies governing scenic quality.

Municipal Code

The Project site is currently zoned Recreation, and portions would be rezoned to DWL and Neighborhood General 3 Medium Density Residential. A portion of the Project site would remain Recreation for the proposed 9-hole golf course. The DWL designation is intended to allow light industrial development, and the Neighborhood General 3 Medium Density Residential designation is intended to allow multi-family residential development. The specific standards for senior citizen apartment uses outlined in Azusa Municipal Code Section 88.42.200 would also apply to the residential site.

The design of the proposed Project would be consistent with applicable development regulations of the proposed DWL and Neighborhood General 3 Medium Density Residential (as refined for senior citizen apartments by Azusa Municipal Code Section 88.42.200) zones that would apply to the Project site pertaining to visual character, such as height limitations, lot coverage, floor area ratio, and setbacks. Limitations in the DWL include height limits and setback requirements. The height limit for buildings in the DWL zone is 55 feet and would not be exceeded as the proposed light industrial buildings would be 38 feet tall. Setback requirements in the DWL zone include 10-foot minimums for front and side street setbacks, both of which would be met by the Project. Side yard setbacks and rear setbacks are required to be a minimum of 20 feet if next to residential areas. Most of the proposed light industrial buildings would not be adjacent to residential areas, except for Building 6 on the east end of the industrial site, where residential uses occur to the north and east. A 28-foot wide fire lane is proposed between Building 6 and the residential areas to the north and east; therefore, Building 6 would not encroach into the 20-foot setback requirement. While there is no minimum landscape coverage requirement for this zone, a landscape plan approved by the City would be required and implemented. The preliminary landscape plan for the industrial site proposes landscaping focused along the frontages with North Todd Avenue and West 10th Street, with additional focus at the southeastern end of the industrial site to provide screening for the neighboring residential uses. This landscape screening would complement the required screening wall between the industrial and residential uses. Trees would also be planted throughout the site and in the surrounding area according to the City's tree replacement policy (refer to Section 4.3, *Biological Resources*, for further discussion).

Limitations in the Neighborhood General 3 Medium Density Residential zone for senior citizen apartments (also referred to as age-restricted residential uses) include maximum height limitations of 45 feet that would not be exceeded by the Project, which includes buildings up to 41.5 feet tall. Setback minimums for senior citizen apartments are 10 feet in the side yard, 15 feet for the street side and rear, and 20 feet for the front, and lot coverage maximum is 60 percent. Residential site setbacks vary throughout the site but would be a minimum of 10 feet in the side yard, 15 feet for the street side, 15 feet in the rear (10 feet for some parking structures), and 20 feet in the front. Therefore, all proposed residential site setbacks would be consistent with the Neighborhood General 3 Medium Density Residential zone requirements for senior citizen apartments. Lot coverage on the residential site is estimated at 24.7 percent (213,417 SF of building area on an 863,186 SF lot). As described for the industrial site, there is no minimum landscape coverage requirement for the proposed residential zone; however, the senior citizen apartments standards require landscaping of the front yard setback. A landscape plan is proposed with the Project and would require approval by the City. The preliminary landscape plan for the residential site proposes landscaping at the entrance, along internal drive aisles, and surrounding the proposed buildings, with a focus on tree planting around the perimeter of the residential site. Refer to Section 4.3, *Biological Resources*, for further discussion of tree replacement. Based on the above, the proposed Project would not conflict with applicable zoning regulations governing scenic quality.

Level of Significance Prior to Mitigation

Implementation of the Project would not conflict with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.1.5.4 Light and Glare

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

There are two primary artificial sources of light that generally affect a built environment: light emanating from building interiors that passes through windows to the outside, and light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting) that affect the natural ambient light level. The introduction of light can be a nuisance by affecting adjacent areas and diminishing the view of the clear night sky, depending on the location of the light sources and their proximity to nearby light-sensitive areas. The Project site is in a developed area that contains a mix of uses. The existing light sources in the Project area include streetlights and vehicle lights along surrounding roadways, as well as from interior and exterior building lighting emanating from the existing buildings on the surrounding properties.

Pursuant to Azusa Municipal Code Section 46-409, a majority of the construction activities are anticipated to occur during the daytime hours (Monday through Saturday, 7:00 a.m. to 6:00 p.m.), when construction-related lighting would not be required. However, short-term pouring of concrete on the industrial site (10 nights) and residential site (4 nights) would occur. During this time, new light sources would be required but would be used for a limited period and directed into the site such that views of the surrounding area would not be adversely affected.

The proposed Project would include the introduction of additional lighting at a developed site with some existing light sources (golf course clubhouse, driving range, and parking area). Nighttime exterior lighting would be provided at the proposed residential and industrial sites for safety, security, and circulation purposes. Outdoor lighting would cast downward and away from neighboring residential areas. Lighting at the reconfigured golf course would not represent a new source of light as the existing golf course has lighting, and nighttime lighting would not be added to the reconfigured golf course. The Project would be subject to Azusa Municipal Code Section 88.31.030, *Outdoor Lighting*, which establishes lighting standards to ensure that light trespass (spill light), light pollution, and glare have a negligible impact on surrounding properties, particularly residential uses. Lighting for the proposed Project would include roadway pole lights up to 25 feet in height, pedestrian pole lights up to 14 feet in height, and bollard lights near the ground for pathway lighting. Small and large wall sconces, tree up lights, recessed step lights, and palm tree mounted flood lights are also proposed for the residential site. Exterior lighting systems would typically be equipped with timers to automatically turn off during nighttime hours when not needed, ensuring that public safety and egress lighting remain unaffected. Following conformance

with Azusa Municipal Code requirements, the Project would not result in significant adverse impacts associated with the introduction of new sources of lighting.

Glare impacts can occur when artificial light or sunlight reflects off a surface, creating a harsh, intensely bright effect. Glare can create discomfort or present safety concerns. As discussed in Section 3.0, *Project Description*, building materials would include stucco exterior walls with decorative trim and tiles and concrete barrel tile roofs for the residential development. The light industrial buildings would be made of concrete. These architectural elements are not sources of glare. Glass would be limited to windows typical of residential construction, and no other highly reflective surfaces would be constructed. The extent and surface area of glass on the homes would not be at a scale to generate adverse glare effects. As such, the Project would not create a new source of glare that would adversely affect views in the area.

Level of Significance Prior to Mitigation

Implementation of the Project would not create a new source of substantial light and glare, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.1.6 Cumulative Impact Analysis

The geographic scope for the aesthetics cumulative impact analysis includes a 0.25-mile radius around the Project site, which would conservatively capture the immediate viewshed and surrounding visible areas not obscured by intervening development and/or topography. This geographic scope, referred to as "Project viewshed" for the purposes of this cumulative analysis, generally extends to the San Gabriel Mountains to the north, North Azusa Avenue on the east, West 8th Street on the south, and 500 feet east of the San Gabriel River Trail on the west. This area is generally developed with residential uses to the east, industrial uses to the west and south, and open space to the northwest.

The proposed Project would not have a significant impact related to aesthetics at the project level, as discussed above. Based on the site's location surrounded by development, there are limited opportunities for new development in the Project viewshed that would inhibit scenic views or visual quality of the area, especially because there are no designated scenic resources in the Project area. Moreover, none of the cumulative projects identified in Table 4-1 are located in the Project viewshed, and none are located between the Project site and the San Gabriel Mountains. In addition, the Project is not located within the vicinity of the identified cumulative projects such that light introduced by these projects would combine with new light sources at the Project site to alter views in the area. Similar to the proposed Project, future development in the City, including the identified cumulative projects, would be required to comply with City policies governing visual quality, including open space development standards, lighting and glare standards, grading standards, and protected tree policies. When considered with other reasonably foreseeable projects in the viewshed vicinity, cumulative aesthetics impacts would be less than significant.

4.2 Air Quality

This section addresses the potential for air pollutant emissions to be generated by construction and operation of the proposed Project and evaluates the associated potential impacts to air quality. The existing conditions and regulatory setting related to air quality for the Project site are also addressed. The information and analysis contained in this section primarily relies on the Air Quality and Greenhouse Gas Emissions Technical Report prepared for the Project by HELIX Environmental Planning (HELIX; 2025a), which is included as Appendix B to this EIR.

4.2.1 Existing Conditions

The Project site is located within the eastern Los Angeles County portion of the South Coast Air Basin (SCAB), which consists of all or part of four counties: Los Angeles, San Bernardino, Riverside, and Orange. Air quality in the SCAB is regulated by the U.S. Environmental Protection Agency (USEPA) at the federal level, by the California Air Resources Board (CARB) at the state level, and by the SCAQMD at the regional level.

4.2.1.1 Air Pollutants of Concern

Criteria Pollutants

Criteria pollutants are defined by state and federal law as a risk to the health and welfare of the public. In general, criteria air pollutants include the following compounds:

- Ozone (O_3)
- Carbon monoxide (CO)
- Nitrogen dioxide (NO_2)
- Particulate matter (PM), which is further subdivided:
  - Coarse PM, 10 microns or less in diameter (PM_{10})
  - Fine PM, 2.5 microns or less in diameter ($PM_{2.5}$)
- Sulfur dioxide (SO_2)
- Lead (Pb)

Criteria pollutants can be emitted directly from sources (primary pollutants; e.g., CO, SO_2, PM_{10}, $PM_{2.5}$, and Pb), or they may be formed through chemical and photochemical reactions of precursor pollutants in the atmosphere (secondary pollutants; e.g., O_3, NO_2, PM_{10}, and $PM_{2.5}$). PM_{10} and $PM_{2.5}$ can be both primary and secondary pollutants. The principal precursor pollutants of concern are reactive organic gases (ROGs), also known as volatile organic compounds (VOCs)[1], and nitrogen oxides (NO_X).

The descriptions of sources and general health effects for each of the criteria air pollutants are shown in Table 4.2-1, *Common Sources and Human Health Effects of Criteria Air Pollutants*. Specific adverse health effects on individuals or population groups induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables such as cumulative concentrations, local

[1] CARB defines and uses the term ROGs while the USEPA defines and uses the term VOCs. The compounds included in the lists of ROGs and VOCs and the methods of calculation are slightly different. However, for the purposes of estimating criteria pollutant precursor emissions, the two terms are often used interchangeably.

meteorology and atmospheric conditions, and the number and characteristics of exposed individuals (e.g., age, gender). Criteria pollutant precursors (ROG and NO_X) affect air quality on a regional scale, typically after significant delay and distance from the pollutant source emissions. Health effects related to ozone and NO_2 are, therefore, the product of emissions generated by numerous sources throughout a region.

Emissions of criteria pollutants from vehicles traveling to or from the Project site (mobile emissions) are distributed nonuniformly in location and time throughout the region, wherever the vehicles may travel. As such, specific health effects from these criteria pollutant emissions cannot be meaningfully correlated to the incremental contribution from the Project.

Table 4.2-1
COMMON SOURCES AND HUMAN HEALTH EFFECTS OF CRITERIA AIR POLLUTANTS

Pollutant	Major Man-Made Sources	Human Health Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to climate change and nutrient overloading, which deteriorates water quality. Causes brown discoloration of the atmosphere.
Ozone (O_3)	Formed by a chemical reaction between reactive organic gases (ROGs) and nitrogen oxides (NO_X) in the presence of sunlight. Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield. Damages rubber, some textiles, and dyes.
Particulate Matter (PM_{10} and $PM_{2.5}$)	Produced by power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and other sources.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Sulfur Dioxide (SO_2)	A colorless, nonflammable gas formed when fuel containing sulfur is burned, when gasoline is extracted from oil, or when metal is extracted from ore. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid, which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Lead	Metallic element emitted from metal refineries, smelters, battery manufacturers, iron and steel producers, use of leaded fuels by racing and aircraft industries.	Anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, lowered IQ. Affects animals, plants, and aquatic ecosystems.

Source: CARB 2024a; USEPA 2024a

Toxic Air Contaminants

The California Health and Safety Code (H&SC) Section 39655(a) defines a toxic air contaminant (TAC) as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal Clean Air Act (CAA) (42 United States [U.S.] Code Section 7412[b]) is a TAC. Under state law, the California Environmental Protection Agency (CalEPA), acting through CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health.

Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid materials. The solid material in diesel exhaust is referred to as diesel particulate matter (DPM). Almost all DPM is 10 microns or less in diameter, and 90 percent of DPM is less than 2.5 microns in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. In 1998, CARB identified DPM as a TAC based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. DPM has a notable effect on California's population—it is estimated that about 70 percent of the total known cancer risk related to air toxins in California is attributable to DPM.

Toxics Best Available Control Technology

Diesel powered on-road (highway) trucks are a potential source of DPM. In addition, some transport refrigeration units (TRUs) are powered by a small diesel engine and are a potential source of DPM. TRUs provide cooling for trucks and/or trailers that transport goods requiring refrigeration. The Toxics Best Available Control Technology for operation of diesel internal combustion engines is compliance with USEPA and CARB emissions standards. All heavy-duty diesel powered on-road vehicles manufactured since 2010 are required to meet USEPA emissions standards, including reductions of emissions of DPM by approximately 90 percent compared to unregulated engines. Diesel powered TRUs are considered nonroad equipment. The USEPA has promulgated multiple tiers of emissions standards (with Tier 4 being the most stringent) for nonroad diesel engines manufactured, depending on engine horsepower and application. CARB regulations require diesel engines used in TRUs, with 25 or more horsepower, sold in California since 2012 to be USEPA Tier 4 Interim certified.

4.2.1.2 Climate and Meteorology

The distinctive climate of the SCAB is determined by its terrain and geographic location. The SCAB is a coastal plain with connecting broad valleys and low hills. It is bound by the Pacific Ocean to the southwest and high mountains around the rest of its perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light, average wind speeds.

The usually mild climatological pattern is interrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. Winds in the Project area are usually driven by the dominant land/sea breeze circulation system. Regional wind patterns are dominated by daytime onshore sea breezes. At night, the wind generally slows and reverses direction, traveling toward the sea. Local canyons can also alter wind direction, with wind tending to flow parallel to the canyons. The vertical dispersion of air pollutants in the SCAB is hampered by the presence of persistent temperature inversions. High pressure systems, such as the semi-permanent high-pressure zone in which the SCAB is

located, are characterized by an upper layer of dry air that warms as it descends, restricting the mobility of cooler marine-influenced air near the ground surface, and resulting in the formation of subsidence inversions. Such inversions restrict the vertical dispersion of air pollutants released into the marine layer and, together with strong sunlight, can produce worst-case conditions for the formation of photochemical smog. The basin-wide occurrence of inversions at 3,500 feet amsl or less averages 191 days per year.

The predominant wind direction in the vicinity of the Project site is from the southwest, and the average wind speed is approximately 3.8 miles per hour (mph), as measured at the Azusa air quality monitoring station located approximately 0.25 mile southwest of the industrial site (SCAQMD 2017). The annual average maximum temperature in the Project area, as measured at the Azusa City Park climatic station approximately 0.5 mile southeast of the Project site, is approximately 77.8 degrees Fahrenheit (°F), and the annual average minimum temperature is approximately 47.7°F. Total precipitation in the Project area averages approximately 19.0 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer (Western Regional Climate Center 2024).

4.2.1.3 Existing Air Quality

Attainment Designations

The USEPA has classified air basins (or portions thereof) as being in "attainment," "nonattainment," "maintenance," or "unclassified" for each criteria air pollutant, based on whether or not the area achieves the National Ambient Air Quality Standards (NAAQS). Similar designations are made at the state level based on each air basin's achievement of the California Ambient Air Quality Standards (CAAQS). Upon attainment of a standard for which an area was previously designated nonattainment, the area is classified as a maintenance area. If an area is designated unclassified, it is because inadequate air quality data were available as a basis for a nonattainment or attainment designation. Table 4.2-2, *South Coast Air Basin Attainment Status*, lists the federal and state attainment status of the SCAB for criteria pollutants. The SCAB is a federal and state nonattainment area for ozone and $PM_{2.5}$, and a state nonattainment area for PM_{10}.

Table 4.2-2
SOUTH COAST AIR BASIN ATTAINMENT STATUS

Criteria Pollutant	Federal Designation	State Designation
Ozone (O_3) (1-hour)	(No federal standard)	Nonattainment
Ozone (O_3) (8-hour)	Extreme Nonattainment	Nonattainment
CO (Carbon Monoxide (CO)	Attainment (Maintenance)	Attainment
Coarse Particulate Matter (PM_{10})	Attainment (Maintenance)	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	Serious Nonattainment	Nonattainment
Nitrogen Dioxide (NO_2)	Attainment (Maintenance)	Attainment
Sulfur Dioxide (SO_2)	Unclassifiable/Attainment	Unclassifiable/Attainment
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen Sulfide	(No federal standard)	Attainment
Visibility	(No federal standard)	Attainment

Source: SCAQMD 2016; USEPA 2024b

[1] The federal 1-hour standard of 12 ppm was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for a long period and is addressed in State Implementation Plans.

[2] At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

Monitored Air Quality

The SCAQMD operates a network of ambient air monitoring stations throughout the SCAB. The purpose of the monitoring stations is to measure ambient concentrations of criteria air pollutants and determine whether the ambient air quality meets the CAAQS and the NAAQS. The nearest ambient monitoring station to the Project site is the Azusa monitoring station, located approximately 0.25 mile south of the industrial site, which has available monitoring data through 2022. Air quality data collected at the Azusa monitoring station for the years 2020 through 2022 are shown in Table 4.2-3, *Air Quality Monitoring Data*. The most recent (2023) air quality monitoring data available within the vicinity of the Project site is from the Glendora-Laurel monitoring station located approximately 3.45 miles east of the golf course site. Monitoring data for the year 2023 from the Glendora-Laurel station is described below Table 4.2-3.

Table 4.2-3
AIR QUALITY MONITORING DATA

Pollutant Standard	2020	2021	2022
Ozone (O_3) – Azusa Station			
Maximum concentration 1-hour period (ppm)	0.168	0.108	0.111
Maximum concentration 8-hour period (ppm)	0.125	0.086	0.080
Days above 1-hour state standard (>0.09 ppm)	53	20	6
Days above 8-hour state/federal standard (>0.070 ppm)	65	22	11
Coarse Particulate Matter (PM_{10}) – Azusa Station			
Maximum 24-hour concentration (µg/m^3)	152.3	79.4	98.2
Measured Days above 24-hr state standard (>50 µg/m^3)	9	11	7
Measured Days above 24-hr federal standard (>150 µg/m^3)	0	0	0
Annual average (µg/m^3)	40.4	33.4	38.3
Exceed state annual standard (20 µg/m^3)	Yes	Yes	Yes
Fine Particulate Matter ($PM_{2.5}$) – Azusa Station			
Maximum 24-hour concentration (µg/m^3)	102.7	61.9	18.4
Measured Days above 24-hour federal standard (>35 µg/m^3)	5	3	0
Annual average (µg/m^3)	13.1	11.4	10.1
Exceed state annual standard (12 µg/m^3)	Yes	Yes	No
Exceed state annual standard (9 µg/m^3)	Yes	Yes	Yes
Nitrogen Dioxide (NO_2) – Azusa Station			
Maximum 1-hour concentration (ppm)	0.065	0.078	0.048
Days above state 1-hour standard (0.18 ppm)	0	0	0
Days above federal 1-hour standard (0.100 ppm)	0	0	0
Annual average (ppm)	0.013	0.014	*
Exceed annual federal standard (0.053 ppm)	No	No	*
Exceed annual state standard (0.030 ppm)	No	No	*

Source: CARB 2024b
ppb = parts per billion; ppm = parts per million; µg/m^3 = micrograms per cubic meter, * = insufficient data available.

As shown in Table 4.2-3, monitoring data at the Azusa station reported exceedances of the 1-hour state ozone standard and 8-hour state/federal ozone standard multiple days in 2020 through 2022. For PM, the Azusa station reported: the state 24-hour standard was exceeded on multiple days in 2020 through 2022; the state annual average PM_{10} standard was exceeded for all years 2020 through 2022; the federal 24-hour PM2.5 standard was exceeded on multiple days in 2020 and 2021; the new federal 2024 annual

average PM_{10} standard was exceeded for all years 2020 through 2022; and the state annual average PM_{10} standard was exceeded in 2020 and 2021. No exceedances of the state or federal 1-hour standard for NO_2 was reported for the years 2020 through 2022 at the Azusa station.

Monitoring data for 2023 is available at the Glendora-Laurel station, which reported exceedances of the 1-hour state ozone standard for 57 days in 2023 and the 8-hour state/federal ozone standard for 70 days in 2023. For PM_{10}, the Glendora-Laurel station reported no exceedances of the national 24-hour standard in 2023, with no data available for the state 24-hour standard. The Glendora-Laurel monitoring station did not have data available for $PM_{2.5}$ in 2023. No exceedances of the state or federal 1-hour standard for NO_2 were reported for 2023 at the Glendora-Laurel station (CARB 2024b).

4.2.1.4 Sensitive Receptors

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the most likely to be affected by air pollution and are referred to as sensitive receptors: adults over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptor locations. Examples of these sensitive receptor locations are residences, schools, hospitals, and daycare centers. Following OEHHA guidance for Health Risk Assessments (HRAs), the health impacts are analyzed for individual residents assumed to be standing in their primary outdoor spaces closest to the source of TACs from 17 to 21 hours per day (depending on the age group) every day for 30 years and for individual off-site workers assumed to be working with moderate intensity outside of a commercial or industrial building for 8 hours per day, 260 days per year. Because of these and other assumptions, HRAs are, by design, conservative (health protective).

The closest existing sensitive receptor locations to the industrial site are multi-family residential properties adjacent to (to the north and east) the southeast portion of the industrial site, with primary outdoor spaces (apartment balconies and patios) located approximately 30 feet from the industrial site. The closest existing sensitive receptor locations to the residential site are single-family properties adjacent to the residential site's western property line, with primary outdoor spaces (backyards and side yards) abutting the residential site. The closest school to the Project site is the Victor Hodge Elementary School, located south of the southern portion of the golf course site, approximately 840 feet northeast of the industrial site, and approximately 1,000 feet southeast of the residential site. Refer to Figure 3-2. As a residential development, the residential site would be a new sensitive receptor location.

4.2.1.5 Community Health Risks

The SCAQMD has conducted studies on carcinogenic risk from exposure to air toxics in the SCAB. The most recent is the Multiple Air Toxics Exposure Study V, which includes a fixed site monitoring program with ten stations, an updated emissions inventory of TACs, and a modeling effort to characterize risk across the SCAB. The study focuses on the carcinogenic risk from exposure to air toxics but does not estimate mortality or other health effects from particulate exposures. According to the interactive tool displaying this data, the area around the Project site has a cumulative cancer risk from TACs of 534 in 1 million, and 64.6 percent of the existing cumulative cancer risk from TACs is from DPM (SCAQMD 2024a).

4.2.2 Regulatory Setting

4.2.2.1 Federal Regulations

Federal Clean Air Act

Air quality is defined by ambient air concentrations of specific pollutants identified by the USEPA to be of concern with respect to the health and welfare of the public. The USEPA is responsible for enforcing the CAA of 1970 and its 1977 and 1990 Amendments. The CAA required the USEPA to establish NAAQS, which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. In response, the USEPA established both primary and secondary standards for several criteria pollutants. On February 7, 2024, the USEPA announced a final rule to lower the annual arithmetic mean (AAM) primary NAAQS for $PM_{2.5}$ from 12 µg/m^3 to 9 µg/m^3. The new final rule retains the existing 24-hour primary and AAM secondary NAAQS for $PM_{2.5}$. Table 4.2-4, *Ambient Air Quality Standards*, shows the federal and state ambient air quality standards for criteria pollutants. As described above and shown in Table 4.2-2, the SCAB is classified as an extreme nonattainment area for the 8-hour NAAQS for ozone and as a serious nonattainment area for the $PM_{2.5}$ NAAQS.

4.2.2.2 State Regulations

California Clean Air Act

The federal CAA allows states to adopt ambient air quality standards and other regulations, provided they are at least as stringent as federal standards. CARB, a part of the CalEPA, is responsible for the coordination and administration of both federal and state air pollution control programs within California, including setting the CAAQS. CARB also conducts research, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

In addition to primary and secondary standards, the state has established a set of episode criteria for O_3, CO, NO_2, SO_2, and PM. These criteria refer to episode levels representing periods of short-term exposure to air pollutants that actually threaten public health. Table 4.2-2, above, lists the state attainment status of the SCAB for the criteria pollutants. Under state designation, the SCAB is currently in attainment for CO, NO_2, SO_2, lead, sulfates, hydrogen sulfide, and visibility reducing particles; and in nonattainment for ozone (1-hour and 8-hour), PM_{10}, and $PM_{2.5}$ (SCAQMD 2016).

State Implementation Plan

The CAA requires areas with unhealthy levels of O_3, inhalable PM, CO, NO_2, and SO_2 to develop plans, known as State Implementation Plans (SIPs). SIPs are comprehensive plans that describe how an area will attain the NAAQS. The 1990 amendments to the CAA set deadlines for attainment based on the severity of an area's air pollution problem.

Table 4.2-4
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards	Federal Standards Primary[1,2]	Federal Standards Secondary[3]
O_3	1 Hour	0.09 ppm (180 µg/m^3)	–	–
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)	Same as Primary
PM_{10}	24 Hour	50 µg/m^3	150 µg/m^3	Same as Primary
	AAM	20 µg/m^3	–	Same as Primary
$PM_{2.5}$	24 Hour	–	35 µg/m^3	Same as Primary
	AAM	12 µg/m^3	9 µg/m^3	15.0 µg/m^3
CO	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	–
	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)	–	–
NO_2	1 Hour	0.18 ppm (339 µg/m^3)	0.100 ppm (188 µg/m^3)	–
	AAM	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	Same as Primary
SO_2	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m^3)
	24 Hour	0.04 ppm (105 µg/m^3)	–	–
Lead	30-day Avg.	1.5 µg/m^3	–	–
	Calendar Quarter	–	1.5 µg/m^3	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m^3	Same as Primary
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	No Federal Standards	No Federal Standards
Sulfates	24 Hour	25 µg/m^3	No Federal Standards	No Federal Standards
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	No Federal Standards	No Federal Standards
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m^3)	No Federal Standards	No Federal Standards

Source: CARB 2016; USEPA 2024c

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

[2] The AAM primary NAAQS for $PM_{2.5}$ was reduced from 12 µg/m^3 to 9 µg/m^3 by a USEPA final rule issued on February 7, 2024.

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

O_3 = ozone; ppm = parts per million; µg/m^3 = micrograms per cubic meter; PM_{10} = coarse particulate matter, 10 microns or less in diameter; AAM = Annual Arithmetic Mean; $PM_{2.5}$ = fine particulate matter, 2.5 microns or less in diameter; CO = carbon monoxide; mg/m^3 = milligrams per cubic meter; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide; km = kilometer; – = No Standard

SIPs are not single documents—they are a compilation of new and previously submitted plans, programs (e.g., monitoring, modeling, permitting), district rules, state regulations, and federal controls. Many of California's SIPs rely on a core set of control strategies, including emission standards for cars and heavy trucks, fuel regulations, and limits on emissions from consumer products. State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP

elements and submit them to CARB for review and approval. CARB forwards the SIP revisions to the USEPA for approval and publication in the Federal Register. Code of Federal Regulations (CFR) Title 40, Chapter I, Part 52, Subpart F, Section 52.220 lists all of the items that are included in the California SIP. At any one time, several California submittals are pending USEPA approval.

California Energy Code

CCR Title 24 Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings, were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. Energy-efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for space and water heating) results primarily in GHG emissions; therefore, the California Energy Code and other regulations related primarily to GHG reduction but with the co-benefit of air quality improvements are discussed further in Section 4.7, *Greenhouse Gas Emissions*.

4.2.2.3 Local Regulations

South Coast Air Quality Management District

Air quality in the SCAB portion of Los Angeles County is regulated by the SCAQMD. As a regional agency, the SCAQMD works directly with the Southern California Association of Governments (SCAG), County transportation commissions, and local governments and cooperates actively with all federal and state government agencies. The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary.

Air Quality Management Plan

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a sequence of Air Quality Management Plans (AQMPs).

On December 2, 2022, the SCAQMD adopted the 2022 AQMP, which is a regional and multi-agency effort (SCAQMD, CARB, SCAG, and USEPA). The 2022 AQMP represents a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures. The plan seeks to achieve multiple goals in partnership with other entities promoting reductions in criteria pollutants, GHG emissions, and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. Included in the 2022 AQMP are updated strategies and control measures to address the designation of the SCAB as an "extreme" nonattainment area for the 2015 NAAQS 8-hour ozone standard. To meet the 2015 NAAQS ozone standard, an additional 67 percent reduction of NO_X will be required compared to the reductions forecast to occur by 2037 (as required by current adopted rules and regulations). Achieving the NO_X reductions will require extensive use of zero emission technologies across all stationary and mobile sources. The overwhelming majority of NO_X emissions are from heavy-duty trucks, ships, and other state and federally regulated mobile sources that are mostly beyond the SCAQMD's control. The region will not meet the NAAQS ozone standard, absent significant federal action. In addition to federal action, the 2022 AQMP requires substantial reliance on future deployment of advanced technologies to meet the NAAQS ozone standard (SCAQMD 2022).

The AQMP, in combination with those from all other California nonattainment areas with serious (or worse) air quality problems, is submitted to CARB, which develops the California SIP. The SIP relies on the same information from SCAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin.

Rules and Regulations

The following rules promulgated by the SCAQMD would be applicable to construction and/or operation of the Project.

Rule 401 – Visible Emissions. Limits the allowable opacity of air contaminant emissions from any single source.

Rule 402 – Nuisance. Prohibits the discharge of air contaminants, including odors, which cause injury, detriment, nuisance, or annoyance to any considerable number of persons.

Rule 403 – Fugitive Dust. Requires actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions, including emissions from construction activities. Project construction would be required to implement all applicable fugitive dust best available control measures specified in Table 1 in the rule.

Rule 1113 – Architectural Coating. Establishes VOC limits for architectural coatings (e.g., paints, stains, preservatives). Effective January 1, 2019, building interior and exterior paint is limited to a maximum VOC content of 50 g/L.

Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Sets requirements to control the emission of VOCs from excavating, grading, handling, and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM. The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials.

Rule 2305 – Warehouse Indirect Source Rule. Requires owners and operators of warehouses with 100,000 SF or more of indoor floor space in a single building to directly reduce NO_X and PM emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities.

Southern California Association of Governments

SCAG is the metropolitan planning organization (MPO) for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements. Pursuant to California H&SC Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are

supportive of, the goals of regional and state air quality plans to attain the NAAQS. The Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP. The SCAQMD combines its portion of the AQMP with those prepared by SCAG. In April 2024, SCAG's Regional Council adopted the 2024 RTP/SCS (SCAG 2024a).

Azusa General Plan

Chapter 5 of the Azusa General Plan, *Natural Environment*, contains the following applicable goals and policies for reducing air pollutant emissions in the City, and improving overall air quality:

Goal 1. Improve air quality in Azusa and reduce exposure to air pollutants.

Policy 1.1. Integrate air quality concerns into land use planning decisions.

Policy 1.2. Integrate air quality concerns into site design review.

Policy 1.3. Reduce pollutant emissions from quarry operations, off -road vehicle use areas, industrial uses, and vehicular traffic.

Policy 1.4. Participate in regional air quality planning strategies.

Policy 1.5. Consider encouraging the use of "green roof" construction technologies.

4.2.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential air quality impacts are based on Appendix G of the CEQA Guidelines. A significant impact to air quality could occur if implementation of the proposed 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 nonattainment under an applicable federal or state ambient air quality standard;

c) Expose sensitive receptors to substantial pollutant concentrations; or

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

Appendix G of the CEQA Guidelines states that the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the above determinations. The SCAQMD has established significance thresholds to assess the regional and localized impacts of project-related air pollutant emissions. The significance thresholds are updated, as needed, to appropriately represent the most current technical information and attainment status in the SCAB. Table 4.2-5, *SCAQMD Thresholds of Significance*, presents the most current significance thresholds, including regional daily thresholds for short-term construction and long-term operational emissions; maximum incremental cancer risk and hazard indices for TACs; and maximum ambient concentrations for exposure of sensitive receptors to localized pollutants. A project with daily emission

rates, risk values, or concentrations below these thresholds is generally considered to have a less than significant effect on air quality.

Non-cancer chronic (long-term) health effects are evaluated based on established Reference Exposure Limits for each TAC and on the calculated Hazard Index (HI). An HI less than 1 means non-cancer adverse health effects are not expected for exposed individuals. An HI of 1 or higher indicates non-cancer chronic health effects are possible (but not certain) for exposed individuals. Unlike non-cancer chronic health effects, for exposure to carcinogens, there is no level of exposure below which no adverse health effects are expected. Potential increases in long-term cancer risks are evaluated in terms of the increased chance of an individual developing cancer from long-term exposure to a source or sources of TACs, expressed in chances per million.

Table 4.2-5
SCAQMD THRESHOLDS OF SIGNIFICANCE

Pollutant	Construction	Operation
Mass Daily Thresholds (pounds per day)		
VOC	75	55
NO_X	100	55
CO	550	550
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_X	150	150
Lead	3	3
Toxic Air Contaminants		
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)	
Ambient Air Quality for Criteria Pollutants		
NO_2	1-hour average ≥ 0.18 ppm Annual average ≥ 0.03 ppm	
CO	1-hour average ≥ 20.0 ppm (state) 8-hour average ≥ 9.0 ppm (state/federal)	
PM_{10}	24-hour average ≥ 10.4 µg/m^3 (construction) 24-hour average ≥ 2.5 µg/m^3 (operation) Annual average ≥ 1.0 µg/m^3	
$PM_{2.5}$	24-hour average ≥ 10.4 µg/m^3 (construction) 24-hour average ≥ 2.5 µg/m^3 (operation)	
SO_2	1-hour average ≥ 0.075 ppm 24-hour average ≥ 0.04 ppm	

Source: SCAQMD 2019
VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; PM_{10} = coarse particulate matter, 10 microns or less in diameter; $PM_{2.5}$ = fine particulate matter, 2.5 microns or less in diameter; SO_X = sulfur oxides; TACs = toxic air contaminants; NO_2 = nitrogen dioxide; ppm = parts per million; µg/m^3 = micrograms per cubic meter; SO_2 = sulfur dioxide

As part of the SCAQMD's environmental justice program, more attention has been focused on localized air quality effects. Also, while regional impact analysis is based on attaining or maintaining regional emissions standards, localized impact analysis compares the concentration of a pollutant at a receptor site to a health-based standard.

SCAQMD has developed a localized significance threshold (LST) methodology and mass rate look-up tables by source receptor area that can be used by public agencies to determine whether a project may generate significant adverse localized air quality impacts. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard; they are developed based on the ambient concentrations of that pollutant for each source receptor area (SCAQMD 2009). The LST methodology translates the concentration standards into emissions thresholds that are a function of the project site area, source to receptor distance, and the location within the SCAB. Per guidance from SCAQMD, the site area should correspond to the maximum daily acres disturbed by construction as calculated using the CalEEMod default acres graded methodology where crawler tractors, rubber-tired dozers, and graders are assumed to grade 0.5 acres per day each, and scrapers are assumed to grade one acre per day each (SCAQMD 2025). If a project exceeds the LST look-up values, then the SCAQMD recommends that project-specific localized air quality modeling be performed.

The proposed Project site is within source receptor area 9, East San Gabriel Valley. The closest sensitive receptor locations are multi-family residences with primary outdoor spaces (balconies and patios) approximately 30 feet east of the industrial site and single-family residences adjacent to the west side of the residential site, with primary outdoor spaces (backyards and side yards) abutting the Project residential site. Therefore, the LSTs in source receptor area 9 with receptors located between 0 and 25 meters (0 to 82 feet) are used in this analysis.

4.2.4 Methodology and Assumptions

Criteria pollutant and precursor emissions were calculated using CalEEMod Version 2022.1. CalEEMod is a computer model used to estimate air emissions resulting from land development projects throughout the state of California. CalEEMod was developed by the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California air quality management and pollution control districts.

In brief, CalEEMod is a computer model that estimates criteria air pollutant and GHG emissions from mobile (i.e., vehicular) sources, area sources (fireplaces, woodstoves, and landscape maintenance equipment), energy use (electricity and natural gas used in space heating, ventilation, and cooling; lighting; and plug-in appliances), water use and wastewater generation, and solid waste disposal. Emissions are estimated based on land use information input to the model by the user. Further detail about CalEEMod is provided in Appendix B, and default parameters that were changed in the modeling of Project emissions are described below.

4.2.4.1 Construction Sources

Construction emissions were estimated using CalEEMod based on the proposed construction phases and equipment described below.

Construction Activities

Construction activities would include site preparation, grading, utility undergrounding, building construction, architectural coatings, and paving. The quantity, duration, and intensity of construction activity influence the amount of construction emissions and related pollutant concentrations that occur at any one time. As such, the emission forecasts provided herein reflect a specific set of conservative assumptions based on the expected construction scenario wherein a relatively large amount of

construction activity is occurring in a relatively intensive manner. Because of this conservative assumption, actual emissions could be less than those forecasted. If construction would be delayed or occurs over a longer time period, emissions could be reduced because of: (1) a more modern and cleaner-burning construction equipment fleet mix than assumed in the modeling; and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval).

Construction emissions were estimated based on the timeline provided by the Project engineer, and the modeled construction schedule is provided in Table 4.2-6, *Anticipated Construction Schedule*. Construction was assumed to occur five days per week, with equipment operating up to eight hours per day. Grading of the industrial and golf course sites would not require the import or export of soil materials, and grading of the residential site would require the export of 8,610 CY of soil material. Based on estimates from aerial images of the Project site, approximately 13 truckloads of vegetation were assumed to be exported from the Project site during site preparation. Based on an estimate of six inches of uncompressed pavement depth, approximately 119 tandem trailer truckloads (226 one-way trips) of asphalt would be imported to the Project site during paving.

Table 4.2-6
ANTICIPATED CONSTRUCTION SCHEDULE

Construction Activity	Construction Period Start	Construction Period End	Number of Working Days
Phase 1 – Industrial Site			
Site Preparation	11/1/2025	12/31/2025	43
Grading	1/1/2026	2/28/2026	42
Underground Utilities	1/1/2026	1/31/2026	22
Building Construction	3/1/2026	12/31/2026	219
Architectural Coatings	10/1/2026	12/31/2026	66
Paving	12/1/2026	12/31/2026	22
Phase 2 – Residential Site			
Site Preparation	1/1/2026	3/31/2026	64
Grading	4/1/2026	5/31/2026	43
Underground Utilities	4/1/2026	6/30/2026	65
Building Construction	6/1/2026	7/31/2027	305
Architectural Coatings - Buildings	2/1/2027	7/26/2027	126
Architectural Coatings – Swimming Pool	7/27/2027	7/31/2027	4
Paving	8/1/2027	9/30/2027	65
Phase 3 – Golf Course Site			
Golf Course Realignment	1/1/2026	1/7/2026	5
Clubhouse Paving	1/8/2026	1/21/2026	10
Clubhouse Interior Painting	1/22/2026	1/31/2026	7

Source: HELIX 2025a

Construction Off-Road Equipment

Construction of the Project would require the use of heavy off-road equipment throughout the duration of construction. All industrial site construction equipment estimates are based on default values in CalEEMod, with a water truck added for fugitive dust control, except for underground utilities excavation, which would require one excavator per the Project engineer. Table 4.2-7, *Phase 1*

Construction Equipment, presents a summary of the modeled equipment for industrial site construction activities.

Table 4.2-7
PHASE 1 CONSTRUCTION EQUIPMENT

Equipment	Horsepower	Number	Hours/Day
Site Preparation			
Rubber-tired Dozers	367	3	8
Tractors/Loaders/Backhoes	84	4	8
Water Trucks	376	1	4
Grading			
Excavators	36	2	8
Graders	148	1	8
Rubber-tired Dozers	367	1	8
Scrapers	423	2	8
Tractors/Loaders/Backhoes	84	2	8
Water Trucks	376	1	4
Underground Utilities			
Excavators	36	1	8
Building Construction			
Cranes	367	1	7
Forklifts	82	3	8
Generator Sets	14	1	8
Tractors/Loaders/Backhoes	84	3	7
Welders	46	1	8
Water Trucks	376	1	4
Architectural Coating			
Air Compressors	37	1	6
Paving			
Pavers	81	2	8
Paving Equipment	89	2	8
Rollers	36	2	8

Source: HELIX 2025a

All Phase 2, residential site, construction equipment estimates are based on default values in CalEEMod, with a water truck added for fugitive dust control, except for underground utilities excavation, which would require two excavators per the Project engineer. Table 4.2-8, *Phase 2 Construction Equipment*, presents a summary of the modeled equipment for residential site construction activities.

Phase 3, golf course site construction would include grading for the relocation of the 7th hole tee box and shortening of the 8th hole green and for minor parking lot expansion, assumed to require a rubber-tired dozer, a grader, and a backhoe. The golf course clubhouse interior painting and parking lot pavement renovation activities were modeled using CalEEMod defaults. Table 4.2-9, *Phase 3 Construction Equipment*, presents a summary of the modeled equipment for construction within the golf course site.

Table 4.2-8
PHASE 2 CONSTRUCTION EQUIPMENT

Equipment	Horsepower	Number	Hours/Day
Site Preparation			
Rubber-tired Dozers	367	3	8
Tractors/Loaders/Backhoes	84	4	8
Water Trucks	376	1	4
Grading			
Excavators	36	2	8
Graders	148	1	8
Rubber-tired Dozers	367	1	8
Scrapers	423	2	8
Tractors/Loaders/Backhoes	84	2	8
Water Trucks	376	1	4
Underground Utilities			
Excavators	36	2	8
Building Construction			
Cranes	367	1	7
Forklifts	82	3	8
Generator Sets	14	1	8
Tractors/Loaders/Backhoes	84	3	7
Welders	46	1	8
Water Trucks	376	1	4
Architectural Coating			
Air Compressors	37	1	6
Paving			
Pavers	81	2	8
Paving Equipment	89	2	8
Rollers	36	2	8

Source: HELIX 2025a

Table 4.2-9
PHASE 3 CONSTRUCTION EQUIPMENT

Equipment	Horsepower	Number	Hours/Day
Grading			
Rubber-tired Dozers	367	3	8
Graders	148	1	8
Tractors/Loaders/Backhoes	84	1	8
Water Trucks	376	1	1
Clubhouse Interior Painting			
Air Compressors	37	1	6
Parking Lot Pavement Renovations			
Pavers	81	1	8
Paving Equipment	89	1	8
Rollers	36	1	8

Source: HELIX 2025a

Construction On-Road Trips

Worker commute trips and vendor delivery trips were modeled based on CalEEMod defaults. Worker trips for Phase 1 construction are anticipated to vary between 20 and 188 trips per day, depending on construction activity. Exporting vegetation/debris from the site during Phase 1 site preparation would result in approximately 80 one-way haul trips (an average of approximately 2 one-way trips per workday). Phase 1 paving would require 97 loads of aggregate/asphalt import based on 12 inches of uncompressed depth and 16 CY per tandem trailer load, resulting in 86.6 one-way trips per day.

Worker trips for Phase 2 construction are anticipated to vary between 20 and 204 trips per day, depending on construction activity. Exporting vegetation from the site during Phase 2 site preparation would result in approximately 100 one-way haul trips resulting in an average of approximately 2 one-way trips per workday. Phase 2 grading would require an export of 8,610 CY resulting in approximately 1,076 one-way haul trips and an average of approximately 22 one-way trips per workday. Phase 2 paving would require 97 loads of aggregate/asphalt import based on 12 inches of uncompressed depth and 16 CY per tandem trailer load, resulting in approximately 39 one-way trips per day.

Worker trips for Phase 3 construction are anticipated to vary between 6 and 10 trips per day, depending on construction activity. The CalEEMod default worker, vendor and haul trip distances, and default fleet mixes, were used in the model for all phases of construction.

Construction Architectural Coatings

Architectural coatings applied during construction were assumed to be building interior and exterior coatings and pavement markings. The Project would use building architectural coatings (e.g., paint) with VOC content not to exceed 50 g/L in accordance with the SCAQMD's limits in Rule 1113 for standard building paints (i.e., building envelope coating, flat coating, floor coating, and non-flat coating). Per SCAQMD Rule 1113, pavement marking would have a maximum VOC content of 100 g/L. CalEEMod does not have the capability to calculate VOC emissions from the application of swimming pool coatings; however, these emissions were calculated separately (see Appendix B to Appendix B of the EIR), assuming the coatings would have the maximum allowable VOC content of 340 g/L for swimming pool coatings per SCAQMD Rule 1113. The area to be coated was estimated from the site plan and assumed to occur over four workdays.

4.2.4.2 LST Dispersion Modeling

Where daily localized criteria pollutant emissions exceeded the SCAQMD LSTs, localized impacts were analyzed using the CalEEMod output data for on-site emissions and dispersion modeling to determine if the SCAQMD construction period concentration thresholds would be exceeded. Localized pollutant concentrations were modeled using Lakes AERMOD View version 12.0.0. The Lakes program utilizes the USEPA's AERMOD Gaussian air dispersion model version 23132. AERMOD is a steady-state, multiple-source, Gaussian dispersion model designed for use with emission sources situated in terrain where ground elevations can exceed the release heights of the emission sources (i.e., complex terrain). Modeling was completed using the methodology described in SCAQMD's LST Methodology (SCAQMD 2008a) and Modeling Guidance for AERMOD (SCAQMD 2024b). The LST dispersion modeling input calculation sheets and output reports are included in Appendix D to Appendix B of the EIR.

Source Parameters

Emissions of PM_{10} and $PM_{2.5}$ produced on-site during Project construction were modeled as area sources with a release height of zero meters and an initial plume height of one meter. To be conservative in modeling 24-hour pollutant concentrations from construction in the industrial and residential sites, all construction equipment was assumed to be working in an area near the closest off-site sensitive receptor locations: at the east end of the industrial site encompassing Building 5 and Building 6; and at the south end of the residential site encompassing the area between the residential neighborhood to the west and the golf course driving range to the east. Modeling assumed eight hours of construction equipment use per day occurring Monday through Friday from 8 a.m. to 4 p.m.

Meteorological Data

SCAQMD provides pre-processed meteorological data suitable for use with AERMOD (SCAQMD 2017). The available data set recommended by SCAQMD for the Project area was from the Azusa station, approximately 0.25 mile south of the industrial site. Urban dispersion coefficients with a Los Angeles County population of 9,818,605 were selected in the model in accordance with SCAQMD modeling recommendations (SCAQMD 2024b).

Terrain Data

U.S. Geological Survey (USGS) Digital Elevation Model files with a 30-meter resolution covering an area approximately 1.4 kilometers by 1.4 kilometers around the Project site were used in the model to cover the analysis area. Terrain data was imported to the model using AERMAP, a terrain preprocessing program for AERMOD.

4.2.4.3 Operational Sources

Operational emissions were estimated using CalEEMod. Operational sources of criteria pollutant emissions include mobile (transportation), area, and energy. Emissions associated with water/wastewater, solid waste, and refrigerants are also calculated in CalEEMod; however, these sources generate GHG emissions, and the methodology related to modeling of these sources is described in Section 4.7, *Greenhouse Gas Emissions*.

Mobile (Transportation) Sources

Operational emissions from mobile source emissions are associated with Project-related VMT (calculated in the model from trip generation and trip lengths). Per the TIS prepared for the Project, the industrial site would generate 1,719 average daily trips (ADT), the residential site would generate 831 ADT, and the golf course site would generate 273 ADT (Linscott, Law & Greenspan, Engineers [LLG] 2024). For the industrial site, 88 daily truck trips were estimated in the TIS, of which 32.7 percent would be two-axle trucks, 17.9 percent would be three-axle trucks, and 49.9 percent would be four or more axle trucks (LLG 2024). The industrial site truck fleet mix was modeled in CalEEMod; two-axle trucks were assumed to be light-heavy duty two (10,001 to 14,000 pounds gross vehicle weight), three-axle trucks were assumed to be medium-heavy duty (14,001 to 33,000 pounds gross vehicle weight), and four or more axle truck were assumed to be heavy-heavy duty (greater than 33,000 pounds gross vehicle weight). The fleet mix for all other trips were modeled using CalEEMod defaults.

Truck trip distances were modeled using the SCAQMD recommended distance of 40 miles for warehouse projects, assuming only the local portion of each truck trip (local delivery or highway access) would result in new VMT to the region. CalEEMod default trip distances and purposes were used for all other trips.

Area Sources

Area sources include emissions from landscaping equipment, the use of consumer products, and the reapplication of architectural coatings for maintenance. Emissions associated with area sources were estimated using the CalEEMod default values, which incorporate maximum VOC content restrictions per SCAQMD Rule 1113 described above.

Energy Sources

Development within the Project site would use electricity for lighting, heating, cooling, and appliances. Electricity generation typically entails the combustion of fossil fuels, including natural gas and coal, which is then transmitted to end users. A building's electricity use is thus associated with the off-site or indirect emission of GHGs at the source of electricity generation (power plant). Project buildings except for the proposed residential site clubhouse and existing golf course clubhouse would be all-electric (would not use natural gas). Therefore, the default CalEEMod natural gas use for industrial site and residential buildings was converted to the equivalent energy in electricity and added to the CalEEMod default electricity use. The default natural gas consumption for the two clubhouse buildings was maintained. The 2022 version of Title 24 Part 6 requires most new commercial and industrial buildings in California to install on-site photovoltaic electricity generation (e.g., solar panels). The minimum solar panel electrical generation capacity for Project buildings was calculated per 2022 Title 24 Part 6, equation 140.110-A and equation 170.2-C. The solar energy generated was accounted for in the modeling using measure E-10-B in the CalEEMod measures section.

4.2.4.4 Health Risk Assessment

An HRA was prepared to analyze potential health risks to nearby sensitive receptors and off-site workers from the emission of DPM during operation of the industrial site in accordance with applicable portions of the OEHHA's *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA 2015), and applicable portions of the SCAQMD's *Modeling Guidance for AERMOD* (SCAQMD 2024b). Methodology related to preparation of the HRA is summarized briefly here and further detailed in Appendix B. HRA modeling inputs and outputs are included in Appendix E to Appendix B of the EIR.

TAC Emissions

DPM emissions calculations used in the Project HRA were based on PM_{10} exhaust emissions from the truck trip generation provided in the TIS (LLG 2024). Emissions of DPM from trucks circulating and idling within the industrial site were calculated using emission factors from CARB's EMFAC2021 version 1.0.2 online database and the truck fleet mix estimated from the Project TIS, as detailed for mobile source emissions above. Because five percent of the Project's industrial building space could be used for refrigerated warehousing, five percent of all trucks (4.4 out of 88) entering or exiting the industrial site were assumed to be equipped with a TRU. All TRUs were assumed to be directly powered by a diesel engine or be electrically powered and supplied by a diesel-powered generator mounted on the truck or

trailer. Emissions of DPM for TRUs were calculated using emission factors from CARB's OFFROAD2021 version 1.0.6 online database.

Dispersion Modeling

Localized concentrations of DPM were modeled using Lakes AERMOD View version 12.0.0. Plot files from AERMOD using unitized emissions (one gram per second) for each DPM source were imported into CARB's Hotspots Analysis and Reporting Program, Air Dispersion Modeling and Risk Tool (ADMRT) version 22118. The ADMRT calculated ground-level concentrations of DPM utilizing the imported plot files and the annual and hourly emissions inventory.

Source Parameters

Trucks circulating within the industrial site were modeled as line volume sources, while trucks parked in the loading dock and parking areas were modeled as volume sources. Emissions calculated for each source include trucks moving; trucks idling for the maximum allowable 5 minutes per CCR Title 13, Sections 2449(d)(3) and 2485, plus one additional minute corresponding to low speed reversing in the loading dock areas; and 2.2 TRUs running for four hours per day. Emissions of DPM would not be constant throughout the day. However, since the industrial buildings are assumed to operate 24 hours per day, 7 days per week, the truck volume was assumed to be steady throughout all hours of the day and week (the variable emissions option for source parameters was not used).

Meteorological Data

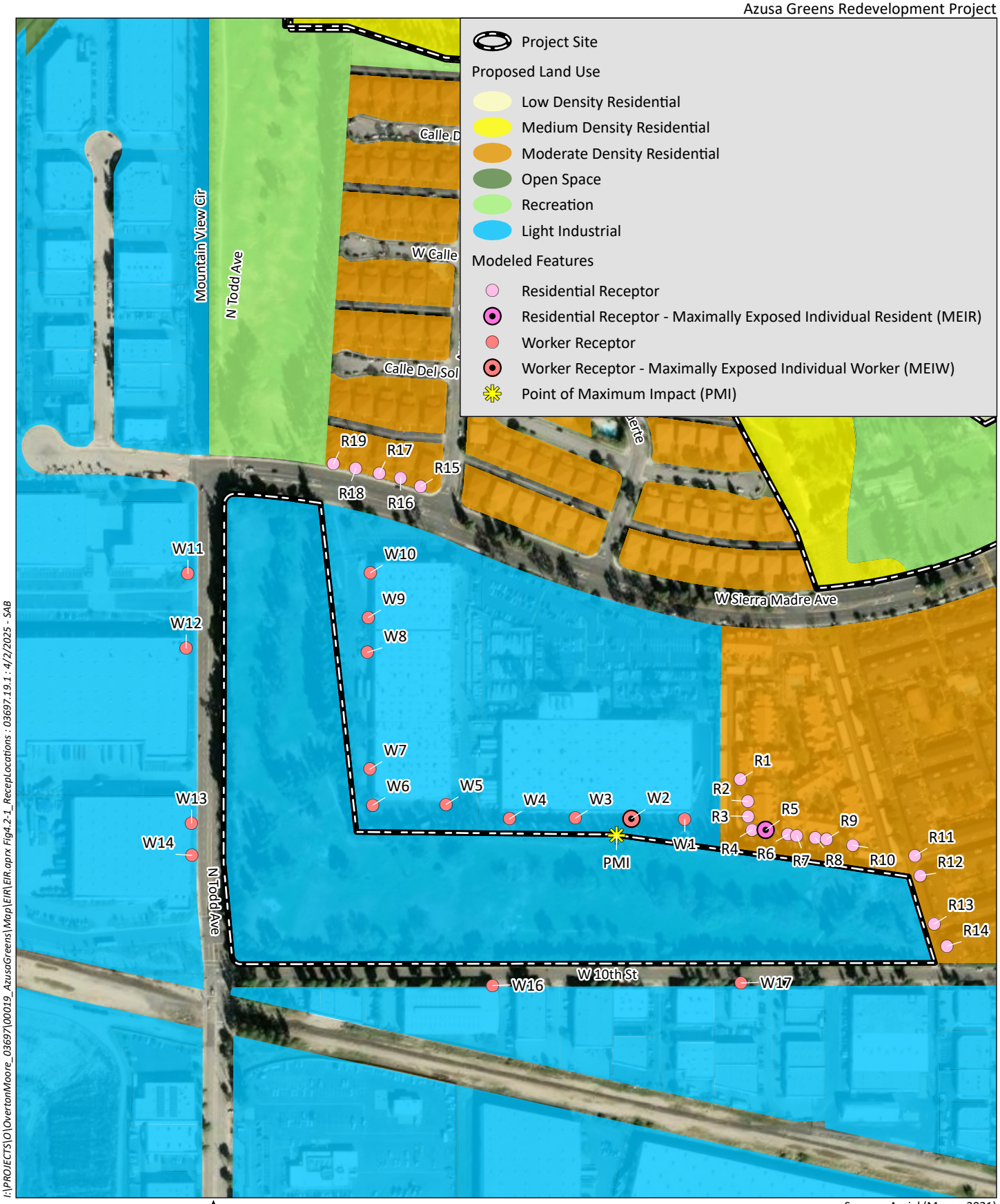
SCAQMD provides pre-processed meteorological data suitable for use with AERMOD (SCAQMD 2017). The available data set recommended by SCAQMD for the Project area was from the Azusa station, approximately 0.25 mile south of the industrial site. Urban dispersion coefficients with a Los Angeles County population of 9,818,605 were selected in the model in accordance with SCAQMD modeling recommendations (SCAQMD 2024b).

Terrain Data

USGS Digital Elevation Model files with a 30-meter resolution covering an area approximately 1.4 kilometers by 1.4 kilometers around the Project site were used in the model to cover the analysis area. Terrain data was imported to the model using AERMAP.

Receptor Modeling

To develop risk isopleths (linear contours showing equal level of risk), receptors were placed in a cartesian grid 1,400 meters by 1,400 meters (approximately 0.87 mile by 0.87 mile), centered on the Project site with a grid spacing of 20 meters (66 feet), in accordance with the SCAQMD guide recommendations (SCAQMD 2024b). To ensure the area of maximum off-site impact was captured, receptors were placed along the industrial site boundary at 10-meter (33-foot) intervals. Additional discrete receptors were placed at the closest primary outdoor spaces for the 19 closest residences around the industrial site and 17 closest worker locations (commercial or industrial buildings). See Figure 4.2-1, *Health Risk Assessment Receptor Locations*.



Source: Aerial (Maxar, 2021)

HELIX Environmental Planning

Health Risk Assessment Receptor Locations

Figure 4.2-1

Risk Determination

Health risks resulting from localized concentration of DPM were estimated using the ADMRT. The latest cancer slope factors and chronic Reference Exposure Limits, and exposure paths for all TACs designated by CARB are included in ADMRT. For the residential cancer risk, an exposure duration of 30 years was selected in accordance with the OEHHA guidelines (OEHHA 2015).

The model conservatively assumes that residents would be standing and breathing outdoors at the location of the property line closest to the Project every day between 17 and 21 hours per day (depending on the age group, starting with infants in utero in the third trimester of pregnancy) for 30 years. The Risk Management Policy using the derived method for the intake rate percentile was selected in accordance with the SCAQMD guide recommendations (SCAQMD 2024b). For off-site worker cancer risk, an exposure duration of 25 years was selected with an assumption of 8 hours per day, 5 days per week of exposure while standing outside with moderate intensity breathing rates, in accordance with the OEHHA guidelines. Because DPM only has an inhalation cancer slope factor and an inhalation chronic Reference Exposure Limit, only the cancer risk and chronic risk from exposure to DPM was evaluated (acute risk and 8-hour chronic risk would be zero), and only the inhalations pathway was evaluated.

Cancer burden evaluates an overall population's increased cancer risk and is defined as the increases in cancer cases in the population due exposure to TACs from a project. Cancer burden is calculated differently from individual risk. Per OEHHA, cancer burden uses a 70-year exposure to evaluate population-wide cancer risk, and the cancer burden only evaluates residential exposure (not worksites). Cancer burden is calculated by multiplying the number of residents exposed to an incremental excess cancer risk of 1 in 1 million or greater by the estimated incremental excess cancer risk of the maximally exposed individual resident.

4.2.5 Impact Analysis

4.2.5.1 Air Quality Plans

Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The 2022 AQMP, adopted by SCAQMD and described further in Section 4.2.2.3, is the applicable air quality plan for the Project. In accordance with the procedures established in SCAQMD's CEQA Air Quality Handbook, the following criteria are required to be addressed to determine the Project's consistency with applicable SCAQMD and SCAG policies (SCAQMD 1993):

- Criterion 1: Would the Project result in any of the following:
    - An increase in the frequency or severity of existing air quality violations;
    - Cause or contribute to new air quality violations; or
    - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?

- Criterion 2: Would the Project exceed the assumptions utilized in preparing the AQMP?
    - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
    - Does the Project include air quality mitigation measures; or
    - To what extent is Project development consistent with the AQMP control measures?

Criterion 1

As discussed in Section 4.2.5.2, below, the construction and operation of the Project would not result in emissions of criteria pollutants and precursors exceeding the SCAQMD's thresholds. The threshold levels have been established to ensure that typical development projects, which do not exceed the threshold levels, would not increase the frequency or severity of existing air quality violations or contribute to new air quality violations. Therefore, the Project would not conflict with criterion 1.

Criterion 2

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the Azusa General Plan and SCAG's RTP/SCS.

At full buildout, the Project is estimated to support 481 jobs on-site, comprised of 464 full-time equivalent jobs from the industrial site, 5 from the residential site, and 12 from the golf course site. The residential site is estimated to have a population of 465 people (refer to Section 4.12, *Population and Housing*). The Project proposes a General Plan amendment for the industrial site to change the land use designation from Recreation to Light Industrial and for the residential site to change the land use designation from Recreation to Neighborhood General 3 Medium Density Residential. A change in land use does not necessarily result in a conflict with the AQMP. However, the General Plan amendments required to implement the Project would result in more emissions-intensive land uses than those accounted for in SCAG's RTP/SCS, which reflects the adopted land uses of the Azusa General Plan. Therefore, further discussions of the Project's emissions and Project consistency with mobile source emission assumptions underlying the AQMP are provided below.

As discussed in Section 4.2.5.2, below, the Project's construction and operational emissions would not exceed the SCAQMD's regional thresholds, and no air quality mitigation measures would be required. The Project would comply with all applicable rules and regulations including the SCAMQD's Rule 403 which requires control of fugitive dust and implementation of BMPs, and Rule 1113 which limits the VOC content in paints.

Pursuant to H&SC Section 40460, SCAG has the responsibility of preparing and approving portions of the AQMP relating to the integration of regional land use programs, measures, and strategies. The SCAQMD combines its portion of the AQMP with those prepared by SCAG. The RTP/SCS and Transportation Control Measures, included in the 2022 AQMP/SIP for the SCAB, are based on SCAG's 2020-2045 RTP/SCS (the previous RTP/SCS).

For typical land use development projects, the 2020-2045 RTP/SCS land use control measures (i.e., goals and policies) focus on the reduction of vehicle trips and VMT. The Project site is not located in an area identified in the 2020-2045 RTP/SCS for dense growth, transportation-oriented development, or focused transportation and multi-modal improvements. Per the Project VMT analysis in the TIS, the Project's industrial site, residential site, and golf course site would generate VMT per capita (i.e., VMT per Project employee and VMT per Project resident) that would exceed the applicable thresholds (refer to Section 4.15, *Transportation*). With all feasible mitigation applied, the Project's VMT impact would be significant and unavoidable (LLG 2024). Therefore, the Project would conflict with the 2022 AQMP transportation control measures based on the SCAG's 2020-2045 RTP/SCS.

Level of Significance Prior to Mitigation

Implementation of the Project could conflict with or obstruct implementation of the applicable air quality plan; therefore, impacts would be potentially significant.

Mitigation Measures

The primary source of the conflict with the 2022 AQMP is the Project's unaccounted for emissions from the change in land use and the Project's VMT impact. As discussed further in Section 4.15, *Transportation*, the Project would generate VMT per capita that would exceed the applicable thresholds, and while mitigation measures TR-1 through TR-4 to reduce Project VMT are identified, the Project's VMT impact would remain significant and unavoidable. Because there would be no feasible mitigation which would further reduce the VMT impact, there would be no feasible mitigation which would reduce the impact from conflicts with the 2022 AQMP to less than significant.

Level of Significance After Mitigation

Mitigation measures TR-1 through TR-4 would reduce VMT of the Project but would not reduce VMT impacts below the applicable threshold. No feasible mitigation measures have been identified that would reduce this impact below a level of significance. Therefore, impacts would be significant and unavoidable.

4.2.5.2 Air Quality Standards

Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard?

By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development within the region. The Project would generate criteria pollutants and precursors in the short-term during construction and the long-term during operation. To determine whether a project would result in cumulatively considerable emissions that would violate an air quality standard or contribute substantially to an existing or projected air quality violation, a project's emissions are evaluated based on the quantitative emission thresholds provided in Table 4.2-5.

Construction Emissions

The Project construction emissions were estimated using CalEEMod as described in Section 4.2.4. The results of the calculations for the combined concurrent construction activity maximum daily emissions

of the Project are compared to the SCAQMD's thresholds in Table 4.2-10, *Maximum Daily Construction Emissions*. The data shown does not include any reduction from fugitive dust control measures required for compliance with SCAQMD Rule 403 and application of building coatings with a VOC content of 50 g/L or less in compliance with SCAQMD Rule 1113.

Table 4.2-10
MAXIMUM DAILY CONSTRUCTION EMISSIONS

Concurrent Activities	Pollutant Emissions (pounds per day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Phase 1 Site Preparation	3.6	33.3	32.9	<0.1	21.4	11.5
Phase 1 Grading, Underground Utilities; Phase 2 Site Preparation; Phase 3 Grading	8.3	72.5	76.4	0.1	39.7	20.2
Phase 1 Grading, Underground Utilities; Phase 2 Site Preparation; Phase 3 Paving	7.8	63.7	68.3	0.1	32.2	16.4
Phase 1 Grading, Underground Utilities; Phase 2 Site Preparation; Phase 3 Architectural Coating	23.7	61.0	64.4	0.1	32.1	16.2
Phase 1 Grading; Phase 2 Site Preparation	7.0	61.9	63.2	0.1	32.0	16.3
Phase 1 Building Construction; Phase 2 Site Preparation	5.3	44.5	54.9	0.1	24.1	12.3
Phase 1 Building Construction; Phase 2 Grading, Underground Utilities	5.5	46.0	58.4	0.1	14.1	6.0
Phase 1 Building Construction; Phase 2 Underground Utilities, Building Construction	3.9	27.1	52.1	<0.1	5.8	2.0
Phase 1 Building Construction; Phase 2 Building Construction	3.7	25.5	49.7	<0.1	5.7	1.9
Phase 1 Building Construction, Architectural Coating; Phase 2 Building Construction	30.5	26.8	49.5	<0.1	6.1	2.1
Phase 1 Building Construction, Architectural Coating, Paving; Phase 2 Building Construction	32.5	41.3	63.0	0.1	8.3	2.9
Phase 2 Building Construction	1.7	11.4	22.6	<0.1	2.9	0.9
Phase 2 Building Construction, Architectural Coating	19.8	12.4	27.3	<0.1	3.3	1.0
Phase 2 Building Construction, Swimming Pool Coating	18.9	11.2	24.1	<0.1	2.9	0.9
Phase 2 Paving	1.1	9.8	12.0	<0.1	1.2	0.5
Maximum Daily Emissions	32.5	72.5	76.4	0.1	39.7	20.2
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2025a; SCAQMD 2019
VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides;
PM_{10} = coarse particulate matter, 10 microns or less in diameter; $PM_{2.5}$ = fine particulate matter, 2.5 microns or less in diameter

As shown in Table 4.2-10, the short-term construction-related emissions from combined concurrent Project construction activities would not exceed the SCAQMD's thresholds for emissions for any criteria pollutant or precursor.

Construction of the golf course site is anticipated to be complete in January 2026, and operation of the golf course site would occur concurrently with construction of the residential site and industrial site from February 2026 through December 2026. Maximum daily combined residential site and industrial site construction emissions during this overlap period would occur in December 2026 (combined Phase 1 Building Construction, Phase 1 Architectural Coating, Phase 1 Paving, and Phase 2 Building Construction); see Table 4.2-10 above. Industrial site construction is anticipated to be complete in December 2026, and operation of the industrial and golf course sites would occur concurrently with residential site construction from January 2027 through September 2027. The combined maximum daily Project emissions for concurrent construction and operation for 2026 and 2027 are shown in Table 4.2-11, *Concurrent Construction and Operational Emissions*.

Table 4.2-11
CONCURRENT CONSTRUCTION AND OPERATIONAL EMISSIONS

Combined Activities	Pollutant Emissions (pounds per day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2026						
Phase 1 and Phase 2 Maximum Daily Construction in December 2026	32.5	41.3	63.0	0.1	8.3	2.9
Phase 3 Maximum Daily Operation	2.8	1.0	10.6	<0.1	2.6	0.7
Maximum Daily Combined Emissions in 2026[1]	**35.3**	**42.3**	**73.6**	**0.1**	**10.9**	**3.6**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***	***No***
2027						
Phase 2 Maximum Daily Construction 2027	19.8	12.4	27.3	<0.1	3.3	1.0
Phase 1 Maximum Daily Operation	17.0	14.4	82.1	0.3	18.8	5.0
Phase 3 Maximum Daily Operation	2.8	1.0	10.6	<0.1	2.6	0.7
Maximum Daily Combined Emissions in 2027[1]	**39.6**	**27.8**	**119.9**	**0.3**	**24.7**	**6.7**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2025a; SCAQMD 2019

[1] Totals may not sum due to rounding.

VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = coarse particulate matter, 10 microns or less in diameter; $PM_{2.5}$ = fine particulate matter, 2.5 microns or less in diameter

As shown in Table 4.2-11, the combined daily emissions from concurrent Project construction and operation would not exceed the SCAQMD's thresholds for emissions for any criteria pollutant or precursor.

As shown in Tables 4.2-10 and 4.2-11, construction activities associated with the development of the proposed Project would not substantially contribute to the SCAB's nonattainment status for ozone, PM_{10}, or $PM_{2.5}$. Therefore, construction of the proposed Project would not violate an air quality standard or contribute to an existing or projected air quality violation.

Operational Emissions

The Project's operational emissions were estimated using CalEEMod, as described in Section 4.2.4, for the earliest anticipated first full year of Project operation, 2028. Table 4.2-12, *Maximum Daily Operational Emissions*, compares the Project's maximum daily operational emissions for operation of all three components with the SCAQMD's thresholds.

Table 4.2-12
MAXIMUM DAILY OPERATIONAL EMISSIONS

Source	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile	9.4	16.9	101.1	0.3	28.2	7.4
Area	22.1	--	29.3	<0.1	<0.1	<0.1
Energy	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Maximum Daily Emissions[1, 2]	**31.4**	**17.0**	**130.5**	**0.3**	**28.2**	**7.4**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2025a; SCAQMD 2019

[1] Total may not sum due to rounding.

[2] Maximum daily emissions of VOC, CO, SO_X, PM_{10}, and $PM_{2.5}$ would occur during summer, maximum daily emission of NO_X would occur during winter.

VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 4.2-12, the Project's final operational emissions for the anticipated first full year of operation would not exceed the SCAQMD's thresholds. Accordingly, the Project's operational emissions would not substantially contribute to the SCAB nonattainment status for ozone, PM_{10}, and $PM_{2.5}$. Long-term operation of the Project would not violate an air quality standard or contribute to an existing or projected air quality violation.

Level of Significance Prior to Mitigation

Implementation of the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Construction and operation of the Project would not violate an air quality standard or contribute to an existing or projected air quality violation and the impact would be less than significant.

Although this impact would be less than significant without mitigation, mitigation required to reduce impacts to sensitive receptors (discussed below in Section 4.2.5.3) would result in reductions of emissions of criteria pollutants and precursors during Project construction. Mitigation measure AQ-1 would require applications of water to all exposed surfaces a minimum of three times per day and mitigation measure AQ-2 would require all diesel-powered off-road equipment with 25 or more

horsepower to meet USPEA Tier 4 Final emissions standards. For informational purposes, the reductions in emissions of criteria pollutants and precursors during Project construction resulting from mitigation measures AQ-1 and AQ-2 addressing impacts to sensitive receptors are shown in Table 4.2-13, *Construction Emissions Reductions from Mitigation*.

Table 4.2-13
CONSTRUCTION EMISSIONS REDUCTIONS FROM MITIGATION

Source	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Maximum daily emissions without mitigation	32.5	72.5	76.4	0.1	39.7	20.2
Maximum daily emissions with mitigation	30.2	21.3	87.8	0.1	10.4	4.9
Percent Change	**-7.1%**	**-70.7%**	**+14.9%**	**0.0%**	**-73.8%**	**-75.5%**

Source: HELIX 2025a
VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = coarse particulate matter, 10 microns or less in diameter; $PM_{2.5}$ = fine particulate matter, 2.5 microns or less in diameter

4.2.5.3 Sensitive Receptors

Would the Project expose sensitive receptors to substantial pollutant concentrations?

Construction Activities

Criteria Pollutants

The localized effects from the on-site portion of daily construction emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's LST method, described in Section 4.2.3. The proposed Project site is within source receptor area 9, East San Gabriel Valley. Consistent with the LST guidelines, when quantifying mass emissions for localized analysis, only emissions that occur on-site are considered. Emissions related to off-site delivery/haul truck activity and construction worker trips are not considered in the evaluation of construction-related localized impacts, as these mobile emissions are spread along area roadways and are not localized.

Per the SCAQMD *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds* (SCAQMD 2025), the site area should correspond to the maximum area disturbed per day calculated using the CalEEMod default methodology for determining acres grade per day, which assumes 0.5 acre per day per dozer or grader and 1 acre per day per scraper. The maximum daily construction emissions for each of the industrial site and residential site would occur during site preparation when the use of three rubber-tired dozers is anticipated, resulting in 1.5 acres disturbed per day. The maximum daily construction emissions for the golf course site would occur during grading when the use of a rubber-tired dozer and a grader is anticipated, resulting in 1 acre disturbed per day. Therefore, the LSTs used in the analysis are those for: source receptor area 9; receptors located between 0 and 25 meters (0 to 82 feet); 1 to 2 acre site for the industrial and residential site; and 0 to 1 acre site for the golf course site. Table 4.2-14, *Unmitigated Maximum Localized Daily Construction Emissions*, shows the maximum localized construction emissions, without accounting for any fugitive dust control measures, for each phase in comparison with the applicable LSTs.

Table 4.2-14
UNMITIGATED MAXIMUM LOCALIZED DAILY CONSTRUCTION EMISSIONS

Construction Phase	Pollutant Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Phase 1 – Industrial Site, Site Preparation	33.0	31.7	21.7	11.4
Phase 2 – Residential Site, Site Preparation	30.4	31.1	20.9	11.3
SCAQMD LSTs (2 acres; 25 meters)	*128*	*953*	*7*	*5*
Exceed LST (2 acre; 25 meters)?	*No*	*No*	***Yes***	***Yes***
Phase 3 – Golf Course Site, Grading	12.4	13.0	7.6	3.9
SCAQMD LST (1 acre; 25 meters)	*89*	*623*	*5*	*3*
Exceed LST (1 acre; 25 meters)?	*No*	*No*	***Yes***	***Yes***

Source: HELIX 2025a; SCAQMD 2009
NO_X = nitrogen oxides; CO = carbon monoxide; PM_{10} = coarse particulate matter, 10 microns or less in diameter; $PM_{2.5}$ = fine particulate matter, 2.5 microns or less in diameter

As shown in Table 4.2-14, localized emissions for NO_X and CO would remain below their respective SCAQMD LSTs. However, localized emissions for PM_{10} and $PM_{2.5}$ would exceed their respective SCAQMD LSTs. Therefore, dispersion modeling was conducted, as described in Section 4.2.4.2, to determine if pollutant concentrations, measured at the closest sensitive receptor locations, from Project construction on-site sources would exceed the SCAQMD's thresholds for 24-hour PM_{10} concentration, annual PM_{10} concentration, or 24-hour $PM_{2.5}$ concentration. SCAQMD has not adopted a threshold for annual average $PM_{2.5}$ concentration.

The maximum hourly and maximum annual PM_{10} and $PM_{2.5}$ on-site project construction emissions were calculated from the CalEEMod results. The highest concentrations of PM_{10} and $PM_{2.5}$, calculated at the closest outdoor use space (i.e., side yard, back yard, patio) for the closest residences to the Project site, without mitigation or consideration of any dust control measures, are compared to the SCAQMD project-level concentration thresholds in Table 4.2-15, *Unmitigated Localized Particulate Matter Concentrations*.

Table 4.2-15
UNMITIGATED LOCALIZED PARTICULATE MATTER CONCENTRATIONS

Location	Calculated Concentration ($\mu g/m^3$)	SCAQMD Threshold ($\mu g/m^3$)	Exceed Threshold?
PM_{10} 24-hour Average			
Industrial Site	29.7	10.4	**Yes**
Residential Site	30.3	10.4	**Yes**
Golf Course Site	27.4	10.4	**Yes**
PM_{10} Annual Average			
Industrial Site	0.5	1.0	No
Residential Site	0.5	1.0	No
Golf Course Site	0.1	1.0	No
$PM_{2.5}$ 24-hour Average			
Industrial Site	16.0	10.4	**Yes**
Residential Site	16.4	10.4	**Yes**
Golf Course Site	12.8	10.4	**Yes**

Source: HELIX 2025a
PM_{10} = coarse particulate matter, 10 microns or less in diameter; $PM_{2.5}$ = fine particulate matter, 2.5 microns or less in diameter; $\mu g/m^3$ = micrograms per cubic meter

As shown in Table 4.2-15, annual average PM_{10} would not exceed the SCAQMD thresholds for ambient concentration for any of the sites. However, 24-hour average concentrations of PM_{10} and $PM_{2.5}$ would exceed the SCAQMD thresholds for ambient concentrations for all three sites. Therefore, construction of the Project could result in exposure of sensitive receptors to substantial localized concentrations of criteria pollutants and precursors.

Toxic Air Contaminants (DPM)

Implementation of the Project would result in the use of heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles. These vehicles and equipment could generate the TAC DPM. Generation of DPM from construction projects typically occurs in a localized area (e.g., at the Project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction (e.g., grading, building construction), the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. During some equipment-intensive phases, such as grading, construction-related emissions would be higher than during other less equipment-intensive phases, such as building construction. Concentrations of mobile-source DPM emissions are typically reduced by 70 percent at approximately 500 feet (CARB 2005).

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has with the substance; a longer exposure period to a fixed quantity of emissions would result in higher health risks. Current models and methodologies for conducting cancer HRAs are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from OEHHA) and are best suited for evaluation of long duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime (OEHHA 2015). Considering this information, the short duration of construction activity using heavy earth moving equipment (four months for industrial site construction and six months for residential site construction), the highly dispersive nature of DPM, and the fact that construction activities would occur at various locations throughout the Project site, construction of the Project would not expose off-site sensitive receptors to substantial DPM concentrations.

Operational Activities

Criteria Pollutants

As discussed in Section 4.2.4, SCAQMD has developed the LST methodology that can be used by public agencies to determine whether a project may generate significant adverse localized air quality impacts from on-site emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$. For Project operational activities, emissions of NO_X and CO are associated with truck and passenger vehicle emissions which primarily occur off-site. The portion of truck and passenger vehicle emissions which occur on-site are limited to low-speed circulation and idling and would be a small portion of the Project operational emissions of 17 pounds per day of NO_X and 133 pounds per day of CO, far below the applicable operational LST thresholds (for source receptor area 9, 5 acres, with receptors between 0 and 25 meters) of 203 pounds per day of NO_X and 1,733 pounds per day of CO.

Operational PM_{10} and $PM_{2.5}$ emissions from area sources (primarily landscape equipment exhaust) would be negligible—less than 0.1 pound per day. The only remaining on-site operational source of PM emissions would be low-speed circulation and idling exhaust emissions from trucks. Project on-site PM exhaust emission (i.e., DPM) were calculated for the HRA, as described in Section 4.2.4.4. The total DPM emissions produced on or near the Project site by Project-related truck trips would be approximately 6.8 pounds per year (0.02 pounds per day), far below the LST threshold of 4 pounds per day for PM_{10} and 2 pounds per day for $PM_{2.5}$. Therefore, operation of the Project would not result in exposure of sensitive receptors to substantial localized concentrations of NO_X or CO. Impacts related to exposure of sensitive receptors to Project operational emissions of PM (primarily DPM) are discussed and evaluated further below.

CO Hotspots

Vehicle exhaust is the primary source of CO. In an urban setting, the highest CO concentrations are generally found in close proximity to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as the distance from the emissions source (e.g., congested intersection) increases. Project-generated traffic has the potential of contributing to localized "hotspots" of CO off-site. Because CO is a byproduct of incomplete combustion, exhaust emissions are worse when fossil fueled vehicles are operated inefficiently, such as in stop-and-go traffic or through heavily congested intersections. Because CO disperses rapidly, hotpots are most likely to occur in areas with limited vertical mixing, such as tunnels, long underpasses, or below-grade roadways.

The analysis prepared for CO attainment in the SCAB by SCAQMD can be used as a screening tool in evaluating the potential for CO exceedances in the SCAB. CO attainment was thoroughly analyzed as part of SCAQMD's 2003 AQMP where four high-volume intersections in the Los Angeles metropolitan area at the peak morning and afternoon time periods did not predict a violation of CO standards. The 2003 AQMP indicates the most stringent 1-hour CO standard (20.0 ppm) would not likely be exceeded until the daily traffic at the modeled intersection exceeded more than 400,000 vehicles per day (SCAQMD 2003). Therefore, if an intersection does not exceed 400,000 vehicles per day, then a detailed CO hot spot analysis does not need to be prepared.

According to the intersection analysis contained in the TIS, the highest volume Project-affected intersection would be the intersection of Todd Avenue and Foothill Boulevard. Based on the peak hour conditions of the intersection under the "Future with Project Conditions," as provided in the Project TIS, the intersection would carry a PM peak hour volume of 3,663 and a daily volume of approximately 37,000 vehicles (LLG 2024), substantially below the daily traffic volumes of 400,000 vehicles per day that would be expected to generate CO concentration exceedances. Based on the studies undertaken for the 2003 AQMP, there is no reason unique to the SCAB meteorology or unique to any Project-affected intersection to conclude that the CO concentrations at any Project-affected intersection would exceed the 1-hour CO standard. Therefore, the Project does not trigger the need for a detailed CO hotspot model, and the Project would not expose sensitive receptors to substantial concentrations of CO.

Operational DPM Emissions

Implementation of the Project would result in emissions of DPM from operation of the industrial site, which could include warehouse and refrigerated warehouse operations. To evaluate potential impacts to sensitive receptors from the operational DPM emissions, an HRA was completed, as described in Section 4.2.4.4, above. Because DPM does not have any acute health effect (short-term) or 8-hour non-

cancer chronic effect Reference Exposure Limits, only long-term cancer and non-cancer chronic effects were evaluated.

The estimated community incremental excess cancer risk and non-cancer chronic health risk due to exposure to the Project's operational DPM emissions are presented in Table 4.2-16, *Increased Health Risks for Modeled Receptors*. These estimates are conservative (health protective) and assume that the resident (receptors R1 through R19) or worker (receptors W1 through W17) is outdoors for the entire exposure period (17 to 21 hours per day, every day for 30 years for residents, and 8 hours per day, 260 days per year for 25 years for workers). See Figure 4.2-1 for modeled receptor locations.

As shown in Table 4.2-16, the incremental increased cancer risk would not exceed the SCAQMD's threshold of 10 in 1 million or exceed the SCAQMD's non-cancer chronic health risk threshold of 1.0 HI for any modeled receptors.

The maximally exposed individual resident would be receptor R5, located at the south end of the apartment building directly north of the Building 6 loading docks. Receptor R5 would have an incremental increased cancer risk of 3.5 in 1 million and a non-cancer chronic HI of less than 0.01. The maximally exposed individual worker would be receptor W2, located at the rear of the industrial building directly north of the Building 5 loading docks. Receptor W2 would have an incremental increased cancer risk of 0.5 in 1 million and a non-cancer chronic HI of less than 0.01.

The point of maximum impact would be located at Universal Transverse Mercator coordinates zone 11, 415050 meters east, 3778152 meters north, along the industrial site property line directly north of the proposed industrial Building 5 loading docks (refer to Figure 4.2-1). No residents are anticipated to be located at the point of maximum impact and the point of maximum impact is not in an area where an off-site worker would be located for extended periods (an outdoor workplace or break area for the adjacent industrial business). If a worker receptor was to be located at the point of maximum impact for 25 years, the increased cancer risk would be 0.9 in 1 million, and the non-cancer chronic HI would be less than 0.01.

Cancer burden evaluates an overall population's increased cancer risk and is defined as the increases in cancer cases in the population due exposure to TACs from a project. Cancer burden is calculated differently from individual risk. Per OEHHA, cancer burden uses a 70-year exposure to evaluate population-wide cancer risk, and the cancer burden only evaluates residential exposure (not worksites). Cancer burden is calculated by multiplying the number of residents exposed to an incremental excess cancer risk of 1 in 1 million or greater by the estimated incremental excess cancer risk of the maximally exposed individual resident. The population exposed to the 1 in 1 million or greater cancer risk was estimated by overlaying the 1 in million 70-year risk isopleth on aerial images and counting the number of single and multi-family residential buildings within or touching the isopleth. Seven single-family residences and 14 multi-family buildings (with 100 total estimated dwelling units) were identified within or touching the isopleth. To be conservative (not underestimating the population), all single-family residences were assumed to house 10 residents, and all multi-family dwellings were assumed to house 5 residents, for a total estimated population of 570. The 70-year residential cancer risk for the maximally exposed individual resident would be 4.3 in 1 million (4.3×10^{-6}). Therefore, the estimated cancer burden from a 70-year exposure to industrial site operational DPM emissions would be 0.002, below the SCAQMD threshold of 0.5. Long-term operational DPM emissions from the Project would not result in cancer risk, chronic health risk, or cancer burden exceeding the respective SCAQMD thresholds.

Table 4.2-16
INCREASED HEALTH RISKS FOR MODELED RECEPTORS

Receptor	Cancer Risk (chances per million)	SCAQMD Threshold (chances per million)	Exceed Threshold?	Chronic Health Risk (HI)	SCAQMD Threshold (HI)	Exceed Threshold?
R1	2.1	10	No	<0.01	1.0	No
R2	2.5	10	No	<0.01	1.0	No
R3	2.9	10	No	<0.01	1.0	No
R4	3.5	10	No	<0.01	1.0	No
R5	3.5	10	No	<0.01	1.0	No
R6	3.5	10	No	<0.01	1.0	No
R7	3.4	10	No	<0.01	1.0	No
R8	2.8	10	No	<0.01	1.0	No
R9	2.6	10	No	<0.01	1.0	No
R10	2.0	10	No	<0.01	1.0	No
R11	1.1	10	No	<0.01	1.0	No
R12	1.1	10	No	<0.01	1.0	No
R13	0.9	10	No	<0.01	1.0	No
R14	0.8	10	No	<0.01	1.0	No
R15	1.0	10	No	<0.01	1.0	No
R16	1.0	10	No	<0.01	1.0	No
R17	1.1	10	No	<0.01	1.0	No
R18	1.2	10	No	<0.01	1.0	No
R19	1.2	10	No	<0.01	1.0	No
W1	0.4	10	No	<0.01	1.0	No
W2	0.5	10	No	<0.01	1.0	No
W3	0.4	10	No	<0.01	1.0	No
W4	0.2	10	No	<0.01	1.0	No
W5	0.2	10	No	<0.01	1.0	No
W6	0.3	10	No	<0.01	1.0	No
W7	0.3	10	No	<0.01	1.0	No
W8	0.3	10	No	<0.01	1.0	No
W9	0.3	10	No	<0.01	1.0	No
W10	0.2	10	No	<0.01	1.0	No
W11	0.1	10	No	<0.01	1.0	No
W12	0.1	10	No	<0.01	1.0	No
W13	0.2	10	No	<0.01	1.0	No
W14	0.2	10	No	<0.01	1.0	No
W15	0.1	10	No	<0.01	1.0	No
W16	0.1	10	No	<0.01	1.0	No
W17	0.2	10	No	<0.01	1.0	No

Source: HELIX 2025a
HI = Hazard Index

Level of Significance Prior to Mitigation

Construction of the Project would not expose sensitive receptors to substantial concentrations of DPM and impacts would be less than significant. However, construction could result in significant localized concentrations of criteria pollutants and impacts would be potentially significant. Long-term operation

of the Project would not result in significant localized concentrations of CO. Long-term Project operational DPM emissions would not result in cancer risk, chronic health risk, or cancer burden exceeding the respective SCAQMD thresholds. Therefore, implementation of the Project could expose sensitive receptors to substantial pollutant concentrations, and the impact would be potentially significant.

Mitigation Measures

AQ-1 **Tier 4 Construction Equipment.** All diesel-powered off-road construction equipment, equal to or greater than 25 horsepower, used on the Project site shall meet USEPA Tier 4 Final PM emissions standards. Prior to issuing construction permits, the Project applicant or designated representative shall provide to the City a comprehensive inventory of all diesel-powered off-road construction equipment, equal to or greater than 25 horsepower, to be used on the Project site during any portion of construction. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. The City shall verify that all construction equipment is USEPA Tier 4 Final certified or has been retrofitted with CARB approved diesel particulate matter reduction systems resulting in PM emissions meeting USEPA Tier 4 Final standards.

AQ-2 **Fugitive Dust Best Management Practices**. Prior to issuing construction permits, the City shall verify that Project construction contract or construction documentation specify the requirement to implement all fugitive dust Best Available Control Measures listed in Table 1 of the SCAQMD Rule 403, and the following control measures are enhanced to require watering exposed surface a minimum of three times per day:

- Clearing and Grubbing Control Measure 02-1: Maintain stability of soil through pre-watering of site prior to clearing and grubbing (e.g., site preparation). In addition, during dry weather, water exposed surfaces a minimum of three times per day during clearing and grubbing activities.

- Cut and Fill Control Measure 05-1: Pre-water soils prior to cut and fill activities (e.g., grading). In addition, during dry weather, water all exposed surfaces a minimum of three times per day during cut and fill activities.

Level of Significance After Mitigation

On-site Project construction emissions of PM_{10} and $PM_{2.5}$ would result from exhaust emissions from construction equipment and from fugitive dust resulting from use of construction equipment and movement of vegetation, debris, and soil. Mitigation measure AQ-1 would reduce construction equipment exhaust PM emissions by requiring the use of USEPA certified Tier 4 Final diesel engines (or engines equipped with CARB approved retrofits resulting in equivalent emissions) for all diesel-powered equipment used on the Project site with 25 or more horsepower. Tier 4 Final diesel engines reduce exhaust emissions of PM by 90 percent or more compared to Tier 0 engines. In addition to reducing localized concentrations of PM_{10} and $PM_{2.5}$, mitigation measure AQ-1 has the effect of reducing emissions of DPM during construction, further reducing the less than significant health risks to nearby sensitive receptors.

Mitigation measure AQ-2 would require implementation of enhanced construction fugitive dust BMPs including the requirement to water exposed surfaces a minimum of three times per day during site preparation and grading (the standard BMP is to water exposed surfaces twice per day). Per CalEEMod mitigation defaults, watering exposed surfaces three times per day reduces fugitive dust PM_{10} and $PM_{2.5}$ emissions from equipment use and material loading by 74 percent.

The maximum PM_{10} and $PM_{2.5}$ on-site project construction emissions, with implementation of mitigation measures AQ-1 and AQ-2, were calculated from CalEEMod for use in dispersion modeling. The highest 24-hour concentrations of PM_{10} and $PM_{2.5}$ calculated at the closest outdoor use space (i.e., side yard, back yard, patio) for the closest residences to the Project site, with implementation of mitigation measures AQ-1 and AQ-2, are compared to the SCAQMD project-level concentration thresholds in Table 4.2-17, *Mitigated Localized Particulate Matter Concentrations*.

Table 4.2-17
MITIGATED LOCALIZED PARTICULATE MATTER CONCENTRATIONS

Location	Calculated Concentration (µg/m³)	SCAQMD Threshold (µg/m³)	Exceed Threshold?
PM_{10} 24-hour Average			
Industrial Site	7.4	10.4	No
Residential Site	7.5	10.4	No
Golf Course Site	6.7	10.4	No
$PM_{2.5}$ 24-hour Average			
Industrial Site	3.5	10.4	No
Residential Site	4.0	10.4	No
Golf Course Site	3.3	10.4	No

Source: HELIX 2025a
PM_{10} = coarse particulate matter, 10 microns or less in diameter; $PM_{2.5}$ = fine particulate matter, 2.5 microns or less in diameter; µg/m³ = micrograms per cubic meter

As shown in Table 4.2-17, 24-hour average PM_{10} and $PM_{2.5}$ concentrations from mitigated construction emissions on the Project site would not exceed the SCAQMD concentration thresholds for exposure of sensitive receptors to localized pollutants. Therefore, with implementation of mitigation measure AQ-1 and AQ-2, the Project would not expose sensitive receptors to substantial pollutant concentrations, including localized criteria pollutants, CO hotpots, and TACs. Impacts would be less than significant with mitigation incorporated.

4.2.5.4 Odors

Would the Project result in emissions (such as those leading to odors) adversely affecting a substantial number of people?

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations (SCAQMD 1993). The Project, which involves a light industrial site, a residential site, and a golf course, would not include any of the land uses typically associated with odor complaints, nor are there any of these land uses in the Project vicinity.

Emissions from construction equipment, such as diesel exhaust, VOCs from architectural coatings, and paving activities may generate odors; however, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. Additionally, noxious odors would be confined to the immediate vicinity of construction equipment. Use of diesel-powered equipment during Project construction would be required to comply with CCR Title 13, Sections 2449(d)(3) and 2485, which minimize the idling time of construction equipment either by requiring it to be shut off when not in use and by limiting the time of idling to no more than five minutes. This limitation on idling reduces diesel exhaust, thereby reducing emissions leading to odors. The Project would also be required to comply with SCAQMD Rule 1113, which limits the allowable VOC content in paint and other coatings, reducing VOC emissions leading to odors. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Long-term operation of the Project would not be a substantial source of objectionable odors. Therefore, the Project would not create objectionable odors affecting a substantial number of people.

Level of Significance Prior to Mitigation

Implementation of the Project would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.2.6 Cumulative Impact Analysis

The geographic scope for the air quality cumulative analysis is the SCAB. It is appropriate to consider the entire air basin as air emissions can travel substantial distances and are not confined by jurisdictional boundaries; rather, they are influenced by large-scale climatic and topographical features. While some air quality emissions can be localized, such as a CO hotspot or odor, the overall consideration of cumulative air quality is typically more regional.

The SCAB is a federal and/or state nonattainment area for ozone, PM_{10}, and $PM_{2.5}$. The nonattainment status of regional pollutants is a result of past and present development within the SCAB, and this regional impact is cumulative rather than attributable to any one source. Cumulative projects throughout the air basin generate construction and operational air pollutant emissions that contribute to air quality impacts. The thresholds of significance are relevant to whether a project's individual emissions would result in a cumulatively considerable incremental contribution to the existing cumulative air quality conditions. These thresholds are designed to identify those projects that would result in significant levels of air pollution and to assist the region in attaining the applicable state and federal ambient air quality standards. If a project's emissions are less than those threshold levels, the project would not be expected to result in a considerable contribution to the significant cumulative impact.

The proposed Project and other projects in the SCAB would contribute PM and the ozone precursors VOC and NO_X to the area during short-term construction and long-term operation. As described above,

emissions during Project construction and operation would not generate emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation. As such, the Project would not result in a cumulatively considerable contribution to air quality violations in the SCAB.

Another metric for assessing a project's cumulative impact with respect to air quality is whether it is consistent with the assumptions underlying an adopted local, regional, or statewide plan, or a related planning document on air quality. As discussed above, the Project would generate unaccounted for emissions as a result of new land uses with higher emissions than the existing land use designation as well as an increase in VMT where air quality plans aim to reduce VMT with new development. Although mitigation measures TR-1 through TR-4 would reduce VMT impacts, the Project's VMT impact would remain significant and unavoidable. Given the Project-level impact would be significant and unavoidable, the Project is considered to also have a cumulatively considerable impact related to air quality plan conflicts.

Potential impacts to sensitive receptors and odor generation are more localized, and a cumulative impact for these issues could occur if concurrent construction or operations would generate substantial pollutants or odorous emissions that would combine to affect neighboring land uses. The Project is not located within close proximity to the identified cumulative development projects (refer to Figure 4-1); therefore, it is not anticipated that mitigated construction emissions or construction odors would combine with those of other projects and result in significant cumulative impacts. Similarly, Project operation would not result in significant impacts to sensitive receptors or odors and is not located near other cumulative developments that would generate these emissions. Therefore, the Project would not result in a cumulatively considerable impact on sensitive receptors or odors. In summary, the Project would result in less than cumulatively considerable impacts to air quality standards, sensitive receptors, and odors but would contribute to a significant and unavoidable cumulative impact related to air quality plans.

4.3 Biological Resources

This section addresses the potential impacts to biological resources that could occur due to the proposed Project during both construction and operation. The existing conditions and regulatory setting related to biological resources for the Project site are also addressed. The information and analysis contained in this section primarily rely on the Biological Resources Report prepared for the Project by NV5 (2024) and the Arborist Survey Report prepared by Stringer Biological Consulting, Inc. (2023), which are included in Appendix C to the EIR.

4.3.1 Existing Conditions

The biological study area (BSA) described in the Biological Resources Report includes the Project site surrounded by a 100-foot buffer, for a total study area of 149.38 acres. The Project site has been used as a golf course since the 1960s but is considered not operational under the baseline condition. However, the golf course has continued to be maintained, including continued watering, landscape maintenance, and outdoor lighting being used for security purposes. The Project site is not fenced, apart from the driving range which is mostly netted and fenced.

The site is surrounded predominantly by non-native trees and is adjacent to residential communities with commercial buildings located along the western and southern portions. The San Gabriel River is located near the northwestern corner outside of the BSA, with a stormwater basin facility located to the north of the BSA.

4.3.1.1 Vegetation and Land Cover

Vegetation and land cover within the BSA consists primarily of five land cover types: developed, disturbed, ruderal, and golf course greens (lawns), interspersed with landscaped/ornamental trees and shrubs. Table 4.3-1, *Vegetation and Land Cover Types,* provides a description of each category and its extent within the Project site, the 100-foot buffer, and the BSA as a whole.

Table 4.3-1
VEGETATION AND LAND COVER TYPES

Vegetation/Land Cover Type	Description	Project Site (acres)	100-ft Buffer (acres)	BSA (acres)
Developed	This land cover type consists of unvegetated developed areas, including pavement or hardscape where vegetation is not supported. Developed areas within the Project site include concrete paths, golf course buildings, and paved parking areas.	3.94	43.94	47.88

Vegetation/Land Cover Type	Description	Project Site (acres)	100-ft Buffer (acres)	BSA (acres)
Disturbed	Areas mapped as disturbed habitat consist of graded areas or bare ground with patches of native and non-native ruderal plants and contain highly disturbed soils and/or compacted soils. Plant species observed within disturbed habitat include non-native grasses (*Bromus sp.*), common purslane (*Portulaca oleracea*), puncture vine (*Tribulus terrestris*), and London rocket (*Sisymbrium irio*).	0.15	3.64	3.79
Golf Course Greens	Golf course greens are maintained lawn areas dominated by Bermuda grass (*Cynodon dactylon*), and interspersed with Asian ponysfoot (*Dichondra micrantha*), English daisy (*Bellis perennis*), clover (*Trifolium sp*.), and English plantain (*Plantago lanceolata*). Areas mapped as golf course greens include the golf course fairway, putting greens, and other miscellaneous grassy areas (with no trees) associated with the golf course.	43.28	1.84	45.12
Landscaped and Ornamental Trees and Shrubs	Landscaped/ornamental vegetation is a human-influenced assemblage of plant species and consists of non-native horticulture trees, shrubs, and plants planted for landscaping and aesthetic purposes. Non-native vegetation includes Canary Island pine (*Pinus canariensis*) and Italian stone pine (*P. pinea*), which were the dominant species. Additional non-native tree species includes king palm (*Archontophoenix cunninghamiana*), Mexican fan palm (*Washingtonia robusta*), Peruvian pepper tree (*Schinus molle*), Brazilian pepper tree (*Schinus terebinthifolius*), black poui (*Jacaranda mimosifolia*), and eucalyptus (*Eucalyptus sp*.). This community is predominately non-native, but it also contains some native species, such as coast live oak (*Quercus agrifolia*).	37.21	6.89	44.10
Ruderal	Ruderal/disturbed areas are heavily to sparsely vegetated by non-native, weedy plant species (ruderal vegetation) or they lack vegetation completely. These areas are persistent where habitat has been physically disturbed by human activities, resulting in compacted soils and a dominance of ruderal plants. Ruderal areas within the Project site include driving range, dirt lots, dirt access roads, and other semi-maintained areas.	6.89	0.60	7.49
	TOTAL	91.47	56.91	149.38

Source: NV5 2024

4.3.1.2 Observed Plant and Wildlife Species

A total of 76 plant species representing 34 families of plants were observed within the BSA during the biological survey in 2022. The dominant plant species noted within the BSA included Mexican fan palm, English daisy, clover species, Canary Island pine, Italian stone pine, and Bermuda grass. A complete list of plant species observed within the BSA can be found in Appendix D of the Biological Resources Report, which is included as Appendix C of this EIR.

There were 35 bird species detected during the biological survey in 2022, including acorn woodpecker (*Melanerpes formicivorus*), house finch (*Haemorhous mexicanus*), rock dove (*Columba livia*), and western bluebird (*Sialia mexicana*). Two active bird nests were observed on April 13, 2022. One active house sparrow (Passer domesticus) was observed on the north side of the golf course clubhouse, where the parents were observed feeding their young. A second active bird nest was in the process of being constructed by a European starling (*Sturnus vulgaris*) on the north side of the golf course clubhouse. Neither species is protected under the Migratory Bird Treaty Act (MBTA). An inactive bird nest was also observed within the BSA.

A total of six invertebrates were detected within the BSA during the 2022 survey, including giant swallowtail (*Papilio cresphontes*), monarch butterfly (*Danaus Plexippus*), and red gum lerp psyllid (*Glycaspis brimblecombei*). In addition, seven mammals were detected, including ground squirrel species (*Sciuridae sp*.) and bobcat (*Lynx rufus*), as well as three reptiles, including granite spiny lizard (*Sceloporus orcutti*). A complete list of wildlife species observed within the BSA can be found in Appendix D of the Biological Resources Report, included as Appendix C of this EIR.

4.3.1.3 Special-Status Species

Special-status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the U.S. Fish and Wildlife Service (USFWS) under the Federal Endangered Species Act (FESA); those listed or candidates for listing as Rare, Threatened, Endangered under the California Endangered Species Act (CESA) or the Native Plant Protection Act; those identified as Fully Protected under Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code (CFG Code); Species of Special Concern identified by the California Department of Fish and Wildlife (CDFW); and plants occurring on Ranks 1 and 2 of the California Native Plant Society's California Rare Plant Rank system.

No special-status plant species were detected during the general biological surveys. Multi-stemmed dudleya (*Dudleya multicaulis*), a California Rare Plan Rank 1B.1 species, was previously documented within the BSA in the "hills above Azusa" in 1884 and is presumed extant. Neither the species nor its habitat was observed within the BSA.

Additionally, no USFWS designated critical habitat occurs within the BSA. The California Natural Diversity Database (CNDDB) identifies two federally listed threatened species (least Bell's vireo [*Vireo bellii pusillus*] and Santa Ana sucker [*Catostomus santaanae*]) and one federally and state listed endangered species (coastal California gnatcatcher [*Polioptila californica*]) with potential to occur in the area. However, there is no potential for the Santa Ana sucker or the coastal California gnatcatcher to occur within the BSA as their respective habitats are not present within the BSA. No state or federally listed species identified in the CNDDB for this area were observed during the surveys conducted on April 12 and 13, 2022. However, the monarch butterfly, a federally listed candidate species, was observed in the

BSA. Table 4.3-2, *Special-Status Species Potential to Occur,* summarizes the potential for other special-status species to occur within the BSA, their agency status, their known habitat/distribution, and their likelihood of occurrence within the BSA.

Table 4.3-2
SPECIAL-STATUS SPECIES POTENTIAL TO OCCUR

Common Name (Scientific Name)	Agency Status	Habitat/Distribution	Potential to Occur
Burrowing owl (*Athene cunicularia*)	State Candidate for Listing as Endangered or Threatened	Burrowing owls live underground in burrows that they have dug or taken over from a prairie dog or ground squirrel. Preferred habitats include open, treeless areas with low, sparse vegetation, such as grasslands and deserts, and usually on gently sloping terrain where they can hunt for insects and rodents.	**Unlikely to occur**. One known observation occurs 3.5 miles southwest of the Project site. There is one potentially suitable habitat area present within the Ruderal portion in the southeast edge of the industrial site. However, the BSA consists of low quality habitat for this species. In addition, no owl sign was observed during the site visit.
Least Bell's vireo (*Vireo bellii pusillus*)	USFWS Threatened	Least Bell's vireos occupy a variety of habitats, including mesquite scrub within arroyos, palm groves, and hedgerows bordering agricultural and residential areas. They migrate south by September and return to California by mid-March to early April.	**Presumed Absent**. No potentially suitable nesting or foraging habitat for this species occurs within the Project site. This species has been documented in the San Gabriel River Channel west of the BSA but was not observed during site surveys.
Crotch's bumble bee (*Bombus crotchii*)	State Endangered	Crotch's Bumble Bee is found in open grassland and scrub. This bee is able to persist in semi-natural habitats surrounded by intensely modified landscapes. Food plant sources include milkweeds, dusty maidens, medics, phacelias, and sages.	**Unlikely to occur**. There is one potentially suitable habitat area located approximately 200 feet northwest of the Project site. The BSA and surrounding area provide little to no habitat for Crotch's bumble bee as they consist of lands that are developed, landscaped or hardscaped, heavily maintained and irrigated, contain few nectar sources, and have compact soil with little to no leaf litter or debris.
Monarch butterfly (*Danaus plexippus*)	USFWS Candidate	Monarch butterflies require milkweed (*Asclepias ssp*.) to lay their eggs on and for the larvae to forage on as they mature. Adult monarchs require the nectar from flowering plants to survive and are often seen along roadsides, at wetlands, in meadows and in fields.	**Known to occur**. This species was observed in the BSA. However, there is no potentially suitable overwintering habitat area for this species present within the BSA.

Source: NV5 2024

4.3.1.4 Aquatic Resources

According to the USFWS National Wetlands Inventory and the U.S. Geological Society National Hydrography Database, no waterways or wetlands were found within the BSA. The Federal Emergency Management Agency (FEMA) has identified the BSA as an area outside of the 100-year flood zone, and no aquatic resources were identified within the BSA.

4.3.1.5 Wildlife Corridor Evaluation

A wildlife corridor is a physical feature that joins two or more larger areas of similar habitats or resource areas that animals can travel, and that would otherwise be fragmented or separated from each other by natural barriers, such as rivers and rugged terrain; changes in vegetation composition; land permanently altered for human activities, such as agricultural fields and clear-cuts; and infrastructure, such as roads, dams, berms, development, and fencing. Wildlife corridors can be natural or human-made, and they can vary in size, shape, and composition. Wildlife corridors serve as bridges that link isolated "islands" of wildlife habitat. The main goal of corridors is to allow animals access to isolated habitat areas and to facilitate movement of individuals, for dispersal, and seasonal, migratory, and daily travels for foraging, water, cover, escape, breeding, searching for mates, and other needs. Wildlife corridors restore genetic connectivity, promote biodiversity, and help to maintain healthy wildlife populations.

Natural wildlife corridors generally include biological and physical features, such as native vegetation, food, water, shelter, and cover, which are needed to temporarily support wildlife and allow wildlife to safely move through it. They may either be contiguous strips of vegetation and habitat, such as riparian strip, intermittent patches of habitat, or physical features spaced closely enough to allow safe travel. Wildlife can also use landscape features within larger natural habitat areas that provide the least amount of topographic resistance in moving from one area to another. These "travel routes" include riverbeds, washes, drainages, canyons, and ridgelines. The native vegetation and/or specific landscape feature is usually unique from the surrounding area.

Human-made wildlife corridors are often referred to as "wildlife crossings." Wildlife crossings are structures that allow animals to pass over, under, or through physical barriers that otherwise hinder movement, such as a road or highway. They include culverts, tunnels, underpasses, and overpasses. Wildlife crossings are usually narrow and short in length. Wildlife will also use trails and dirt roads to move through landscapes with natural impediments, such as dense/thick vegetation or steep terrain; or human-made impediments, such as development or structures.

Although the BSA contains a golf course, it does not contain or function as a wildlife movement corridor. The BSA is surrounded on three sides by residential and industrial development, meaning that human activities, lighting, noise, and traffic associated with the golf course would most likely deter wildlife movement through the BSA. Additionally, the BSA does not contain wildlife travel routes such as canyons, riparian strips, ridgelines, or waterways, nor does it contain wildlife crossing tunnels such as tunnels, culverts, underpasses, or overpasses. Rather, wildlife movement is likely to occur in the open space to the northwest and west of the BSA, especially within the San Gabriel River corridor.

4.3.1.6 Tree Inventory

An Arborist Survey Report was completed on August 17, 2023 (Stringer Biological Consulting, Inc. 2023). As part of the report, a total of 1,934 trees were inventoried within the study area for this survey (see Figure 1 of the Arborist Survey Report in Appendix F to Appendix C of this EIR) belonging to

approximately 31 different species. As described further below, removal or relocation of any tree with a diameter at breast height (DBH) of 6 inches or greater requires authorization from the City Director of Public Works.

As described in the Arborist Survey Report, the most abundant species of tree in the Project site is Canary Island pine, with 1,089 individuals identified. Canary Island pines are widely planted around the perimeter of the golf course and along fairways. The Canary Island pines are generally in fair condition, but many of them have been topped or heavily pruned for utility line clearance or for other purposes. Mexican fan palms are the second most abundant tree, with 360 identified within the Project site. In places, the Mexican fan palms are suffering from rot due to being watered by the sprinklers on the golf course. The third most abundant tree is Italian stone pine, of which there are 194; however, many are in poor health. Of the 1,934 trees that were inventoried, 220 were in poor condition and 39 were recommended for removal due to being in very poor condition and/or the presence of major defects.

4.3.2 Regulatory Setting

4.3.2.1 Federal Regulations

Federal Endangered Species Act

Administered by the USFWS, the FESA provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered a "take" under the FESA. FESA Section 9(a) defines take as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." "Harm" and "harass" are further defined in federal regulations and case law to include actions that adversely impair or disrupt a listed species' behavioral patterns.

The USFWS designates critical habitat for endangered and threatened species. The goal is to restore healthy populations of listed species within their native habitats, so they can be removed from the list of threatened or endangered species. Once an area is designated as critical habitat pursuant to the FESA, federal agencies must consult with the USFWS to ensure that any action they authorize, fund, or carry out is not likely to result in the destruction or adverse modification of the critical habitat. No critical habitat designated by the USFWS for federally listed endangered species is mapped within or adjacent to the Project site.

Sections 7 and 10(a) of the FESA regulate actions that could jeopardize endangered or threatened species. Section 7 generally describes a process of federal interagency consultation and issuance of a biological opinion and incidental take statement when federal actions may adversely affect listed species. Section 10(a) generally describes a process for the preparation of a Habitat Conservation Plan and issuance of an incidental take permit.

Migratory Bird Treaty Act

Migratory bird species that are native to the U.S. or its territories are protected under the federal MBTA, as amended under the Migratory Bird Treaty Reform Act of 2004 (Federal Register Doc. 05-5127). The MBTA is generally protective of migratory birds. In common practice, the MBTA is now used to place restrictions on the disturbance of active bird nests during the nesting season. In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests.

Clean Water Act

The U.S. Army Corps of Engineers regulates impacts to waters of the U.S. under Section 404 of the Clean Water Act (CWA). The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the U.S. A federal CWA Section 404 Permit would be required for a project to place fill in waters of the U.S. Projects impacting waters of the U.S. could be permitted on an individual basis or be covered under one of several approved nationwide permits. Individual permits are assessed individually based on the type of action, amount of fill, etc. Individual permits typically require substantial time (often longer than one year) to review and approve, while nationwide permits are pre-approved if a project meets appropriate conditions.

A CWA Section 401 Water Quality Certification administered by the Regional Water Quality Control Board (RWQCB) must be issued prior to issuance of a Section 404 Permit. The RWQCB reviews projects for consistency with the achievement of water quality objectives and the reasonable protection of beneficial uses designated in the applicable Water Quality Control Plan. Collectively, wetland and water resources regulated by the State Water Resources Control Board (SWRCB) and RWQCB are referred to as waters of the state, and these resources may or may not include waters of the U.S.

4.3.2.2 State Regulations

California Endangered Species Act

Similar to the FESA, the CESA of 1970 provides protection to species considered threatened or endangered by the State of California (CFG Code Section 2050 et seq.). The CESA recognizes the importance of threatened and endangered fish, wildlife, and plant species and their habitats, and prohibits the taking of any endangered, threatened, or rare plant and/or animal species unless specifically permitted for education or management purposes.

The CESA established that it is state policy to conserve, protect, restore, and enhance state endangered species and their habitats. Under state law, plant and animal species may be formally designated rare, threatened, or endangered by official listing by the California Fish and Game Commission. The CESA authorizes that private entities may “take” plant or wildlife species listed as endangered or threatened under the FESA and CESA, pursuant to a federal Incidental Take Permit if the CDFW certifies that the incidental take is consistent with the CESA (CFG Code Section 2080.1[a]). For state-only listed species, CFG Code Section 2081 authorizes the CDFW to issue an Incidental Take Permit for state-listed threatened and endangered species if specific criteria are met.

California Fish and Game Code

The CFG Code provides specific protection and listing for several types of biological resources. Pursuant to CFG Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the CFG Code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by CFG Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. CFG Code Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by CDFW and/or USFWS.

Under CFG Code Sections 1600 et. seq., CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife and requires a Streambed Alteration Agreement for such activities. The CDFW issues a Streambed Alteration Agreement with any necessary mitigation to ensure the protection of the state's fish and wildlife resources. The CDFW has jurisdiction over riparian habitats associated with watercourses.

CFG Code Section 2800 et. seq., known as the Natural Community Conservation Planning Act, is intended to conserve, protect, restore, and enhance natural communities. It promotes the protection of natural communities at the ecosystem scale while accommodating compatible land uses. CDFW is the principal state agency implementing the Natural Community Conservation Planning program. Natural Community Conservation Plans developed in accordance with this program provide for comprehensive management and conservation of multiple wildlife species and identify and provide for the regional or area-wide protection and perpetuation of natural wildlife diversity while allowing compatible and appropriate development and growth.

4.3.2.3 Local Regulations

City of Azusa General Plan

Chapter 5, *Natural Environment,* of the Azusa General Plan, focuses on the natural environment, including air, water, flora, fauna, minerals, geology, and noise. The open space and biological resources goals and policies relevant to the proposed Project include:

Goal 1. Preserve, restore, and enhance the diversity of biological resources in the City's undeveloped hillsides, canyons, floodplains, and urban areas.

Policy 1.3. Strive for the long-term maintenance of all native wildlife species living in the City and the Sphere of Influence, including common and sensitive species.

City of Azusa Municipal Code

Azusa Municipal Code Chapter 62, Article VI, *Tree Preservation*, serves as the City's tree preservation ordinance. Section 62-197, *General Requirements for New Subdivisions*, states trees that have a DBH of six inches or greater shall not be removed or relocated unless authorized by the Director of Public Works and, if destroyed, such trees shall be replaced. The DBH is the diameter measured at 4.5 feet above natural grade. The Azusa Municipal Code further states that all existing living trees having a DBH of six inches or more shall be preserved when so directed by the Director of Public Works, and no grading shall be done to endanger them without authorization. If said trees are destroyed, the applicant shall replace them with trees whose size, number, and planting location shall be determined by the Director of Public Works before the issuance of occupancy permits. The size and age of the trees proposed for removal will determine how many new trees may be substituted for the destroyed tree, but at a minimum three new trees shall replace one tree removed. The ratio may be increased at the discretion of the Director of Public Works. However, Azusa Municipal Code Section 62-193(c)(1) states that the removal or pruning of any tree which poses an imminent threat to public property or welfare, as determined by any member of a law enforcement agency, the Los Angeles County Fire Department (LACoFD), or the City's Director of Public Works is exempt from the requirements of this ordinance.

4.3.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential biological resources impacts are based on Appendix G of the CEQA Guidelines. A significant impact to biological resources could occur if implementation of the proposed Project would:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS;

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS;

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

f) Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

4.3.4 Methodology and Assumptions

The information related to existing conditions on the proposed Project site is based on the Biological Resources Report prepared for the Project, which consisted of a pre-field literature review to assess applicable federal, state, and local regulations for the Project site and a general biological survey of the BSA. The literature research consisted of a review of standard resources such as the CNDDB, USFWS National Wetland Inventory, CDFW, and USFWS lists of special-status plants and wildlife species.

Field surveys were conducted on April 12 and 13, 2022. All plant and wildlife species detected, as well as dominant plant species within each vegetation community and land cover type, were recorded. Further detail related to the methodology used in the preparation of the Biological Resources Report is provided in Appendix C. An additional site visit was conducted by Busby Biological Services on May 14, 2024, to confirm the previous vegetation mapping done by NV5 in 2022 and conduct additional habitat assessments for special-status species, including western burrowing owl, monarch butterfly, and Crotch's bumble bee. Additional information related to this habitat assessment can be found in Appendix G to Appendix C of this EIR.

In preparation of the Arborist Report for the Project, trees with a DBH of six inches or greater were inventoried and assessed by International Society of Arboriculture Certified Arborist, Stephen Stringer, and a field technician. Trees with a DBH under six inches that would be expected to reach a DBH of six inches within one to two years were also included in the survey. Additional methodology information related to the Arborist Report is provided in Appendix F to Appendix C of this EIR.

4.3.5 Impact Analysis

4.3.5.1 Special-Status Species

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 CDFW or USFWS?

As discussed in Section 4.3.1.3, the Project site is not anticipated to support special-status plant species. No special-status plant species were observed during the field survey. Although multi-stemmed dudleya was previously documented within the BSA in the "hills above Azusa" in 1884, neither the species nor its habitat was observed within the BSA. Therefore, the Project would not have an adverse effect on special-status plant species.

The field survey conducted by NV5 on April 12 and 13, 2022, documented the presence of two active bird nests and one inactive bird nest. Although the identified nests were not for species protected under the MBTA, their presence indicates there is potential nesting habitat for birds protected under the MBTA within surrounding vegetation and trees, as well as within building infrastructure in the proposed Project site. Therefore, the Project has the potential to disrupt nesting sites and result in substantial adverse effects to protected nesting birds and raptors during construction.

As described in Section 4.3.1.3, the CNDDB identifies the Project area as having the potential to support multiple special-status species. While the CNDDB states there is potential for least Bell's vireo, coastal California gnatcatcher, and Santa Ana sucker to occur in the area, the habitats for these species are not present within the BSA, and they are not anticipated to occur within the Project site or be affected by the Project. Burrowing owl, monarch butterfly, and Crotch's bumble bee were also noted as having the potential to occur within the site; however, site-specific surveys determined the Project site would not support these species, as described below.

Burrowing owl, a state candidate endangered species, is considered unlikely to occur within the BSA. Although there is one known observation of this species 3.5 miles southwest of the Project site, the habit assessment conducted by Busby Biological Services on May 14, 2024, concluded that the BSA consists of low-quality habitat for burrowing owl, and no owl sign was detected during the site visit. Therefore, implementation of the Project would not cause a disturbance to potentially suitable habitat for burrowing owl or adversely affect nesting of this special-status species.

The monarch butterfly, which is listed as a USFWS candidate species, was observed within the BSA during the field surveys conducted by NV5 on April 12 and 13, 2022. However, the habitat assessment conducted for this species on May 14, 2024, concluded that there are no potentially suitable overwintering habitat areas with stable microclimate conditions to support monarch butterfly within the BSA. As there are no suitable overwintering habitat areas for monarch butterfly within the BSA, implementation of the Project would not adversely affect the habitat of this candidate species. Individual monarch butterfly traveling through the site may still occur but would be mobile and are not anticipated to be adversely affected by Project implementation.

Survey results from the habitat assessment conducted on May 14, 2024, for Crotch's bumble bee, which is listed as a state candidate endangered species, concluded that there is one potentially suitable habitat area for the species located approximately 200 feet northwest of the Project site. No wildlife agency

consultation requirements apply to candidate species; however, the species has the potential to be listed as an endangered species in the future. The BSA provides little to no suitable habitat for Crotch's bumble bee, as the Project site and its surroundings consist of lands that are developed, landscaped or hardscaped, heavily maintained and irrigated, contain few nectar sources, and have compact soil with little to no leaf litter or debris. Therefore, implementation of the proposed Project would not adversely affect Crotch's bumble bee or its habitat.

Level of Significance Prior to Mitigation

The Project would not have a substantial adverse effect on a candidate, sensitive, or special-status species or its habitat, and impacts would be less than significant for special-status species. However, implementation of the Project could result in a substantial adverse effect on nesting birds; therefore, this impact would be potentially significant.

Mitigation Measures

BIO-1 **Nesting Bird Avoidance.** If construction activities are proposed to commence in a portion of the Project site that has been previously undisturbed by Project construction activities during the migratory bird breeding season (from January 1 to August 31 for raptors and hummingbirds and February 15 to August 31 for all other avian species), a pre-construction survey for active nests of bird species protected by the MBTA shall be conducted by a qualified avian biologist within 36 hours prior to the start of construction activities.

The pre-construction nest survey shall be conducted within all suitable nesting habitat within the portion of the Project site and a 100-foot buffer of where construction activities are proposed to begin (where access is permitted). An active nest is defined by active nest building, incubating adults on a nest, or the presence of eggs and/or nestlings. If eggs are present without adults, the qualified avian biologist shall determine if the nest is active or has been abandoned after a pre-determined observation period has been conducted.

If active bird nests are identified in the Project site or 100-foot buffer area during the pre-construction nest survey, an Environmentally Sensitive Area shall be established and remain until it has been determined by the qualified avian biologist that the young have fledged, or nesting activities have ceased. The qualified avian biologist, in consultation with the MBTA and CFG Code, shall determine the extent of the Environmentally Sensitive Area, which is typically set at 500 feet for raptors and 100 feet for all other avian species. The extent of the Environmentally Sensitive Area and the type of disturbance allowed in areas adjacent to the Environmentally Sensitive Area shall be informed by the MBTA and CFG Code.

The Environmentally Sensitive Area shall be clearly marked in the field with appropriate signage and fencing, where appropriate. Additional pre-construction nest surveys shall be required if there is a lapse in construction activities within a specific area for more than seven days during the nesting season.

Level of Significance After Mitigation

With the implementation of mitigation measure BIO-1, impacts to nesting birds and their habitats would be less than significant. Impacts to other special-status species would remain less than significant without mitigation.

4.3.5.2 Sensitive Habitats

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 CDFW or USFWS?

The BSA primarily consists of five land cover types, as outlined in Section 4.3.1.1, including developed, disturbed, golf course greens, landscaped/ornamental trees and shrubs, and ruderal. The Project site does not consist of any sensitive vegetation communities, and no riparian habitat areas were found on or adjacent to the Project site. Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community.

Level of Significance Prior to Mitigation

Implementation of the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.3.5.3 Wetlands

Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

According to the USFWS National Wetlands Inventory and the U.S. Geological Society National Hydrography Database, the Project site does not contain any state or federally protected wetlands or waterways. No wetland features were identified within or adjacent to the Project site as a result of surveys. Therefore, the Project would not have a substantial adverse effect on state or federally protected wetlands.

Level of Significance Prior to Mitigation

Implementation of the Project would not have a substantial adverse effect on state or federally protected wetlands, and there would be no impact.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

There would be no impact.

4.3.5.4 Wildlife Corridors

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?

As discussed above, the proposed Project site does not function as a wildlife corridor. The site is surrounded on three sides by residential and industrial development. This development would deter wildlife movement through the Project site due to human activities, lighting, noise, and traffic associated with the golf course. Additionally, the site does not contain wildlife travel routes, such as canyons, riparian strips, ridgelines, or waterways, nor does it contain wildlife crossings structures, such as tunnels, culverts, underpasses, or overpasses that would provide connectivity between large areas of open space on a local or regional scale. Alternatively, wildlife would likely utilize the open space to the northwest and west of the Project site, especially within the San Gabriel River corridor. Therefore, implementation of the Project would not substantially interfere with wildlife movement or impede the use of nursery sites.

Level of Significance Prior to Mitigation

Implementation of the Project would not interfere substantially with wildlife movement, wildlife corridors, or the use of nursery sites, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.3.5.5 Local Policies or Ordinances

Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The City's Tree Preservation Ordinance (Azusa Municipal Code Section 62-197) protects trees that have a DBH of six inches or more. According to the City's Tree Preservation Ordinance, all trees of such a size shall be preserved as directed by the Director of Public Works, and no grading shall be done to endanger the trees. If these trees are destroyed, they shall be replaced at a minimum ratio of 3:1 with the tree size, number, and planting locations to be approved by the Director of Public Works. The Tree Preservation Ordinance also requires protection measures for trees that will be retained.

An arborist report was prepared in 2023 to identify trees subject to this policy (Stringer Biological Consulting Inc. 2023). The arborist survey identified 1,934 trees with a DBH of approximately six inches or greater in its study area. Of the 1,934 trees that were inventoried, 220 were in poor condition, and

39 were recommended for removal due to being in very poor condition and/or the presence of major defects. These 259 trees are not required to be replaced in accordance with Azusa Municipal Code Section 62-193(c)(1). Of the remaining 1,675 trees with a DBH over six inches, 281 are proposed for removal within the residential site, and 564 trees are proposed for removal within the industrial site. Per the City's Tree Preservation Ordinance, these trees are required to be replaced at a ratio of 3:1. To comply with the City's Tree Preservation Ordinance, the Project would be required to plant 843 trees at the residential site and 1,692 trees at the industrial site. The Project proposes planting 843 trees at the residential site and 225 trees at the industrial site. As the proposed tree planting at the industrial site would not meet City standards, the Project would conflict with the City's Tree Preservation Ordinance. The Project is also required to implement tree preservation measures during construction in compliance with the City's Tree Preservation Ordinance.

Level of Significance Prior to Mitigation

Implementation of the Project could conflict with local policies or ordinances protecting biological resources; therefore, impacts would be potentially significant.

Mitigation Measures

BIO-2 **Tree Replacement Fees.** Prior to issuance of a grading permit, the Project applicant shall pay a tree replacement fee to the City, as established by the City's Schedule of Fees and Charges in effect at the time of grading permit issuance. The fee shall be used for the planting of replacement trees off-site that cannot be accommodated within the Project site in accordance with the City's Tree Preservation Ordinance. The fee shall be placed by the City in a dedicated account for the replacement of trees and shall cover replanting of trees removed from the Project site at a 3:1 ratio, less those planted within the Project site or not subject to the City's replacement policy due to poor health according to Azusa Municipal Code Section 62-193(c)(1). According to current landscape plans for the Project, the applicant shall pay a fee for the City to plant 1,467 trees off-site for those replacement trees that would not be planted within the Project site; however, the ultimate fee paid shall be based on the final landscape plans indicating the number of trees to be removed and those to be planted in accordance with Azusa Municipal Code Section 62-197 requirements.

Level of Significance After Mitigation

With the implementation of mitigation measure BIO-2, the Project would not conflict with local policies or ordinances protecting biological resources, and impacts would be less than significant.

4.3.5.6 Conservation Plans

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?

The City does not currently have an adopted Habitat Conservation Plan or Natural Community Conservation Plan, and is not subject to another approved local, regional, or state habitat conservation plan (CDFW 2023). Therefore, the Project would not conflict with these plans.

Level of Significance Prior to Mitigation

Implementation of the Project would not conflict with the provisions of an adopted habitat conservation plan, and there would be no impact.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

There would be no impact.

4.3.6 Cumulative Impact Analysis

The geographic scope for the biological resources cumulative analysis is the Los Angeles County region. Cumulative projects located in the County have the potential to affect sensitive biological resources such as special-status species, sensitive habitat, and wetlands. Adjacent jurisdictions, including incorporated cities, the County, and tribal governments, would be required to comply with applicable federal and/or state regulations that protect biological resources, such as the FESA and the CESA. If significant impacts occur from particular cumulative projects, mitigation measures are usually implemented to reduce impacts to the extent feasible. However, in the absence of a comprehensive NCCP in place for the long-term protection of biological resources within the City and region, a cumulative loss of such resources could occur, even after mitigation has been implemented for individual projects.

As discussed above, no direct or indirect impacts of the Project were identified for special-status plant or animal species. However, the Project does have the potential to impact avian species protected under the MBTA during construction. Mitigation measure BIO-1 (see Section 4.3.5.1) would reduce this impact to below a level of significance. Cumulative development projects in the region would also be required to avoid impacts to nests in accordance with the MBTA. Therefore, the proposed Project would avoid direct and indirect impacts to nesting birds and would not result in a cumulatively considerable contribution to nesting bird impacts within the region.

In addition, as discussed above, the Project site does not contain sensitive vegetation communities, riparian habitat areas, state or federally protected wetlands or waterways, or wetland features. The proposed Project site does not function as a wildlife corridor, and development of the Project would not interfere with wildlife movement or impede the use of nursery sites. Therefore, the Project would not contribute to the cumulative loss of these habitats or biological resources within the region, and the cumulative impact of the Project would be less than significant. No conflicts with habitat conservation plans would occur, given none apply to the Project area.

The Project would replace trees removed on the site or pay a fee for replacement trees to be planted within the City at a ratio of 3:1 in accordance with mitigation measure BIO-2 (see Section 4.3.5.5). Cumulative development projects within the City would also be subject to this requirement, which would increase the total number of trees in the City as trees are removed. Given trees removed from the site would be replaced, the Project would not result in a cumulatively considerable impact to trees protected by a local tree preservation policy. In summary, the Project would not result in a net loss of biological resources with adherence to the identified mitigation measures, and Project impacts to biological resources would not be cumulatively considerable.

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4.4 Cultural Resources

The purpose of this section is to identify existing cultural (including historic and archeological) resources within and around the Project site and to assess the potential for impacts to such resources as a result of the proposed Project. Mitigation measures are recommended, as necessary, to minimize potential impacts of Project implementation. This section is primarily based on the Cultural Resources Survey prepared by HELIX, which is attached to this EIR as Appendix D (HELIX 2025b).

4.4.1 Existing Conditions

4.4.1.1 Natural Setting

Holocene age alluvium deposited by the San Gabriel River underlies the Project site. As described further in Section 4.6, *Geology and Soils*, approximately 0.5 foot of topsoil is present throughout the Project site with quaternary alluvial deposits underlying the topsoil layer. Alluvial deposits are expected to extend to more than 30 feet in depth.

The natural vegetation during the prehistoric era consisted of coastal sage scrub, riparian, and grassland communities. Prehistorically, the coastal sage scrub community, interspersed with areas of native grasslands, would have covered the adjacent flood plain of the Los Angeles Basin as well as most of the canyons in the adjacent lower elevation foothills of the San Gabriel Mountains. Many of the native plant species found in the vegetation communities in the Project vicinity are known to have been used by coastal native populations for food, medicine, tools, ceremonial activities, and other uses. Major wildlife species found in this environment were very important to the prehistoric diet, and deer were an important source of leather, bone, and antler.

4.4.1.2 Cultural Setting

Prehistoric Period

Southern California has a long history of human occupation, with the earliest evidence of human occupation dating to the late Pleistocene, approximately 12,000 years ago. Prehistoric material culture in the state's southern region has been categorized according to periods or patterns that define technological, economic, social, and ideological elements. Within these periods, archaeologists have defined cultural patterns or complexes specific to prehistory within the state's southern region, including the Project area. The first three periods, the Early Man, Milling Stone, and Intermediate periods, are defined as approximately 10,000 B.C. to A.D. 500.

The last stage, the Late Prehistoric period, is defined as a period of aboriginal population growth accompanied by social and artifactual complexity, as discussed further below. This period of cultural transformation occurred among the California coastal tribes before European contact. Evidence of this cultural diversification can be seen in material culture as new technologies are introduced, such as the bow and arrow. Artifacts characteristic of this time period are small side-notched, leaf-shaped, and triangular-shaped, projectile points; flat-rimmed sandstone mortars; and *Olivella* (olive shell) callus cup and *Tivela* (Pismo clam) cylinder beads.

Ethnohistory

The Project site is located within the territory that has traditionally been occupied by the Takic-speaking Gabrielino (also spelled as Gabrieleno or Gabrieleño) and Fernandeño people. The Gabrielino and Fernandeño were so closely related that most researchers have seen little to distinguish them from each other. The original distinction between them was made mostly based on the Native people living in the Los Angeles Basin that were originally absorbed into the Spanish Mission San Gabriel and those into the Mission San Fernando. Other Indigenous groups in the surrounding areas include the Chumash to the north and northwest, the Tataviam/Alliklik to the north, the Serrano to the east, and the Luiseño and Juaneño to the south. Interactions between these groups are well-documented, comprised primarily of trade and intermarriage.

While some contact between the Gabrielino and the Spanish occurred in 1542 during the voyage led by Juan Cabrillo and again in 1602 during the voyage of Sebastián Vizcaíno, when each landed briefly in their territory, the earliest substantial Spanish contact with the Gabrielino was with the Portola expedition in 1769. This expedition, which originated in San Diego, followed along the coastline north and eventually reached San Francisco Bay. The impact of the subsequent establishment of the Spanish mission system and colonization along the coast during the end of the eighteenth century and the beginning of the nineteenth century was immediate and profound to the Gabrielino. The fact that, relative to other native groups, little is known ethnographically about the Gabrielino is due to their very early absorption into the mission system and the rapid spread of deadly European diseases, which did not allow early ethnographers to record much of their native culture. The Gabrielino and Fernandeño population is estimated at approximately 5,000 individuals at the beginning of the Mission era, with virtually none surviving by 1910. This population is estimated to have consisted of 50 residential communities, with populations ranging from 50 to 150 individuals.

Before contact, the Gabrielino subsisted by hunting and gathering practices, making use of resources available in the natural environment. In addition to terrestrial resources, their access to the coast allowed them to expand their resource base to include marine resources as well. Women were instrumental in the collection and preparation of vegetal foods, and the production of baskets, pots, and clothing, while men were responsible for the hunting of game and fishing as well as the conduct of trading ventures, ceremonial activities, and political interactions. The Gabrielino were active traders with trade networks established with the Chumash to the north, with the Gabrielino on the islands of Santa Catalina, Santa Barbara, San Clemente, and San Nicolas to the west, and with the Serrano and Cahuilla to the east, and extending through them into the eastern desert and as far east as Arizona. While the Gabrielino were characterized by some early writers as peaceful, others describe accounts of internecine warfare and feuds between various Gabrielino villages in different areas of their territory. Ethnographers, on the other hand, have generally described relations with their neighbors, the Luiseño, Cahuilla, Serrano, and Chumash, as mostly friendly.

Due to the dearth of ethnographic information on Gabrielino social structure and territorial organization, their neighbors, the better-described Takic speaking Luiseño, Serrano, and Cahuilla, are frequently used to augment, and to infer, those aspects of the Gabrielino. In general, the Gabrielino settlement pattern included both primary subsistence villages in use continuously, possibly by more than one kin group; and smaller, temporary, family unit, camp locations, likely based on the seasonal availability of certain resources in particular areas of their territory. Gabrielino houses were generally circular domed structures created with thatched tule, fern, or carrizo. Prehistorically, the distribution of village units generally correlated with available water sources such as stream courses and springs.

Historical Background

Spanish Period

The first European explorers to reach southern California were the members of Juan Rodriguez Cabrillo's 1542 expedition. Between that time and 1769, Spanish, British, and Russian explorers made only limited excursions into Alta (upper) California, and none established permanent settlements in the region.

In 1769, the San Diego Presidio was established by Gaspar de Portolá, marking the first Spanish settlement in Alta California. At the same time, Mission San Diego de Alcalá was established by the Franciscan Father Junipero Serra, the first of 21 missions built by Spanish Franciscan monks in Alta California between 1769 and 1823. Portolá proceeded north, exploring the Arroyo Seco as he passed through the Los Angeles Basin, before heading through the San Fernando Valley, then reaching the San Francisco Bay on October 31, 1769. On September 4, 1781, 12 years after Portolá's initial visit, a dozen families from Sonora, Mexico, founded El Pueblo de la Reina de los Angeles de la Porciúncula ("The Town of the Queen of Angels on the Portiuncula River"; or simply El Pueblo de la Reina de los Angeles, "The Town of the Queen of Angels") under the specific directions of Governor Felipe de Neve.

The Portolá expedition marked the beginning of Spanish military supply routes that serviced the newly established missions, including Mission San Gabriel de Arcángel (1771), the first permanent European settlement in the area. In 1772, Spanish Commander Pedro Fages explored a canyon that passed through the mountains north of present-day Gorman and named the area Cañada de Las Uvas, or Grapevine Canyon. Friar Francisco Garces further explored the region in 1776, and Spanish settlers began establishing ranchos in the San Fernando Valley by the 1790s.

Almost immediately, the Franciscan padres began attempts at converting the local Indigenous populations to Christianity through baptism, as well as relocating them to mission grounds. Twenty six years after the establishment of Mission San Gabriel de Arcángel, the San Fernando Mission was founded in 1797, as a stopping point between the San Gabriel and San Buenaventura missions. Most of the Indigenous population in the Los Angeles Basin, as well as the surrounding foothill and mountain ranges, were persuaded or forced to settle near the two missions. These included the Tataviam, the Chumash, the Gabrielino, the Serrano, many Cahuilla as far as the Coachella and San Jacinto valleys, and even some Luiseño of the San Jacinto Valley, as well as Indigenous groups from the southern Channel Islands.

Mexican Period

The primary focus of the Spanish during their occupation of California was the construction of the mission system and associated presidios for the purpose of integrating the Native American population into Christianity. While there were incentives provided by the Spanish monarchy to entice settlers to pueblos or towns, only three pueblos were established during the Spanish period, of which only two were successful and remained as California cities (San José and Los Angeles). Several factors hindered growth within Alta California, including the threat of foreign invasion, political dissatisfaction, and unrest among the Indigenous population. In 1821, after more than a decade of intermittent rebellion and warfare, New Spain (Mexico and the California territory) won independence from Spain. A year later, in 1822, the Mexican legislative body in California ended the Spanish isolationist policies of the region and decreed California ports open to foreign merchants.

Although Mexico had gained its independence in 1821, Spanish patterns of culture and influence remained for some time. The missions continued, operating in mostly the same fashion as they had previously, and most of the laws related to the distribution of land did not change throughout the 1820s. Beginning in the 1820s, extensive land grants were established in the interior, partly to increase the population inland and away from the more settled coastal areas where the Spanish had concentrated their colonization efforts. Furthermore, the secularization of the missions in 1834 resulted in the subdivision of former mission lands and the establishment of additional ranchos. These massive swaths of land were granted to prominent and well-connected individuals as ranchos, ushering in the Rancho Era, with the society making a transition from one dominated by the church and the military to a more civilian population, with people living on ranchos or in pueblos. With the numerous new ranchos in private hands, cattle ranching expanded and prevailed over agricultural activities. During the age of the ranchos (1834–1848), landowners focused their resources on the cattle industry and devoted large tracts to grazing. Cattle hides were the primary southern California export during this time, used to trade for goods from the east and other areas in the U.S. and Mexico. The influx of explorers, trappers, and ranchers associated with the land grants increased the number of non-native inhabitants of the region, and this rising population contributed further to the decimation of the Indigenous population, from the introduction and rise of diseases foreign to them, and the violence enacted against them.

The first Mexican settlement near the Project area was within the modern-day City of Azusa. Rancho Azusa de Dalton (originally Rancho El Susa), a 4,431-acre land grant, was given to Luis Arenas in 1841 by Governor Juan Alvarado. Three years later, in 1844, Arenas sold the rancho to Henry Dalton, who renamed the rancho to Rancho Azusa de Dalton. Dalton would go on to purchase portions of Rancho San Jose, Rancho San Francisquito, and Rancho Santa Anita; he would ultimately own an expanse of land from modern-day San Dimas to Pasadena.

American Period

The U.S. took control of California in 1846, seizing Monterey, San Francisco, San Diego, and Los Angeles. Los Angeles soon slipped from American control, however, and needed to be retaken in 1847. Approximately 600 U.S. sailors, Marines, Army dragoons, and mountain men converged under the leadership of Colonel Stephen W. Kearny and Commodore Robert F. Stockton in early January of that year to challenge the California resistance, which was led by General Jose Maria Flores. The American party scored a decisive victory over the Californios in the Battle of the Rio San Gabriel and at the Battle of La Mesa the following day, effectively ending the war and opening the door for increased American immigration.

Hostilities officially ended with the signing of the Treaty of Guadalupe Hidalgo in 1848, in which the U.S. agreed to pay Mexico $15 million for the conquered territory, including California, Nevada, Utah, and parts of Colorado, Arizona, New Mexico, and Wyoming, representing nearly half of Mexico's pre-1846 holdings. California joined the U.S. in 1850 as the 31st state. Though the discovery of gold in northern California in 1848 gave rise to the California Gold Rush, the first California gold was found in the County in 1842. The large strike at Sutter's Creek seven years later led to an enormous influx of American citizens in the 1850s and 1860s, and these "forty-niners" rapidly displaced the old rancho families. One year after the discovery of gold, nearly 90,000 people journeyed to the California gold fields. With most miners drawn to central California by its well-known strikes, Los Angeles attracted people who were largely peripheral to the Gold Rush.

As required by the Land Act of 1951, Dalton filed a claim for Rancho Azusa de Dalton with the Public Lands Commission. However, while his claims for Rancho Azusa de Dalton and Rancho San Jose were approved, Dalton disagreed with the results of the 1860 General Land Office survey conducted by Henry Hancock. Hancock, it seemed, did not consult previous maps of Dalton's lands, nor did he consult witnesses who would provide locations of landmarks. Instead, Hancock misidentified several landmarks, incorrectly followed several trails, and ultimately excluded 18,000 acres from three of Dalton's grants. The federal government opened this land to homesteading.

Homesteaders, or as Dalton thought of them, squatters, swarmed the newly opened land and began filing for homesteads. Dalton did not have the required funds to fight the filings and, thus, had to borrow funds from J. S. Slauson, a land developer in the region. After 24 years of litigation and subsequent resurveys of the area, the courts ultimately decided against him – Dalton would later turn the smaller Rancho Azusa over to Slauson in 1885, who deeded a 55-acre homestead to Dalton.

City of Azusa

Azusa was first listed in the 1860 census as a township with a population of 363 – the population of the valley would grow considerably over the following decade, necessitating the construction of a Provisional School. This first school, built of logs and brush, would become the first school in the Upper San Gabriel Valley.

In 1887, J.S. Slauson laid out the town of Azusa; prices for prime lots were as high as $500. The completion of the Los Angeles and San Gabriel Valley Railroad in 1887 likely contributed to these high prices; the railroad brought new people searching for homes and new investment opportunities. It was written that when the roads and lots were graded, numerous Native American artifacts were unearthed. A decade later, in 1898, the City was officially incorporated with a population of 865 individuals.

4.4.1.3 Existing Cultural Resources

Records Search

HELIX obtained a records search of the Project site and a one-half-mile radius around the site from the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, on October 12, 2023. The SCCIC has a record of six previously recorded cultural resources within a one-half-mile radius of the Project site, but none have been recorded within the Project site. The six resources recorded within the records search radius are of historic context, including two resources associated with water conveyance, two resources associated with hydroelectric power, one residence, and the Glendora Ridge Motorway.

Archival Research

The 1894 Pomona (1:62,500) topographic map depicts the Project area as an undeveloped region with a single road running through it. The Atchison Topeka and Santa Fe Railroad is recorded to the south, and the community of Azusa is located to the southeast. Both of these features are depicted on the 1925 Azusa (1:24,000) topographic map – the Pacific Electric Railway is also recorded on this map, just south of the Project area. The 1939 topographic map depicts the growth of Azusa to the east and also shows a railroad crossing north through the Project area; this railroad is not present on the map from 1953. Instead, the area is recorded as Spreading Grounds for the San Gabriel River to the north. These spreading grounds are reduced in size on the subsequent 1966 map – the Azusa Greens Public Golf

Course is recorded in the area, though 11th Street is depicted running through the southern portion of the Project site. SR 39, first visible on the 1953 map, is depicted as splitting south of Sierra Madre Avenue on this map. The 1972 Azusa map depicts the expansion of Sierra Madre Avenue to the west, as well as the development of the existing structures surrounding the Project area.

The aerial photographs of the area corroborate the changes seen in the topographic maps. The early aerial photographs, from 1952, 1964, and 1972 show the development of Azusa and the Azusa Greens Golf Course. No structures are visible in these photographs, and the golf course remains unchanged in the 1977 and 1980 aerial photographs.

Tribal Cultural Resources

HELIX contacted the Native American Heritage Commission (NAHC) on September 8, 2023, for a Sacred Lands File (SLF) search, and in a response dated October 23, 2023, the NAHC indicated that at least one sacred land or tribal cultural resource was identified in the SLF for the Project vicinity. The NAHC did not provide additional information regarding the sacred land or tribal cultural resource. Refer to Section 4.16, *Tribal Cultural Resources*, for additional discussion regarding tribal cultural resources within the Project vicinity.

Field Survey

A pedestrian survey of the Project site conducted on November 14, 2023, did not result in the identification of cultural resources. The survey noted the golf course appeared to be maintained, as evidenced by recent landscaping, tire tracks from vehicle access, and the groundskeeper on-site. Golf course equipment, one small shed or storage structure, and numerous push piles and excavated pits were identified during the survey but do not constitute historic resources. While no cultural material was observed during the field survey, it is noted that existing landscaping of the site may have prevented visibility of existing cultural resources.

4.4.2 Regulatory Setting

4.4.2.1 Federal Regulations

National Register of Historic Places

Federal regulations that apply to projects with a federal nexus (e.g., permitting or funding from a federal agency) include the National Historic Preservation Act (NHPA) and its implementing regulations (16 U.S. Code 470 et seq., 36 CFR Part 800). Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on "historic properties," that is, properties (either historic or archaeological) that are eligible for listing on the National Register of Historic Places (NRHP). To be eligible for the NRHP, a historic property must be significant at the local, state, or national level under one or more of the following four criteria:

1. Associated with events that have made a significant contribution to the broad patterns of our history;

2. Associated with the lives of persons significant in our past;

3. Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction; and/or

4. Has yielded or may be likely to yield, information important in prehistory or history.

4.4.2.2 State Regulations

California Register of Historic Resources

Similar to the NRHP, the California Register of Historical Resources (CRHR) program, established in 1992, encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies resources for planning purposes; determines eligibility of state historic grant funding; and provides certain protections under CEQA. State criteria used to determine whether a historic resource qualifies for the CRHR are those listed in CEQA Guidelines Section 15064.5. A resource may be listed in the CRHR if it is significant at the federal, state, or local level under one of more of the four criteria listed below:

1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the U.S.;

2. Is associated with the lives of persons important to the nation or to California's past;

3. 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; and/or

4. Has yielded, or may be likely to yield, information important in prehistory or history of the state or nation.

PRC Section 21083.2(g) defines further criteria for identifying unique archaeological resources, which may be considered "historical resources" for the purposes of CEQA. Since resources that are not listed or determined eligible for the state or local registers may still be historically significant, their significance shall be determined if they are affected by a project. The significance of a historical resource under criterion 4 rests on its ability to address important research questions.

Health and Safety Code Section 7050.5

Section 7050.5 of the H&SC provides the procedure to follow in the event that human remains are discovered outside of a dedicated cemetery. The section states:

a) Every person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law is guilty of a misdemeanor, except as provided in Section 5097.99 of the Public Resources Code. The provisions of this subdivision shall not apply to any person carrying out an agreement developed pursuant to subdivision (l) of Section 5097.94 of the Public Resources Code or to any person authorized to implement Section 5097.98 of the Public Resources Code.

b) In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to their authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make their determination within two working days from the time the person responsible for the excavation, or their authorized representative, notifies the coroner of the discovery or recognition of the human remains.

c) If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

Public Resources Code Section 5097.98

Section 5097.98 of the PRC outlines the steps to be taken in the event that human remains believed to be of Native American origin are discovered. In accordance with H&SC Section 7050.5, the County coroner would contact the NAHC who would identify and notify the most likely descendant (MLD) of the human remains. The MLD may inspect the remains and make recommendations for their treatment, including but not limited to, removal, preservation in place, or other culturally appropriate treatment. PRC Section 5097.98 also provides the procedure to be followed in the event that no MLD is identified or no treatment options are agreed to by the landowner and MLD or NAHC.

4.4.2.3 Local Regulations

Azusa General Plan

City policies and implementation programs pertaining to historical and cultural resources are contained in Chapter 3, *The Built Environment*, of the General Plan (City 2004a). The historical and cultural resources section of this chapter establishes a framework to protect, preserve, and provide awareness of the City's cultural setting and history. The City's historical and cultural resources are those buildings, objects, landmarks, and features of the land that evoke a sense of the past and reflect the cultural history of the City. Goals, policies, and implementation programs established in the General Plan that relate to historical and cultural resources and are applicable to the Project include the following:

Goal 1. Acknowledge, preserve, and protect the City's Native American heritage.

Policy 1.1. Determine, early in the planning process, through field surveys and Native American consultation, whether archaeological or cultural resources are located within a proposed development site.

Implementation measure HR2 from the Historical/Cultural Resources Implementation Programs identified in the General Plan applies to the Project and has been completed through preparation of the Project's cultural resources survey provided in Appendix D.

HR2: Archaeological Surveys. Require archaeological surveys of undeveloped areas including those areas that although part of the built environment, may have the potential for subsurface archaeological sites. In the case of the San Gabriel River corridor, which may not have project-specific actions, conduct surveys as part of the overall planning process so that resources can be integrated into the planning and enhancement process. If resources are encountered, encourage avoidance of the resources if they are determined to be significant as defined in CEQA Guidelines Section 15064.5. If avoidance is not feasible, implement a mitigation plan to excavate, analyze, and report on the discoveries.

In the event that any prehistoric, historic, or paleontological resources are discovered during construction-related earth-moving activities, all work within 50 feet of the resources shall be halted and the developer shall consult with a qualified archaeologist or paleontologist to assess the significance of the find. If any finds are determined to be significant by the qualified archaeologist, then representatives from the City of Azusa and the qualified archaeologist and/or paleontologist shall meet to determine the appropriate course of action.

Should human remains be discovered during the implementation of a proposed project, the local coroner must be contacted immediately. Both the NAHC (pursuant to NAGPRA [the Native American Graves Protection and Repatriation Act]) and any identified descendants should be notified, and recommendations received, if the remains are determined to probe of Native American origin.

City of Azusa Municipal Code

The City's Historic Preservation Ordinance, adopted in 2000 as Chapter 55, Article II, *Historic Preservation*, of the Azusa Municipal Code, codifies the intent of historic preservation in the City. Landmark designations, historic review procedures, and historic preservation incentives are administered by the City's Cultural and Historic Preservation Commission. The City is in the process of updating the Historic Context Statement and Historic Survey. The original Historic Property Survey List prepared in 2000 included 96 potential historic properties and three potential historic districts (the Downtown Historic District, the Foothill Historic District, and the Sunset/San Gabriel Historic District).

The City's Development Code (Azusa Municipal Code Chapter 88, *Development Code*) carries out the General Plan policies by regulating development and land uses within the City. Azusa Municipal Code Section 88.30.012, *Archaeological Resource Protection*, regulates construction activities when archeological resources are unearthed or discovered during ground-disturbing construction activities. The standards provided therein are as follows:

A. Construction activities shall cease, and the department shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, approved by the City, and funded by the applicant, and disposition of artifacts may be accomplished in compliance with state and federal law.

B. In the event archeological resources are found to include human remains, or in any other case when human remains are discovered during construction, the county coroner shall be notified in addition to the department so proper disposition may be accomplished.

4.4.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential cultural resources impacts are based on Appendix G of the CEQA Guidelines. A significant impact to cultural resources could occur if implementation of the proposed 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 formal cemeteries.

4.4.4 Methodology and Assumptions

The Cultural Resources Survey prepared by HELIX for the Project (refer to Appendix D) included a records search of the California Historical Resources Information System, a review of the state Office of Historic Preservation historic properties directories and Local Register, a NAHC SLF search, Native American outreach, a review of historic aerial photographs and maps, and a cultural resources sensitivity analysis.

HELIX obtained a records search from the SCCIC at California State University, Fullerton, on October 12, 2023. The records search covered a one-half-mile radius around the Project area and included the identification of previously recorded cultural resources and locations and citations for previous cultural resources studies.

A pedestrian survey of the Project site was conducted on November 14, 2023, by HELIX staff archaeologist Michael Tapia and Native American monitor Brandon Dominguez from Indigenous Group. The Project area was walked in transects spaced approximately 15 meters apart, using the serpentine method and meandering when needed. The survey site consisted of the existing golf course at the Azusa Greens Country Club. Visibility of the Project site was fair, but landscaping hindered at least 60 percent of the survey area. Rodent burrows were observed throughout the site, which presented subsurface soils described as loamy sand with gravel inclusions.

Historic maps and aerial photographs were also reviewed to assess the potential for historic archaeological resources to be present, as well as to examine changes in the land use and environment over time. Archival sources that were consulted include historic topographic maps and aerial imagery. These include aerials from 1952, 1964, 1972, 1980, and 1992 and several historic USGS topographic maps, including the 1894 Pomona (1:62,500) and the 1925, 1939, 1953, 1966, and 1972 Azusa (1:24,000) topographic maps.

4.4.5 Impact Analysis

4.4.5.1 Historic Resources

Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

As described in the Cultural Resources Survey conducted for the Project, the SCCIC records search did not identify any historical resources within the Project site. The six historic-period resources identified in the records search occur outside of the Project site and would not be affected by the Project. Existing improvements within the site consist of the golf course and related structures, including the golf course clubhouse, which would undergo interior renovations as part of the Project. As no historical structures were identified on the Project site, no adverse change in the significance of a historical resource is anticipated.

Level of Significance Prior to Mitigation

The Project would not cause a substantial adverse change in the significance of a historical resource, and there would be no impact.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

There would be no impact.

4.4.5.2 Archaeological Resources

Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

As described in the Cultural Resources Survey conducted for the Project, no recorded archaeological resources occur within the Project site or within one-half-mile of the site. However, ground visibility during the pedestrian survey of the site was limited due to existing landscaping, and the Project site is in an alluvial area, where there is a potential for buried archaeological resources. In addition, the NAHC states the Project area is sensitive for prehistoric and/or tribal cultural resources. As a result, the Project site has the potential to contain unknown, buried archaeological resources that would be disturbed as a result of ground-disturbing construction activity.

Level of Significance Prior to Mitigation

The Project has the potential to cause a substantial adverse change in the significance of an archaeological resource. Impacts would be potentially significant.

Mitigation Measures

CUL-1 **Workers Environmental Awareness Program**. The Project applicant shall retain a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, to prepare and implement a Workers Environmental Awareness Program (WEAP) training to address cultural resources issues anticipated at the site. The WEAP shall include information on the laws and regulations that protect cultural resources, the penalties for a disregard of those laws and regulations, what to do if cultural resources are unexpectedly uncovered during demolition and construction, and contact information for a qualified archaeologist who shall be contacted in the case of unanticipated discoveries. The WEAP shall also include Project-specific information regarding the potential for and types of prehistoric and historic resources that may be encountered during construction.

CUL-2 **Archaeological and Native American Monitoring**. The Project applicant shall retain and compensate for services of a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, and a qualified Native American monitor, approved by the Gabrieleno Band of Mission Indians – Kizh Nation Tribal Government, to perform all training and monitoring requirements related to prehistoric and historic cultural resources for the Project. An archaeologist and Native American monitor shall be present to monitor all initial ground-disturbing activities associated with the Project, including but not limited to: demolition, removal of building foundations and asphalt, potholing or auguring, grubbing, tree removals/weed abatement, boring/grading of soils, drilling/trenching for utilities, excavations associated with development, etc. The monitors shall complete daily monitoring logs that provide descriptions of the daily activities, including construction activities, locations, soil, and any cultural materials identified. In addition, the monitors shall provide insurance certificates, including liability insurance, for any archaeological resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in PRC Section 21083.2 (a) through (k).

If, during initial ground disturbance, the monitors determine that the ground-disturbing activities have little or no potential to impact cultural resources, and/or the monitors determine that ground disturbances would occur within previously disturbed and nonnative soils, the qualified archaeologist may recommend that monitoring may be reduced or eliminated. This decision shall be made in consultation with the Native American monitor and the City, with the final decision to reduce or eliminate monitoring to be at the discretion of the City. If cultural resources are encountered during ground-disturbing activities, work within the immediate area shall halt, and the find shall be evaluated in accordance with mitigation measure CUL-3.

CUL-3 **Unanticipated Discovery of Cultural Resources**. If cultural resources are encountered during demolition and ground-disturbing activities, work in the immediate area (at least a 50-foot radius) shall halt and a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, shall be contacted immediately to evaluate the find. If the discovery proves to be a significant cultural resource under CEQA, additional treatment and/or recovery

efforts shall be required. The City shall coordinate with the qualified archaeologist to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resources, along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be donated to a local school or historical society in the area for educational purposes.

Level of Significance After Mitigation

With the implementation of mitigation measures CUL-1 through CUL-3, impacts to archaeological resources would be less than significant.

4.4.5.3 Human Remains

Would the Project disturb any human remains, including those interred outside of formal cemeteries pursuant to § 15064.5?

The Project site does not contain a known burial ground or formal cemetery. However, as noted by the NAHC, the Project area is sensitive for prehistoric and/or tribal cultural resources. In addition, ground visibility was quite limited during the pedestrian survey of the site, and the Project site is in an alluvial area where there is potential for buried cultural resources. As a result, the Project area has the potential to contain human remains that would be disturbed as a result of Project construction.

Level of Significance Prior to Mitigation

The Project has the potential to disturb human remains, and impacts would be potentially significant.

Mitigation Measures

CUL-4 **Unanticipated Discovery of Human Remains and Associated Funerary Objects**. If human remains or associated funerary objects are discovered on-site, work shall be diverted a minimum of 150 feet from the find and an exclusion zone shall be placed around the burial. The qualified archaeologist and/or Native American monitor shall notify the construction manager who shall call the County Coroner. If the County Coroner determines the remains to be Native American in origin, the County Coroner shall contact, by telephone within 24 hours, the NAHC, as mandated by state law, who shall then appoint an MLD.

The discovery shall be kept confidential and secure to prevent any further disturbance. Prior to the continuation of ground-disturbing activities within 150 feet of the remains, the property owner shall consult with the MLD to arrange a designated location within the Project footprint for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment and placed over the

excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard shall be posted near the find outside of construction hours. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, it may be determined that burials should be removed. If applicable, the identified MLD shall work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the MLD, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Cremations shall either be removed in bulk or by means as necessary to ensure complete recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery, and a separate treatment plan shall be created. The Project applicant shall consult with the MLD or associated tribe regarding avoidance of all cemetery sites. Once complete, a final report of all activities shall be submitted to the NAHC. No scientific study or utilization of any invasive diagnostics on human remains shall be allowed.

Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony shall be removed to a secure container on-site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project site but at a location mitigated between the tribe and the property owner at the site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

Level of Significance After Mitigation

With the implementation of mitigation measure CUL-4, impacts to human remains would be less than significant.

4.4.6 Cumulative Impact Analysis

The geographic area for the analysis of cumulative impacts related to cultural resources is the Los Angeles County region. Cumulative projects in the County have the potential to result in a cumulative impact associated with the loss of historical and/or archaeological resources through development activities or the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings that cause a substantial adverse change in the significance of the resource. Cumulative projects that involve demolition or ground-disturbing activities have the potential to result in significant impacts to cultural resources. These projects would be regulated by applicable federal, state, and local regulations; however, even with regulatory compliance, individual historical resources still could be affected or degraded as a result of new private or public development, or redevelopment associated with cumulative projects. Likewise, the loss of archaeological resources on a regional level may not be adequately mitigated through the data recovery and collection methods specified in these regulations, as their value may also lie in the cultural values and religious beliefs of applicable groups.

The Project site contains the existing golf course clubhouse that was constructed in 1966 and would be lightly renovated by the Project. As discussed above, the existing building is not considered a historical resource and thus, renovation of this building would not result in a substantial adverse change in the significance of a historical resource. No other historic resources were identified within the proposed

Project site. Therefore, the Project would not contribute to a significant cumulative impact on historical resources.

Multiple cumulative projects would involve excavation and other ground-disturbing activities, which could allow for the potential of discovering previously unknown buried archaeological resources and human remains. As discussed above, the proposed Project could result in potentially significant impacts to unknown buried archaeological resources. This impact would be mitigated below a level of significance with the implementation of mitigation measures CUL-1 through CUL-3 (see Section 4.4.5.2). In addition, due to the prehistoric and tribal sensitivity of the Project area, there is a potential for buried cultural resources, including human remains, to be encountered. This potential impact would be mitigated to a level of less than significant with the implementation of mitigation measure CUL-4 (see Section 4.4.5.3). These mitigation measures would reduce the proposed Project's potential to alter the significance of unknown buried cultural resources as a result of ground-disturbing activity. Thus, the Project would not result in a cumulatively considerable contribution to cumulative impacts to cultural resources within the region.

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4.5 Energy

This section describes the existing conditions and regulatory framework related to energy use and conservation, and evaluates the potential impacts related to energy that could occur as a result of the implementation of the proposed Project. Energy calculations discussed in the analysis in this section are provided in Appendix E to the EIR.

4.5.1 Existing Conditions

4.5.1.1 Electricity

Electricity usage for land use categories varies depending on the type of electricity uses in a building, the types of construction materials used in constructing the building, and the efficiency of the electricity-consuming devices used within the building. In 2022, total utility-scale electricity generation in the state was 287,220 gigawatt-hours (GWh), which was an increase of approximately 3.4 percent from 2021 (California Energy Commission [CEC] 2022a). CEC forecasts of future electricity demand anticipate that consumption will grow between 0.99 and 1.59 percent per year from 2017 to 2030, with peak demand forecasts growing by 0.30 to 1.52 percent annually from 2017 to 2030 (CEC 2018). In Los Angeles County, the CEC reported an annual electrical consumption for 2022 of approximately 68 billion kilowatt hours (kWh), with 23.3 billion kWh for residential uses and 45.2 billion kWh for non-residential uses (CEC 2022b).

California's electricity system has been undergoing a considerable shift from non-renewable to renewable sources in recent years. The energy resource mix has substantially changed in the past decade as new renewable energy sources have come online. Since 2012, solar generation has increased nearly twentyfold, wind generation has grown by 63 percent, and coal has been nearly phased out of the power mix (CEC 2023)

Azusa Light and Water (ALW) serves approximately 16,500 customers throughout the City of Azusa (City 2024b). ALW currently provides electricity service to the Project site and would continue to do so upon Project implementation. According to the City, ALW customers consume approximately 250,000 megawatts (MW) of electricity annually (City 2024b). The City has signed long-term agreements for wind and hydropower totaling approximately 17.2 MW of capacity and entered into multiple photovoltaic projects since 2013. ALW continues to meet California's Renewable Portfolio Standards (RPS) targets (City 2024c).

4.5.1.2 Natural Gas

Natural gas utility rates and services in California are regulated by the California Public Utilities Commission (CPUC). In 2018, California gas utilities forecasted that they would deliver approximately 4,740 million cubic feet per day of gas to their customers, on average, under normal weather conditions. The majority of natural gas utility customers in California are residential and small commercial customers, although these customers consume only about 35 percent of natural gas used in the state (CPUC 2024).

The majority of natural gas used in California is sourced from out-of-state natural gas basins. The state does not receive liquefied natural gas supplies. Biogas, including gas from wastewater treatment plants and dairy farms, has recently begun to be used, and the state has been encouraging its development

and expansion. Natural gas from out-of-state production basins is delivered to California via the interstate natural gas pipeline system. This gas is then delivered via Southern California Gas Company's (SoCalGas) and Pacific Gas and Electric's statewide network to local transmission and distribution pipelines, or local storage fields (CPUC 2024). SoCalGas supplies natural gas to the City and Project vicinity. The Project would only consume natural gas at the leasing/clubhouse and cabana buildings; other Project components would be all-electric.

Statewide natural gas demand is expected to decrease at an annual average rate of 1.1 percent through 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, and SB 350 goals to decrease the use of non-renewable energy sources. Other factors that contribute to the downward trend are tighter standards created by revised Title 24 codes and standards, renewable electricity goals, a decline in core commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (California Gas and Electric Utilities 2022).

4.5.1.3 Transportation Fuels

Automobiles and trucks consume gasoline and diesel fuel, which are non-renewable energy products derived from petroleum. As of the start of 2024, California had approximately 35.7 million registered vehicles, which consumed approximately 13.6 billion gallons of gasoline during 2023 (California Department of Motor Vehicles 2024; California Department of Tax and Fee Administration 2023). Gasoline and other vehicle fuels are commercially provided commodities that would be available to the proposed Project through commercial outlets.

The Integrated Energy Policy Report provides the CEC's assessment of energy issues facing the state of California. The 2021 Integrated Energy Policy Report includes a transportation energy and demand forecast that considers vehicles and associated fuels, consumer preferences, regulatory impacts, economic and demographic factors, and projected improvements in technology (CEC 2022c). The forecast of transportation fuel use in the 2021 Integrated Energy Policy Report estimated that between 2021 and 2035, gasoline fuel demand for transportation in California will decline primarily due to increases in electrification and the use of zero emission vehicles. Petroleum-based fuels will continue to represent the largest share of transportation energy demand. Under the high-demand case for light-duty vehicles, gasoline consumption is anticipated to drop from approximately 13.8 billion gross gasoline equivalents (GGE) in 2020 to approximately 11 billion GGE in 2035. Electricity consumption for transportation would increase from less than one billion GGE in 2020 to approximately four billion GGE, which includes raw energy used by plug-in vehicles, but also the gasoline energy avoided by using more plug-in vehicles. Diesel energy is forecast at less than one billion GGE in 2020 and estimated to remain roughly the same in 2035 (CEC 2022c). The 2023 Integrated Energy Policy Report does not update the forecast of transportation fuel use but notes that statewide VMT has decreased from pre-COVID-19 levels and a larger share of vehicles driven in the state are zero-emission vehicles (CEC 2024).

4.5.1.4 Existing Infrastructure

Electricity and natural gas service is currently provided to the Project site by ALW and SoCalGas. Existing electrical distribution infrastructure occurs within the rights-of-way surrounding the Project site and along the northern side of the residential site. Overhead distribution lines occur north of the residential site and at the industrial site frontages with West 10th Street and North Todd Avenue, where poles occur within the industrial site. A transformer is located near the existing golf course clubhouse building.

Natural gas service is provided only to the existing golf course clubhouse, where a meter is located next to a trash enclosure. There is a two-inch gas main located in West 10th Street and a four-inch, high pressure gas main in North Todd Avenue. There is also a 2-inch gas distribution main that extends north from West 10th Street and is capped approximately at the proposed location of Building 3.

4.5.2 Regulatory Setting

4.5.2.1 Federal Regulations

At the federal level, the U.S. Department of Transportation (USDOT), the U.S. Department of Energy, and the USEPA are three agencies with significant influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through the establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements. Major relevant federal energy-related laws and plans are discussed below.

Federal Energy Policy and Conservation Act

First enacted in 1975, the Federal Energy Policy and Conservation Act established fuel economy standards for on-road motor vehicles in the U.S. The National Highway Traffic and Safety Administration (NHTSA), which is part of USDOT, is responsible for establishing additional vehicle standards and revising the existing standards under the Energy Policy and Conservation Act. Current standards require a combined passenger car and light-duty truck average fuel economy of 49 miles per gallon by 2026 (NHTSA 2022). Heavy-duty vehicles (i.e., vehicles and trucks over 8,500 pounds gross vehicle weight) are not currently subject to fuel economy standards. Fuel economy is determined based on each manufacturer's average fuel economy for their fleet of vehicles available for sale in the U.S. On the basis of information gathered under the program, USDOT is authorized to assess penalties for noncompliance. Over its nearly 40-year history, this regulatory program has resulted in vastly improved fuel economy throughout the U.S. vehicle fleet.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 set increased fuel economy standards for motor vehicles as well as a renewable fuel standard, building energy efficiency standards, and appliance and lighting efficiency standards. The lighting efficiency standards required increasing levels of energy efficiency, ultimately requiring light bulbs by 2020 to consume 60 percent less energy and effectively phasing out the incandescent lightbulb.

Under the Energy Independence and Security Act, USEPA is responsible for developing and implementing regulations to ensure that transportation fuel sold in the U.S. contains a minimum volume of renewable fuel. The renewable fuels program was expanded to include diesel fuel in addition to gasoline. The Energy Independence and Security Act also required the USEPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces. Additional provisions of the Energy Independence and Security Act address energy savings in government and public institutions, research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green" jobs.

Intermodal Surface Transportation Efficiency Act of 1991

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of inter-modal transportation systems to maximize mobility, as well as to address national and local interests in air quality and energy. The ISTEA contained factors that MPOs were required to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values that were to guide transportation decisions in that metropolitan area. The planning process for specific projects would then address these policies. Another requirement was to consider the consistency of transportation planning with federal, state, and local energy goals. Through this requirement, energy consumption was expected to become a decision criterion, along with cost and other values that determine the best transportation solution.

The Transportation Equity Act for the 21st Century

The Transportation Equity Act for the 21st Century builds upon the initiatives established in the ISTEA legislation discussed previously. This act authorizes highway, highway safety, transit, and other efficient surface transportation programs. It also continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. The Transportation Equity Act for the 21st Century also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety.

4.5.2.2 State Regulations

At the state level, the CEC, CPUC, and CARB all regulate different aspects of energy. The CPUC regulates privately-owned utilities in the energy, rail, telecommunications, and water sectors. The CEC collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes and funds energy efficiency programs, and adopts and enforces appliance and building energy efficiency standards. California is exempt under federal law from setting state fuel economy standards for new on-road motor vehicles. CARB has responsibility for mobile source emissions in the state.

This section focuses primarily on policies, regulations, and laws in the state of California that directly pertain to the regulation of energy resources. Refer to Section 4.7, *Greenhouse Gas Emissions*, for a discussion of policies, regulations, and laws that target the reduction of GHG emissions and are expected to achieve co-benefits in the form of reduced demand for energy-related resources and enhanced efficiencies related to energy consumption.

State of California Energy Action Plan

The CEC and CPUC approved the first State of California Energy Action Plan in 2003. The plan established shared goals and specific actions to ensure that adequate, reliable, and reasonably priced electrical power and natural gas supplies are provided, and identified policies, strategies, and actions that are cost-effective and environmentally sound for California's consumers and taxpayers. In 2005, a second Energy Action Plan was adopted by the CEC and CPUC to reflect various policy changes and actions of the prior two years. In 2008, the CEC and CPUC determined that it was not necessary or productive to prepare a new energy action plan. This determination was based in part on a finding that the state's

energy policies have been significantly influenced by the passage of AB 32, the California Global Warming Solutions Act of 2006. Rather than produce a new energy action plan, the CEC and CPUC prepared an update that examines the state's ongoing actions in the context of global climate change.

Renewable Portfolios Standard Program

Established in 2002 under SB 1078, accelerated in 2006 under SB 107, in 2011 under SBX1-2, in 2015 under SB 350, and again in 2018 under SB 100, California's RPS required retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020. Initially, the RPS provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to RPS.

SB 350, signed in 2015, increased the RPS from 33 percent in 2020 to 50 percent by 2030. This will increase the use of RPS-eligible resources, including solar, wind, biomass, and geothermal. In addition, large utilities are required to develop and submit Integrated Resource Plans to detail how each entity will meet their customers resource needs, reduce GHG emissions, and increase the use of clean energy. SB 100 was subsequently signed in 2018 and extends the renewable electricity procurement goals and requirements of SB 350. SB 100 requires that all retail sales of electricity to California end-use customers be procured from 100 percent eligible renewable energy resources and zero-carbon resources by the end of 2045.

California Building Standards

Title 24, Part 6

CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Non-residential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. Energy-efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for space or water heating) results in GHG emissions.

The Title 24 standards are updated approximately every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards became effective on January 1, 2023. The 2022 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. New for the 2022 Title 24 standards are non-residential on-site photovoltaic (solar panels) electricity generation and storage requirements and electrification requirements for appliances and heating technologies (CEC 2022d).

The standards are divided into three basic sets. First, there is a basic set of mandatory requirements that apply to all buildings. Second, there is a set of performance standards – the energy budgets – that vary by climate zone (of which there are 16 in California) and building type; thus, the standards are tailored to local conditions. Finally, the third set constitutes an alternative to the performance standards, which is a set of prescriptive packages that act as a checklist compliance approach.

Title 24, Part 11

The California Green Building Standards Code (CALGreen; CCR Title 24, Part 11) is a code with mandatory requirements for all non-residential buildings (including industrial buildings) and residential buildings for which no other state agency has the authority to adopt green building standards. The current 2022 Standards for new construction of, and additions and alterations to, residential and non-residential buildings went into effect on January 1, 2023.

The development of CALGreen is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste, make buildings more efficient in the use of materials and energy, and reduce environmental impacts during and after construction. The 2022 CALGreen Code improves upon the 2019 CALGreen Code by updating standards for bicycle parking, EV charging, and water efficiency and conservation. The 2022 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more.

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

CEQA Guidelines, Appendix F

CEQA Guidelines Appendix F, *Energy Conservation*, provides guidance for EIRs regarding potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. In addition, though not described as thresholds for determining the significance of impacts, Appendix F seeks inclusion of information in an EIR addressing the following topics:

- 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 effects of the project on local and regional energy supplies and on requirements for additional capacity.
- The effects of the project on peak and base period demands for electricity and other forms of energy.
- The degree to which the project complies with existing energy standards.
- The effects of the project on energy resources.
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

4.5.2.3 Local Regulations

City of Azusa General Plan

Chapter 5 of the Azusa General Plan, *Natural Environment*, includes various policies related to reducing energy consumption. The Air Quality section of this chapter includes the following implementation program:

AQ1 Design Review. Encourage energy-efficient design elements in new development including appropriate site orientation, solar design, use of landscaping, and insulating materials, to reduce energy consumption for heating and cooling.

In addition, Chapter 3 of the Azusa General Plan, *The Built Environment*, includes goals and policies related to the reduction of energy consumption. The Infrastructure section of this chapter includes the following policies related to the proposed Project:

Policy 1.1. Monitor the demands on the electrical system, manage development to mitigate impacts and/or facilitate improvements to the energy supply and distribution system, and maintain and expand energy supply and distribution facilities.

Policy 1.4. Minimize electrical consumption through site design, use of efficient systems, and other techniques.

Policy 1.6. Continue to require the incorporation of electrical conservation features in the design of all new construction and site development. Encourage the retrofit to existing buildings and development to include electrical conservation features, including, but not limited to, wireless technology and solar energy.

Chapter 4 of the Azusa General Plan, *Economy and Community*, provides additional goals, policies, and programs related to energy consumption reduction. The Economic Development section of this chapter outlines the following program which is related to the proposed Project:

EC8 Residential Improvement Program. Over time, encourage builders to incorporate energy-efficient features and other green building practices into new and renovated housing.

4.5.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential energy impacts are based on Appendix G of the CEQA Guidelines. A significant impact to energy could occur if implementation of the proposed 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.

4.5.4 Methodology and Assumptions

The evaluation of potential impacts related to energy use that may result from construction and long-term operation of the Project relies in part on the analysis contained in the Project's Air Quality and Greenhouse Gas Emissions Technical Report, provided in Appendix B. This analysis of impacts to energy resources discusses the proposed Project's temporary (i.e., construction) and permanent (i.e., operational) effects. In addition to the CalEEMod data reported in the Air Quality and Greenhouse Gas Emissions Technical Report, this analysis also relies on energy modeling performed by HELIX and provided in Appendix E. Fuel consumption factors in terms of gallons per hour of diesel for off-road equipment were calculated using data from the CARB Mobile Source Emissions Inventory online database–OFFROAD2021 version 1.0.9 (CARB 2025a). Fuel consumption factors, in terms of gallons of diesel and gasoline per mile traveled, were calculated from the CARB Mobile Source Emissions Inventory online database–EMFAC2021 version 1.0.2 (CARB 2025b). Construction fuel consumption was modeled for the year 2025, the year that construction is predicted to begin, while operational fuel consumption was modeled for the year 2028, the first full year of operation. Additionally, energy modeling assumed that approximately two TRUs would be used for four hours per day. In the absence of specific TRU dimensions, the TRUs were modeled as generators with a similar average horsepower. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect energy resources.

4.5.5 Impact Analysis

4.5.5.1 Energy Consumption

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?

The Project would result in the demand for energy resources during both construction and long-term operations, as described below.

Electricity

Construction Use

Electricity used during construction would be minimal. Temporary electric power would be provided by ALW for as-necessary lighting and electronic equipment (including use for computers, heating, ventilation, and air conditioning [HVAC] within construction trailers), and electrically powered hand tools. The electricity used for construction activities would be temporary and minimal.

Operational Use

At full buildout, the proposed Project would require electricity for the proposed residential, industrial, and golf course clubhouse buildings, EV charging, and parking lot lighting. CalEEMod results, provided in Appendix B, rely on assumptions related to typical electricity consumption by land use to estimate emissions. As described in Section 4.2.4.2, the Project's electricity demand was estimated based on CalEEMod defaults for energy demand and the conversion of energy demands from natural gas for the residential and industrial buildings that would not have natural gas connections. Based on these default values, the Project was estimated to require approximately 10,513,018 kWh per year of electricity. This represents a less than 0.02 percent increase in County-wide electricity use of 68.5 billion kWh for 2022

(CEC 2022b). CalEEMod defaults assume the implementation of energy-reducing efforts in compliance with the 2019 Title 24 standards; therefore, the Project would further reduce energy demand in accordance with the updated Title 24 requirements. It is anticipated that rooftop photovoltaic systems would be installed on building rooftops in accordance with 2022 Title 24 requirements for multi-family and non-residential buildings, which would reduce the Project's electricity demand by approximately 852,128 kWh per year. This reduction is included in the Project's estimated electricity demand of 10,513,018 kWh per year. Verification of Title 24 requirements occurs during building permit issuance and compliance with the Title 24 standards in effect at that time would be required for Project buildings. Given compliance with the statewide energy efficiency requirements for buildings, the Project would not result in wasteful, inefficient, or unnecessary consumption of electricity during Project operation.

Natural Gas

Construction Use

Natural gas is not anticipated to be required during project construction. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below. Any minor amounts of natural gas that may be consumed as a result of the Project construction would be temporary and negligible and would not occur in a wasteful manner.

Operational Use

The Project would only add a new natural gas connection at the residential clubhouse building, as the other new Project buildings would be all-electric. Prior to Project approval, the applicant would be required to demonstrate that the proposed Project meets the Title 24 requirements applicable at that time, as required by state regulations. The small quantity of natural gas that would be used at the residential clubhouse and existing golf course clubhouse (estimated at 277,088 thousand British thermal units [kBTU] per year in Appendix B) represents a less than 0.0001 percent increase in County-wide natural gas use of 282 billion kBTU for 2022 (CEC 2022b). The Project's natural gas usage would not be wasteful, inefficient, or unnecessary.

Petroleum

Construction Use

Petroleum-based fuel, including gasoline and diesel, would be the primary source of energy during construction. Fuel consumed by construction equipment would be the primary source of energy consumption during construction, while the transportation of construction materials and construction workers would also use fuel resources. Heavy-duty construction equipment associated with construction activities, as well as haul trucks involved in moving dirt around the Project site, would rely on diesel fuel. Construction workers would travel to and from the Project site throughout the duration of construction. It is assumed that construction workers would travel to and from the Project site mainly in gasoline-powered vehicles.

Construction equipment estimates for the Project are based on Project information provided by the Project engineer and default values for CalEEMod. Types of construction equipment anticipated to be used in Project construction are discussed in more detail in Section 4.2.4.1. Gasoline and diesel would also be consumed during worker commute and vendor delivery trips during construction. The CalEEMod default worker, vendor, and haul trip distances for Los Angeles County were used in the model. Given

these assumptions, Project construction would require approximately 167,621 gallons of diesel and 82,569 gallons of gasoline during construction.

The proposed Project would be required to comply with CARB's Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to no more than five minutes. Furthermore, the Project's construction practices would be typical, and would not require specialized construction equipment or otherwise present unusual circumstances in which substantial amounts of fuel would be required. Therefore, petroleum use during construction of the proposed Project would be temporary and would not be wasteful or inefficient.

Operational Use

The majority of fuel consumption during Project operations would be the result of vehicles traveling to and from the Project site for resident trips and worker commutes. As discussed in Section 4.15, *Transportation*, the Project is anticipated to generate a total of 2,823 ADT. Vehicles traveling to and from the Project site during operations would include resident and employee passenger vehicles and haul trucks associated with industrial operations. Based on the Project's VMT estimated in CalEEMod, the Project would result in consumption of approximately 175,380 gallons of diesel fuel per year and 457,521 gallons of gasoline fuel per year. As described in Section 4.2, *Air Quality*, it is anticipated that refrigerated industrial space could result in the use of approximately two TRUs per day. TRUs are placed in haul trucks to either refrigerate or heat perishable products during transport and are powered by diesel internal combustion engines. The use of two TRUs for four hours per day would result in consumption of approximately 136 gallons of diesel fuel per year. In total, Project operations would consume approximately 633,037 gallons of fuel per year; this represents a less than 0.03 percent increase compared to County-wide fuel use of 2.6 billion gallons in 2022 (CEC 2022e).

Over the lifetime of the proposed Project, the fuel efficiency of the vehicles used by residents is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the Project site during operation would decrease over time. This is largely due to increasing statewide fuel economy standards and an anticipated shift in the statewide vehicle fleet to increased numbers of EVs. For example, CARB has adopted an approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California. The Project would support the implementation of these efforts with the installation of EV charging infrastructure according to CALGreen requirements. While the proposed Project would result in the consumption of petroleum-based fuels during operations, the increase would not result in the wasteful, inefficient, or unnecessary consumption of petroleum-based energy resources.

Level of Significance Prior to Mitigation

Implementation of the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.5.5.2 Energy Efficiency Plans

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

The proposed Project would comply with applicable energy standards and regulations during construction and would be built and operated in accordance with existing, applicable building regulations at the time of construction, as mandated by Title 24 energy efficiency standards. The City does not have a Climate Action Plan, but the Project would be built in accordance with statewide energy efficiency regulations that achieve the General Plan policies listed in Section 4.5.2.3, which aim to reduce energy use in the City. As it relates to General Plan Infrastructure Policy 1.1, the Project's electrical connections would be appropriately sized for the anticipated energy demand of the Project in coordination with ALW.

The Project would also utilize solar energy and minimize natural gas consumption. This would support the statewide transition towards renewable energy use via both the on-site generation of solar energy and the electrification of buildings that allows for electricity increasingly generated from renewable sources to be transmitted to the buildings. Therefore, the Project would not conflict with or obstruct state or local plans for renewable energy or energy efficiency.

Level of Significance Prior to Mitigation

Implementation of the proposed Project would not conflict with or obstruct a renewable energy or energy efficiency plan, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.5.6 Cumulative Impact Analysis

Potential cumulative impacts related to energy would result if the proposed Project, in combination with past, present, and future projects, would result in the wasteful or inefficient use of energy. This could result from development that would not incorporate sufficient building energy efficiency features, not achieve building energy efficiency standards, or would result in the wasteful or unnecessary use of energy during construction or operations. The geographic scope for projects that may have a potential cumulative impact related to energy are projects occurring within the areas served by the Project's energy service providers (ALW and SoCalGas). Projects that include the development of buildings or other structures that have the potential to consume energy in an inefficient manner would have the potential to contribute to a cumulative impact. Projects that would mostly include construction, such as transportation infrastructure, could also contribute to a cumulative impact; however, the impact of

these projects would be limited because they would typically not involve ongoing, substantial energy use.

As discussed above, the proposed Project would not result in the wasteful or inefficient use of energy or result in significant impacts to state or local plans for renewable energy or energy efficiency. Construction and operations associated with the proposed Project would result in the use of energy in an efficient manner that would comply with applicable state and local regulations. The use of energy would not be substantial in comparison to statewide electricity, natural gas, gasoline, and diesel demand. New capacity or supplies of energy resources would not be required. Similar to the proposed Project, cumulative projects would be subject to CALGreen energy efficiency standards for residential or commercial buildings. In addition, these projects would be required to meet or exceed the Title 24 building standards, further reducing any inefficient use of energy. Future development would be required to meet increasingly stringent building standards set forth by the state. Therefore, the proposed Project, in combination with cumulative projects, would not contribute to a significant cumulative impact related to the wasteful or inefficient use of energy, or result in conflicts with plans for the use of renewable energy sources.

4.6 Geology and Soils

This section describes the geologic and seismic conditions of the Project site and evaluates the potential for geologic hazard impacts associated with implementation of the Project. This section is primarily based on the Industrial Site Geotechnical Feasibility Study (Southern California Geotechnical 2022a; Appendix F), Residential Site Preliminary Geotechnical Investigation (Albus & Associates 2023; Appendix G), Industrial Site Fault Study (Southern California Geotechnical 2022b; Appendix H), and Paleontological Resources Report (Bargas Environmental Consulting 2023; Appendix I), prepared for the Project. These reports were prepared to evaluate the site's subsurface conditions, identify potential geologic and seismic hazards that may affect the development, and provide preliminary geotechnical recommendations for the design and construction of the Project.

4.6.1 Existing Conditions

4.6.1.1 Geologic Setting

The Project site is located within the Transverse Ranges physiographic province of California, which is characterized by several anomalous east-west trending mountain ranges that truncate the northwesterly-trending Peninsular Ranges to the southeast and grade into the northwesterly-trending Coastal Ranges to the northwest. The Project site is located in the San Gabriel Mountains area, which is considered the central Transverse Ranges. The San Gabriel Mountains are bounded to the north by the San Andres Fault Zone and to the south by the SMFZ.

The bedrock geology within the mountainous areas of the central Transverse Ranges (San Gabriel Mountains) consists of high-grade metamorphic Precambrian rocks intruded by Paleozoic to Cretaceous plutons. During the Cretaceous era, extensive mountain building occurred during the emplacement of the southern California batholith. The central Transverse Ranges have been disrupted and uplifted by Tertiary and Quaternary strike-slip faulting along the San Andres fault and thrust faulting along the north-dipping Sierra Madre fault. This tectonic activity has resulted in the present terrain occurring in the Project vicinity, where several deep alluvial fans occur at the southern base of the San Gabriel mountains. The Project site is located within the alluvial fan of the San Gabriel River, which extends from the eastern San Gabriel mountains, trending northeast-southwest to north-south, towards the Pacific Ocean.

Soils and Fill Materials

Based on subsurface exploration of the Project site, it is underlain by topsoil, artificial fill, and alluvial soils characteristic of stream channels and alluvial fan outwash deposits. A description of these units is presented below.

Topsoil

Topsoil at the Project site consists of loose silty fine sands and silty fine to coarse sands with little to extensive amounts of fine root fibers and roots. During geotechnical investigations, topsoil was observed to be generally 0.5 to 1 foot in thickness.

Artificial Fill

The artificial fill soils on the site generally consist of loose to dense silty fine to coarse sands, fine to coarse sands, gravelly fine to coarse sands, and fine sands. The fill soils possess a disturbed and mottled appearance, with some samples containing brick and rebar fragments, resulting in their classification as artificial fill. The artificial fill extends from depths of approximately 1 to 5.5 feet below ground surface.

Alluvium

The alluvial soils underlying the Project site generally consist of medium to very dense gravelly, fine to coarse sands with occasional to extensive cobble and boulder content. Larger cobbles and boulders on the Project site reach a maximum dimension of four to five feet across. The alluvial soils were encountered to the maximum depth explored (8 feet) but are anticipated to extend to more than 50 feet in depth.

Groundwater

No groundwater was encountered during subsurface exploration of the Project site; therefore, groundwater is not anticipated to occur within the top eight feet below the site's surface. Historical groundwater data indicates groundwater levels in the Project area have fluctuated between 20 and 60 feet below ground surface between 2011 and 2022, with occasional spikes to 10 feet below ground surface.

4.6.1.2 Geologic Hazards

Faulting and Seismicity

The Project area is within a designated earthquake fault zone as defined by the Alquist-Priolo Earthquake Faulting Zone Act. The Upper Duarte Fault, a parallel strand of the SMFZ system, traverses the southwest corner of the industrial site. Sediment and groundwater anomalies encountered during boring of the Project site, as described in the Project's fault study, confirm that the Upper Duarte Fault is an active fault.

The SMFZ is an east-west trending fault system that extends from Tujunga, California to San Bernardino, California. The SMFZ involves large segments, labeled A through E, with individual identities; the Upper Duarte fault is a strand of Segment D of the SMFZ. Other faults near the Project site include the Sierra Madre Fault to the north, the Duarte Fault to the south, and the Raymond Fault (which is not part of the SMFZ) to the west.

Landslides

Areas having the potential for earthquake-induced landslides generally occur within areas of previous landslide movement, or where local topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacement. Debris flows are caused by high rainfall, steep slopes, loss of vegetation cover, and thick overburden. Areas in the northern portion of the City may be susceptible to landslides due to their proximity to the foothills of the San Gabriel Mountains, which contain steep slopes. However, the Project site is in a flat, central, and urbanized portion of the City where landslides are unlikely to occur.

Liquefaction and Lateral Spreading

Liquefaction is the loss of strength in generally cohesionless, saturated soils when a seismic event induces an excessive level of pressure. The primary factors which influence the potential for liquefaction include groundwater table elevation, soil type and plasticity characteristics, relative density of the soil, initial confining pressure, and intensity and duration of ground shaking. The depth within which the occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface. The Project site is mapped within a liquefaction hazard zone by the California Geological Survey (CGS; 2024); however, subsurface conditions encountered on the site during site-specific investigations are not considered to be conducive to liquefaction due to high soil density.

Seismically Induced Settlement

Seismically induced settlements occur when soil densifies due to ground shaking, resulting in soil instability and building movement. This typically occurs on loose, granular soils with a high liquefaction potential. As stated above, the soils at the Project site are dense and not conducive to liquefaction; therefore, seismically induced settlement is also unlikely to occur at the Project site.

Soil Expansion

Soil expansion occurs when soils with a high absorption potential expand and increase in volume; this can exert force on buildings and cause structural damage. The near-surface soils on the site generally consist of silty sands, sands, and gravelly sands, which were visually classified as very low to non-expansive in the investigations conducted for the Project's geotechnical reports (refer to Appendices F and G). Additionally, as stated above, the soils at the Project site are dense and do not have a high absorption potential. Soil expansion is unlikely to occur at the Project site.

4.6.1.3 Paleontological Resources

Paleontological resources are the remains of indications of ancient non-human organisms. They are scarce non-renewable natural resources. Fossil remains such as bones, teeth, shells, and leaves are found in geologic deposits (rock formations) where they were originally buried. As a result, the potential for fossils in each area can be predicted based on known relationships between geologic formations and fossil occurrences.

According to the paleontological resources assessment conducted for the proposed Project (refer to Appendix I), the Holocene-age deposits present at the surface of the Project area are typically considered to have a low potential for significant paleontological resources due to the relatively young age of the deposits. Additionally, the records search did not identify any fossils within the Project site boundaries, and the closest reported fossil localities were more than 10 miles from the Project site.

4.6.2 Regulatory Setting

4.6.2.1 Federal Regulations

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act of 1977 (Public Law 95-124) established the National Earthquake Hazards Reduction Program, which is coordinated through FEMA, the USGS, the National Science Foundation, and the National Institute of Standards and Technology. The purpose of this program is to establish measures for earthquake hazards reduction and promote the adoption of earthquake hazards reduction measures by federal, state, and local governments; national standards and model code organizations; architects and engineers; building owners; and others with a role in planning and constructing buildings, structures, and lifelines through (1) grants, contracts, cooperative agreements, and technical assistance; (2) development of standards, guidelines, and voluntary consensus codes for earthquake hazards reduction for buildings, structures, and lifelines; and (3) development and maintenance of a repository of information, including technical data, on seismic risk and hazards reduction. The National Earthquake Hazards Reduction Program is intended to improve the understanding of earthquakes and their effects on communities, buildings, structures, and lifelines through interdisciplinary research that involves engineering, natural sciences, and social, economic, and decisions sciences.

Disaster Mitigation Act of 2000

The Federal Disaster Mitigation Act of 2000 (Public Law 106-390) provides the legal basis for FEMA mitigation planning requirements for state, local, and tribal governments as a condition of mitigation grant assistance. This act amended the Robert T. Stafford Disaster Relief and Emergency Assistance Act by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasizes the need for state, local, and tribal entities to closely coordinate mitigation planning and implementation efforts. The requirement for a state mitigation plan is continued as a condition of disaster assistance, adding incentives for increased coordination and integration of mitigation activities at the state level through the establishment of requirements for two levels of state plans. This act also established a new requirement for local mitigation plans and authorized up to seven percent of Hazard Mitigation Grand Program funds available to a state for the development of state, local, and tribal mitigation plans.

International Building Code

The International Building Code (IBC) is one of the International Codes published by the International Code Council and forms the basis for California's Building Code, as well as most of the state building codes in the U.S. It has been adopted by the California Legislature to address the specific building conditions and structural requirements for California, as well as provide guidance on foundation design and structural engineering for different soil types. The IBC assigns buildings risk categories and design requirements based on the intended use of a facility.

U.S. Geological Survey Landslide Hazards Program

The USGS Landslide Hazard Program provides information on landslide hazards, including information on current landslides, landslide reporting, real time monitoring of landslide areas, mapping of landslides

through the National Landslide Hazards Map, local landslide information, landslide education, and research (USGS 2024).

4.6.2.2 State Regulations

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (PRC Sections 2621-2630, Division 2 Chapter 7.5) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The purpose of this act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Alquist-Priolo Earthquake Fault Zoning Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. The 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. Local agencies must regulate most development projects within these zones. Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings would 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 (typically 50-foot setbacks are required).

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 directs the California Department of Conservation (DOC), CGS to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the Seismic Hazards Mapping Act is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards. Staff geologists gather existing geological, geophysical, and geotechnical data from numerous sources to produce the Seismic Hazard Zone Maps. They integrate and interpret these data regionally to evaluate the severity of the seismic hazards and designate as Zones of Required Investigation 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. The Seismic Hazards Mapping Act requires that site-specific geotechnical investigations be conducted within the Zones of Required Investigation to identify and evaluate seismic hazards (i.e., liquefaction and earthquake-induced landslides) and formulate mitigation measures prior to permitting most developments designed for human occupancy.

Special Publication 117A

The CGS prepared its Guidelines for Evaluating and Mitigating Seismic Hazards in California (Special Publication 117A) in 2008. Special Publication 117A constitutes the guidelines for evaluating seismic hazards other than surface fault-rupture, and for recommending mitigation measures as required by PRC Section 2695(a) and contains several important revisions to the 1997 edition of Special Publication 117. The objectives of Special Publication 117A are to assist in the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigation and to promote uniform and effective statewide implementation of the evaluation and mitigation elements of the Seismic Hazards Mapping Act.

2022 California Building Standards Code

California building standards are published in CCR, Title 24, also known as the California Building Standards Code (CBSC). The CBSC, which applies to all applications for building permits, consists of 11 parts that contain administrative regulations for the California Building Standards Commission and for all state agencies that implement or enforce building standards. Local agencies must ensure development complies with the CBSC guidelines. Cities and counties can adopt additional building standards beyond the CBSC. CBSC Part 2, named the California Building Code (CBC), is based upon the 2021 IBC, as described below.

California Building Code

The CBC, Part 2 of the CBSC, is included in CCR Title 24. The CBC incorporates the IBC, a model building code adopted across the U.S. Through the CBC, the state provides a minimum standard for building design and construction. The CBC contains specific requirements for seismic safety, foundations, retaining walls, and site demolition. The CBC also includes provisions for grading, including drainage and erosion control. The CBC provides minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC has provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground shaking with a specified probability of occurring at a site.

4.6.2.3 Local Regulations

City of Azusa General Plan

Chapter 5, *Natural Environment*, of the Azusa General Plan, contains the Geologic Hazards section, which addresses natural hazards in the City (City 2004a). Potential risks to residents and the local environment associated with hazards such as liquefaction, soil failure, earthquakes, and flooding, are considered. This section provides background information related to each issue, and identifies goals and policies regarding hazardous structures, flooding and drainage, emergency preparedness and education, and post-disaster reconstruction. The following goals and policies are related to geology and soils.

Goal 1. Ensure the continued functioning of essential (critical, sensitive, and high-occupancy) facilities following a disaster; help prevent loss of life from the failure of critical and sensitive facilities in an earthquake; and help prevent major problems for post-disaster response, such as difficult or hazardous evacuations or rescues, numerous injuries, and major cleanup or decontamination of hazardous materials.

Policy 1.1. Require that earthquake survival and efficient post-disaster functioning are primary concerns in the siting, design, and construction standards of essential facilities.

Policy 1.2. Require that proposed essential facilities apply the most current professional standards for seismic design and be subject to seismic review, including detailed site investigations for faulting, liquefaction, ground motion characteristics, and slope stability.

Policy 1.4. Prohibit the location of Sensitive and High-Occupancy facilities within 100 feet of the identified active fault zone or potentially active fault zone of concern, unless it is determined by a

qualified geologic engineer that a closer location will not result in undue risks based on detailed site investigations.

Policy 1.7. Incorporate planning for potential seismic incidents affecting Critical, Sensitive, and High-Occupancy Facilities into the City's contingency plans for disaster response and recovery.

Azusa Municipal Code

Azusa Municipal Code Section 88.30.030, *Hazard Mitigation*, codifies the requirements to implement the hazard policies and standards of the Natural Environment Element of the Azusa General Plan. Subpart C of this section states:

Location Requirements: No critical facility shall be located within, or within 150 feet of an identified active or potentially active fault zone, or future Alquist-Priolo Earthquake Fault Zone, and no sensitive or high occupancy facility shall be located within 100 feet of the identified active or potentially active fault zone, unless a qualified engineer determines to the satisfaction of the City, based on detailed site investigations, that a closer location will not result in undue risks.

4.6.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential geology and soils impacts are based on Appendix G of the CEQA Guidelines. A significant impact related to geology and soils could occur if implementation of the proposed 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;

    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 Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or

f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

4.6.4 Methodology and Assumptions

Technical reports related to geology and soils were used to analyze the potential geological impacts of the Project. Preliminary geotechnical studies included the results of visual site reconnaissance, subsurface exploration via borings and test pits, and field and laboratory testing. The fault study of the industrial site involved the logging of two fault trenches. Additional information related to the methodology of these studies can be found in the geotechnical reports prepared for the Project, provided as Appendices F, G, and H to the EIR.

The Paleontological Resources Report, provided as Appendix I to the EIR, was based on a desktop-level paleontological study that included reviews of geologic maps and paleontological literature as well as a records search at the Natural History Museum of Los Angeles County. The records search was conducted to identify any known paleontological resources within the Project site or from the same geologic unit within a one-mile buffer. Paleontological potential rankings were assigned using the federal Potential Fossil Yield Classification system. Refer to Appendix I for additional description of the methodology.

4.6.5 Impact Analysis

4.6.5.1 Seismic Hazards

Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?

Alquist-Priolo Fault Zones

The Upper Duarte Fault traverses the southwest corner of the industrial site. In accordance with the provisions of the Alquist-Priolo Earthquake Fault Zoning Act, all new construction of habitable structures within the Fault Rupture Hazard Zone must be preceded by a fault trenching investigation to determine the presence of on-site strands of any active or potentially active fault and determine the need for a structural setback. The Fault Study performed at the industrial site identified two faults associated with the Upper Duarte Fault that occur on the Project site and concluded these faults are considered active based on sediment dating. Therefore, a 50-foot setback from the fault zones was recommended for the construction of habitable structures. The proposed Project incorporates this recommendation and does not propose construction of buildings (residential or non-residential buildings) within the fault zone, as shown in Figure 3-6. In addition, as described further below, conformance to building construction standards for seismic safety within the CBC would ensure that proposed structures would be able to withstand seismic events associated with these faults. Based on the proposed design of the Project to avoid siting buildings within the identified Alquist-Priolo Earthquake Fault Zone, the Project would not cause substantial adverse effects from rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map.

Ground Shaking

As stated above, the Project site contains an active fault and would be susceptible to ground shaking during a seismic event associated with these on-site faults as well as those located throughout the Project region. However, the Project would be required to comply with General Plan Geologic Hazards Element policies and the Azusa Municipal Code requirements described above, which implement the General Plan policies. In addition, conformance to building construction standards for seismic safety within the CBC would ensure that the Project would be able to withstand seismic shaking. Specifically, the CBC provides minimum standards relating to building design and construction to protect from structural damage and hazards that could occur from seismic shaking. The Project would be required to be constructed according to the recommendations associated with the site's seismic design parameters, including using suitable fill material beneath building foundations, constructing foundations within the allowable bearing values, and constructing recommended building footings. Therefore, adherence to General Plan Geologic Hazards Element policies, the City's Municipal Code, and the CBC would ensure that the Project would not cause substantial adverse effects associated with ground shaking.

Ground Failure and Liquefaction

The Project site contains dense soils that are not anticipated to be subject to ground failure or liquefaction. In addition, long-term groundwater levels are not shallow enough to result in liquefaction at the site. Regardless, the Project would be required to comply with building construction standards in the CBC that would ensure the Project would be able to withstand seismic activity in the region. However, no design recommendations specifically related to liquefaction were identified as necessary within the geotechnical reports prepared for the Project.

Landslides

The Project site is in a flat, urbanized area of the City that does not contain steep slopes. In addition, no historical landslide activity was identified at the Project site. Therefore, the geotechnical reports prepared for the Project conclude landslides are unlikely to occur on the Project site, and no design recommendations related to landsliding are required to be incorporated into the Project design.

Level of Significance Prior to Mitigation

No impact related to ground failure or landslides would occur. Given adherence to applicable building codes and geotechnical recommendations, the Project would not result in substantial adverse effects related to ground rupture or ground shaking. Impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.6.5.2 Soil Erosion

Would the Project result in substantial soil erosion or the loss of topsoil?

Grading, excavation, demolition, and construction activities associated with the Project would expose topsoil, thereby increasing the potential for erosion. Graded or excavated areas would be stabilized through the installation of hardscape and landscaping once operational; therefore, erosion potential would primarily be a concern during Project construction. However, as described further in Section 4.9, *Hydrology and Water Quality*, the Project would also incorporate long-term water quality controls pursuant to National Pollutant Discharge Elimination System (NPDES) requirements, which would protect runoff from minor erosion during Project operation. Short-term erosion and sedimentation potential associated with Project construction would be addressed through conformance with the NPDES and associated Azusa Municipal Code requirements (Chapter 60, *Stormwater and Urban Runoff Pollution Prevention*). These regulations require the development of an erosion and sedimentation control plan based on Project site characteristics that would involve the implementation of BMPs to avoid erosion and off-site drainage during construction. The final BMPs required during construction would be determined during preparation of the Project's Stormwater Pollution Prevention Plan (SWPPP) but are anticipated to include standard measures such as dust control, waste management, and silt fencing installation. Adherence to applicable NPDES permit and Azusa Municipal Code requirements would ensure the Project would not result in substantial soil erosion or the loss of topsoil.

Level of Significance Prior to Mitigation

Given adherence to the applicable erosion control requirements, the Project would not result in substantial soil erosion or topsoil loss. Impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.6.5.3 Geologic Instability

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?

The Project site is primarily underlain by sandy artificial fill and quaternary alluvium consisting of medium dense to very dense gravelly fine to coarse sands. Soils with high densities are not considered to be at risk of lateral spreading, subsidence, liquefaction, or collapse due to the low potential for compaction or absorption. As described above, the Project site is relatively flat and not anticipated to be at risk of landslides. The Project does not propose the creation of slopes or other features that would result in the Project site becoming geologically unstable. Additionally, the Project would be required to comply with the CBC, which contains design requirements by soil type to ensure building stability (Section 1806, *Presumptive Load-Bearing Values of Soils* and Section 1605*, Load Combinations*). The Project would be constructed in accordance with the applicable geotechnical design recommendations

and CBC requirements for fill material characteristics and allowable foundation bearing pressures based on the underlying soil types to accommodate the proposed buildings.

Level of Significance Prior to Mitigation

Given adherence to applicable building codes and geotechnical recommendations, the Project would not result in construction on an unstable geologic unit or cause a geologic unit to become unstable. Impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.6.5.4 Expansive Soil

Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

The Project site is primarily underlain by sandy artificial fill and quaternary alluvium consisting of medium dense to very dense gravelly fine to coarse sands. Visual observation of topsoil within the Project site resulted in the determination that soils underlying the Project site have very low to no expansion potential. Soil material used and compacted beneath building foundations would also be required by the geotechnical recommendations for the Project to have a very low to no expansion potential. Further, the Project would be required to comply with the CBC which specifies building requirements based on the expansion potential of underlying soils. Therefore, the Project would not be located on expansive soil and would not result in a risk to life or property as a result of potential soil expansion.

Level of Significance Prior to Mitigation

Given adherence to applicable building codes and geotechnical recommendations, the Project would not result in risks related to expansive soil. Impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.6.5.5 Septic Tanks

Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The Project would not require the installation of septic tanks or alternative wastewater systems. The Project would connect to the existing public sewer system, which includes sewer mains in Sierra Madre Avenue, North Todd Avenue, and West 10th Street. The Project would construct pipelines and laterals to the proposed buildings from this existing sewer infrastructure and would not involve the use of septic tanks.

Level of Significance Prior to Mitigation

Implementation of the Project would not result in the construction of septic tanks or alternative wastewater disposal systems, and there would be no impact.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

There would be no impact.

4.6.5.6 Paleontological Resources

Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Project site is located in a developed area of the City with some history of disturbance. According to the paleontological resources report prepared for the Project, the Project site is entirely underlain by Holocene-age alluvial gravel and sand, which have a low potential to contain significant paleontological resources due to the relatively young age of the deposits. Additionally, the records search did not identify any fossils within the Project site boundaries, and the closest reported fossil localities were more than 10 miles from the Project site. Therefore, ground-disturbing activities proposed by the Project would not result in the destruction of paleontological resources or unique geologic features.

Level of Significance Prior to Mitigation

Implementation of the Project would not directly or indirectly destroy a unique paleontological resource or unique geologic feature, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.6.6 Cumulative Impact Analysis

Potential cumulative impacts would occur if the proposed Project in combination with the cumulative projects identified in Table 4-1 would result in significant effects to geology and soils. However, impacts related to geology and soils are generally site-specific, as risks associated with geologic settings in one location do not result in associated geologic failure elsewhere. Therefore, the geographic area for the analysis of cumulative impacts related to geology and soils consists of properties adjacent to the Project site.

While none of the identified cumulative development projects occur adjacent to the Project site, cumulative development would be sited within an area subject to seismic activity similar to the Project site. Some of the cumulative projects would require excavation at depths that could potentially cause adverse effects including risk of loss, injury, or death due to strong seismic ground shaking, liquefaction, or landslides. Cumulative development could also involve construction activities which could result in soil erosion or loss of topsoil. However, projects that could be exposed to geologic hazards would be subject to project-specific geotechnical and soil investigations, and potential hazards would be avoided through site-specific recommendations for design and construction. In addition, compliance with applicable General Plan and Municipal Code requirements, CBC regulations, and NPDES Permit requirements would reduce cumulative impacts concerning seismic-related ground failure, unstable geologic units or soils, expansive soils, and soil erosion to a less than significant level. As the proposed Project would also incorporate these engineering best practices, permit requirements, and local regulations related to geology and soils during construction of the Project, cumulative impacts would be less than significant.

As discussed above, the Project site is underlain by material that has a low potential to contain significant paleontological resources, and no fossils were identified to be present within the vicinity of the Project site. Some of the identified cumulative projects could require excavation at depths that could potentially expose or damage paleontological resources. However, these projects would be required to mitigate impacts to paleontological resources through construction monitoring programs and treatment and/or curation requirements for discovered fossils. With the implementation of such mitigation measures, cumulative impacts to paleontological resources from the identified cumulative projects would be considered less than significant, and the Project would not contribute to cumulative paleontological resource impacts.

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4.7 Greenhouse Gas Emissions

This section provides an analysis of potential GHG emissions impacts resulting from construction and operation of the proposed Project. The existing conditions and regulatory framework related to GHGs are also provided in this section. The following analysis primarily relies on the assessment of potential GHG emissions impacts presented in the Project's Air Quality and Greenhouse Gas Emissions Technical Report (HELIX 2025a), which is included as Appendix B to the EIR.

4.7.1 Existing Conditions

4.7.1.1 Climate Change Overview

Global climate change refers to changes in average climatic conditions on Earth, including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by atmospheric gases. These gases are commonly referred to as GHGs because they function like a greenhouse by letting sunlight in but preventing heat from escaping, thus warming the Earth's atmosphere.

GHGs are emitted by natural processes and human (anthropogenic) activities. Anthropogenic GHG emissions are primarily associated with: (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition.

The temperature record shows a decades-long trend of warming, with the Earth's average surface temperature in 2023 confirmed as the warmest on record. Global temperatures in 2023 were around 2.1°F (1.2 degrees Celsius) above a 1951-1980 baseline period average (National Aeronautics and Space Administration 2024). GHG emissions from human activities are the most significant driver of observed climate change since the mid-20th century (United Nations Intergovernmental Panel on Climate Change [IPCC] 2013). The IPCC constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. The statistical models show a "high confidence" that temperature increase caused by anthropogenic GHG emissions could be kept to less than two degrees Celsius relative to pre-industrial levels if atmospheric concentrations are stabilized at about 450 ppm carbon dioxide equivalent (CO_2e) by the year 2100 (IPCC 2014).

4.7.1.2 Greenhouse Gasses

The GHGs defined under California's AB 32 include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).

Carbon Dioxide. CO_2 is the most important and common anthropogenic GHG. CO_2 is an odorless, colorless GHG. Natural sources include the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungi; evaporation from oceans; and volcanic outgassing. Anthropogenic sources of CO_2 include burning fuels, such as coal, oil, natural gas, and wood. Data from ice cores indicate that CO_2 concentrations remained steady prior to the current period for approximately 10,000 years. Per data collected at the Mauna Loa Observatory in Hawaii, the average atmospheric CO_2 concentration in 2010 was 390 ppm, 39 percent above the concentration at the start of the Industrial Revolution (about 280 ppm in 1750). In 2023, the average atmospheric CO_2 concentration was 421 ppm, the highest annual average measured at the Mauna Loa Observatory since data collection began in

1959. As of January 2024, the CO_2 concentration exceeded 422 ppm, a 51 percent increase since 1750 (National Oceanic and Atmospheric Administration 2024).

Methane. CH_4 is the main component of natural gas used in homes. A natural source of CH_4 is from the decay of organic matter. Geological deposits known as natural gas fields contain CH_4, which is extracted for fuel. Other sources are from decay of organic material in landfills, fermentation of manure, and cattle digestion.

Nitrous Oxide. N_2O is produced by both natural and human-related sources. N_2O is emitted during agricultural and industrial activities, as well as during the combustion of fossil fuels and solid waste. Primary human-related sources of N_2O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic (fatty) acid production, and nitric acid production.

Hydrofluorocarbons. Fluorocarbons are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane with chlorine and/or fluorine atoms. Chlorofluorocarbons are nontoxic, nonflammable, insoluble, and chemically nonreactive in the troposphere (the level of air at Earth's surface). Chlorofluorocarbons were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. They destroy stratospheric ozone; therefore, their production was stopped as required by the 1989 Montreal Protocol.

Sulfur Hexafluoride. SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.

Global Warming Potential

GHGs have long atmospheric lifetimes that range from one year to several thousand years. Long atmospheric lifetimes allow for GHG emissions to disperse around the globe. Because GHG emissions vary widely in the power of their climatic effects, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO_2. For example, a gas with a GWP of 10 is 10 times more potent than CO_2 over 100 years. CO_2e is a quantity that enables all GHG emissions to be considered as a group despite their varying GWPs. The GWP of each GHG is multiplied by the prevalence of that gas to produce CO_2e.

Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's Second Assessment Report. In 2007, IPCC updated the GWP values based on the latest science at the time in its Fourth Assessment Report (AR4). The updated GWPs in the IPCC AR4 have begun to be used in recent GHG emissions inventories. In 2013, the IPCC again updated the GWP values based on the latest science in its Fifth Assessment Report (IPCC 2013). However, the United Nations Framework Convention on Climate Change (UNFCCC) reporting guidelines for national inventories require the use of GWP values from the AR4. To comply with international reporting standards under the UNFCCC, official emission estimates for California and the U.S. are reported using AR4 GWP values, and statewide and national GHG inventories have not yet updated their GWP values to the Fifth Assessment Report values. GHG emissions in this analysis are reported using the AR4 GWP values.

By applying the GWP ratios, CO_2e emissions can be tabulated in metric tons (MT) per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline.

The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4.7-1, *Global Warming Potentials and Atmospheric Lifetimes*.

Table 4.7-1
GLOBAL WARMING POTENTIALS AND ATMOSPHERIC LIFETIMES

Greenhouse Gas	Atmospheric Lifetime (years)	IPCC AR4 GWP
Carbon Dioxide (CO_2)	50-200	1
Methane (CH_4)	12	25
Nitrous Oxide (N_2O)	114	298
HFC-134a	14	1,430
PFC: Tetrafluoromethane (CF_4)	50,000	7,390
PFC: Hexafluoroethane (C_2F_6)	10,000	12,200
Sulfur Hexafluoride (SF_6)	3,200	22,800

Source: IPCC 2007
IPCC = Intergovernmental Panel on Climate Change; AR4 = Fourth Assessment Report;
GWP = global warming potential; HFC = hydrofluorocarbon; PFC = perfluorocarbon

4.7.1.3 Greenhouse Gas Inventories

Global and National GHG Inventory

In 2020, total anthropogenic GHG emissions worldwide were estimated at 49,800 million metric tons (MMT) of CO_2e emissions. The five largest emitting countries and the European Union (EU-27), together account for about 60 percent of total global GHG emissions: China (27 percent), the U.S. (12 percent), the European Union (about 7 percent), India (7 percent), the Russian Federation (4.5 percent) and Japan (2.4 percent) (PBL Netherlands Environmental Assessment Agency 2022).

According to USEPA inventories, total U.S. GHG emissions were approximately 5,981 MMT CO_2e in 2020 (USEPA 2022). The primary GHG emitted by human activities in the U.S. was CO_2, which represented approximately 76.4 percent of total GHG emissions (4,760 MMT CO_2e). The largest source of CO_2, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 92.8 percent of CO_2 emissions in 2018 (5,031.8 MMT CO_2e). Relative to 1990, gross U.S. GHG emissions in 2020 were lower by 7.3 percent, down from a high of 15.2 percent above 1990 levels in 2007. GHG emissions decreased from 2019 to 2020 by 10.6 percent and overall, net emissions in 2020 were 21.4 percent below 2005 levels (USEPA 2022).

State GHG Inventory

CARB performed statewide inventories for the years 2000 to 2021, as shown in Table 4.7-2, *California Greenhouse Gas Emissions by Sector*. The inventory is divided into seven broad sectors of economic activity: agriculture, commercial and residential, electricity generation, industrial, transportation, high GWP, and recycling and waste. For comparison, the 1990 baseline inventory for AB 32 is also shown in Table 4.7-2 (CARB 2007). As shown in Table 4.7-2, statewide GHG emissions totaled 430.7 MMT CO_2e in 1990, 471.1 MMT CO_2e in 2000, 448.5 MMT CO_2e in 2010, and 381.3 MMT CO_2e in 2021. Transportation-related emissions consistently contribute the most GHG emissions, followed by industrial emissions and electricity generation.

Table 4.7-2
CALIFORNIA GREENHOUSE GAS EMISSIONS BY SECTOR

Sector	Emissions (MMT CO_2e)			
	1990	2000	2010	2021
Agriculture and Forestry	18.9 (4%)	30.8 (7%)	34.0 (8%)	30.9 (8%)
Commercial and Residential	44.1 (10%)	44.3 (10%)	46.0 (12%)	38.8 (10%)
Electricity Generation	110.5 (26%)	104.7 (23%)	90.3 (20%)	62.4 (16%)
High Global Warming Potential	-	6.6 (1%)	13.7 (3%)	21.3 (6%)
Industrial	105.3 (24%)	92.8 (20%)	88.1 (20%)	73.9 (19%)
Recycling and Waste	-	6.8 (1%)	7.8 (2%)	8.4 (2%)
Transportation	150.6 (35%)	175.3 (38%)	162.9 (37%)	145.6 (38%)
Unspecified Remaining	1.3 (<1%)	0.3 (<1%)	0.3 (<1%)	0.0 (0%)
Total	**430.7**	**461.6**	**442.7**	**381.3**

Source: CARB 2007; CARB 2024c
MMT = million metric tons; CO_2e = carbon dioxide equivalent; - = not analyzed

4.7.2 Regulatory Setting

4.7.2.1 Federal Regulations

Federal Clean Air Act

The federal CAA is described in further detail in Section 4.2.2.1. As it relates to GHGs, the U.S. Supreme Court ruled on April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency* that CO_2 is an air pollutant, as defined under the CAA, and that the USEPA has the authority to regulate emissions of GHGs. The USEPA announced that GHGs (including CO_2, CH_4, N_2O, HFC, PFC, and SF_6) threaten the public health and welfare of the American people. This action was a prerequisite to finalizing the USEPA's GHG emissions standards for light-duty vehicles, which were jointly proposed by the USEPA and the USDOT's NHTSA.

Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards

The USEPA and the NHTSA worked together on developing a national program of regulations to reduce GHG emissions and improve fuel economy of light-duty vehicles. The USEPA established the first-ever national GHG emissions standards under the CAA, and the NHTSA established Corporate Average Fuel Economy standards under the Energy Policy and Conservation Act. On April 1, 2010, the USEPA and NHTSA announced a joint Final Rulemaking that established standards for 2012 through 2016 model year vehicles. This was followed up on October 15, 2012, when the agencies issued a Final Rulemaking with standards for model years 2017 through 2025.

In December 2021, USEPA issued a new rule formally adopting standards previously proposed in August 2021 for model years 2023 and 2024 and finalizing more stringent standards than previously proposed for model years 2025 and 2026. The rule assumes a 17 percent EV market penetration by 2026. Although this is a departure from the NHTSA Corporate Average Fuel Economy standards, USEPA did coordinate with NHTSA during the development of the new standards. On March 20, 2024, USEPA announced new, more ambitious final standards to further reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year 2027. The final standards build upon USEPA's final standards for federal GHG emissions standards for passenger cars and light trucks for

model years 2023 through 2026 and leverages advances in clean car technology to result in benefits to Americans ranging from reducing climate pollution, to improving public health, to saving drivers money through reduced fuel and maintenance costs. The standards will phase in over model years 2027 through 2032.

4.7.2.2 State Regulations

California Building Standards

As described in Section 4.5.2.2, CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. These standards establish energy-efficiency requirements, performance standards, and alternative performance standards for new buildings. As a result of energy efficient buildings, less electricity is required, resulting in decreased GHG emissions.

CALGreen (CCR Title 24, Part 11) is also described further in Section 4.5.2.2 and is a code with mandatory requirements for all nonresidential buildings (including industrial buildings) and residential buildings for which no other state agency has the authority to adopt green building standards. CALGreen, similar to the Title 24, Part 6 requirements, aims to reduce GHG emissions from buildings as a result of reductions in energy use, water consumption, construction waste, and other resources.

Executive Order S-3-05

On June 1, 2005, Executive Order (EO) S-3-05 proclaimed that California is vulnerable to climate change impacts. It declared that increased temperatures could reduce snowpack in the Sierra Nevada, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To avoid or reduce climate change impacts, EO S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

Assembly Bill 32 – Global Warming Solution Act of 2006

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires that CARB develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed by AB 32 to set a GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG emission reductions.

Executive Order B-30-15

On April 29, 2015, EO B-30-15 established a California GHG emission reduction target of 40 percent below 1990 levels by 2030. The EO aligns California's GHG emission reduction targets with those of leading international governments, including the European Union. California met the target of reducing GHGs emissions to 1990 levels by 2020, as established in AB 32. California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the goal established by EO S-3-05 of reducing emissions to 80 percent under 1990 levels by 2050.

Senate Bill 32

SB 32 (Amendments to the California Global Warming Solutions Action of 2006) extends California's GHG reduction programs beyond 2020. SB 32 amended the H&SC to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the state's continuing efforts to pursue the long-term target expressed in EO B-30-15 of 80 percent below 1990 emissions levels by 2050.

Assembly Bill 197

A condition of approval for SB 32 was the passage of AB 197. AB 197 requires that CARB consider the social costs of GHG emissions and prioritize direct reductions in GHG emissions at mobile sources and large stationary sources. AB 197 also gives the California legislature more oversight over CARB through the addition of two legislatively appointed members to the CARB Board and the establishment of a legislative committee to make recommendations about CARB programs to the legislature.

Assembly Bill 1493 and Advanced Clean Cars

AB 1493 (Pavley) requires that CARB develop and adopt regulations that achieve "the maximum feasible reduction of GHGs emitted by passenger vehicles and light-duty truck and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the state." On September 24, 2009, CARB adopted amendments to the Pavley regulations that intend to reduce GHG emissions in new passenger vehicles from 2009 through 2016. The amendments bind California's enforcement of AB 1493 (starting in 2009), while providing vehicle manufacturers with new compliance flexibility.

In January 2012, CARB approved Advanced Clean Cars I, a new emissions-control program for model years 2017 through 2025, including low-emissions vehicle and zero-emissions vehicle criteria. The Advanced Clean Cars II regulations were adopted in 2022, imposing the next level of low-emission and zero-emission vehicle standards for model years 2026 through 2035 that contribute to meeting federal ambient air quality ozone standards and California's carbon neutrality targets.

By 2035, all new passenger cars, trucks, and SUVs sold in California will be zero emissions. The Advanced Clean Cars II regulations take the state's already growing zero-emission vehicle market and robust motor vehicle emission control rules and augments them to meet more aggressive tailpipe emissions standards and ramp up to 100 percent zero-emission vehicles (CARB 2024d).

Assembly Bill 341

The state legislature enacted AB 341 (PRC Section 42649.2), increasing the diversion target to 75 percent statewide. AB 341 requires all businesses and public entities that generate 4 CY or more of waste per week to have a recycling program in place. The final regulation was approved by the Office of Administrative Law on May 7, 2012, and went into effect on July 1, 2012.

Executive Order S-01-07

This EO, signed by Governor Schwarzenegger on January 18, 2007, directs that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by

the year 2020. It orders that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established for California and directs CARB to determine whether an LCFS can be adopted as a discrete early action measure pursuant to AB 32. CARB approved the LCFS as a discrete early action item with a regulation adopted and implemented in April 2010. Although challenged in 2011, the Ninth Circuit reversed the District Court's opinion and rejected arguments that implementing LCFS violates the interstate commerce clause in September 2013. CARB is therefore continuing to implement the LCFS statewide.

Senate Bill 350

Approved by Governor Brown on October 7, 2015, SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This will increase the use of Renewables Portfolio Standard eligible resources, including solar, wind, biomass, and geothermal. In addition, large utilities are required to develop and submit Integrated Resource Plans to detail how each entity will meet their customers resource needs, reduce GHG emissions, and increase the use of clean energy.

Senate Bill 375

SB 375, the Sustainable Communities and Climate Protection Act of 2008, supports the state's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the state's MPOs. CARB periodically reviews and updates the targets, as needed.

Each of California's MPOs must prepare an SCS as an integral part of its RTP. The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate alternative planning strategy to meet the targets. The alternative planning strategy is not a part of the RTP. Qualified projects consistent with an approved SCS or alternative planning strategy categorized as "transit priority projects" would receive incentives to streamline CEQA processing.

Senate Bill 100

Approved by Governor Brown on September 10, 2018, SB 100 extends the renewable electricity procurement goals and requirements of SB 350. SB 100 requires that all retail sales of electricity to California end-use customers be procured from 100 percent eligible renewable energy resources and zero-carbon resources by the end of 2045.

Executive Order N-79-20

EO N-79-20, signed by Governor Newsom on September 23, 2020, establishes three goals for the implementation of zero emissions vehicles in California: first, 100 percent of in-state sales of new passenger cars and trucks will be zero-emissions by 2035; second, 100 percent of medium- and heavy-duty vehicles in the state will be zero-emissions vehicles by 2045 for all operations where

feasible, and by 2035 for drayage trucks; and third, 100 percent of off-road vehicles and equipment will be zero-emissions by 2035, where feasible.

Assembly Bill 1279

Approved by Governor Newsom on September 16, 2022, AB 1279, the California Climate Crisis Act, declares the policy of the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. AB 1279 anticipates achieving these policies through direct GHG emissions reductions, removal of CO_2 from the atmosphere (carbon capture), and an almost complete transition away from fossil fuels.

Senate Bill 905

Approved by Governor Newsom on September 16, 2022, SB 905, Carbon Sequestration: Carbon Capture, Removal, Utilization, and Storage Program, requires CARB to establish a Carbon Capture, Removal, Utilization, and Storage Program to evaluate the efficacy, safety, and viability of carbon capture, utilization, or storage technologies and CO_2 removal technologies and facilitate the capture and sequestration of CO_2 from those technologies, where appropriate. SB 905 is an integral part of achieving the state policies mandated in AB 1279.

California Air Resources Board: Scoping Plan

The Scoping Plan is a strategy CARB develops and updates at least once every five years, as required by AB 32. It lays out the transformations needed across California's society and economy to reduce emissions and reach climate targets. The current 2022 Scoping Plan is the third update to the original plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 mandate of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG emission targets. The 2013 Scoping Plan assessed progress toward achieving the 2020 mandate and made the case for addressing short-lived climate pollutants. The 2017 Scoping Plan also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the SB 32 mandate of reducing GHGs by at least 40 percent below 1990 levels by 2030.

On December 15, 2022, CARB approved the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels; further reductions in short-lived climate pollutants; support for sustainable development; increased action on natural and working lands to reduce emissions and sequester carbon; and the capture and storage of carbon (CARB 2022).

4.7.2.3 Local Regulations

Southern California Association of Governments

As described in Section 4.2.2.3, SCAG prepares the RTP/SCS for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties, which includes transportation programs, measures, and strategies generally designed to reduce VMT, which in turn reduces GHG emissions from transportation sources. The 2024 RTP/SCS identifies strategies to achieve GHG emission reductions primarily based on efficient land use planning strategies and transportation system improvements. These strategies include promoting priority development areas for low-VMT development, 15-minute communities where trip distances are shortened, and other technology improvements to reduce GHG emissions from mobile sources.

4.7.3 Thresholds of Significance

Thresholds used to evaluate potential GHG emissions impacts are based on applicable criteria in CEQA Guidelines Appendix G. A significant GHG emission impact could occur if the implementation of the proposed Project would:

a) Generate GHG 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 GHGs.

Given the relatively small levels of emissions generated by a typical development in relationship to the total amount of GHG emissions generated on a national or global basis, individual development projects are not expected to result in significant, direct impacts with respect to climate change. However, given the magnitude of the impact of GHG emissions on the global climate, GHG emissions from new development could result in significant, cumulative impacts with respect to climate change. Therefore, the potential for a significant GHG emissions impact is limited to a project's contribution to cumulative GHG impacts.

The determination of significance is governed by CEQA Guidelines 15064.4, entitled "Determining the Significance of Impacts from Greenhouse Gas Emissions." CEQA Guidelines Section 15064.4(a) states, "[t]he determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make 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. A lead agency shall have discretion to determine, in the context of a particular project, whether to … [use a quantitative model or qualitative model]" (emphasis added). In turn, CEQA Guidelines Section 15064.4(b) clarifies that a lead agency should consider "Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project." Therefore, consistent with CEQA Guidelines Section 15064.4, the GHG emissions analysis for the Project appropriately relies upon a threshold based on the exercise of careful judgement and believed to be appropriate in the context of this Project.

On December 5, 2008, the SCAQMD Governing Board adopted their *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* for projects where the SCAQMD is the lead agency. The SCAQMD's interim GHG significance threshold uses a tiered approach to determining significance.

Tier 1 consists of evaluating whether or not the Project qualifies for any applicable exemption under CEQA. Tier 2 consists of determining whether or not the Project is consistent with a GHG emission reduction plan that may be part of a local general plan, for example. Tier 3 establishes a screening significance threshold level to determine significance using a 90 percent emission capture rate approach. Tier 4, to be based on performance standards, is yet to be developed. Under Tier 5 the Project proponent would allow offsets to reduce GHG emission impacts to less than the proposed screening level.

For industrial projects with emissions primarily from stationary sources, the SCAMD has adopted a threshold of 10,000 MT CO_2e per year. The SCAQMD has continued to consider the adoption of significance thresholds for residential and general development projects. The most recent proposal issued in September 2010 uses the following tiered approach to evaluate potential GHG emission impacts from various uses. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_2e/year), commercial projects (1,400 MT CO_2e/year), and mixed-use projects (3,000 MT CO_2e/year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e/year would be used for all non-industrial projects. These thresholds have not been adopted by the SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption are uncertain. If the CARB adopts statewide significance thresholds, SCAQMD staff plans to report back to the SCAQMD Governing Board regarding any recommended changes or additions to the SCAQMD's interim threshold.

As the City does not currently have any approved quantitative thresholds related to GHG emissions and because a substantial portion of the Project's GHG emissions would be from mobile sources (not from stationary source industrial processes), the quantitative analysis provided herein relies upon the SCAQMD proposed screening threshold for non-industrial or mixed-use facility projects of 3,000 MT CO_2e (SCAQMD 2008b).

4.7.4 Methodology and Assumptions

4.7.4.1 Emissions Modeling

GHG emissions were calculated using CalEEMod, Version 2022.1, as described in further detail in Section 4.2.4. Construction emissions were calculated based on the anticipated construction schedule (refer to Table 4.2-6), construction equipment for Phases 1-3 (refer to Table 4.2-7, Table 4.2-8, and Table 4.2-9), and vehicle trips. CalEEMod estimates construction GHG emissions for each year of construction activity based on the annual construction equipment profile and other factors determined as needed to complete all activities of construction by the target completion year. As such, each year of construction activity has varying quantities of GHG emissions. Per guidance from the SCAQMD, total construction GHG emissions resulting from the Project are amortized over 30 years and added to operational GHG emissions.

Operational emissions were also estimated using CalEEMod. Operational sources of GHG emissions include mobile (transportation), area, energy, water/wastewater, solid waste, and refrigerants. The area, energy, and mobile source emissions assumptions related to pollutant emissions are provided in Section 4.2.4.2 and are consistent with the assumptions for GHG emissions modeling. Assumptions related to water and wastewater, solid waste, and refrigerants sources of GHG emissions are provided below.

Water and Wastewater Sources

Water-related GHG emissions are from the conveyance and treatment of water and wastewater. Outdoor water use (i.e., landscape irrigations) for the residential site was estimated at 4,522,423 gallons per year in the landscape plan. The projected water demand for the industrial buildings is approximately 13,272 gallons per day, or approximately 4,844,280 gallons per year (Thienes Engineering, Inc. 2024a). Irrigation has been maintained for the golf course during closure and modeling assumes the Project would not result in changes in golf course water use compared to existing conditions, though water use for the golf course would decrease given the remaining seven holes would be converted to other uses. Residential site indoor water use (and the equivalent wastewater generation) and industrial site outdoor water use were modeled using CalEEMod defaults.

Solid Waste Sources

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. CalEEMod determines the GHG emissions associated with the disposal of solid waste into landfills. Portions of these emissions are biogenic. CalEEMod methods for quantifying GHG emissions from solid waste are based on the IPCC method using the degradable organic content of waste. Solid waste was modeled using CalEEMod defaults.

Refrigerants

CalEEMod calculates GHG emissions associated with refrigerants (typically HFCs or blends of gases containing HFCs), which are emitted through leakage or maintenance from Project refrigeration systems, freezers, and air conditioning systems. Refrigerant emissions were calculated using CalEEMod defaults.

4.7.5 Impact Analysis

4.7.5.1 Greenhouse Gas Emissions

Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Emissions

Project construction GHG emissions were estimated using CalEEMod as described in Section 4.7.4. Emissions of GHGs related to the construction of the Project would be temporary. As shown in Table 4.7-3, *Estimated Construction GHG Emissions*, total GHG emissions associated with construction of the Project are estimated at 2,346 MT CO_2e. For construction emissions, SCAQMD guidance recommends that the emissions be amortized (i.e., averaged) over 30 years and added to operational emissions for comparison with the applicable threshold. Averaged over 30 years, the proposed construction activities would contribute approximately 78.2 MT CO_2e emissions per year.

Table 4.7-3
ESTIMATED CONSTRUCTION GHG EMISSIONS

Phase/Year	Emissions (MT CO_2e)
Phase 1/2025	124.6
Phase 1/2026	926.4
Phase 2/2026	777.5
Phase 2/2027	506.7
Phase 3/2026	10.3
Total[1]	**2,345.5**
Amortized Construction Emissions[2]	*78.2*

Source: HELIX 2025a
[1] Totals may not sum due to rounding.
[2] Construction emissions are amortized over 30 years in accordance with SCAQMD guidance.
GHG = greenhouse gas; MT = metric tons; CO_2e = carbon dioxide equivalent

Operational Emissions

The Project's operational GHG emissions were estimated using CalEEMod as described in Section 4.7.4. The Project's annual GHG emissions for the earliest anticipated first full year of operation (2028), including amortized annual construction emissions, are shown in Table 4.7-4, *Operational GHG Emissions*.

Table 4.7-4
OPERATIONAL GHG EMISSIONS

Emission Sources	2028 Emissions (MT CO_2e)
Vehicular (Mobile)	5,772.2
Area	11.6
Energy	2,464.4
Water/Wastewater	49.1
Solid Waste	202.7
Refrigerants	82.7
Amortized Construction (30 years)	78.2
Project Total[1]	**8,660.7**
SCAQMD Screening Threshold	*3,000*
Exceed Threshold?	**Yes**

Source: HELIX 2025a
[1] Totals may not sum due to rounding.
GHG = greenhouse gas; MT = metric tons; CO_2e = carbon dioxide equivalent

As shown in Table 4.7-4, the Project's annual GHG emissions, including amortized construction emissions, would be approximately 8,661 MT CO_2e per year and would exceed the SCAQMD GHG screening threshold of 3,000 MT CO_2e per year.

Level of Significance Prior to Mitigation

Implementation of the Project could result in the generation of GHG emissions, either directly or indirectly, that may have a significant impact on the environment; therefore, impacts would be potentially significant.

Mitigation Measures

The Project's mobile source emissions alone (5,772 MT CO_2e per year) would exceed the SCAQMD's 3,000 MT CO_2e per year threshold. Mobile source GHG emissions are a result of a project's VMT. Per the Project VMT analysis, the Project would generate VMT per capita that would exceed the applicable VMT thresholds. Mitigation measures TR-1 through TR-4 requiring bicycle parking facilities, a commute trip reduction program, and a ride-sharing program, would be incorporated into the Project. However, with all feasible mitigation applied, the Project's VMT impact would remain significant and unavoidable (refer to Section 4.15, *Transportation*).

The source of a project's GHG emissions is as important as the quantity of the emissions (CARB 2022). As discussed further in Section 4.7.5.2, below, Appendix D to CARB's 2022 Scoping Plan identifies transportation electrification, VMT reduction, and building decarbonization and the three priority areas that address the state's largest sources of emissions where local governments have authority or influence.

Without consideration of the Project's mobile sources emissions, the Project's GHG emission would be approximately 2,889 MT CO_2e per year and would not exceed the SCAQMD's 3,000 MT CO_2e per year threshold. While the energy source emissions make up the second largest portion of the estimated Project GHG emissions, these emissions are largely a result of ALW's pollutant intensity factor of 453 pounds of CO_2e per megawatt hour of electricity provided in CalEEMod. ALW will be required to increase its procurement of renewable energy in accordance with state RPS targets, which would result in decreased GHG emissions per megawatt hour of electricity. Additionally, the Project would provide EV parking infrastructure per Title 24 Part 11 CALGreen requirements, and all new Project buildings with the exception of the residential site leasing/clubhouse building would be all-electric. Therefore, no additional Project mitigation measures are needed to address transportation or building electrification.

Nonetheless, even with all feasible VMT mitigation applied, the Project's mobile source emissions alone would exceed the threshold and remain significant and unavoidable. As discussed in Section 4.15, *Transportation*, there are no further feasible mitigation measures which would reduce the VMT impact below a level of significance. Therefore, there are no further feasible mitigation measures which would reduce the VMT-related GHG emissions impact to less than significant.

Level of Significance After Mitigation

Mitigation measures identified in Section 4.15, *Transportation*, would reduce the VMT impacts of the Project but would not reduce these impacts below the applicable threshold. No feasible mitigation measures have been identified that would reduce this impact below a level of significance. Therefore, impacts would be significant and unavoidable.

4.7.5.2 Greenhouse Gas Emission Reduction Plans

Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

There are numerous state plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the LCFS, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the Project level is not addressed. Impacts are evaluated based on whether the Project would conflict with or obstruct implementation of the CARB's 2022 Scoping Plan at the state level, and the SCAGs 2024 RTP/SCS at the regional level. Consistency with Azusa General Plan policies is also addressed at the local level.

2022 Scoping Plan

As discussed in Section 4.7.2.2, the 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. Appendix D to the 2022 Scoping Plan includes recommendations for local government actions that align with the state's climate goals, with a focus on local GHG reduction strategies and approval of new land use development. The 2022 Scoping Plan appendix identifies three priority areas that address the state's largest sources of emissions that local governments have authority or influence over:

1. Transportation electrification
2. VMT reduction
3. Building decarbonization

The Project would provide EV parking infrastructure per the Title 24 Part 11 CALGreen requirements, and all new Project buildings with the exception of the residential site leasing/clubhouse building would be all-electric (would not use natural gas). The provision of primarily electric buildings would also result in the annual energy source GHG emissions reported above decreasing over time given statewide requirements for utility providers to increase sources of clean energy. Therefore, the Project would not conflict with priority areas 1 and 3. However, the Project would generate VMT per capita that would exceed the applicable thresholds, even with mitigation incorporated (refer to Section 4.15, *Transportation*). Therefore, the Project would conflict with local action priority area 2, VMT reduction, and the Project would conflict with the 2022 Scoping Plan.

2024 RTP/SCS

As required by SB 375, the primary goal of the 2024 RTP/SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks based on land use planning and transportation options. To accomplish this goal, the 2024 RTP/SCS identifies various strategies to reduce per capita VMT. The 2024 RTP/SCS is expected the help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020-2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Implementation of the 2024 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. There are 88 policies identified in the categories of Mobility (System Preservation and Resilience, Complete Streets, Transit and Multimodal Integration, Transportation System Management, Transportation Demand Management, Technology Integration, Safety, Funding the System/User Fees), Communities (Priority Development Areas, Housing the Region, 15-Minute Commutes, Equitable Engagement and Decision-Making), Environment (Sustainable Development, Air Quality, Clean Transportation, Natural and Agricultural Lands Preservation, Climate Resilience), and Economy (Goods Movement, Broadband, Universal Basic Mobility, Workforce Development, Tourism). A full analysis of the Project's consistency with 2024 RTP/SCS strategies and policies is included as Appendix D to Appendix B of this EIR, and a summary is provided below. It is noted that many of the 2024 RTP/SCS policies do not apply to the Project, as they are associated with regional land use planning or transportation facilities, and there would be no conflict with these policies.

Within the Project area, the Project would improve sidewalks and crossings consistent with Complete Streets and Safety policies. The proposed age-restricted residential use would contribute to regional housing stocks and provide affordable units in accordance with the 2024 RTP/SCS Housing policies. Further, the creation of jobs throughout the Project components would contribute to the Workforce Development policies. However, as a result of the Project's significant GHG emissions and VMT impacts, the Project would conflict with several 2024 RTP/SCS strategies (Transportation Demand Management, Priority Development Areas, 15-Minute Communities, Sustainable Development, and Air Quality) aimed at GHG emission and VMT reduction. In addition, because the Project proposes a General Plan amendment for the industrial site to change the land use designation from Recreation to Light Industrial and for the residential site to change the land use designation from Recreation to Neighborhood General 3 Medium Density Residential, the Project would result in growth which is not accounted for in the emissions projections used to create the 2024 RTP/SCS. Therefore, the Project would conflict with SCAG's 2024 RTP/SCS.

Azusa General Plan

Although not drafted for the purpose of reducing GHG emissions, the Azusa General Plan includes some policies and implementation programs which would have co-benefits of reducing GHG emissions. The Project incorporates energy efficiency, water efficiency, and pedestrian/bicycle/transit facilities in accordance with General Plan implementation programs EC8, *Residential Improvement Program*, and AQ1, *Design Review*. The Project would also comply with General Plan Chapter 3, Infrastructure Policies I 1.4, 1.6, 2,6, and 2.8 related to conservation of electricity and water via compliance with state building codes that require energy efficiency and water conservation features. A complete discussion of Project consistency with applicable General Plan policies, is included in Section 4.10, *Land Use and Planning*. The Project would not conflict with applicable Azusa General Plan policies for conservation of electricity and water, which would reduce GHG emissions.

Level of Significance Prior to Mitigation

Implementation of the Project could conflict with a plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs; therefore, impacts would be potentially significant.

Mitigation Measures

The primary source of the conflict with the CARB's 2022 Scoping Plan and the SCAG's 2024 RTP/SCS is the Project's VMT impact. As discussed further in Section 4.15, *Transportation*, the Project would generate VMT per capita that would exceed the applicable thresholds, and while mitigation measures TR-1 through TR-4 to reduce Project VMT are identified, the Project's VMT impact would remain significant and unavoidable. Because there would be no feasible mitigation which would reduce the VMT impact, there would be no feasible mitigation which would reduce the impact from conflicts with applicable GHG reduction plans to less than significant.

Level of Significance After Mitigation

Mitigation measures identified in Section 4.15, *Transportation*, would reduce the VMT impacts of the Project but would not reduce these impacts below the applicable threshold. No feasible mitigation measures have been identified that would reduce conflicts with the GHG plans below a level of significance. Therefore, impacts would be significant and unavoidable.

4.7.6 Cumulative Impact Analysis

The geographic scope of consideration for GHG emissions is global, as such emissions contribute, on a cumulative basis, to global climate change. By nature, GHG impacts are cumulative as they are the result of combined worldwide emissions over many years, and additional development would incrementally contribute to this cumulative impact. As such, the impact analysis presented above also serves as the Project's cumulative impact analysis. This approach is consistent with the supporting documentation published by the California Natural Resources Agency when promulgating the SB 97-related CEQA amendments, which indicated that the impact of GHG emissions should be considered in the context of a cumulative impact, rather than a project-level impact. Therefore, as identified in Section 4.7.5, above, the Project would generate GHG emissions that could have a significant impact on the environment and would conflict with plans adopted for the purpose of reducing GHG emissions. As these impacts would be significant and unavoidable, the Project's contribution to the globally significant climate change impact would also be cumulatively considerable.

4.8 Hazards and Hazardous Materials

This section of the EIR analyzes the potential for the proposed Project to result in impacts related to hazards and hazardous materials. Project-specific information provided in this section is from the Phase I Environmental Site Assessment (ESA) Report (Ardent Environmental Group 2022), the Phase II Subsurface Investigation Letter Report (Phase II Report; Roux Associates, Inc. 2024), and the Asbestos and Lead-Containing Materials Demolition Survey Report (Titan Environmental Solutions 2023), which are included as Appendices J, K and L, respectively.

4.8.1 Existing Conditions

The Phase I ESA was completed to assess the likelihood of recognized environmental conditions (RECs) that might be present on the Project site as a result of current or historical land uses or adjacent uses. The Phase I ESA included a site reconnaissance of the Project site, reconnaissance of adjoining properties, a review of the historical usage of the Project site, and a review of relevant documentation provided by various public and local agencies through various electronic databases listing possible hazardous waste-generating facilities on and within the vicinity of the Project site.

4.8.1.1 Terminology

Hazardous materials are substances with certain physical or chemical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Hazardous materials are used for a variety of purposes, including service industries, various small businesses, medical uses, schools, and households. Many chemicals used in household cleaning, construction, dry cleaning, film processing, landscaping, and automotive maintenance and repair are considered hazardous. Small-quantity hazardous waste generators include facilities such as automotive repair, dry cleaners, and medical offices.

REC, as defined in American Society for Testing and Materials (ASTM) 1527-21, means (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the 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 the subject property under conditions that pose a material threat of a future release to the environment.

Controlled REC, as defined in ASTM 1527-21, is a REC affecting the 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 the implementation of required controls.

De-Minimis Condition, as defined in ASTM 1527-21, 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. A condition determined to be a de minimis condition is not considered a REC nor a Controlled REC.

Chemical of Concern, as defined in ASTM E2600-15, is a chemical that is present in the subsurface environment, has a vapor pressure greater than 1 millimeter of mercury, or a Henry's Law Constant

greater than 1×10-5 atmosphere cubic meter per mole at ambient temperature and pressure, and can potentially migrate as a vapor between the water table and ground surface of a property.

4.8.1.2 Physical Setting

The Project site is located in the San Gabriel Valley within the Los Angeles Basin in the northern portion of the Transverse Range Geologic Province. The local and regional surface topography of the Project site generally slopes to the southwest and has an elevation of approximately 640 feet amsl. No natural surface water bodies, including ponds, streams, or other bodies of water, are present on the site. The San Gabriel River is located immediately west of the site and two large flood control basins are located immediately north of the site.

The Project site lies within the San Gabriel Valley Groundwater Basin. Portions of the San Gabriel Valley Groundwater Basin have been impacted with chlorinated solvents, including tetrachloroethylene (PCE) and trichloroethene (TCE), due to historical industrial activities. These impacted areas of the groundwater basin have been designated as a Federal Superfund Site and are referred to as "Operable Units," as described further below.

4.8.1.3 On-site and Surrounding Uses

From at least 1928 to 1964, the Project site and surrounding areas were vacant. The golf course clubhouse was constructed in 1966 in its current configuration. During this time, the surrounding properties were developed for residential purposes, and by 1977, some of the surrounding properties were redeveloped for commercial purposes. Between 1977 and 1981, the on-site golf course and surrounding roads were constructed.

No permits for flood drains, sumps, clarifiers, underground storage tanks (USTs), aboveground storage tanks (ASTs), or other possible environmental issues were noted in the Azusa Building and Safety Division files for the Project site. Based on a search of City directories, the Project area has generally consisted of residential properties and commercial use since the late 1990s. No businesses of possible environmental concern (e.g., dry cleaner, gasoline station, or large industrial businesses) were noted in the immediate Project site vicinity. Based on a review of the DOC, Geologic Energy Management Division online well finder, the Project site is not located within an active oil field and no oil or natural gas wells have been drilled on-site.

4.8.1.4 Listed Hazardous Materials Sites and Facilities

A search of federal, tribal, state, and local environmental regulatory agency databases was conducted to identify listed hazardous materials sites on the site or within the appropriate minimum search distances for each database. The properties identified in the database searches included the Project site and off-site listed facilities. Additional details on the databases searched and the search results are provided in Appendix J of this EIR. No listed facilities occur on the Project site. Off-site listed facilities are summarized below. Based on the information obtained related to nearby hazardous sites and associated activities, no potential REC is present.

State and Tribal Superfund Equivalent Sites

The Project site lies within the San Gabriel Valley Groundwater Basin. Portions of the San Gabriel Valley Groundwater Basin have been impacted with chlorinated solvents, including PCE and TCE, due to

historical industrial activities. As discussed previously, these impacted areas of the groundwater basin have been designated as a Federal Superfund Site and are referred to as "Operable Units." The site does not lie within an Operable Unit. The closest Operable Unit is the Baldwin Park Operable Unit located approximately three miles southwest of the site. Due to the close proximity of the Baldwin Park Operable Unit, the San Gabriel Valley Groundwater Basin is listed on the National Priorities List database. Based on the distance and direction of the Baldwin Park Operable Unit from the site, this listing would not be considered an environmental concern to the Project. The closest facility with groundwater data is located at 301 Aerojet Avenue, approximately 1.3 miles southwest of the site, where groundwater was measured at a depth of approximately 330 to 347 feet below ground surface and groundwater flow was reported in a southwesterly direction.

State and Tribal Hazardous Waste Facilities

A total of six facilities were noted in the Phase I ESA as being properties within the vicinity of the Project site with the potential to pose an environmental concern. Table 4.8-1, *Listed Sites of Potential Environmental Concern,* provides information regarding these six sites, including the environmental databases they appear on, their location, and their distance from the Project site. The environmental databases, which included facilities of potential environmental concern within the vicinity of the Project site, include the Federal Corrective Action Report (CORRACTS), the Federal Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal Facilities List (non-CORRACTS), the Federal RCRA Generators List, the state Calsites Database (Calsites), and the state Solid Waste Landfill Sites (SWLF). Several other databases were searched, which did not include facilities of potential environmental concern within the vicinity of the Project site, and can be found in the Phase I ESA in Appendix J.

Table 4.8-1
LISTED SITES OF POTENTIAL ENVIRONMENTAL CONCERN

Listed Facility	Database(s) Site Appears On	Location	Distance/Direction From Project Site
Aerojet Azusa	CORRACTS	1100 West Hollyvale Street	0.871 mile west-southwest
American Cyanamid Co	Calsites, SWLF	1001 N Todd Avenue	0.019 mile west-southwest
Anthony Manufacturing Corporation	RCRA Generators	1000 West Sierra Madre Avenue	0.032 mile west-southwest
Azusa Dump Owl 4X	Calsites	Azusa	0.047 mile west
Criterion Catalyst	CORRACTS, non-CORRACTS, RCRA Generators, Calsites, SWLF	1001 N Todd Avenue	0.019 mile west-southwest
Valspar Corporation	RCRA Generators	1004 West Tenth Street	0.019 mile southwest

Source: Ardent Environmental Group 2022

The facilities that appear on CORRACTS are those that are undergoing corrective action under the RCRA, which is an order issued when there has been a release of hazardous waste or constituents into the environment from an RCRA facility. However, these facilities (Aerojet Azusa and Criterion Catalyst) are not considered an environmental concern to the Project due to their distance, direction, and depth to groundwater.

The site that appears on the non-CORRACTS database (Criterion Catalyst) is reported by the USEPA as a facility that reports the generation, storage, transportation, treatment, or disposal of hazardous waste. However, based on the distance, direction, and depth to groundwater, this facility would not be considered an environmental concern to the Project site.

The facilities which appear on the RCRA Generators list (Anthony Manufacturing Company, Criterion Catalyst, and Valspar Corporation) are those that generate hazardous waste as defined by the RCRA. This list is maintained for permitting purposes and does not indicate the generation of hazardous waste resulting in potential hazards for surrounding land uses.

The Calsites database, also known as the state-equivalent Comprehensive Environmental Response, Compensation, and Liability Information System, is maintained by the California Department of Toxic Substances Control (DTSC) and contains information on both known and potentially contaminated properties. Azusa Dump Owl 4x was previously used during World War II to manufacture tear gas and other chemical weapons. In 2005, a Site-Specific Chemical Warfare Material Scoping and Security Study Report was completed, which revealed that chemical bombs containing cyanogen chloride, phosgene, and hydrogen cyanide were distributed from the Azusa Dump Owl 4x facility. Based on this study, no evidence of dumping was noted. Beginning in approximately 2016, this off-site property began to be redeveloped with the existing commercial buildings now present. Based on the distance, direction, and depth to groundwater, this historical facility would not be considered an environmental concern to the site. Criterion Catalyst and American Cyanamid Company also appear on this database but are not an environmental concern due to their distance, direction, and depth to groundwater.

The SWLF database consists of open and closed solid waste disposal facilities and transfer stations. Criterion Catalysts and American Cyanamid Company appear on this database but are not an environmental concern due to their distance, direction, and depth to groundwater.

Hazardous Waste Information System

The Hazardous Waste Information System database extracts copies of hazardous waste manifests received each year by DTSC. The Azusa Greens Country Club is listed on this database for the years 2016, 2015, 2014, 2013, 2012, 2011, 1996, and 1994 for generating “aqueous solution with 10 percent or more organic residues,” or “oil/water separation sludge.” These are common chemicals associated with maintenance activities at golf courses, and no chlorinated solvent waste was reported at the golf course. Listing on these databases would not be considered an environmental concern.

4.8.1.5 Storage and Disposal of Hazardous Substances

Following a site visit in 1990, the LARWQCB issued a directive letter dated May 25, 1990, to Azusa Greens Country Club requesting an investigation of the areas where chemicals (namely waste oil) were being stored in the golf course maintenance area. A subsurface investigation next to two areas where 55-gallon drums of waste oil were being stored was conducted and laboratory results for one area showed no detectable concentrations of VOCs and low concentrations (37 milligrams per kilogram [mg/kg]) of total recoverable petroleum hydrocarbons. The second location indicated surficial staining on unpaved soil and elevated concentrations of total recoverable petroleum hydrocarbons at 46,800 mg/kg and low concentrations of benzene at 0.013 mg/kg; all remaining VOCs were not detected. The volume of the impacted soil was estimated to be approximately 0.67 CY. Based on the type of contaminant (i.e., heavy oil) and limited extent and volume (shallow soils in the vicinity of the 55-gallon drums), no further work was recommended. Subsequent letters from LARWQCB, USEPA, and the Los

Angeles County Department of Health Services indicate disagreement related to the need for remediation action and it is unknown whether remediation action occurred related to these soils. During site reconnaissance in 2022, no oil drums were identified in this area and pavement had since been installed. Due to the repaving activities, limited extent of impacted soils, and types of contaminants, the Phase I ESA concludes that no further work is needed and this is not an environmental concern.

During the 1990 LARWQCB site visit noted above, an 800-gallon gasoline UST was also noted immediately northwest of the golf course maintenance building. According to the Los Angeles County Department of Public Works (LACDPW) records, a 1,000-gallon gasoline UST was removed from the site under the direction of the LACDPW in 1994. Laboratory results of confirmation soil samples indicated no detectable concentrations of petroleum hydrocarbons and benzene, toluene, ethylbenzene, and xylenes. Based on these results, the LACDPW issued a no further action letter dated February 15, 1995. Although the initial report suggested that the UST was an 800-gallon UST, it is very common to misrepresent actual volumes of USTs. The 1,000-gallon UST, reportedly removed in 1994, was located in the same general vicinity as the reported 800-gallon UST, and therefore, it is assumed that these tanks are one and the same. Ardent Environmental Group reviewed the data and concurred with the LACDPW that no further work is needed regarding the former 1,000-gallon gasoline UST, and no environmental concern is present.

During the Phase I ESA site reconnaissance in 2022, an approximately 550-gallon waste oil AST within secondary containment was identified in the golf course maintenance area. At least three 55-gallon drums of virgin oil and six drums of waste oil were also located in this area and within secondary containment. No stains or evidence of a release were noted, and storage of these materials is therefore not considered an environmental concern.

4.8.1.6 Fertilizers, Pesticides, and Herbicides

The golf course greens are maintained with fertilizers and some limited pesticides and herbicides as applicants to the course. Fertilizers are generally comprised of potassium, nitrates, and sodium, which are non-toxic chemicals. However, some pesticides and herbicides, including as a result of historical application, can represent risks to human health, especially in residential contexts where less hardscape and buildings are present. The Phase II Report identified detectable concentrations of pesticides in soil samples collected throughout the Project site but did not find detectable concentrations of herbicides in soils on the Project site (refer to Appendix K).

4.8.1.7 Lead and Asbestos

Lead and asbestos were commonly used in building construction prior to 1980, though construction materials after 1980 may still include asbestos. If such materials are present, they may pose a risk to human health if they are disturbed and become airborne. The manufacture of lead-based paint (LBP) and lead-containing material (LCM) was phased out in approximately 1978. The manufacture of most asbestos-containing materials (ACMs) was phased out in the 1970s, ending in 1980. Previously manufactured ACMs that were in stock continued to be used through approximately 1981. Some non-friable ACMs are still manufactured (e.g., roofing mastics). However, in general, buildings constructed after 1981 have a negligible potential to contain friable ACMs and a low potential for most non-friable ACMs, apart from roofing materials.

Construction of the Azusa Greens Country Club occurred in 1966, meaning LBP and ACMs are likely present in the structure. Therefore, an Asbestos and Lead-Containing Materials Demolition Survey Report was conducted at the Project site (refer to Appendix L). ACMs were identified in the roof, flooring, and HVAC adhesive materials in the existing golf course clubhouse on the Project site. LCMs and LBPs above detectable levels were identified in approximately 273 locations in the golf course clubhouse and associated parking area, including walls, sinks, doors and door frames, cabinets, baseboards, and more.

4.8.1.8 Airport Hazards

The nearest airports to the proposed Project site are the San Gabriel Valley Airport (previously El Monte Airport), located approximately 7 miles southwest of the Project site, and the Brackett Field Airport, located approximately 8 miles southeast of the Project site. The Project site is not located within the San Gabriel Valley Airport or Brackett Field Airport influence areas (Los Angeles County Airport Land Use Commission 1991, 2015).

4.8.1.9 Wildland Fire Hazards

The Project site is currently a recreational land use, while the surrounding area primarily consists of industrial and residential uses. The site is located within a local responsibility area (LRA). While the Project site itself is not within a Very High Fire Hazard Severity Zone (VHFHSZ), it is within a Wildland Urban Interface (WUI) area, which is a zone of transition between wilderness and human civilization that experiences a heightened risk of wildfire (U.S. Forest Service [USFS] 2023). Areas of the San Gabriel Mountains, which are directly north of the Project site, are within a VHFHSZ. Both the Forest Division of the LACoFD and the USFS, in a mutual aid agreement, can respond to a forest fire depending on the severity and complexity of an emergency. Additional information regarding wildland fire hazards can be found in Section 4.18, *Wildfire.*

4.8.2 Regulatory Setting

4.8.2.1 Federal Regulations

Chemical Accident Prevention Provision

The provisions listed under Part 68 of the CFR set forth the list of regulated substances and thresholds, the petition process for adding or deleting substances to the list of regulated substances, the requirements for owners or operators of stationary sources concerning the prevention of accident releases, and the state accidental release prevention programs approved under Section 112(r) of the federal CAA.

Comprehensive Environmental Response, Compensation, and Liability Act and the Superfund Amendment and Reauthorization Act of 1986

Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, on December 11, 1980. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for the release of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. The Superfund Amendments and Reauthorization Act amended CERCLA on October 17, 1986. The Superfund Amendments and

Reauthorization Act stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites, required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations, provided new enforcement authorities and settlement tools, increased state involvement in every phase of the Superfund program, increased the focus on human health problems posed by hazardous waste sites, encouraged greater citizen participation in making decisions on how sites should be cleaned up, and increased the size of the trust fund to $8.5 billion.

Federal Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 provided a new set of mitigation plan requirements for state and local jurisdictions to coordinate disaster mitigation planning and implementation. States are encouraged to complete a "Standard" or an "Enhanced" Natural Mitigation Plan. "Enhanced" plans demonstrate increased coordination of mitigation activities at the state level, and, if completed and approved, increase the amount of funding through the Hazard Mitigation Grant Program. California's updated State Hazard Mitigation Plan was adopted in October 2010 and approved by FEMA Region IX.

Federal Response Plan

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a Presidential declaration of a major disaster or emergency.

Hazardous Materials Transport

USDOT regulates the transportation of hazardous materials between states. State agencies with primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are California Highway Patrol (CHP) and Caltrans. Together, these agencies determine container types used and license hazardous waste haulers for the transportation of hazardous waste on public roads, including explosives that may be used for blasting.

International Fire Code

The International Fire Code, created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The International Fire Code regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The International Fire Code and the IBC use a hazard classification system to determine what protective measures are required for fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the International Fire Code employs a permit system based on hazard classification. The International Fire Code is updated every three years.

National Emissions Standards for Hazardous Air Pollutants Program

Under federal law, 188 substances are listed as Hazardous Air Pollutants. Major sources of specific Hazardous Air Pollutants are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) program. The USEPA is establishing regulatory schemes for specific source categories and requires the implementation of maximum achievable control technologies for major sources of Hazardous Air Pollutants in each source category. State law has established the framework for California's Toxic Air Contaminant Identification and Control Program, which is generally more stringent than the federal program, and is aimed at Hazardous Air Pollutants that are a problem in California. The state has formally identified more than 200 substances as TACs and is adopting appropriate control measures for each. Once adopted at the state level, each air pollution control district will be required to adopt a measure that is equally or more stringent.

Renovating, Repair and Painting Rule

In 2008, EPA issued the Renovation, Repair and Painting Rule. This rule requires that firms performing renovation, repair, and painting projects that disturb LBP in pre-1978 homes, childcare facilities, and schools be certified by EPA and use certified renovators who are trained by EPA-approved training providers to follow lead-safe work practices. Individuals can become certified renovators by taking an 8-hour training course from an EPA-approved training provider. Contractors must use lead safe work practices and follow these three simple procedures: (1) contain the work area; (2) minimize dust; and (3) clean up thoroughly.

Resource Conservation and Recovery Act

The RCRA gives the USEPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled the EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

4.8.2.2 State Regulations

The state regulations that govern hazardous materials are equal to or more stringent than federal regulations. California has been granted primary oversight responsibility by the EPA to administer and enforce hazardous waste management programs. State regulations have detailed planning and management requirements to ensure that hazardous wastes are handled, stored, and disposed of properly to reduce risks to human health and the environment. Several key state laws pertaining to hazardous wastes are discussed below. In addition, the DTSC, the SWRCB, and the Integrated Waste Management Act (IWMA) regulate the generation of hazardous materials, and are described below.

Department of Toxic Substances Control

The responsibility for the implementation of RCRA was given to CalEPA's DTSC in August 1992. The DTSC is also responsible for implementing and enforcing California's own hazardous waste laws, which are known collectively as the Hazardous Waste Control Law. Although similar to RCRA, the California Hazardous Waste Control Law and its associated regulations define hazardous waste more broadly and regulate a larger number of chemicals. Hazardous wastes regulated by California, but not by EPA, are called "non-RCRA hazardous wastes."

California Emergency Services Act

The California Emergency Services Act provides the basic authority for conducting emergency operations following a proclamation of emergency by the governor and/or appropriate local authorities. Local government and district emergency plans are considered to be extensions of the California Emergency Plan, established in accordance with the Emergency Services Act.

California Fire Code

The California Fire Code is Chapter 9 of CCR Title 24. It was created by the California Building Standards Commission and is based on the International Fire Code created by the International Code Council, described above. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The California Fire Code regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The California Fire Code and the CBC use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the California Fire Code employs a permit system based on hazard classification. The California Fire Code is updated every three years.

Hazardous Materials Release Response Plans and Inventory

Two programs found in the California H&SC Chapter 6.95 are directly applicable to the CEQA issue of risk due to hazardous substance release. In Los Angeles County, these two programs are referred to as the Hazardous Materials Business Plan (HMBP) program and the California Accidental Release Program, which is the state adaptation of CFR Part 68, described above. The HMBP and California Accidental Release Program provide threshold quantities for regulated hazardous substances. When the indicated quantities are exceeded, an HMBP or Risk Management Plan is required pursuant to the regulation. Congress requires USEPA Region 9 to make Risk Management Plan information available to the public through the USEPA's Envirofacts Data Warehouse.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs) are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the EPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

California State Fire Plan

The 2010 California State Fire Plan was the first statewide fire plan developed in concert between the State Board of Forestry and Fire Protection and the California Department of Forestry and Fire Protection (CAL FIRE). The central goals of the State Fire Plan include (1) improved availability and use of information on hazard and risk assessment; (2) land use planning, including general plans, new

development, and existing developments; (3) shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as community wildfire protection plans; (4) establishing fire resistance in assets at risk, such as homes and neighborhoods; (5) shared vision among multiple fire protection jurisdictions and agencies; (6) levels of fire suppression and related services; and (7) post-fire recovery.

Emergency Services Act

Under the Emergency Services Act (California Government Code Section 8850 et seq.), the state developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Quick response to incidents involving hazardous materials or hazardous waste is a key element of this plan. The Governor's Office of Emergency Services administers the plan, coordinating the responses of other agencies, including EPA, CHP, RWQCBs, air quality management districts, and county disaster response offices.

Government Code Section 65962.5 (Cortese List)

The provisions of Government Code Section 65962.5 are commonly referred to as the Cortese List. The Cortese List is a planning document used by state and local agencies to provide information about hazardous materials release sites. Government Code Section 65962.5 requires CalEPA to develop an updated Cortese List annually, at minimum. DTSC is responsible for a portion of the information contained in the Cortese List. Other California state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

Hazardous Waste Control Act

The Hazardous Waste Control Act is implemented by regulations contained in CCR Title 26 that describe requirements for the proper management of hazardous wastes. The act created the state hazardous waste management program, which is similar to, but more stringent than, the federal RCRA program. The Hazardous Waste Control Act and Title 26 regulations list more than 800 potentially hazardous materials and establish criteria for identifying, packaging, transporting, and disposing of such wastes. Under these regulations, the generator of hazardous waste material must complete a manifest that accompanies the material from the point of generation to transportation to the ultimate disposal location, with copies of the manifest filed with the DTSC.

Aboveground Petroleum Storage Act

The Aboveground Petroleum Storage Act (H&SC Section 25270) requires registration and spill prevention programs for ASTs that store petroleum. In some cases, ASTs for petroleum may be subject to groundwater monitoring programs that are implemented by the RWQCBs and the SWRCB. The LACoFD Health Hazardous Materials Division is the local administering agency for this program within the proposed Project area.

Occupational Health and Safety Administration, Asbestos and Lead

The EPA, CalEPA, and the California Division of Occupational Safety and Health (Cal/OSHA) regulate hazardous materials, including ACMs and LCMs. The USEPA banned several asbestos-containing products in the 1970s (see 40 CFR Part 61, Subpart M; 16 CFR Part 1305; and 16 CFR 1304). Per Cal/OSHA (29 CFR 1926.1101 and 29 CFR 1910.1001), insulation, surfacing, asphalt, and vinyl flooring

material prior to 1980 should be assumed to be ACMs and handled accordingly. EPA and Cal/OSHA require proper abatement and disposal of ACMs and LCMs to protect human health and safety. If the abatement activities involve over 100 SF of ACMs, then the asbestos abatement is required to be completed or overseen by a certified consultant (Title 8 CCR, Article 2.6, Section 341.15).

State Responsibility Area Fire Safe Regulations

CCR Title 14 regulations constitute the basic wildland fire protection standards of the California Board of Forestry and Fire Protection. They have been prepared and adopted for the purpose of establishing minimum wildfire protection standards in conjunction with building, construction, and development in State Responsibility Areas (SRAs). Title 14 regulates that the future design and construction of structures, subdivisions, and developments in an SRA shall provide for basic emergency access and perimeter wildfire protection measures. The project site is not located in or near an SRA.

Accidental Release Prevention Law/California Accidental Release Prevention Program

SB 1889 required California to implement a new federally mandated program governing the accidental airborne release of chemicals promulgated under Section 112 of the federal CAA. Effective January 1, 1997, the Accidental Release Prevention Law/California Accidental Release Prevention Program replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. The California Accidental Release Prevention Program addresses facilities that contain specified hazardous materials, known as regulated substances, that, if involved in an accidental release, could result in adverse off-site consequences. The California Accidental Release Prevention Program defines "regulated substances" as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.

CCR Title 14, Division 1.5

CCR Title 14, Division 1.5 establishes the regulations for CAL FIRE and is applicable in all SRAs where CAL FIRE is responsible for wildfire protection. Development within SRAs must comply with these regulations. Among other measures, Title 14 establishes minimum standards for emergency access, fuel modification, property line setbacks, signage, and water supply.

Hazardous Waste Control Law

Under CCR Title 22, the term "hazardous substance" refers to both hazardous materials and hazardous wastes. Both are classified according to four properties: (1) toxicity; (2) ignitability; (3) corrosiveness; and (4) reactivity (CCR Title 22, Chapter 11, Article 3). A "hazardous material" is defined in H&SC Section 25501 as a material listed in H&SC Section 25501(n)(1) that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

Hazardous materials in various forms can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazards to human health and the environment can occur during the production, storage, transportation, use, or disposal of hazardous materials.

The DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Both laws impose "cradle-to-grave" regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other Certified Unified Program Agencies, including the County Department of Environmental Health.

Unified Program

CalEPA delegates to qualifying local agencies oversight and permitting responsibility for certain state programs pertaining to hazardous waste and hazardous materials. This is achieved through the Unified Program, created by state legislation in 1993 to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities for the following emergency and management programs:

- Hazardous materials release response plans and inventories (business plans);
- California Accidental Release Program;
- Underground Storage Tank Program;
- Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control and Countermeasure plans;
- Hazardous Waste Generator and On-site Hazardous Waste Treatment (tiered permitting) Programs; and
- California Uniform Fire Code: Hazardous material management plans and hazardous material inventory statements.

State Water Resources Control Board

Brownfields are underutilized properties where reuse is hindered by the actual or suspected presence of pollution or contamination. The goals of the SWRCB's Brownfield Program are to:

- Expedite and facilitate site cleanups and closures for Brownfields sites to support reuse of those sites;
- Preserve open space and greenfields;
- Protect groundwater and surface water resources, safeguard public health, and promote environmental justice; and
- Streamline site assessment, clean up, monitoring, and closure requirements and procedures within the various SWRCB site cleanup programs.

Site cleanup responsibilities for brownfields primarily reside within four main programs at the SWRCB: the Underground Storage Tank Program, the Site Cleanup Program, the Department of Defense Program, and the Land Disposal Program. These SWRCB cleanup programs are charged with ensuring sites are remediated to protect the state's surface and groundwater and return it to beneficial use.

California Air Resources Board

One of CARB's major goals is to protect the public from exposure to TACs. The California Air Toxics Program establishes the process for the identification and control of toxic air contaminants and includes provisions to make the public aware of significant toxic exposures and for reducing risk. The Toxic Air Contaminant Identification and Control Act (AB 1807) created the state's program to reduce exposure to air toxics. The Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) supplements the AB 1807 program, by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

Under AB 1807, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, the CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community." AB 1807 also requires CARB to use available information gathered from the AB 2588 program to include in the prioritization of compounds. This report includes available information on each of the above factors required under the mandates of the AB 1807 program. AB 2588 "Hot Spots" program requires facilities to report their air toxics emissions, ascertain health risks, and to notify nearby residents of significant risks. In September 1992, the "Hot Spots" Act was amended by SB 1731, which required facilities that pose a significant health risk to the community to reduce their risk through a risk management plan.

Accidental Release Prevention Law

The Accidental Release Prevention Law provides for consistency with federal laws (i.e., the Emergency Preparedness and Community Right-to-Know Act and the CAA) regarding accidental chemical releases and allows local oversight of both the federal and state programs. State and federal laws are similar in their requirements; however, the California threshold planning quantities for regulated substances are lower than the federal quantities. Local agencies may set lower reporting thresholds or add additional chemicals to the program. The Accidental Release Prevention Law is implemented by the Certified Unified Program Agencies and requires that any business, where the maximum quantity of a regulated substance exceeds the specified threshold quantity, register with the responsible Certified Unified Program Agency as a manager of regulated substances and prepare a Risk Management Plan. A Risk Management Plan must contain an off-site consequence analysis, a five-year accident history, an accident prevention program, an emergency response program, and a certification of the truth and accuracy of the submitted information. Businesses submit their plans to the Certified Unified Program Agencies, which makes the plans available to emergency response personnel. The Business Plan must identify the type of business, location, emergency contacts, emergency procedures, mitigation plans, and chemical inventory at each location.

Transportation of Hazardous Materials/Wastes

Transportation of hazardous materials/wastes is regulated by CCR Title 26. The USDOT is the primary regulatory authority for the interstate transport of hazardous materials. The USDOT establishes regulations for safe handling procedures (i.e., packaging, marking, labeling, and routing). The CHP and Caltrans enforce federal and state regulations and respond to hazardous materials transportation emergencies. Emergency responses are coordinated as necessary between federal, state, and local governmental authorities and private persons through a State Mandated Emergency Management Plan.

Worker and Workplace Hazardous Materials Safety

Occupational safety standards exist to minimize worker safety risks from both physical and chemical hazards in the workplace. Cal/OSHA is responsible for developing and enforcing workplace safety standards and assuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA requires many businesses to prepare Injury and Illness Prevention Plans and Chemical Hygiene Plans. The Hazard Communication Standard requires that workers be informed of the hazards associated with the materials they handle.

Integrated Waste Management Act

The California IWMA of 1989 (AB 939), which is administered by the California Department of Resources Recycling and Recovery (CalRecycle), requires counties to develop an Integrated Waste Management Plan (IWMP) that describes local waste diversion and disposal conditions, and lays out realistic programs to achieve the waste diversion goals. IWMPs compile Source Reduction and Recycling Elements that are required to be prepared by each local government, including cities. Source Reduction and Recycling Elements analyze the local waste stream to determine where to focus diversion efforts, and provide a framework to meet waste reduction mandates. The goal of the solid waste management efforts is not to increase recycling, but to decrease the amount of waste entering landfills. AB 939 required all cities and counties to divert a minimum of 50 percent of all solid waste from landfill disposal. In 2011, the state legislature enacted AB 341 (PRC Section 42649.2), increasing the diversion target to 75 percent statewide. AB 341 also requires the provision of recycling services to commercial and residential facilities that generate 4 CY or more of solid waste per week.

4.8.2.3 Local Regulations

Los Angeles Regional Water Quality Control Board

The LARWQCB is the enforcing agency for the protection and restoration of water resources, including the remediation of unauthorized releases of hazardous substances in soil and groundwater. The UST Section directs environmental cleanup activities at leaking UST sites. Such sites include active and inactive gasoline stations, agricultural sites, brownfield redevelopment sites, airports, bulk petrochemical storage terminals, pipeline facilities, and various chemical and industrial facilities. The Site Cleanup Section oversees activities at non-UST sites where soil or groundwater contamination has occurred. Many of these sites are former industrial facilities and dry cleaners, where chlorinated solvents were spilled, or have leaked into the soil or groundwater.

South Coast Air Quality Management District

The SCAQMD works with CARB and is responsible for developing and implementing rules and regulations regarding air toxics on a local level. The SCAQMD establishes permitting requirements, inspects emission sources, and enforces measures through educational programs and/or fines. SCAQMD Rule 1403 governs the demolition of buildings containing asbestos materials. Rule 1403 specifies work practices with the goal of minimizing asbestos emissions during building demolition and renovation activities, including the removal and associated disturbance of ACM. The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage and disposal requirements for asbestos-containing waste materials. SCAQMD Rule 166 sets the requirements to control the emission of VOCs

from excavating, grading, handling, and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

Hazardous Materials Control Program

In May 1982, the Los Angeles County Board of Supervisors established the Hazardous Materials Control Program within the Department of Health Services. Originally, the Program focused on the inspection of businesses that generate hazardous waste, but has since expanded to include hazardous materials inspections, criminal investigations, site mitigation oversight, and emergency response operations. On July 1, 1991, the Program was transferred to the LACoFD and its name changed to the Health Hazardous Materials Division.

The Health Hazardous Materials Division's mission is to protect the public health and the environment throughout Los Angeles County from accidental releases and improper handling, storage, transportation, and disposal of hazardous materials and wastes through coordinated efforts of inspections, emergency response, enforcement, and site mitigation oversight. The Hazardous Materials Specialists are environmental health professionals dedicated to preventing pollution by serving both the public and business communities in Los Angeles County.

Household Hazardous and E-Waste Roundup Program

The Los Angeles County Sanitation District (LACSD), in cooperation with the Los Angeles County Department of Health Services, has established the Household Hazardous and E-Waste (electronic waste) Roundup Program. The Household Hazardous Waste Collection Program provides County residents with a legal and cost-free way to dispose of unwanted household chemicals that cannot be disposed of in household solid waste bins.

City of Azusa Wildfire Mitigation Plan

The City's Wildfire Mitigation Plan was established in 2019 and identifies ignition sources and wildfire risks related to the City's electric grid. The Wildfire Mitigation Plan identifies wildfire mitigation activities that shall be conducted by the City, such as undergrounding of facilities in fire threat areas, establishment of a vegetation management program, deployment of non-explosion fuses, and noticing of these programs and planned safety procedures to customers (City 2023b).

City of Azusa Local Hazard Mitigation Plan

The City's Local Hazard Mitigation Plan (LHMP) was prepared to identify hazards that threaten the City, determine likely impacts, and set mitigation goals and strategies (City 2018). The LHMP discusses historical instances and future vulnerabilities for dam failures, floods, earthquakes, drought, liquefaction, landslides, wildfires, and other severe weather events. Goals of the LHMP include:

- Goal 1: Minimize risk and vulnerability of Azusa to natural hazards and protect lives and prevent losses to property, public health, economy, and the environment.

- Goal 2: Increase community education, awareness, and preparedness to hazards of concern and promote participation and action to reduce hazard-related losses.

- Goal 3: Improve the community's capabilities to prevent/mitigate hazard-related losses and to be prepared for, respond to, and recover from a disaster event.

Azusa General Plan

Chapter 4, *Economy and Community*, of the Azusa General Plan, discusses fire protection and emergency medical services. This plan provides fire protection goals and policies as follows:

Goal 2. Ensure adequate protection from fire and medical emergencies for Azusa residents and property owners.

Policy 2.7. Ensure that buildings and lots are maintained in a manner that is consistent with fire prevention and personal safety.

Policy 2.8. Continue to work with the LACFD to provide fire prevention, first aid, and lifesaving public education programs.

Chapter 5, *Natural Environment*, of the Azusa General Plan, focuses on air, water, flora and fauna, minerals, geology, and noise. This plan provides the following goals related to hazards:

Goal 1. Ensure the continued functioning of essential (critical, sensitive, and high-occupancy) facilities following a disaster; help prevent loss of life from the failure of critical and sensitive facilities in an earthquake; and help prevent major problems for post-disaster response, such as difficult or hazardous evacuations or rescues, numerous injuries, and major cleanup or decontamination of hazardous materials.

Chapter 3, *The Built Environment*, of the Azusa General Plan, focuses on city design, mobility, housing, historic and cultural resources, and infrastructure. This chapter provides wastewater treatment and facilities goals and policies, as well as the hazardous waste policy that follows:

Policy 3.8. Continue to monitor businesses that may generate hazardous waste to prevent contamination of water.

Azusa Municipal Code

The Azusa Municipal Code includes regulations pertaining to proper handling, storage, and/or use of hazardous materials. The purpose of Azusa Municipal Code Chapter 60, *Stormwater and Urban Runoff Pollution Prevention*, is to protect the health and safety of the residents of the City and County by protecting the beneficial uses, marine and river habitats, and ecosystems of receiving waters within the City from pollutants carried by stormwater and non-stormwater discharges.

The following regulations are included in the Azusa Municipal Code:

Section 60-8(b). No person shall cause the disposal of hazardous materials or wastes into trash containers used for municipal trash disposal.

Section 60-10(4). Discharge to the storm drain system from storage areas for materials containing grease, oil, or hazardous materials, or uncovered receptacles containing hazardous materials, grease, or oil.

Section 60-15(3). Objects, such as motor vehicle parts, containing grease, oil, or other hazardous materials, and unsealed receptacles containing hazardous materials, shall not be stored in areas exposed to stormwater or otherwise susceptible to runoff.

4.8.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential hazards and hazardous materials impacts are based on Appendix G of the CEQA Guidelines. A significant impact related to hazards or hazardous materials could occur if implementation of the proposed 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 to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

4.8.4 Methodology and Assumptions

The analysis in this section is based primarily on the results of the Phase I ESA prepared for the Project and included as Appendix J to the EIR. The Phase I ESA included queries of hazardous site databases, a review of historical imagery, maps, and files, a site reconnaissance survey, interviews with site representatives, and a screening of potential soil and/or groundwater contaminates within the Project site vicinity. The site reconnaissance was conducted on March 24, 2022, to observe and document existing site conditions. The site reconnaissance consisted of visual observations of the Project site and the adjoining properties as viewed from the Project site boundaries or from adjacent public thoroughfares. Available previous environmental reports and site records were reviewed, including those from the SCAQMD, LARWQCB, the DTSC EnviroStor website, and the Los Angeles County Department of Public Works. Additionally, historic aerial photographs, historic USGS topographic maps, and City directories were reviewed. The regulatory database search was conducted by Environmental

Data Resources, Inc. and included a comprehensive search of listed facilities on numerous federal and state agency databases within varying distances from the Project site.

The analysis in this section is also based on the Phase II Report prepared for the Project and included as Appendix K to this EIR, which provided further investigation into the RECs identified within the Phase I ESA. On May 16 and May 20, 2024, shallow soil sampling was conducted at various locations throughout the Project site. The samples were then transported to a laboratory where they were analyzed for concentrations of pesticides, herbicides, lead, and arsenic. Laboratory results were compared to the USEPA Regional Screening Levels and/or DTSC Human and Ecological Risk Office Human Health Risk Assessment Note Number 3 DTSC modified Screening Levels for commercial/industrial and residential soils. In addition, total lead and arsenic concentrations were compared with regional background levels, as presented in *Background Concentrations of Trace and Major Elements in California Soils* and *Determination of a Southern California Regional Background Arsenic Concentration in Soil*. Refer to Appendix K for additional details.

Additional analysis in this section is based on the results of the Asbestos and Lead-Containing Materials Demolition Survey Report prepared for the Project and included as Appendix L to the EIR. The ACM survey was conducted in accordance with NESHAP pre-demolition standards. The LCM survey was conducted in accordance with applicable standards including, but not limited to, the Department of Housing and Urban Development 24 CFR Part 35 Lead Regulations and 1995 and 2012 Guidelines and EPA 40 CFR Part 745 regulations.

4.8.5 Impact Analysis

4.8.5.1 Routine Transport, Use, or Disposal of Hazardous Materials

Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction

Project construction would involve the on-site use and/or storage of hazardous materials/wastes such as fuels, lubricants, solvents, concrete, paint, and portable septic system wastes. The location of material storage and construction staging areas would be dictated by a SWPPP pursuant to the NPDES General Construction Permit, which includes such measures as regular maintenance of construction equipment, and storage criteria for oil, gasoline, and other potential contaminants that commonly occur during construction activities. While these substances could pose a potential health risk to construction workers and to the public during transport, handling of these materials would occur in accordance with Cal/OSHA guidelines and would be disposed of in accordance with DTSC and County regulations. Based on compliance with regulatory requirements, potential risks from use/storage of construction-related hazardous materials would be effectively avoided or addressed. Project construction would not create a significant hazard to the public or the environment.

Operation

The residential land use would involve the limited use of typical household cleaning products, as well as chemical pesticides and fertilizers required to maintain proposed landscaping, and chemicals associated with the maintenance of the community swimming pool. Transport, use, and disposal of hazardous materials at the proposed residences would include minor amounts of such materials and would be

considered routine. The use, handling, and disposal of these products are addressed by household hazardous waste programs that are part of the IWMP of the County. The Household Hazardous Waste Element of the IWMP specifies how hazardous wastes generated by households are to be collected, recycled, treated, and disposed of safely. Regulated materials would be properly handled, used, stored, transported, and/or disposed of in accordance with applicable regulatory standards. Further, use of these common hazardous materials would not create a significant hazard to the public or the environment.

The golf course use would involve the application of fertilizers and some limited pesticides and herbicides to the course, as has historically occurred on the site. Fertilizers are not considered a potential human health risk, and the use of pesticides and herbicides on the golf course site would not be considered an environmental concern, given users of the golf course would be located outdoors and for a relatively short duration of time.

The proposed industrial site does not have identified tenants. Potential uses of the industrial buildings could include light manufacturing, warehouse retail, repair services, and other uses permitted within the DWL zone. As such, it is possible that hazardous materials would be used and/or stored on-site. However, all use and storage of hazardous materials would be subject to applicable regulations regarding the use, storage, and disposal of hazardous materials, which are intended to reduce potential risks to the public and the environment where hazardous materials are used, stored, or disposed.

Level of Significance Prior to Mitigation

Given adherence to the applicable hazardous waste regulations, the Project would not result in substantial adverse effects related to the transport, use, and disposal of hazardous materials. Impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.8.5.2 Accidental Release of Hazardous Materials

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?

Hazardous materials releases could occur if there are existing hazardous materials at the Project site that would be disturbed by Project construction or operation, or if Project operation activities would involve the handling of substantial amounts of hazardous materials with a potential to result in upset and accident conditions.

Accidental Spills/Release of Hazardous Materials

During Project construction, there is a potential for accidental spills of fuels, lubricants, or various other liquids needed to operate heavy equipment on the Project site. These materials include diesel fuel, gasoline, equipment fluids, concrete, cleaning solutions and solvents, lubricant oils, adhesives, human waste, and chemical toilets. Direct impacts to human health and environmental resources from accidental spills of small amounts of hazardous materials from construction equipment during construction of the buildings could occur in the case of accidental spill. However, as discussed above in Section 4.8.5.1, construction materials storage and staging would be managed by a Project-specific SWPPP, which would include measures to avoid accidental spills and protocols to follow if a spill occurs. Additionally, existing federal, state, and local standards and regulations are in place for the handling, storage, and transport of these materials; therefore, Project construction would not result in reasonably foreseeable upset or accident conditions related to hazardous materials.

Similarly, and as discussed further above, the Project does not propose land uses that would handle substantial quantities of hazardous materials, thereby creating reasonably foreseeable upset or accident conditions. Small quantities of relatively common hazardous materials would be used within the Project site for maintenance, landscaping, and other typical activities. In the event that a future user of the industrial buildings requires additional hazardous materials handling, such use would be subject to the applicable regulations and/or permits to prevent potential accident conditions. Based on regulatory compliance, Project operation would not create a significant hazard to the public or environment through accidental release of hazardous materials.

On-site Soils

The Phase I ESA identified the historical application of pesticides and herbicides throughout the residential site that has operated as a golf course as a potential hazard to future residential land uses. As discussed in the Phase II Report, a laboratory analysis of soil samples collected at the Project site concluded that although concentrations of pesticides and lead were detected, they were below applicable screening thresholds for residential and commercial/industrial uses. No concentrations of herbicides were detected. Arsenic concentrations in the soil samples from the Project site were determined to be above applicable screening levels for residential uses; however, the concentration of arsenic did not exceed the California regional background concentration and would not be considered an impact to future Project residents or employees. Therefore, no hazard to the public or environment is anticipated to occur as a result of hazardous materials released from soils on the Project site.

Hazardous Building Materials

The Project includes the renovation of the existing golf course clubhouse, which was constructed in 1966. Because of the age of the structures, a survey to confirm the presence or absence of ACMs and/or LCMs was conducted. Such materials were identified throughout the golf course clubhouse and associated exterior areas, which may pose a health and safety risk when they are disturbed and become airborne and inhalable during renovation activities. While the demolition and handling of these materials are regulated by various agencies, demolition activities are considered to have the potential to release these hazardous building materials into the environment.

Level of Significance Prior to Mitigation

Implementation of the Project could create a significant hazard to the public or the environment through the release of hazardous building materials, such as ACMs and/or LCMs; therefore, impacts would be potentially significant. No significant hazard to the public or the environment would be generated by accidental spills or the excavation of on-site soils, and impacts would be less than significant.

Mitigation Measures

HAZ-1 **Asbestos-Containing Materials and Lead-Based Paint Survey and Disposal.** Prior to the issuance of a demolition or building permit related to the golf course clubhouse renovations, the Project applicant shall demonstrate to the City that a firm licensed to remove and abate ACMs has been retained to conduct demolition activities within the golf course clubhouse and associated parking area. The contracted firm shall conduct all demolition activities where there is a potential for ACM to occur, as identified in the Project ACM survey, and shall do so in accordance with applicable regulations provided by USEPA, the Occupational Safety and Health Administration, Cal/OSHA, SCAQMD, and others.

The Project applicant shall also demonstrate prior to issuance of a demolition or building permit related to the golf course clubhouse renovations that a plan for the handling of LCMs in compliance with applicable regulations has been prepared. The removal of LCMs, including LBP, shall occur by lead hazard communication trained workers in compliance with 29 CFR 1926.62 and 8 CCR 1532.1. Disturbance of LCM and/or LBP shall be performed using lead safe work practices that do not result in exposures above the Action Level of 30 micrograms per cubic meter of air ($\mu g/m^3$) and/or Permissible Exposure Limit of 50 $\mu g/m^3$. In accordance with 40 CFR 261 and DTSC requirements, all lead containing wastes shall be sampled and analyzed for total and leachable lead concentrations and disposed of accordingly based on the waste characterization analytical results.

Level of Significance After Mitigation

With the implementation of mitigation measure HAZ-1, impacts related to the accidental release of hazardous building materials would be less than significant. Impacts related to accidental spills or the excavation of on-site soils would remain less than significant without mitigation.

4.8.5.3 Hazards to Schools

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?

There is one school located within 0.25 mile of the Project site, Victor Hodge Elementary School, which is 0.03 mile (180 feet) to the southeast of the Project site.

As described above, the proposed Project would involve the temporary use and/or storage of fuels, oils, and other potential hazardous materials during construction, and the limited use/storage of household cleaning products, landscaping pesticides, and pool chemicals during operation. In addition, the

industrial site, which is approximately 0.16 mile (840 feet) west of Victor Hodge Elementary School, has the potential to use, store, and dispose of hazardous materials. The Project's use of hazardous materials during construction would be handled in accordance with NPDES SWPPP requirements, as well as in compliance with all applicable federal, state, and local regulations associated with hazardous materials during operation. Adherence to these applicable regulations would avoid the exposure of construction-related and common residential and industrial hazardous materials from occurring to nearby schools.

As discussed in Section 4.8.5.2, however, the existing golf course clubhouse, located approximately 0.15 mile (800 feet) west of Victor Hodge Elementary School, contains ACMs and/or LCMs. People at nearby schools could potentially be exposed to emissions of these hazardous building materials during construction activities.

Level of Significance Prior to Mitigation

Implementation of the Project could emit hazardous emissions associated with ACMs and LCMs within one-quarter mile of a school; therefore, impacts would be potentially significant.

Mitigation Measures

Refer to mitigation measure HAZ-1, provided in Section 4.8.5.2.

Level of Significance After Mitigation

With the implementation of mitigation measure HAZ-1, impacts to existing schools would be less than significant.

4.8.5.4 Hazardous Materials Sites

Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As part of the Phase I ESA prepared for the proposed Project, various federal, state, and local regulatory databases were searched for information regarding properties with known or suspected releases of hazardous materials, chemical handlers, and/or polluters. The Project site is not located on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5.

A total of 6 listed off-site facilities were identified in the Phase I ESA as having the potential to pose an environmental concern to the Project site based on the search radius. Details of the off-site listed facilities are provided in Section 4.8.1.4. However, the Phase I ESA concluded that none of these off-site facilities represent an REC for the Project site. Therefore, the Project would not result in a significant hazard to the public or the environment by being located on a list of hazardous materials sites.

Level of Significance Prior to Mitigation

Implementation of the Project would not create a significant hazard to the public or the environment as a result of being located on a listed hazardous materials site and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.8.5.5 Airport Hazards

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 above, the proposed Project site is nearest to the San Gabriel Valley Airport (previously El Monte Airport), located approximately 7 miles southwest of the Project site, and the Brackett Field Airport, located approximately 8 miles southeast of the Project site. The Project site is not located within the airport influence areas for either of these airports and, therefore, is not within the safety hazard or excessive noise contours related to airport operations for these airports (Los Angeles County Airport Land Use Commission 1991, 2015). The site is also not located within two miles of a public airport or public use airport without an airport land use compatibility plan. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area.

Level of Significance Prior to Mitigation

Implementation of the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.8.5.6 Emergency Response Plans

Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Emergency response plans include elements to maintain continuity of government, emergency functions of governmental agencies, mobilization and application of resources, mutual aid, and public information. Emergency response plans are maintained at the federal, state, and local levels for all types of manmade and natural disasters. Potential hazards or events that may trigger an emergency response action include earthquakes, tsunamis, floods, wildland fires, landslides, droughts, hurricanes, tropical storms, and freezes. Emergency response actions could also be triggered from a hazardous material incident; water or air pollution, major transportation incident; water, gas, or energy shortage; epidemic; nuclear accident; or terrorism.

The City has adopted an LHMP to address hazards that threaten the City, determine likely impacts, and set mitigation goals and strategies for emergencies such as dam failures, floods, earthquakes, drought, liquefaction, landslides, wildfires, and other severe weather events. The Project would not prevent the ability of the City to implement the wildfire risk mitigation measures identified in the LHMP.

Furthermore, the Project would be required to comply with the Azusa General Plan and Municipal Code, which address emergency response and emergency evacuation. During construction of the proposed Project, temporary lane closures along Sierra Madre Avenue, North Todd Avenue, and West 10th Street necessary to construct the proposed sidewalk alterations and utility connections would be subject to City approval of a Traffic Control Plan and traffic control permit to maintain roadway safety and accessibility for emergency vehicles. In addition, construction of the Project would comply with applicable CBC and County Fire Code standards, which would further ensure that emergency access is maintained during Project construction and operation. Project access locations and internal circulation elements would be designed in accordance with regulations related to evacuation and safety, and the Project would not interfere with the evacuation routes established for the City. According to the County Department of Public Works Disaster Route Map, the nearest disaster routes to the Project site are Azusa Avenue, which is west of the Project site, and Foothill Boulevard, which is south of the Project site (LACDPW 2008). The proposed Project would not interfere with access to either of these disaster routes. Therefore, the Project would not conflict with emergency response or evacuation plans.

Level of Significance Prior to Mitigation

The Project would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.8.5.7 Wildland Fires

Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Although the Project site is not located in a VHFHSZ, a VHFHSZ is located adjacent to the west of the site, and the Project site is within a WUI, meaning the Project has the potential to expose people or structures to risks associated with wildland fires. The proposed buildings and other site improvements would be required to comply with applicable wildland fire risk reduction and prevention requirements of the CBC and the California Fire Code. In addition, the Project would comply with brush management requirements for vegetation surrounding buildings to further minimize wildfire risks. The anticipated development within the Project site would include residential, recreational, and industrial uses, which are not land uses that would impair implementation of or physically interfere with the City's emergency response efforts, as discussed in Section 4.8.5.6 above. Additionally, the Project would not conflict with the City's Wildfire Mitigation Plan, which identifies wildfire mitigation activities that shall be conducted by the City, such as undergrounding facilities in fire threat areas, a vegetation management program,

deployment of non-explosion fuses, and noticing to customers (City 2023b). Additional information regarding wildfire hazards can be found in Section 4.18, *Wildfire*. The Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Level of Significance Prior to Mitigation

Implementation of the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury or death involving wildland fire, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.8.6 Cumulative Impact Analysis

For the most part, hazardous materials impacts are site-specific and would not combine with impacts from other projects to result in cumulative impacts. Therefore, the geographic scope for the analysis of cumulative impacts related to hazardous materials is defined as the Project site and adjacent properties.

The cumulative projects listed in Table 4-1 consist of residential, commercial, and industrial uses; some of the cumulative projects propose industrial land uses or other land uses that would require the transportation, use, or disposal of hazardous materials. However, all cumulative projects would be required to comply with all applicable federal, state, and local regulations related to the handling and storage of hazardous materials, including the requirements for spill containment and cleanup procedures. Proper handling and storage of hazardous materials would minimize the potential for accidental spills, while implementation of spill containment and cleanup procedures would prevent significant hazards to the public or the environment in the event of accidental spills. As discussed above, there is the potential for accidental release of hazardous building materials (ACMs and LCMs) during the construction and operation of the proposed Project. Implementation of mitigation measure HAZ-1 would reduce these impacts to below a level of significance. During the construction of the identified cumulative projects, demolition activity could result in the release of similar hazardous materials; however, as the proposed Project is mitigating impacts to below a level of significance, the potential impacts of the Project would not be cumulatively considerable. Any cumulative project that proposes development of a potential hazardous materials site would be required to remediate the existing site contamination consistent with applicable regulations. Therefore, cumulative impacts related to hazardous materials use and hazardous waste sites would be less than significant.

Cumulative projects in the City would also be required to comply with applicable emergency response and evacuation policies outlined in regulations such as the Federal Response Plan, the California Emergency Services Act, local fire codes, and regional/jurisdictional emergency response and evacuation plans. The Project's construction would occur within the Project site, and existing access for emergency service providers would be maintained during the length of construction. Due to existing regulations, cumulative projects would not result in a significant cumulative impact associated with the implementation of emergency response and evacuation plans.

The Project site is not located within a VHFHSZ as designated by CAL FIRE (CAL FIRE 2024). However, a VHFHSZ is located adjacent to the west of the site, and the Project site is within a WUI area. The Project and cumulative projects would be required to comply with existing regulations that would reduce wildfire risk, including applicable fire and building codes. Thus, the development of the proposed Project or cumulative projects would not exacerbate wildfire risk and cumulative projects would not result in a significant cumulative impact related to wildland fire.

4.9 Hydrology and Water Quality

This section analyzes potential Project impacts on the existing drainage patterns, surface hydrology, flood control facilities, and water quality conditions in the Project vicinity. This analysis is based on a Preliminary Hydrology Study (C&V Consulting, Inc. 2025a; Appendix M) and Preliminary Low Impact Development (LID) Plan (C&V Consulting, Inc. 2025b; Appendix N) prepared for the residential and golf course sites, and the Preliminary Hydrology Calculations (Thienes Engineering, Inc. 2024b; Appendix O) and LID Report (Thienes Engineering, Inc. 2024c; Appendix P) prepared for the industrial site. Within this section, references to drainage conditions within the golf course site refer only to the parking area, as the remainder of the golf course site would not have altered drainage conditions as a result of the Project.

4.9.1 Existing Conditions

4.9.1.1 Regional Hydrology and Drainage Conditions

The Project site is located within the jurisdiction of the LARWQCB. For planning purposes, the LARWQCB uses a classification system that divides surface waters into HUs, areas, and subareas. The classification system also divides areas into groundwater basins. According to the LARWQCB's Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), the Los Angeles region is divided into eight HUs and over 20 groundwater basins (LARWQCB 2014).

The Project site is located within the San Gabriel HU and the San Gabriel Valley Groundwater Basin. The San Gabriel HU covers nearly all of Los Angeles County and a portion of Ventura County. The central portion of the San Gabriel Valley is bound to the north by the San Gabriel Mountains and to the southeast, south, and southwest by a system of low-lying hills. The only significant break along this system of hills is at the Whittier Narrows, where the San Gabriel and Rio Hondo Rivers and their tributaries have incised the hills and formed the drainage system for the valley. The Los Angeles and San Gabriel Rivers are the major drainage systems within the San Gabriel HU and drain the coastal watersheds of the transverse mountain ranges. In addition, these surface waters recharge the underlying aquifers that underlay the groundwater basins.

4.9.1.2 Project Site Hydrology and Drainage Conditions

The Project site is located within the 689-square mile San Gabriel River Watershed, which drains into the San Gabriel River from the San Gabriel Mountains, flowing approximately 58 miles south until its confluence with the Pacific Ocean at San Pedro Bay. The 92.12-acre Project site is within the central portion of the San Gabriel River Watershed and is relatively flat, consisting of a golf course with mostly vegetative cover and a paved 1.91-acre parking area that is impervious. Impervious areas including walkways, buildings, and the parking area are assumed to cover 10 percent of the Project site (approximately 9.21 acres). Project site drainage is directed towards Sierra Madre Avenue, North Todd Avenue, and West 10th Street. Based on the site's soil type (Hanford Silt Loam), and the gravelly sands and sandy gravels that underlie the Project site, infiltration is considered good.

North of Sierra Madre Avenue, drainage generally flows south-westerly from the golf course and parking lot and along Avenida Conejo towards Sierra Madre Avenue, which ultimately routes to downstream inlets along Sierra Madre Avenue. An existing inlet is located in Sierra Madre Avenue adjacent to the

parking lot near the entrance to the golf course. These inlets connect to a LACFCD 11-foot-3-inch by 12-foot box that runs along Sierra Madre Avenue and intercepts runoff generated on the Project site.

Drainage from the industrial site sheet flows to three main areas, including to Sierra Madre Avenue where flows are captured in an existing catch basin at the corner of North Todd Avenue and Sierra Madre Avenue; to along the curb and gutter of North Todd Avenue; and to West 10th Street where flows are conveyed southerly in an existing curb opening catch basin to a 27-inch storm drain.

The existing drainage conditions for the site area are shown in Figure 4.9-1a, *Existing Drainage Conditions – Residential/Golf Course Sites*, and Figure 4.9-1b, *Existing Drainage Conditions – Industrial Site*. Existing drainage calculations for the drainage management areas shown in Figures 4.9-1a and 4.9-1b are summarized in Table 4.9-1, *Existing Drainage Conditions*. As shown, peak flow rates are 70.7 cubic feet per second (cfs) north of Sierra Madre Avenue where residential and golf course parking development is proposed, and 76.2 cfs south of Sierra Madre Avenue where industrial development is proposed.

Table 4.9-1
EXISTING DRAINAGE CONDITIONS

Drainage Area	Acres	Location/Description	Existing Runoff Volume (cfs)
Residential/Golf Course Sites			***100-Year Storm Condition***
XA	19.82	Residential site area flows to Sierra Madre Avenue	61.7
XB	1.91	Golf course parking lot flows to Sierra Madre Avenue	9.0
Total[1]	21.72		70.7
Industrial Site			***50-Year Storm Condition***
A1	0.25	Northerly landscaped area flows to corner of Sierra Madre Avenue and North Todd Avenue	1.0
B1	7.12	Westerly portion of the industrial site flows to North Todd Avenue.	26.7
C1	11.88	Easterly portion of the industrial site flows to West 10th Street.	48.5
Total[1]	19.25		76.2

Source: C&V Consulting, Inc. 2025b; Thienes Engineering, Inc. 2024b
[1] Totals may not sum due to rounding.
cfs = cubic feet per second

4.9.1.3 Floodplain Mapping

The Project site is published on Flood Insurance Rate Map (FIRM) Number 06037C1420F, dated September 26, 2008, and is located in Zone X and D. Zone X is defined as areas of moderate flood hazard, usually the area between the limits of the 100-year and 500-year floods. The Zone X designation is also used to identify base floodplains of lesser hazards, such as areas protected by levees from the one percent annual flood, or shallow flooding areas with average depths of less than one foot or drainage areas less than one square mile. The Zone D designation applies to areas that have not been determined to experience flooding. The Project site is not located within a 100-year flood zone.

DMA	COLOR	LANDUSE	AREA (SF)	AREA (AC)	IMPERVIOUS %
XA		LANDSCAPE	863,154.1	19.815	1%
XB		PARKING	83,104.9	1.908	100%

NOTE: EXISTING CONDITIONS IMPERVIOUS COVERS AND FLOW PATH ARE CONSERVATIVELY ASSUMED FOR HYDROLOGIC ANALYSIS AS REFERENCE ONLY. ALLOWABLE Q ARE GIVEN BY LACFCD FOR DESIGN PROPOSE MITIGATION AS 3.6 CFS PER ACRE.

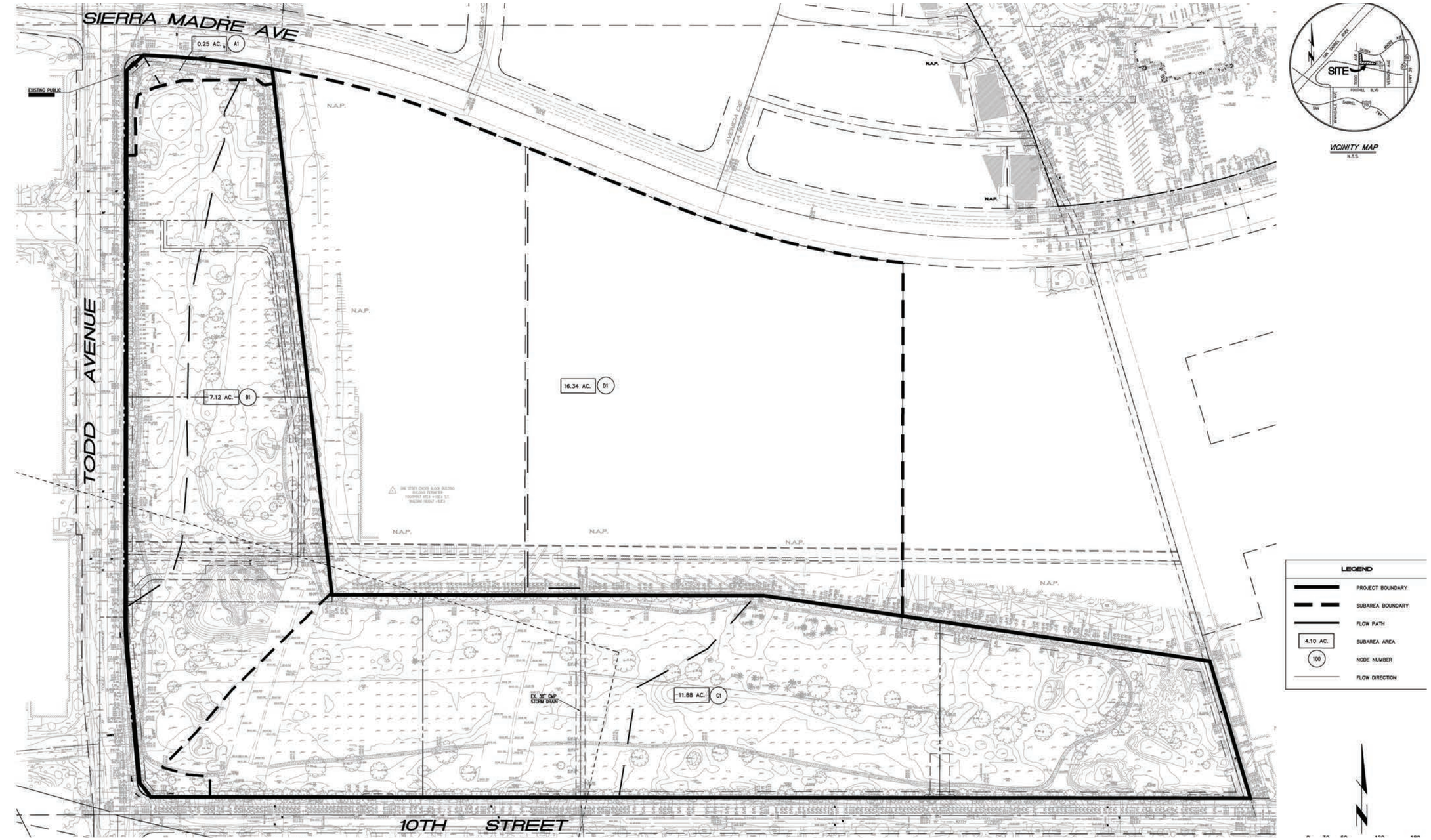
I:\PROJECTS\O\OvertonMoore_03697\00019_AzusaGreens\Map\EIR\Fig4.9-1a_ExDrainageResGC.indd 03697.19.1.5/15/24 - SAB

Source: C&V Consulting, Inc., 2025

HELIX Environmental Planning

Existing Drainage Conditions—Residential/Golf Course Sites

Figure 4.9-1a



I:\PROJECTS\O\OvertonMoore_03697\00019_AzusaGreens\Map\EIR\Fig4.9-1b_ExDrainageIndust.indd 03697.19.1 5/15/24 - SAB

Source: C&V Consulting, Inc., 2024

Existing Drainage Conditions—Industrial Site

Figure 4.9-1b

4.9.1.4 Water Quality Conditions

Nonpoint Source Pollutants

Nonpoint source pollution comes from many sources, and pollutants have been characterized by the major categories below to assist in determining the pertinent data and its use. Nonpoint source pollution is caused by rainfall or snowmelt moving over and through the ground. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into lakes, rivers, wetlands, coastal waters, and ground waters. Nonpoint source pollution can include: excess fertilizers, herbicides, and insecticides from agricultural lands and residential areas; oil, grease, and toxic chemicals from urban runoff and energy production; sediment from improperly managed construction sites, crop and forest lands, and eroding streambanks; salt from irrigation practices and acid drainage from abandoned mines; bacteria and nutrients from livestock, pet wastes and faulty septic systems; and atmospheric deposition and hydromodification. A long-term effect of urbanization can be to increase pollutant export over naturally occurring conditions, thereby affecting the water quality of adjacent streams and downstream receiving waters. An important consideration in evaluating stormwater quality is to assess whether the beneficial use to the receiving waters is impaired. Receiving waters can assimilate a limited quantity of various constituent elements; however, there are thresholds beyond which the measured amount becomes a pollutant and results in an undesirable impact. Standard water quality categories of typical urbanization impacts are:

- *Sediment* – Sediment is made up of tiny soil particles that are washed or blown into surface waters. It is the major pollutant by volume in surface water. Suspended soil particles can cause the water to look cloudy or turbid. The fine sediment particles also act as a vehicle to transport other pollutants, including nutrients, trace metals, and hydrocarbons. Construction sites are the largest source of sediment for urban areas under development. Another major source of sediment is streambank erosion, which may be accelerated by increases in peak rates and volumes of runoff due to urbanization.

- *Nutrients* – Nutrients are a major concern for surface water quality, especially phosphorous and nitrogen, which can cause algal blooms and excessive vegetative growth. Of the two, phosphorus is usually the limiting nutrient that controls the growth of algae in lakes. The orthophosphorous form of phosphorus is readily available for plant growth. The ammonium form of nitrogen can also have severe effects on surface water quality. The ammonium is converted to nitrate and nitrite forms of nitrogen in a process called nitrification. This process consumes large amounts of oxygen, which can impair the dissolved oxygen levels in water. The nitrate form of nitrogen is very soluble and is found naturally at low levels in water. When nitrogen fertilizer is applied to lawns or other areas in excess of plant needs, nitrates can leach below the root zone, eventually reaching groundwater. Orthophosphate from auto emissions also contributes phosphorus in areas with heavy automobile traffic. As a general rule of thumb, nutrient export is greatest from development sites with the most impervious areas. Other problems resulting from excess nutrients are: (1) surface algal scums; (2) water discolorations; (3) odors; (4) toxic releases; and (5) overgrowth of plants. Common measures for nutrients are total nitrogen, organic nitrogen, total Kjeldahl nitrogen, nitrate, ammonia, total phosphate, and total organic carbon.

- *Trace Metals* – Trace metals are primarily a concern because of their toxic effects on aquatic life, and their potential to contaminate drinking water supplies. The most common trace metals

found in urban runoff are lead, zinc, and copper. Fallout from automobile emissions is also a major source of lead in urban areas. A large fraction of the trace metals in urban runoff are attached to sediment; this effectively reduces the level, which is immediately available for biological uptake and subsequent bioaccumulation. Metals associated with sediment settle out rapidly and accumulate in the soils. Urban runoff events typically occur over a shorter duration, reducing the amount of exposure, which could be toxic to the aquatic environment. The toxicity of trace metals in runoff varies with the hardness of the receiving water. As the total hardness of the water increases, the threshold concentration levels for adverse effects increases.

- *Oxygen-Demanding Substances* – Aquatic life is dependent on the dissolved oxygen in the water. When organic matter is consumed by microorganisms, dissolved oxygen is consumed in the process. A rainfall event can deposit large quantities of oxygen-demanding substances in lakes and streams. The biochemical oxygen demand of typical urban runoff is on the same order of magnitude as the effluent from an effective secondary wastewater treatment plant. A problem from low dissolved oxygen results when the rate of oxygen-demanding material exceeds the rate of replenishment. Oxygen demand is estimated by the direct measure of dissolved oxygen and indirect measures such as biochemical oxygen demand, chemical oxygen demand, oils and greases, and total organic carbon.

- *Bacteria* – Bacteria levels in undiluted urban runoff exceed public health standards for water contact recreation almost without exception. Studies have found that total coliform counts exceeded the USEPA's water quality criteria at almost every site and almost every time it rained. The coliform bacteria that are detected may not be a health risk by themselves but are often associated with human pathogens.

- *Oil and Grease* – Oil and grease contain a wide variety of hydrocarbons, some of which could be toxic to aquatic life in low concentrations. These materials initially float on water and create the familiar rainbow-colored film. Hydrocarbons have a strong affinity for sediment and quickly become absorbed to it. The major source of hydrocarbons in urban runoff is through leakage of crankcase oil and other lubricating agents from automobiles. Hydrocarbon levels are highest in the runoff from parking lots, roads, and service stations. Residential land uses generate less hydrocarbon export, although illegal disposal of waste oil into stormwater can be a local problem.

- *Other Toxic Chemicals* – Priority pollutants are generally related to hazardous wastes or toxic chemicals and can be sometimes detected in stormwater. Priority pollutant scans have been conducted in previous studies of urban runoff, which evaluated the presence of over 120 toxic chemicals and compounds. The scans rarely revealed toxins that exceeded the current safety criteria. The urban runoff scans were primarily conducted in suburban areas not expected to have many sources of toxic pollutants (with the possible exception of illegally disposed or applied household hazardous wastes). Measures of priority pollutants in stormwater include: (1) phthalate (plasticizer compound); (2) phenols and creosols (wood preservatives); (3) pesticides and herbicides; (4) oils and greases; and (5) metals.

Characteristics of Runoff

Standard parameters, which can assess the quality of stormwater, provide a method of measuring impairment. The quantity of a material in the environment and its characteristics determine the degree

of availability as a pollutant in surface runoff. In an urban environment, the quantity of certain pollutants in the environment is a function of the intensity of the land use. For instance, a high density of automobile traffic makes a number of potential pollutants (such as lead and hydrocarbons) more available. The availability of a material, such as a fertilizer, is a function of the quantity and the manner in which it is applied. Applying fertilizer in quantities that exceed plant needs leaves the excess nutrients available for loss to surface or groundwater. Water quality parameters for stormwater comprise a long list and are classified in many ways. Typically, the concentration of an urban pollutant, rather than the annual load of that pollutant, is required to assess a water quality problem. Some of the physical, chemical, or biological characteristics that evaluate the quality of the surface runoff are listed below.

- *Dissolved Oxygen* – Dissolved oxygen in the water has a pronounced effect on the aquatic organisms and the chemical reactions that occur. It is one of the most important biological water quality characteristics in the aquatic environment. Dissolved oxygen is a transient property that can fluctuate rapidly in time and space and represents the status of the water system at a particular point and time of sampling. The decomposition of organic debris in water is a slow process, as are the resulting changes in oxygen status. The oxygen demand is an indication of the pollutant load and includes measurements of biochemical oxygen demand or chemical oxygen demand.

- *Biochemical Oxygen Demand* – The biological oxygen demand is an index of the oxygen-demanding properties of the biodegradable material in water. These values are useful in assessing stream pollution loads and for comparison purposes.

- *Chemical Oxygen Demand* – The chemical oxygen demand is a measure of the pollutant loading in terms of complete chemical oxidation using strong oxidizing agents. Chemical oxygen demand does not necessarily provide a good index of oxygen demanding properties in natural waters.

- *Total Dissolved Solids* – Total dissolved solids (TDS) concentration is an important indicator of water quality because dissolved solids affect the ionic bonding strength related to other pollutants, such as metals in the water, and are a major determinant of aquatic habitat. TDS affects the saturation concentration of dissolved oxygen and influences the ability of a water body to assimilate wastes. Eutrophication rates depend on TDS.

- *pH* – The pH of water is the negative log, base 10, of the hydrogen ion activity. A pH of 7 is neutral; a pH greater than 7 indicates alkaline water; a pH less than 7 represents acidic water. In natural water, CO_2 reactions are some of the most important in establishing pH. The pH at any one time is an indication of the balance of chemical equilibrium in water and affects the availability of certain chemicals or nutrients in water for uptake by plants. The pH of water directly affects fish and other aquatic life; generally, toxic limits are pH values less than 4.8 and greater than 9.2.

- *Alkalinity* – Alkalinity is the opposite of acidity, representing the capacity of water to neutralize acid. Alkalinity is also linked to pH and is caused by the presence of carbonate, bicarbonate, and hydroxide, which are formed when CO_2 is dissolved. A high alkalinity is associated with a high pH and excessive solids. Most streams have alkalinity less than 200 milligrams per liter (mg/L). Ranges of alkalinity of 100 to 200 mg/L seem to support well-diversified aquatic life.

- *Specific Conductance* – The specific conductivity of water, or its ability to conduct an electric current, is related to the total dissolved ionic solids. Long-term monitoring of project waters can develop a relationship between specific conductivity and TDS. Its measurement can be used to approximate TDS.

- *Turbidity* – The clarity of water is an important indicator of water quality that relates to the alkalinity of photosynthetic light to penetrate. Turbidity is an indicator of the property of water that causes light to become scattered or absorbed. Turbidity is caused by suspended clays and other organic particles. It can be used as an indicator of certain water quality constituents, such as predicting sediment concentrations.

- *Nitrogen* – Sources of nitrogen in stormwater are organic matter or chemical additions. Ammonia and nitrate are important nutrients for the growth of algae and other plants. Excessive nitrogen can lead to eutrophication since nitrification consumes dissolved oxygen in the water. Some fish life can be affected when nitrate-nitrogen exceeds 4.2 mg/L. The principal water quality criterion for nitrogen focuses on nitrate and ammonia.

- *Phosphorus* – Phosphorus is an important component of organic matter. In many water bodies, phosphorus is the limiting nutrient that prevents additional biological activity from occurring. The origin of this constituent in urban stormwater discharge is generally from fertilizers and other industrial products. Orthophosphate is soluble and is the only biologically available form of phosphorus. Since phosphorus strongly associates with solid particles and is a significant part of organic material, sediments influence concentration in water and are an important component of the phosphorus cycle in streams.

4.9.1.5 Regional Surface Water Quality

The LARWQCB's Basin Plan designates "beneficial uses" for lakes, rivers, streams, and other surface waters. There are a total of 24 different categorizations that can apply, ranging from groundwater recharge to municipal and domestic water supply to water contact recreation. The following is a list of the San Gabriel River's known beneficial uses (LARWQCB 2014), which may be existing, potential, and intermittent and not necessarily applicable to all reaches of the San Gabriel River:

- *Municipal and Domestic Water Supply*: Waters are used for community, military, or individual water supply systems, including, but not limited to, drinking water supply.

- *Industrial Service Supply*: Waters are used for industrial activities that do not depend primarily on water quality, including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well re-pressurization.

- *Industrial Process Supply*: Waters are used for industrial activities that depend primarily on water quality.

- *Groundwater Recharge*: Waters are used for natural or artificial recharge of groundwater for purposes of future extraction, maintenance of water quality, or halting of saltwater intrusion into freshwater aquifers.

- *Warm Freshwater Habitat*: Waters support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.

- *Wildlife Habitat*: Waters support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.

- *Protection of Rare, Threatened, or Endangered Species*: Waters support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered.

4.9.1.6 Regional Groundwater Quality

Groundwater quality within the San Gabriel Valley Groundwater Basin has continued to degrade over time as a result of ground disposal of VOCs used primarily as solvents in industrial and commercial activities dating back to World War II. Agricultural uses introduce pesticides and fertilizers into the groundwater system, and commercial/industrial uses often rely on underground storage tanks that often leak over time, releasing petroleum fuels, solvents, and various hazardous materials.

The seriousness of the San Gabriel Valley Groundwater Basin's degraded regional groundwater quality was revealed in 1979, when high concentrations of VOCs were discovered in the City. Besides VOCs, key constituents of concern in the San Gabriel Valley Groundwater Basin include TDS, nitrate, perchlorate, and Nitrosodimethylamine. Nitrate is also an issue for the San Gabriel Valley Groundwater Basin, as concentrations exceed the nitrate maximum contaminant level in the western portion of the basin west of Alhambra Wash, in the eastern portion of the basin east of Little Dalton Wash, and in the vicinity of the mouth of Puente Valley. Water contaminated with nitrates is either blended with other sources or not used. In addition to VOCs and nitrate, perchlorate, and Nitrosodimethylamine have been detected in concentrations above applicable notification levels in wells from the Main San Gabriel Valley Groundwater Basin. In January 2002, 22 wells were removed from service due to unacceptable levels of perchlorate. Perchlorate treatment facilities are currently operating within the basin. During 1998, eight local wells were found to contain levels of Nitrosodimethylamine above the action level of two parts per thousand. Three facilities are currently in operation to treat Nitrosodimethylamine.

As of this writing, there is no established Groundwater Sustainability Agency or Groundwater Sustainability Plan for the San Gabriel Valley Groundwater Basin. Refer to Section 4.9.2.2 for a discussion regarding the Sustainable Groundwater Management Act.

4.9.1.7 Existing On-Site Stormwater Quality

The Project site is currently developed as a private golf course. According to the Phase I ESA (Ardent Environmental Group, Inc. 2022), no previous assessments on the Project site have indicated contaminants of concern in soil, soil vapor, and groundwater beneath the site are of concern and if present at all, would be considered a de-minimis condition (refer to Appendix J). The Project site is not identified as a contributor to regional groundwater conditions and is not designated a Responsible Party to Superfund actions. Thus, the Project site's existing operations are not currently considered a source of water pollution.

The San Gabriel River, San Pedro Bay, Walnut Creek, and Alamitos Bay are classified as impaired water bodies and have been placed on the 303(d) list of impaired waters for the following pollutants: copper, dioxin, nickel, dissolved oxygen, coliform bacterial, pH, cyanide, lead, indicator bacteria, chlordane, Dichlorodiphenyltrichloroethane (DDT), Polychlorinated biphenyls (PCBs), and sediment toxicity (SWRCB 2022). Since the Project site is a tributary to the San Gabriel River, the Project site is a contributor of pollutants to the impairments within the San Gabriel River and Estuary, as well as the San Pedro Bay. Table 4.9-2, *Existing Impaired Watershed Reaches*, describes existing impaired watershed reaches and identified pollutants/stressors.

Table 4.9-2
EXISTING IMPAIRED WATERSHED REACHES

Water Body	Pollutant/Stressor
San Gabriel River Estuary	Copper, Dioxin, Nickel, Indicator Bacteria, and Dissolved Oxygen
San Gabriel River Reach 1 (Estuary to Firestone)	Temperature, water, pH
San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam)	Cyanide, Lead, Coliform Bacteria, Temperature, and water
San Gabriel River Reach 3 (Whittier Narrows to Ramona)	Indicator Bacteria
San Pedro Bay Near/Off-Shore Zones	Chlordane, Total DDT, PCBs, Sediment Toxicity
Walnut Creek	Benthic Community Effects, Indicator Bacteria, pH
Alamitos Bay	Indicator Bacteria, Dissolved Oxygen

Source: C&V Consulting, Inc. 2025b; Thienes Engineering, Inc. 2024c
DDT = Dichlorodiphenyltrichloroethane; PCB = Polychlorinated biphenyls

4.9.2 Regulatory Setting

4.9.2.1 Federal Regulations

Clean Water Act

The principal law governing pollution of the nation's surface waters is the Federal Water Pollution Control Act (i.e., the CWA). Originally enacted in 1948, it was amended in 1972 and has remained substantially the same since. The CWA consists of two major parts: provisions that authorize federal financial assistance for municipal sewage treatment plant construction and regulatory requirements that apply to industrial and municipal dischargers. The CWA authorizes the establishment of effluent standards on an industry basis. The CWA also requires states to adopt water quality standards that "consist of the designated uses of the navigable waters involved and the water quality criteria for such waters based upon such uses."

The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the NPDES, effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint-source discharge programs, and wetlands protection. The USEPA has delegated the responsibility for the administration of portions of the CWA to state and regional agencies.

Impaired Water Bodies

CWA Section 303(d) and California's Porter-Cologne Water Quality Control Act (described below) require that the state establish the beneficial uses of its state waters and to adopt water quality standards to protect those beneficial uses. Section 303(d) establishes a Total Maximum Daily Load, which is the maximum quantity of a contaminant that a water body can maintain without experiencing adverse effects, to guide the application of state water quality standards. Section 303(d) also requires the state to identify "impaired" streams (water bodies affected by the presence of pollutants or contaminants) and to establish the Total Maximum Daily Load for each stream.

National Pollutant Discharge Elimination System

To achieve its objectives, the CWA is based on the concept that all discharges into the nation's waters are unlawful, unless specifically authorized by a permit. The NPDES is the permitting program for the discharge of pollutants into surface waters of the U.S. under CWA Section 402. Thus, industrial and municipal dischargers (point source discharges) must obtain NPDES permits from the appropriate RWQCB (i.e., the Los Angeles region). The existing NPDES (Phase I) stormwater program requires municipalities serving more than 1,000,000 persons to obtain an NPDES stormwater permit for any construction project larger than five acres. Proposed NPDES stormwater regulations (Phase II) expand this existing national program to smaller municipalities with populations of 10,000 persons or more and construction sites that disturb more than one acre. For other dischargers, such as those affecting groundwater or from non-point sources, a Report of Waste Discharge must be filed with the RWQCB. For specified situations, some permits may be waived, and some discharge activities may be included in an existing General Permit.

National Flood Insurance Program

Congress passed the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973, which are intended to reduce the need for large, publicly-funded flood control structures and disaster relief by restricting development on floodplains.

The National Flood Insurance Program (NFIP) provides a means for property owners to financially protect themselves from flood damage. The NFIP offers flood insurance to homeowners, renters, and business owners if their community participates in the program. Participating communities agree to adopt and enforce ordinances that meet or exceed FEMA requirements to reduce the risk of flooding. The County of Los Angeles and the City of Azusa are participants and must adhere to the NFIP.

Through its Flood Hazard Mapping Program, FEMA identifies flood hazards, assesses flood risks, and partners with states and communities to provide accurate flood hazard and risk data. Flood Hazard Mapping is an important part of the NFIP, as it is the basis of the NFIP regulations and flood insurance requirements. FEMA maintains and updates data through FIRMs and risk assessments. A FIRM is an official map of a community on which FEMA has delineated both the special hazard areas and the risk premium zones applicable to the community.

A Special Flood Hazard Area is an area within a floodplain having a one percent or greater chance of flood occurrence within any given year (commonly referred to as the 100-year flood zone). Special Flood Hazard Areas are delineated on flood hazard boundary maps issued by FEMA. The Flood Disaster Protection Act of 1973 and the National Flood Insurance Reform Act of 1994 make flood insurance mandatory for most properties in Special Flood Hazard Areas.

4.9.2.2 State Regulations

California Toxics Rule

The California Toxics Rule is a federal regulation issued by the USEPA providing water quality criteria for potentially toxic constituents in receiving waters with human health or aquatic life designated uses in California. California Toxics Rule criteria are applicable to the receiving water body and therefore must be calculated based on the probable hardness values of the receiving waters for evaluation of acute (and chronic) toxicity criteria. At higher hardness values for the receiving water, copper, lead, and zinc are more likely to be complexed (bound with) components in the water column. This in turn reduces the bioavailability and resulting potential toxicity of these metals.

Porter-Cologne Water Quality Control Act

The CWA places the primary responsibility for the control of surface water pollution and for planning the development and use of water resources with the states, although it establishes certain guidelines for the states to follow in developing their programs and allows the USEPA to withdraw control from states with inadequate implementation mechanisms.

California's primary statute governing water quality and water pollution issues with respect to both surface waters and groundwater is the Porter-Cologne Water Quality Control Act (California Water Code Section 13000, et seq.). The Porter-Cologne Act grants the SWRCB and the RWQCBs authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product.

Each RWQCB must formulate and adopt a water quality control plan for its region. The regional plans must conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its state water policy. The Porter-Cologne Act also provides that a RWQCB may include within its regional plan water discharge prohibitions applicable to particular conditions, areas, or types of waste.

State Water Resources Control Board

The SWRCB administers water rights, water pollution control, and water quality functions throughout the state, while the RWQCBs conduct planning, permitting, and enforcement activities. For the proposed Project, the NPDES permit is divided into two parts: construction; and postconstruction. Construction permitting is administered by the SWRCB, while post-construction permitting is administered by the RWQCB. In California, NPDES permits are also referred to as waste discharge requirements that regulate discharges to waters of the U.S.

Construction General Permit

On November 16, 1990, the USEPA published final regulations that established stormwater permit application requirements for specified categories of industries. The regulations provide that discharges of stormwater to waters of the U.S. from construction projects are effectively prohibited unless the discharge complies with an NPDES Permit. On September 8, 2022, the SWRCB reissued the General Construction Stormwater Permit (Water Quality Order 2022-0057-DWQ).

Projects that disturb one or more acres of soil or are part of a larger common plan that, in total, disturbs one or more acres, are required to obtain coverage under the Construction General Permit. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore a facility's original line, grade, or capacity. To obtain coverage under the Construction General Permit, Permit Registration Documents, including a Notice of Intent, Risk Assessment, Site Map, and SWPPP, among others, must be filed with the SWRCB prior to the commencement of construction activity. The Notice of Intent notifies the SWRCB of the applicant's intent to comply with the Construction General Permit, and the SWPPP includes a list of BMPs that would be used to protect stormwater runoff from pollutant discharge during construction. Additionally, the project's SWPPP must contain a visual monitoring program and a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) established a framework for sustainable, local groundwater management in 2014. The SGMA requires groundwater-dependent regions to halt overdraft and bring basins into balanced levels of pumping and recharge. With the passage of the SGMA, the Department of Water Resources (DWR) launched the Sustainable Groundwater Management Program to implement the law and provide ongoing support to local agencies around the state. The SGMA requires local agencies to form groundwater sustainable agencies for high and medium priority basins and to implement groundwater sustainability plans within 20 years. The DWR maintains the online SGMA Basin Prioritization Dashboard, which identifies the priority of the groundwater basins in California on a scale of Very Low to High based on a point system that considers factors including population, available wells, irrigated acres, and groundwater resilience. Groundwater basins with more than 14 points are considered Medium or High Priority, while basins with 14 or less points are considered Low or Very Low Priority. The DWR identifies the San Gabriel Valley Groundwater Basin, where the Project is located, as Very Low Priority, and zero priority points are identified, meaning that a groundwater sustainability plan for the San Gabriel Valley Groundwater Basin is not required (DWR 2024).

4.9.2.3 Local Regulations

Los Angeles Regional Water Quality Control Board

The LARWQCB develops and enforces water quality objectives and implementation plans that safeguard the quality of water resources in its region. Its duties include developing basic plans for its hydrologic area, issuing waste discharge requirements, taking enforcement action against violators, and monitoring water quality. The NPDES permit program controls water pollution by regulating point sources that discharge pollutants into waters of the U.S., as authorized by the CWA. Point sources are discrete conveyances such as pipes or man-made ditches. Industrial, municipal, and other similar facilities must obtain permits if their discharges go directly to surface waters.

A portion of the NPDES permit program is administered by the RWQCBs. Polluted stormwater runoff is commonly transported through Municipal Separate Storm Sewer Systems (MS4s). This runoff is often untreated and discharged into local water bodies. The Los Angeles NPDES Permit (Permit No. CAS000002, Order No. R4-2021-0105) requires development of a stormwater management program. Phase I of the stormwater management program requires medium and large cities, or certain counties with populations of 100,000 or more to obtain NPDES permit coverage for their stormwater discharges.

Phase II requires regulated small MS4s in urbanized areas, as well as small MS4s outside the urbanized areas that are designated by the permitting authority, to obtain NPDES permit coverage for their stormwater discharges. Generally, Phase I MS4s are covered by individual permits, and Phase II MS4s are covered by a General Permit. Each regulated MS4 is required to develop and implement a stormwater management program to reduce the contamination of stormwater runoff and prohibit illicit discharges.

Azusa General Plan

City goals and policies pertaining to hydrology and water quality are contained in the Infrastructure section of Chapter 3, *The Built Environment*, of the Azusa General Plan. Goals and policies related to water include, but are not limited to, the following:

Goal 2. Provide a water supply system that is able to meet the projected water demands; upgrade and expand water treatment, supply, and distribution facilities; and pursue funding sources to reduce the cost of water provision for the City.

Policy 2.7. Continue the City's water conservation efforts; review programs periodically and modify and/or expand them as appropriate and feasible.

Policy 2.10. Require the use of reclaimed water for landscaped irrigation, grading, and other non-contact uses in new developments, where available or expected to be available.

In addition, the Infrastructure section of Chapter 3, *The Built Environment*, of the Azusa General Plan discusses goals and policies related to storm drainage. Goals and policies related to storm drainage include the following:

Goal 2. Provide a flood control system that is able to support the permitted land uses while preserving the public safety, upgrade existing deficient systems, and pursue funding sources to reduce the costs of flood control provision in the City.

Policy 4.1. Maintain existing public storm drains and flood control facilities, upgrade and expand storm drain and flood control facilities.

Policy 4.4. Monitor the demands and manage development to mitigate impacts and/or facilitate improvements to the storm drainage system.

Policy 4.7. Require improvements to the existing storm drain and flood control facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.

Policy 4.8. Require new developments to employ the most efficient drainage technology to increase ground percolation, control drainage, and minimize damage to environmentally sensitive areas.

Policy 4.10. Encourage using construction methods and technologies that will reduce the size or decrease the number of impervious surfaces in both new development and the retrofit of existing development.

Azusa Municipal Code

Azusa Municipal Code Chapter 60, *Stormwater and Urban Runoff Pollution Prevention*, is intended to protect the health and safety of the residents of the City and County by protecting the beneficial uses, marine and river habitats, and ecosystems of receiving waters from pollutants carried by stormwater and non-stormwater discharges. Azusa Municipal Code Chapter 60 is intended to enhance and protect the water quality of the receiving waters of the city and the U.S., consistent with the CWA. The proposed residential and light industrial components of the Project would add more than 5,000 SF of impervious surface area to the Project site and are thus identified as "regulated redevelopment projects" subject to the following requirements. Azusa Municipal Code Chapter 60-13 states the following:

(a) Prior to the construction of a regulated development or redevelopment project, such project shall be reviewed by the city for its potential to discharge pollutants to the municipal storm drain system. Such review shall be conducted in accordance with development planning requirements established by the regional board or its executive officer, pursuant to the municipal NPDES permit.

(b) Once a regulated development or redevelopment project has been reviewed for its potential to discharge pollutants to the municipal storm drain system, the city shall require appropriate BMPs to be implemented during construction and following project completion. The prescription of BMPs shall be in keeping with the Standard Urban Storm Water Mitigation Plan requirements established by the regional board or its executive director, pursuant to the municipal NPDES permit.

4.9.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential hydrology and water quality impacts are based on Appendix G of the CEQA Guidelines. A significant impact to hydrology and water quality could occur if implementation of the proposed Project would:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

   i. result in a substantial erosion or siltation on- or off-site;

   ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

   iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

iv. impede or redirect flood flows;

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.9.4 Methodology and Assumptions

Impacts to hydrology and water quality are evaluated based on the Hydrology Studies and LID Plans prepared for the Project, provided as Appendices M, N, O, and P. These studies assess the effects of Project construction on the drainage conditions at the site and provide guidance as to the design of stormwater infrastructure that is required for the proposed Project. As described above, evaluation of the golf course site is limited to the parking area, as the site condition and Project activities would remain consistent with the existing drainage conditions.

4.9.5 Impact Analysis

4.9.5.1 Water Quality Standards

Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Project construction could result in short-term impacts to water quality associated with the handling, storage, and disposal of construction materials; maintenance and operation of construction equipment; and earthmoving activities. These activities could result in the discharge of soil or construction materials and fuels due to stormwater runoff. As the Project would disturb more than one acre, the Project would be required to prepare and submit a Notice of Intent and a SWPPP to the SWRCB demonstrating compliance with the NPDES Construction General Permit. The Construction General Permit requires that non-stormwater discharges from construction sites be eliminated or reduced to the maximum extent practicable, that a SWPPP be developed governing Project construction activities, and that routine inspections of stormwater pollution prevention measures and control practices be performed, including inspections before and after storm events. The Project would be required to implement all construction BMPs outlined in the SWPPP to protect downstream water quality and ensure compliance with the Construction General Permit. Upon construction completion, the Construction General Permit permittee for the Project would be required to submit a Notice of Termination to the SWRCB to indicate that construction has been completed.

Pursuant to Azusa Municipal Code Chapter 60-13, the City would also review the Project for its potential to discharge pollutants to the storm drain system during Project construction and operation prior to construction and prescribe appropriate BMPs. To further minimize the potential for accidental release of pollutants during construction, the routine transport, use, and disposal of construction materials would be required to adhere to applicable state and local standards and regulations for handling, storage, and disposal of hazardous substances (refer to Section 4.8, *Hazards and Hazardous Materials*). Compliance with such measures would prevent hazardous substances from entering downstream water bodies via stormwater runoff and adversely affect existing water quality.

During construction, infiltration basins and other stormwater infrastructure would be installed on the site, as further described in Section 4.9.5.3, below. These improvements include filters to capture debris and pollutants in runoff to provide Project compliance with discharge requirements. As provided in the LID plans prepared for the Project (Appendices N and P), these features adhere to the County's LID Standards Manual and the intent of NPDES permit requirements to prevent adverse effects to water quality. In compliance with Azusa Municipal Code Chapter 60, conditions of approval further enforce the requirement to implement and maintain the identified BMPs for stormwater treatment. Following conformance with the Construction General Permit, preparation of a SWPPP, and implementation of BMPs, the Project would not violate water quality or waste discharge requirements.

Level of Significance Prior to Mitigation

Implementation of the Project would not violate water quality standards or waste discharge requirements and would not otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.9.5.2 Groundwater Supplies and Recharge

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 result in residential, light industrial, and recreational development at the existing golf course site, which is mostly vegetated and pervious, with the exception of the existing parking lot and some paved pathways and associated golf course buildings. The Project would convert the residential and industrial sites, which total approximately 40 acres, to primarily impervious surfaces; however, the DWR identifies the 154,000-acre San Gabriel Valley Groundwater Basin as Very Low Priority, and a groundwater sustainability plan does not exist for the San Gabriel Valley Groundwater Basin. The Project site is not located within a local groundwater recharge area, and the addition of impervious surface area at the site would not impede groundwater recharge. In addition, no groundwater extraction would occur directly as part of the Project. ALW sources water for distribution from wells throughout the City and, therefore, would provide groundwater to the Project for indoor and outdoor water use. However, the Project's use of water from these sources via ALW would not be considered a substantial decrease in groundwater, as sustainable use of groundwater resources to meet customer demand is addressed in water supply planning by ALW (refer to Section 4.17, *Utilities and Service Systems*, for additional water supply information. Thus, Project implementation would not result in a substantial decrease in groundwater recharge in the basin or the depletion of groundwater supplies such that the Project would impede sustainable groundwater management of the San Gabriel Valley Groundwater Basin.

Level of Significance Prior to Mitigation

Implementation of the Project would not impede sustainable groundwater management of the basin, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.9.5.3 Drainage Patterns

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 a substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

The Project would replace portions of the existing Azusa Greens Country Club with residential and light industrial development, as well as golf course redevelopment. The Project would increase the total impervious surface area within the site; however, runoff would continue to drain towards curbs and gutters in adjacent streets, similar to existing conditions. Once developed, the Project would have a total of 28 drainage areas. The drainage areas and proposed stormwater BMPs are shown in Figure 4.9-2a, *Proposed Drainage Conditions – Residential/Golf Course Sites*, as well as Figure 4.9-2b, *Proposed Drainage Conditions – Industrial Site*. Drainage for the remainder of the golf course site is not anticipated to change since these areas would remain landscaped and would not have a substantial change in topography that would alter drainage conditions.

The proposed drainage improvements would include interconnected underground infiltration/detention systems with pipelines where stormwater from the proposed drainage areas would collect and be held before being routed to Sierra Madre Avenue, North Todd Avenue, and West 10th Street, similar to existing drainage conditions. The MS4 facilities downstream of the Project site are engineered; therefore, the Project is exempt from Hydromodification Control requirements. North of Sierra Madre Avenue, a separate infiltration/detention system is proposed for the golf course parking area and would converge with the flows collected from the residential site. The Project would be designed to detain generated runoff, including a proposed outlet weir to control the peak runoff outflow towards the connection to the public LACFCD's storm drain system. The industrial site would be designed to collect runoff at catch basins in the parking areas. Runoff from industrial site drainage areas 4 through 7, which includes Buildings 4 and 5 with their adjacent trailer parking areas as well as a small parking area west of Building 6, would drain towards a proposed private storm drain that would connect to an existing private storm drain at the northwest corner of Building 5 to an existing public storm drain in West 10th Street. All other flows would drain through proposed parkway drains to existing catch basins in North Todd Street and West 10th Street.

VICINITY MAP
N.T.S.

DMA	COLOR	LANDUSE	AREA (SF)	AREA (AC)	IMPERVIOUS %
A–1		RESIDENTIAL	54,536.9	1.252	63%
A–2		RESIDENTIAL	129,117.0	2.964	63%
A–3		RESIDENTIAL	201,889.3	4.635	63%
A–4		RESIDENTIAL	74,733.8	1.716	63%
A–5		RESIDENTIAL	250,335.9	5.747	63%
A–6		RESIDENTIAL	152,542.9	3.502	63%
B–7		PARKING	83,104.9	1.908	100%

NOTE: PROPOSED DEVELOPMENT IMPERVIOUS COVERS ARE DELINEATED PER LANDSCAPE PLAN AS SHOWN WITHIN THIS EXHIBIT. ALLOWABLE Q GIVEN BY LACFCD AS 3.6 CFS PER ACRE UTILIZED FOR DESIGN MITIGATION.

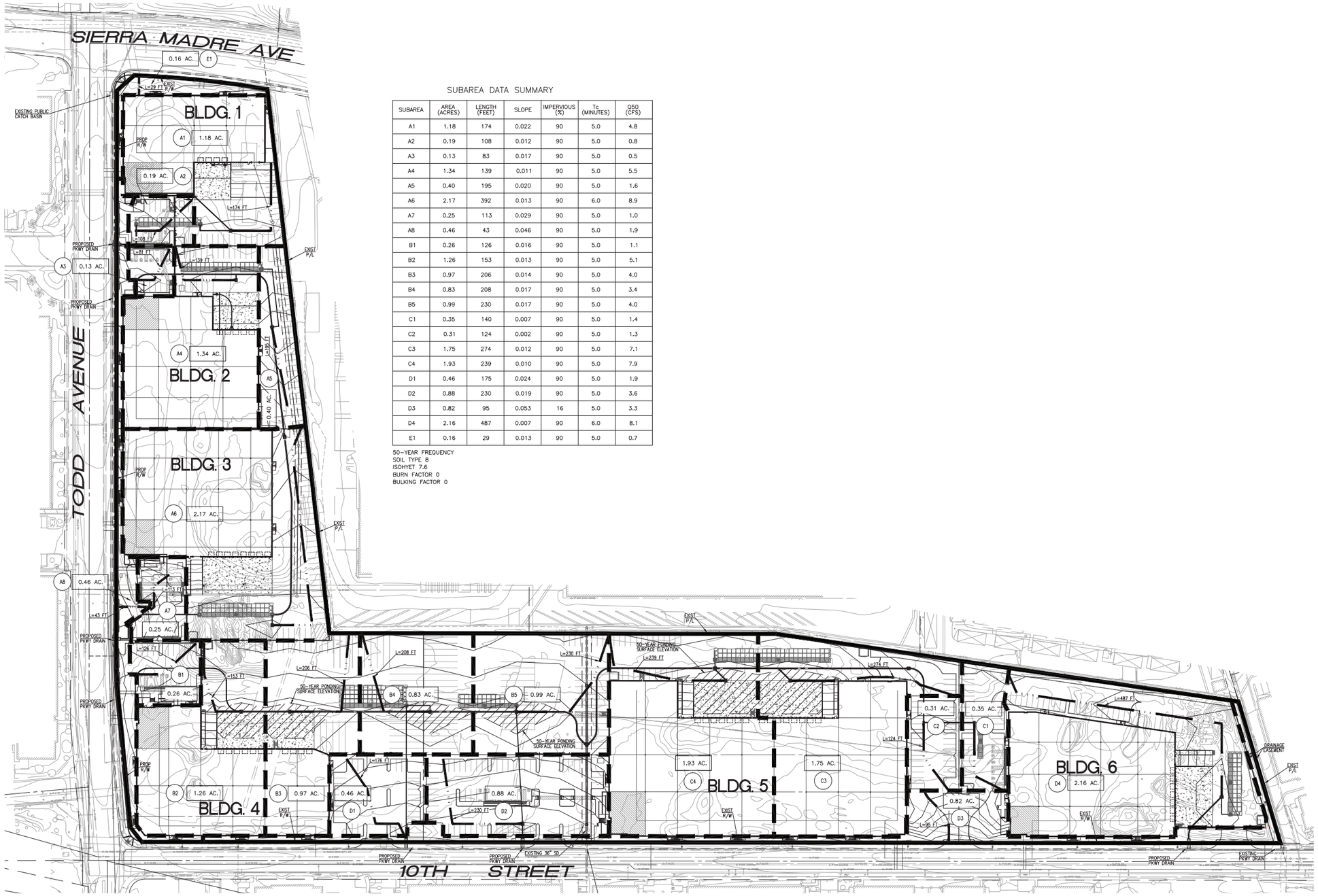
LEGEND:

- DRAINAGE MANAGEMENT AREA (DMA) BOUNDARY
- SITE BOUNDARY
- EXISTING RIGHT OF WAY
- EXISTING LOT LINE
- EXISTING EASEMENT LINE
- SURFACE FLOW DIRECTION
- PIPE FLOW DIRECTION
- FLOW LINE
- PERVIOUS AREA
- X FL — INITIAL SUBAREA NODE / SPOT ELEVATION
- Q_{100}=X CFS — PEAK RUNOFF IN CUBIC FEET PER SECOND (CFS)
- Tc=X MIN — TIME OF CONCENTRATION IN MINUTES (MIN) PROVIDED FOR 100-YR STORM EVENT

Source: C&V Consulting, Inc., 2025

Proposed Drainage Conditions—Residential/Golf Course Sites

Figure 4.9-2a



SUBAREA DATA SUMMARY

SUBAREA	AREA (ACRES)	LENGTH (FEET)	SLOPE	IMPERVIOUS (%)	Tc (MINUTES)	Q50 (CFS)
A1	1.18	174	0.022	90	5.0	4.8
A2	0.19	108	0.012	90	5.0	0.8
A3	0.13	83	0.017	90	5.0	0.5
A4	1.34	139	0.011	90	5.0	5.5
A5	0.40	195	0.020	90	5.0	1.6
A6	2.17	392	0.013	90	6.0	8.9
A7	0.25	113	0.029	90	5.0	1.0
A8	0.46	43	0.046	90	5.0	1.9
B1	0.26	126	0.016	90	5.0	1.1
B2	1.26	153	0.013	90	5.0	5.1
B3	0.97	206	0.014	90	5.0	4.0
B4	0.83	208	0.017	90	5.0	3.4
B5	0.99	230	0.017	90	5.0	4.0
C1	0.35	140	0.007	90	5.0	1.4
C2	0.31	124	0.002	90	5.0	1.3
C3	1.75	274	0.012	90	5.0	7.1
C4	1.93	239	0.010	90	5.0	7.9
D1	0.46	175	0.024	90	5.0	1.9
D2	0.88	230	0.019	90	5.0	3.6
D3	0.82	95	0.053	16	5.0	3.3
D4	2.16	487	0.007	90	6.0	8.1
E1	0.16	29	0.013	90	5.0	0.7

50-YEAR FREQUENCY
SOIL TYPE B
ISOHYET 7.6
BURN FACTOR 0
BULKING FACTOR 0

LEGEND
- PROJECT BOUNDARY
- SUBAREA BOUNDARY
- FLOW PATH
- 4.10 AC. SUBAREA AREA
- PONDING LIMITS

0 30 60 120 180

Source: C&V Consulting, Inc., 2024

I:\PROJECTS\O\OvertonMoore_03697\00019_AzusaGreens\Map\EIR\Fig4.9-2b_PropDrainageIndustrv2.indd 03697.19.1 5/15/24 - SAB

HELIX Environmental Planning

Proposed Drainage Conditions—Industrial Site

Figure 4.9-2b

As shown in Table 4.9-3, *Proposed Drainage Conditions*, runoff from the Project site would decrease compared to existing conditions for the industrial site, while runoff would increase by 3.2 cfs for a total of 73.9 cfs from the proposed residential site and golf course parking area. The allowable Project runoff for the residential site and golf course site parking area is 78.2 cfs (3.6 cfs per acre) based on the design capacity of the Reach 6 Tributary Area (1770 cfs over 481 acres), and as determined by the Los Angeles County Public Works Design Division, Hydraulic Analysis Unit. Proposed storm drains would be sized to convey the 100-year storm per urban flood requirements. As a result, the Project would not result in a substantial change in the amount of surface runoff or the patterns of drainage that would result in flooding or exceed the capacity of stormwater drainage systems.

Table 4.9-3
PROPOSED DRAINAGE CONDITIONS

Drainage Area	Acres	Location/Description	Existing Runoff Volume (cfs)	Proposed Runoff Volume (cfs)
Residential/Golf Course Sites			***100-Year Storm Condition***	
A	19.82	Golf course area flows to Sierra Madre Avenue	61.7	64.9
B	1.91	Golf course parking lot flows to Sierra Madre Avenue	9.0	9.0
Total[1]	21.72		70.7	73.9
Industrial Site			***50-Year Storm Condition***	
A1	0.25	Northerly landscaped area flows to corner of Sierra Madre Avenue and North Todd Avenue	1.0	0.7
B1	7.12	Westerly portion of the Project site flows to North Todd Avenue.	26.7	25.0
C1	11.88	Easterly portion of the Project site flows to West 10th Street.	48.5	31.5
Total[1]	19.25		76.2	57.2

Source: C&V Consulting, Inc. 2025a; Thienes Engineering, Inc. 2024b
[1] Totals may not sum due to rounding.
cfs = cubic feet per second

As the Project would not result in a substantial change in the drainage patterns of the site, the Project would not result in a substantial erosion, a substantial increase in the rate or amount of surface runoff such that flooding would occur, exceedance of stormwater infrastructure capacity, or flood flow alterations. The installation of pervious surfaces and landscaping throughout the site in addition to the proposed infiltration systems would prevent substantial erosion and siltation. The minor alterations in the amount of surface runoff detailed in Table 4.9-3 would not result in flooding and would not exceed the capacity of existing off-site stormwater drainage infrastructure. Lastly, the site is not located within a 100-year flood zone and would not result in the redirection of flood flows. Therefore, the Project would not result in drainage pattern alterations that would cause adverse effects to the surrounding area.

Level of Significance Prior to Mitigation

Implementation of the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.9.5.4 Inundation

Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

Tsunamis are typically generated by seismic activity, which causes displacement of the ocean floor, resulting in large waves at the coast. Seiches are large waves generated in enclosed bodies of water in response to ground shaking. The Project site is not located within a coastal area, and no enclosed water bodies are on or adjacent to the site that would result in inundation due to a seiche. The nearest water body to the Project is the San Gabriel River, approximately 0.4 mile to the west; however, the Project site is at an elevation higher than the San Gabriel River, and the river is not an enclosed body of water. The nearest coastal area to the Project site is the Pacific Ocean, located approximately 35 miles west. As a result, tsunamis and seiches are not considered a potential hazard at the Project site.

As described above, the Project site is mapped within Zones D and X on FEMA's FIRM for the Project area. Therefore, the site is not within a 100-year flood zone and is not anticipated to be at risk of inundation. Further, as described in Section 4.8, *Hazards and Hazardous Materials*, small quantities of hazardous materials may be used at the Project site but would be required to be stored in accordance with applicable regulations intended to prevent the accidental release of such materials. Therefore, in the unlikely event of flooding at the Project site, the Project would not result in a substantial risk of the release of pollutants.

Level of Significance Prior to Mitigation

Implementation of the Project would not risk the release of pollutants due to inundation, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would not occur without mitigation.

4.9.5.5 Water Quality and Groundwater Management Plans

Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The water quality control plan applicable to the Project site is the Basin Plan described above, which designates beneficial uses and water quality objectives for ground and surface waters in the region. At the Project level, compliance with LARWQCB permits and objectives through the implementation of a SWPPP and implementation of identified BMPs during operation would ensure the Project does not conflict with or obstruct the implementation of the Basin Plan.

As discussed earlier, the DWR identifies the San Gabriel Valley Groundwater Basin as Very Low Priority, and a groundwater sustainability plan is not required for the San Gabriel Valley Groundwater Basin. The Project site is not located within a local groundwater recharge area and no groundwater extraction would occur as part of the Project. Thus, Project implementation would not result in conflicts with a sustainable groundwater management plan.

Level of Significance Prior to Mitigation

Implementation of the Project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.9.6 Cumulative Impact Analysis

The geographic scope for analysis of cumulative impacts related to hydrology and water quality is the San Gabriel HU, which covers nearly all of Los Angeles County and a portion of Ventura County. Cumulative impacts would result if modifications to a portion of a watershed or water pollution produced by development were to affect other water bodies in the watershed, as lands and water bodies within the watershed are part of an interrelated hydrologic system.

As described above, implementation of the proposed Project would require conformance with regulatory requirements related to water quality, such as compliance with the NPDES Construction General Permit, preparation of a SWPPP, implementation of BMPs, as well as state and local regulations related to the protection of water quality. The Project also would not alter drainage patterns such that significant impacts to stormwater infrastructure or pollutant discharge would occur. The identified cumulative impact projects could potentially increase the volume of stormwater and contribute to pollutant loading stormwater runoff, resulting in cumulative impacts to the hydrology and water quality of the San Gabriel HU. However, these projects would be required to comply with relevant permits and regulations related to water quality and drainage pattern, as would the proposed Project. As such, the Project would not result in a cumulatively considerable impact related to water quality or drainage, and there would not be a substantial conflict with the applicable water quality control plan.

The Project would not result in groundwater extraction, depletion of groundwater supplies, or impede sustainable groundwater management of the San Gabriel Valley Groundwater Basin. As this basin is designated Very Low Priority, it is not anticipated that the addition of impervious surfaces and urban development at the Project site and for cumulative project development would result in a cumulative impact related to sustainable groundwater management. Since there is no applicable groundwater sustainability plan for the cumulative project area, no conflict with such a plan would occur.

4.10 Land Use and Planning

This section of the EIR describes the existing setting of the Project site within the context of land use plans, identifies applicable plans and policies related to land use, and evaluates potential impacts to land use and planning associated with the implementation of the Project. Information in this section is based in part upon the Azusa General Plan and the Azusa Municipal Code.

4.10.1 Existing Conditions

4.10.1.1 Project Setting and Land Uses

The Project site is currently developed with 16 holes of an 18-hole golf course and associated amenities, including a clubhouse, parking lot, and driving range. Golf carts travel on concrete paths throughout the golf course and have crossings at Sierra Madre Avenue, which bisects the golf course. Small, concrete structures provide restrooms throughout the course (refer to Figure 3-2). Elevations at the Project site range from 629 to 707 feet amsl. Habitat and land cover types within the Project site consist of developed, disturbed, golf course greens, landscaped area, and ruderal.

Based on the Azusa General Plan Land Use Map, the Project site is designated Recreation (City 2017). The site has operated as a private golf course and is not designated or zoned for public open space. Based on the City's Zoning Map (2023a), the Project site is zoned Recreation. The majority of the Project site is within the boundary of the Neighborhood General 3 overlay area, while the majority of the industrial site (excluding a small area at the eastern side) is within the boundary of the City's DWL. The Project site does not have an assigned land use or subzone within these neighborhood or district overlays, as it is currently designated and zoned for Recreation. Refer to Section 3.2.3 for additional information regarding land use and zoning, specifically the neighborhood classification system.

4.10.1.2 Surrounding Setting and Land Uses

The neighborhood around the Project site is dominated by industrial and residential uses in the northern part of the City. Industrial land uses are located west and south of the site. Specifically, these industrial uses occur within the Light Industrial General Plan land use designation and DWL zone. Two water conservation basins are located north of the site within the Recreation land use and zoning designation. Hodge Elementary School and Northside Park are also located near the southern edge of the southeastern portion of the golf course site.

Single-family and multi-family residential land uses are located north, east, and south of the site as well as interspersed throughout the Project site. These residential uses have land use and zoning designations varying between low-density, medium-density, and moderate-density residential. The majority of the residential uses surrounding the Project site are also located within the Neighborhood General 3 classification, with the area southeast of the Project site within the Neighborhood General 1 classification.

The industrial site is located within the southwestern portion of the Project site and is surrounded primarily by warehousing/distribution uses. The industrial site is bounded by Sierra Madre Avenue to the north, industrial and residential uses to the east, West 10th Street to the south, and North Todd Avenue to the west.

The residential site is surrounded primarily by existing residential uses. The residential site encompasses existing holes 1, 18, and 8, as well as a small portion of hole 17. The residential site is bounded by water conservation basins to the north, the Azusa Greens Country Club golf course to the east, Sierra Madre Avenue to the south, and residential uses to the west.

The remaining portion of the existing golf course site, including the clubhouse, parking lot, and driving range, comprises the golf course portion of the Project site and would remain as a private recreational use. The golf course site is bounded by residential uses and water conservation basins to the north, residential uses to the east and south, and existing golf course use proposed for residential uses to the west. The golf course site is also bisected by Sierra Madre Avenue.

4.10.2 Regulatory Setting

4.10.2.1 State Regulations

California Planning and Zoning Law

The legal framework in which California's cities and counties exercise local planning and land use functions is provided in the California Planning and Zoning Law (Government Code Sections 65000 through 66499.58). Under this state planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. These requirements include the inclusion of nine mandatory elements described in the Government Code: land use, circulation, housing, conservation, open space, noise, safety, environmental justice, and air quality. Only cities and counties that have identified disadvantaged communities must address environmental justice, including air quality, in their general plans. Other elements may be added at the discretion of individual jurisdictions when preparing their general plan. Each of the elements sets forth objectives, principles, standards, policies, and plan proposals related to the element's topic.

Senate Bill 375

As described further in Section 4.7.2.2, SB 375 requires coordination of land use planning, RTPs, and funding priorities to reduce GHG emissions from passenger vehicle travel within each MPO planning area. As it pertains to land use planning, each MPO must create an SCS to achieve its regional GHG emissions reduction goal through the development of more compact, complete, and efficient communities. For the Project area, the 2024 RTP/SCS achieves the requirements of SB 375.

4.10.2.2 Local Regulations

Southern California Association of Governments

Regional planning agencies such as SCAG recognize that planning issues extend beyond the boundaries of individual cities. Efforts to address regional planning issues such as affordable housing, transportation, and air pollution have resulted in the adoption of regional plans that affect the City. SCAG has evolved as the largest council of governments in the U.S., functioning as the MPO for six counties (Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial) and 191 cities. The region encompasses an area of more than 38,000 square miles. As the designated MPO, the federal government mandates SCAG to research and develop plans for transportation, growth management, hazardous waste management, and air quality. These mandates led SCAG to prepare comprehensive

regional plans to address these concerns. SCAG is responsible for the maintenance of a continuous, comprehensive, and coordinated planning process resulting in a RTP and a Regional Transportation Improvement Program. SCAG is responsible for the development of demographic projections and is also responsible for the development of the integrated land use, housing, employment, transportation programs, measures, and strategies for the AQMP.

Regional Transportation Plan/Sustainable Communities Strategy

As required by SB 375, SCAG prepares its RTP/SCS for long-range regional planning related to mobility and housing. The land use, housing, and transportation strategies included in the SCS are intended to achieve GHG emission reduction targets. The SCAG RTP/SCS is updated every four years, and on April 4, 2024, SCAG's Regional Council voted to approve and fully adopt the 2024 RTP/SCS, which updated the previous 2020 RTP/SCS (SCAG 2024a). The 2024 RTP/SCS builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern and outlines more than $751 billion in transportation system investments through 2050 (SCAG 2024b). The 2024 RTP/SCS outlines a vision for a more resilient and equitable future, with policies and strategies for achieving the region's shared goals through 2050. The plan was developed through a four-year planning process involving rigorous technical analysis, extensive stakeholder engagement, and robust policy discussions with local elected leaders. It was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The Federal Highway Administration and Federal Transit Administration (FTA) have confirmed the 2024 RTP/SCS achieves air quality conformity requirements and conforms to the SIP. CARB has not yet provided a determination related to the ability of the 2024 RTP/SCS to meet CARB's GHG reduction targets for vehicles.

Regional Housing Needs Assessment

California State Housing Element Law, enacted in 1980, requires SCAG and other regional councils of government in California to determine the existing and projected regional housing needs for persons at all income levels. SCAG is also required by law to determine each jurisdiction's share of the regional housing need in the six-county southern California region. The intent of SB 375 and the Regional Housing Needs Assessment (RHNA) process is to create a better balance of jobs and housing in communities, ensure the availability of decent affordable housing for all income groups and achieve sustainability through long-term strategic land use planning. SCAG takes the lead in overseeing the assessment by identifying measures to gauge housing demand and comparing those numbers against socioeconomic factors throughout the region. The RHNA consists of two measurements: (1) existing need for housing, and (2) future need for housing.

The State Housing Element Law requires local governments to make plans to adequately address their share of existing and projected population growth, taking into consideration the affordability of available and future housing. The California Department of Housing and Community Development enforces the State Housing Element Law by requiring housing elements as part of every city's general plan.

The City's latest Housing Element update was certified in March 2022. The 6th cycle Final RHNA allocation plan was adopted by the SCAG Regional Council in March 2021 and covers the planning period from October 2021 through October 2029. For this cycle, SCAG received a need of 1,341,827 housing

units, which was distributed to all 197 SCAG jurisdictions. Based on a methodology that weighs a number of factors (i.e., projected population growth, employment, commute patterns, and available sites), the City received a total of 2,651 housing units in this allocation, with 760 allocated to very-low-income units, 368 to low-income units, 382 to moderate-income units, and 1,141 to above-moderate income units.

Intergovernmental Review

SCAG's Intergovernmental Review Section is responsible for performing consistency reviews of regionally significant local plans, projects, and programs with SCAG's adopted regional plans. The criteria for projects of regional significance are outlined in CEQA Guidelines Sections 15125 and 15206. The Project would be considered regionally significant as it would meet the following criteria, requiring consistency review.

(1) A proposed local general plan, element, or amendment thereof for which an EIR was prepared.

A proposed plan, project, or program is directed to demonstrate how it is consistent with the 2024 RTP/SCS, which is established through consistency with RTP/SCS Goals and Adopted Growth Forecasts. SCAG encourages review of the Final Program EIR for the 2024 RTP/SCS for guidance, as appropriate. The Final Program EIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible.

Azusa General Plan

Based on the community's vision for long-term physical growth and preservation, the Azusa General Plan informs residents, property owners, and the public of the City's goals, policies, and implementation programs. The document's substantive function is to provide principles and an overall framework for detailed public and private development decisions. It also establishes requirements for additional planning studies where greater specificity is needed. The Azusa General Plan was adopted prior to requirements for the inclusion of environmental justice and air quality elements in general plans for jurisdictions with disadvantaged populations; therefore, the elements required to be addressed in the Azusa General Plan by state law were land use, circulation, open space, housing, conservation, safety, and noise. The Azusa General Plan groups these state-required elements into three chapters: Built Environment, Economy and Community, and Natural Environment.

Built Environment Chapter

The Built Environment chapter focuses on five areas that are or have been constructed by people: City Design (land use and urban form), Mobility, Housing, Historic and Cultural Resources, and Infrastructure.

City Design. The City Design portion of the Built Environment chapter fulfills the state's requirement for a land use element. The land use element has the broadest scope of the general plan elements required by the state. To this end, the City Design section (or land use element) regulates how land is to be used in the City. As a result, many issues and policies contained in all other sections are impacted and/or impact this element. Azusa General Plan Figure CD-2, *Urban Form Diagram*, illustrates the location of neighborhoods, districts, and corridors that make up the City's urban form. According to Figure CD-2, the majority of the industrial site is within the boundary of the North Portion of the DWL, and the residential and golf course sites are within the boundary of the Foothills Neighborhood; however, the

site itself is not designated as part of a district or neighborhood in this figure. The DWL is described as follows:

The West End Industrial District is a regionally important source of jobs and wealth. A compatible mix of stores, restaurants, gas stations, offices, warehouses, public storage, and other uses strengthens the District's vitality...

Within each General Plan chapter are "big ideas" intended to bring about significant change for the City. The City Design "big idea" for the DWL is that it "provide industrial, manufacturing, and high-tech opportunities for small, midsize, and large companies." Also, it is the City's vision to continue to promote its manufacturing (and commercial) West End by supporting the retention and expansion of existing businesses and continuing to attract new firms that supply good jobs.

Land use designations and appropriate density standards and development standards are established to ensure a balance of land uses, as defined in General Plan Table CD-2, *Land Use Diagram Classification*, and illustrated on General Plan Figures CD-3, *Regulating Plan*, and CD-4, *Land Use Diagram*. As stated above, according to the Regulating Plan, the industrial site is surrounded by properties within the North Portion of the DWL; however, it is not specifically identified as part of this district. Similarly, the residential and golf course sites are within the boundary of the Foothill Neighborhoods but are not designated as a neighborhood site. The current General Plan land use map shows the Project site is designated as Recreation (City 2017). Pursuant to General Plan Table CD-2, the typical principal uses (not all-inclusive) for this land use designation are dedicated parks or fields, and no applicable maximum density/intensity is identified.

Mobility. The Mobility portion of the Built Environment chapter provides a comprehensive approach to local transportation choices and complements the Regulating Plan and Land Use Diagram to reduce traffic congestion and pollution, create more prosperous and vital neighborhoods, and promote healthier environments. By putting people first, the City is working toward creating a pedestrian-friendly, transit-oriented community with well-planned transit corridors and extensive pedestrian and bicyclist networks.

Housing. The Housing Element is a program extending from 2021-2029. The 2021-2029 Housing Element identifies strategies and programs that focus on: (1) conserving and improving existing affordable housing; (2) providing adequate housing sites; (3) assisting in the development of affordable housing; (4) removing governmental and other constraints to the housing development; and (5) promoting equal housing opportunities.

Historic and Cultural Resources. This optional section is included in the General Plan, given the rich cultural heritage of the City. The Historic and Cultural Resources section includes requirements to identify historic landmarks, designate historic districts, and protect these cultural resources through development that preserves and embodies the City's social, commercial, architectural, and agricultural history.

Infrastructure. The Infrastructure portion of the Built Environment chapter focuses on the City's water supply, water treatment, storm drainage, solid waste disposal, natural gas, electricity, and telecommunication systems.

Economy and Community Chapter

The General Plan Economy and Community chapter focuses on subject areas that involve the City's economic vitality, including its businesses and residents. The chapter focuses on the community services that improve the overall quality of life. This chapter specifically discusses: Economic Development and Public Services.

Economic Development. The Economic Development portion of the Economy and Community chapter highlights the importance of economic vitality in the City and includes goals and policies related to ensuring the availability of land for various business types; focusing commercial activity in special districts; identifying distinct employment districts; monitoring the opportunity to reuse major heavy industrial sites in the City for other uses; attracting new industries to maintain a diverse and competitive labor force; maintaining a 'business climate' in the City; and strengthening the identity of key retail/commercial districts in the City.

Public Services. The Public Services portion of this chapter encompasses goals and policies related to Police Protection, Fire Protection, Emergency Medical Services, Governmental Administration, Library, and Schools.

Natural Environment Chapter

The Natural Environment chapter focuses on the natural environment, including air, water, flora and fauna, minerals, geology, and noise. Specifically, the focus areas for the Natural Environment include Recreation (Parks and Recreation), Open Space and Biological Resources, Geologic Hazards, Mineral Resources, Air Quality, and Noise.

Parks and Recreation. The Recreation portion of this chapter is intended to address ways in which the City can make parks, bicycle paths, and trails easily accessible to all residents; provide youth with recreational and educational activities throughout the year; ensure active and passive parks are within walking distance of each residential neighborhood; and expand recreation services for people of all ages and interests.

Open Space and Biological Resources. Goals and policies in this portion of the Natural Environmental chapter address the City's open space and biological resources by preserving areas of natural animal and plant habitat, restoring fisheries and aquatic habitats, sustaining development while conserving wildlife habitat, and reducing conflicts between wildlife and people.

Geologic Hazards. This section identifies geologic hazards within the City, including fault zones, floodplains, and areas susceptible to liquefaction, and establishes goals and policies that help to reduce these hazards.

Mineral Resources. Goals and policies in this section recognize the continued operation of quarries in the City while addressing its impacts to biological and scenic resources. The City's vision related to mineral resources is to reclaim Azusa's hillsides and river basin and restore historic mining sites with natural-looking grades and slopes and native vegetation.

Air Quality. This section identifies air quality conditions in the City and goals and policies that can improve air quality and reduce people's exposure to air pollutants.

Noise. The noise section is a tool for including noise control in the planning process to ensure land uses that generate various noise levels are sited near compatible uses. This element identifies noise-sensitive land uses (NSLUs) and noise sources, defines areas of noise impact, and develops policies to ensure that residents are protected from excessive noise intrusion.

Azusa Municipal Code (Chapter 88)

The City's zoning code is found in Azusa Municipal Code Chapter 88, *Development Code* (Development Code), and carries out the General Plan policies by regulating development and land uses within the City. The Development Code was adopted to protect and promote the public health, safety, comfort, convenience, prosperity, and general welfare of the City's residents and businesses. The Development Code's purposes are, among others, to:

- Provide standards for the City's continuing orderly growth and development that assist in enhancing and maintaining distinct community identity, and contribute to the health and wellbeing of residents; and

- Ensure compatibility between different types of development and land uses.

Development Code Article 2, *Urban Standards*, provides standards and guidelines for development within the City and establishes the City's planning and zoning areas (i.e., Zoning Classification Map). Development Code Chapter 88.20, *Regulating Plan*, establishes 17 planning areas within the City, based on the time periods and types of development and land uses that characterize each area. As depicted in Development Code Section 88.20.0470 Figure 2, *City Regulating Plan*, the Project site is surrounded by properties within the North Portion of the DWL; however, it is not specifically identified as part of any of the districts identified in the General Plan. As depicted on the City's Zoning Classification Map, the Project site is zoned Recreation (City 2023a).

Chapter 88.28, Special Purpose Zones. Azusa Municipal Code Chapter 88.28 establishes the intent, land uses and permit requirements, and site planning and building design requirements for the Recreation zone. The Recreation zone is applied to public park and recreation sites within the City and is consistent with and implements the recreation land use classification of the General Plan.

Section 88.28.030 Table 2-4 establishes allowable land uses and permit requirements for new land uses and development in the Recreation zone. Any one or more land uses identified by Table 2-4, as being allowable within the Recreation zone, may be established on any parcel within that zone, subject to the listed planning permit requirement, and in compliance with all applicable Development Code requirements.

Section 88.28.040 Table 2-5 establishes development standards applicable to the Recreation zone. There are no development standards established for the Recreation zone, except for a maximum height limit of 50 feet.

Chapter 88.30, Standards For All Development and Land Uses. Azusa Municipal Code Chapter 88.30 expands upon the zoning standards under Development Code Article 2 by addressing additional details related to site planning, project design, and the operation of land uses, relevant to the following issues, among others: Fences, Walls, Hedges, and Screening; Hazard Mitigation; Height Limits and Exceptions; Security Bards; Setback Requirements and Exceptions; and Underground Utilities. The intent of these standards is to ensure that proposed development is compatible with existing and future development

on neighboring properties, and produces an environment of stable and desirable character, consistent with the General Plan.

Chapter 88.31, Operational Standards. Azusa Municipal Code Chapter 88.31 provides standards that regulate the following operational aspects of an approved land use: noise standards; outdoor lighting; and other performance standards (i.e., air emissions, combustibles/explosives, ground vibration, liquid waste, odor, radioactivity, and electrical disturbance/electromagnetic interference).

Chapter 88.34, Landscaping Standards. Azusa Municipal Code Chapter 88.34 establishes requirements for landscaping to enhance the appearance of development projects, reduce heat and glare, control soil erosion, conserve water, screen potentially incompatible land uses, preserve the integrity of neighborhoods, improve air quality, and improve pedestrian and vehicular traffic and safety.

Chapter 88.36, Parking and Loading. Azusa Municipal Code Chapter 88.36 outlines parking requirements to ensure that sufficient off-street motor vehicle parking facilities are provided for all uses and structures, and that parking facilities are properly designed, attractive, and located to be unobtrusive, generally to the rear of the site, while meeting the needs of the specific use or structure. For golf course uses, four parking spaces per hole and one space per driving range tee are required.

Chapter 88.38, Signs. Azusa Municipal Code Chapter 88.38 details signage requirements related to the placement, type, size, and number of signs allowed within the City, and requires the proper maintenance of signs to promote the community's aesthetic and environmental values, avoid traffic safety hazards caused by visual distractions and obstructions, provide for signs as an effective channel of communication, and safeguard and protect the public health, safety, and general welfare.

Chapter 88.42, Standards for Specific Land Uses. Azusa Municipal Code Chapter 88.42 provides standards for the location, design, and operation of certain specific land use types given their particular characteristics. Senior citizen apartments are addressed in Azusa Municipal Code Section 88.42.200 to account for the different needs of age-restricted housing compared to standard multifamily residential development.

Section 88.51.032, Design Review. Design Review is the City's process of development review intended to ensure that the design of a proposed development and new land uses assists in maintaining and enhancing the City's appearance. Therefore, the purposes of the procedures provided in Azusa Municipal Code Section 88.51.032 are to:

- Recognize the interdependence of land values and aesthetics and encourage the orderly and harmonious appearance of development within the community;
- Ensure that new uses and structures enhance their sites and are compatible with the highest standards of improvement in the surrounding neighborhoods;
- Retain and strengthen the community's visual quality and attractive character;
- Assist project developers in understanding the City's concerns for the aesthetics of development; and
- Ensure that development complies with all applicable City standards and guidelines, and does not adversely affect community health, safety, aesthetics, or natural resources.

Section 88.51.080, General Plan Amendments. This section establishes the procedures for initiation and consideration of a General Plan amendment. Like a Specific Plan, the Planning Commission and City Council are required to make the following findings before approving a General Plan amendment:

- The proposed amendment is in the public interest, and that there will be a community benefit resulting from the amendment;
- The proposed amendment is consistent with the other goals, policies, and objectives of the general plan;
- The proposed amendment will not conflict with provisions of the Development Code, subdivision regulations, or any applicable specific plan; and
- In the event that the proposed amendment is a change to the land use policy map, that the amendment will not adversely affect surrounding properties.

4.10.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential land use and planning impacts are based on Appendix G of the CEQA Guidelines. A significant impact to land use and planning could occur if implementation of the proposed Project would:

a) Physically divide an established community; or

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.

4.10.4 Methodology and Assumptions

The evaluation of impacts related to potential community division considers the existing and planned land uses in the Project vicinity based on desktop evaluation of maps and land use plans. The analysis of impacts related to land use and planning consists of a summary of the regulatory framework that guides the decision-making process related to land use and consideration of whether the proposed Project would conflict with existing regulations intended to avoid environmental impacts or would inhibit the implementation of land use plans adopted to reduce environmental effects.

4.10.5 Impact Analysis

4.10.5.1 Community Division

Would the Project physically divide an established community?

The Project site is in the northern part of the City and includes the developed Azusa Green Country Club, which is surrounded by development ranging from industrial uses on the west and south to residential uses mixed within the Project site and further to the east. Access through this part of the City is provided primarily from Sierra Madre Avenue. The Project would involve the redevelopment of the western portion of the Azusa Greens Country Club with light industrial and residential uses and would retain the eastern part of the golf course for recreation and golfing. The light industrial and residential

uses would occur adjacent to existing light industrial and residential uses and would replace part of the existing golf course. Access throughout the Project area would remain similar to existing conditions as there are no public roadways through the Project site that would be closed as a result of Project implementation.

Redevelopment of the residential site would not physically divide an established community. Existing single-family residences (Rancho Azusa) to the north of Sierra Madre Avenue would continue to be separated from light industrial uses by the northwestern portion of the Azusa Greens Country Club along North Todd Avenue that is not a part of the Project site. The industrial site is situated between light industrial uses (World Depot Incorporated and GCE Group) west of North Todd Avenue and south of West 10th Street from light industrial (Rain Bird Corporation) and multi-family residential uses (Le Med Apartment Homes) situated south of West Sierra Madre Avenue. This area of the golf course would be redeveloped with light industrial development accessible from North Todd Avenue and West 10th Street, both of which are light industrial areas and would not divide existing residential or industrial areas near the Project site. Redevelopment on the golf course site would allow the Azusa Greens County Club to retain nine holes of golf course use and would continue to be interspersed with residential, school, and park development similar to existing conditions; therefore, it would not physically divide an established community.

Level of Significance Prior to Mitigation

Implementation of the Project would not physically divide an established community, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts remain less than significant without mitigation.

4.10.5.2 Land Use Plans, Policies, and Regulations

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?

Plans, policies, and regulations considered in this analysis include the Azusa General Plan and the Azusa Municipal Code. The Project's conformance with the 2024 RTP/SCS is summarized briefly under "Other Plans" below and described further in Sections 4.2, *Air Quality*, and 4.7, *Greenhouse Gas Emissions*.

Azusa General Plan

The Project would involve the redevelopment of the Azusa Greens Country Club golf course as an industrial site, an age-restricted residential community, and a reconfigured 9-hole golf course and driving range. The Project would require discretionary approval of a General Plan amendment that would change the Recreation land use designation for 19.82 acres to Medium Density Residential and 19.33 acres to DWL. Reconfiguration of part of the golf course would not conflict with the Azusa General Plan policies or regulations. The Recreation designation for the 52.97-acre portion of the golf course

would remain, and the golf course would operate as a 9-hole golf course and driving range. The proposed Project and associated proposed General Plan amendment are analyzed below for consistency with the Azusa General Plan policies related to potential environmental effects in Table 4.10-1, *General Plan Policy Consistency Analysis*. As detailed in Table 4.10-1, the project would not conflict with General Plan policies adopted for the purpose of avoiding or mitigating an environmental effect.

Table 4.10-1
GENERAL PLAN POLICY CONSISTENCY ANALYSIS

General Plan Policy	Project Consistency Analysis
The Built Environment	
City Design (Land Use)	
LU 1.1: Establish the urban form of neighborhoods, corridors, districts, and recreation/ open space as shown on Urban Form Diagram, Figure CD-2. Figure CD-2 indicates the location of neighborhoods, districts, corridors in the urban form structure. Figure CD-3 indicates the proposed land uses for those areas within the urban form structure as well as all other areas of the City and Sphere of Influence.	**Consistent**. The Project proposes a General Plan amendment for the industrial site to change the land use designation from Recreation to Light Industrial and for the residential site to change the land use designation to Neighborhood General 3 Medium Density Residential. The industrial site is located in the DWL, so the conversion of this site to industrial uses would comply with the District's goals of providing manufacturing employment and commercial uses to the City. The residential site is within Neighborhood General 3 and surrounded by a mix of residential densities permitted within this neighborhood.
LU 1.2: Establish land use designations and appropriate density standards and development standards to: ensure a balance of land uses; and enhance the City's long-term economic and fiscal well-being, including housing units of all types and prices; retail and commercial uses; employment generating industrial businesses; recreational facilities; governmental services; utilities and infrastructure; institutional and religious; and open space as defined in Land Use Diagram Classification, Table CD-2, and shown on the Regulating Plan, Figure CD-3 and Land Use Diagram, Figure CD-4.	**Consistent**. The Project involves the redevelopment of an existing recreational designated area to introduce age-restricted housing, including affordable units, and employment-generating industrial business to the area. It would also modify the existing golf course to preserve access to private recreational uses. All features of the Project are designed to ensure compatibility with existing development surrounding the site and the Project would not result in an imbalance of land uses within the City.
LU 2.4: Preserve and protect established, stable residential neighborhoods.	**Consistent**. The Project would not alter existing neighborhoods that surround the site. The Project would occur within the existing property of the Azusa Greens Golf Course and would maintain surrounding residential uses.
LU 2.5: Enhance neighborhoods by adding traditional elements such as pedestrian oriented, street lighting, street trees, landscaped parkways, traffic calming measures, and neighborhood centers.	**Consistent**. The Project would provide new sidewalks and street trees along the frontages of the site. New sidewalks, street trees, and lighting, and neighborhood recreational amenities would also be provided in the proposed residential site.
LU 2.9: Require both single family residential and multifamily units and sites be designed to convey a high level of quality and character and reflect and complement surrounding neighborhood character. This includes, but not limited to:	**Consistent**. The Project would be compatible with the surrounding neighborhoods and would include unique, visually interesting architecture. The stacked flats buildings would incorporate window, balcony, and roof treatments that provide variation along each

General Plan Policy	Project Consistency Analysis
Single Family and Multifamily • using "living space forward" design concepts; modulation and building elevation articulation and masses (avoiding undifferentiated "boxlike structures"); • incorporating well-defined roof lines; using extensive site landscape to complement the architectural design of the structure; and • minimizing the amount and width of paving in front and side yards for driveway and garage access Multifamily • conveying the visual character of individual units rather than a singular building mass and volume for multifamily structures; • including separate, well-defined entries for each residential unit; • locate the first occupiable floor at or near the predominate grade elevation, ensure subterranean parking facilities are not visible from the street frontage; and • siting and design of parking areas and facilities to be integrated with and not dominate the architectural character of the structure	elevation. The duplex and triplex buildings would incorporate similar window treatments and include contrasting garage doors. Landscaping throughout the residential site would complement the proposed building style. Duplex and triplex buildings would be oriented around landscaped lawns with garages at the rear of the buildings. Parking for the stacked flat buildings would be provided surrounding these buildings and would not be visible from Sierra Madre Avenue. See Figure 3-10 and Section 4.1, *Aesthetics*.
LU 2.11: Require the design of new residential developments to include the following: • greenbelts, sidewalks, landscaped parkways, parks, recreation amenities, and other community amenities; • minimizing the width of streets to encourage pedestrian activity and to slow traffic, as appropriate; • potentially, include well designed and lighted alleys to minimize the dominance of garages along street frontage; • siting of development to avoid disturbances of sensitive areas and maintain important environmental resources, including topographical formations and habitat; and • accommodate the development of recreational, community meeting, educational, and day care facilities in all residential areas, provided that they are compatible with the intended residential function and character of the neighborhood, and subject to City review and approval.	**Consistent**. See Figures 3-8 and 3-9. The residential site would incorporate pedestrian paths and landscaped common areas. Shared outdoor spaces would occur between duplex and triplex buildings, with garages located in drive aisles at the rear of these buildings. Internal circulation elements within the residential site would generally be of a width to accommodate one lane in each direction while allowing for emergency vehicle access. These internal roadways would contain sidewalks and landscaping for pedestrians. Duplex and triplex buildings would be oriented around landscaped lawns with garages at the rear of the buildings. The Project site does not contain sensitive vegetation communities, and no riparian habitat areas were found on or adjacent to the Project site (refer to Section 4.3, *Biological Resources*). The residential site would incorporate amenities including meeting rooms and other community spaces that would allow for community gatherings and be compatible with the proposed use of the site.

General Plan Policy	Project Consistency Analysis
LU 2.12: Allow for the development of housing types intended to meet the special needs of senior citizens, the physically challenged, and low and moderate income households provided that the units are designed to be compatible with adjacent residential structures.	**Consistent**. The Project includes the development of 230 housing units restricted to individuals 55 years or older. In addition, ten percent of the units would be provided for rent at rates affordable to low-income households and five percent of the units would be provided for rent at rates affordable for moderate-income households. The Project would be developed on a site currently designated as Recreation and comprised of a portion of the Azusa Greens Golf Course. There are single family residences immediately adjacent to the Project site to the south and west. The Project is designed to ensure compatibility with existing uses within the area.
LU 3.2: Multi-family and mixed-use units and sites are designed to convey a high level of quality and character, and reflect and complement surrounding neighborhood character. This includes, but is not limited to: • using "living space forward" design concepts; • modulation and building elevation articulation and masses (avoiding undifferentiated "boxlike structures"); • incorporating well-defined roof lines; • using extensive site landscape to complement the architectural design of the structure; • conveying the visual character of individual units rather than a singular building mass and volume for multi-family structures; • including separate, well-defined entries for each residential unit; • locating the first occupiable floor at or near the predominate grade elevation, ensure subterranean parking facilities are not visible from the street frontage; and • siting and design of parking areas and facilities to be integrated with and not dominate the architectural character of the structure.	**Consistent**. Refer to response to Policy LU 2.9. The proposed residential site development would incorporate recreational amenities, visually interesting architecture, a mix of buildings scales, and de-emphasized parking areas.
LU 3.3: Require new developments to provide for on-street landscaping, landscaped park-on-street landscaping, landscaped parkways, and other streetscape as specified in the Urban Form Element and Development Code.	**Consistent**. The Project would provide new sidewalks and street trees planted along the frontages of the site. New sidewalks in the proposed residential site would also incorporate street trees.
LU 4.2: Encourage the revitalization of the four districts each with its special or unique focus, identity, and mix of uses: • West End Industrial District will be the main job center and economic base of Azusa providing specialized, technological, and manufacturing employment opportunities and supporting retail and commercial uses.	**Consistent**. The industrial site is located within the DWL. The Project proposes a General Plan amendment to change the land use designation of the industrial site from Recreation to Light Industrial. The addition of industrial uses on the industrial site would comply with the goals for the DWL to provide manufacturing employment and commercial uses to the City.

General Plan Policy	Project Consistency Analysis
LU 4.8: Accommodate industrial, manufacturing and supporting commercial use within the West End Industrial District and in accordance with Table CD-2.	**Consistent**. The Project proposes a General Plan amendment to change the land use designation of the industrial site from Recreation to Light Industrial, which would accommodate industrial, manufacturing, and supporting uses in the DWL consistent with the principal uses identified in Table CD-2 of the Azusa General Plan.
LU 4.9: Require buildings within the West End Industrial District to be uniquely identifiable, distinguished in their architecture and site planning, and compatible with adjacent uses and districts.	**Consistent**. The size of the proposed industrial buildings would be compatible with the industrial development to the north, south, and west. The buildings would have a modern design with blue and gray finishes and minor metallic elements. Existing trees and hedges would provide a visual buffer between the Project and residential uses to the northeast and east.
LU 4.10: In the West End Industrial District, establish and require new developments to provide pedestrian and landscape linkages to other areas and businesses within the district and to the Foothill Boulevard corridor, as appropriate.	**Consistent**. The Project would improve pedestrian linkages in the area through the provision of new sidewalks and street trees along North Todd Avenue and West 10th Street at the industrial site, where there is an existing gap in the sidewalk system.
LU 5.6: Require single level, "at grade" parking facilities to be generously landscaped with shrubs and trees.	**Consistent**. The Project would comply with Azusa Municipal Code Section 88.36.090, which requires that trees be planted throughout each parking area at a minimum ratio of one tree for each five parking spaces.
LU 5.7: Require all new development and encourage the remodeling of existing development to provide the maximum window exposure and minimize "blank wall" exposure to the sidewalk and street.	**Consistent**. See Figure 3-7. The industrial buildings would incorporate large windows at the office areas and walls would be finished with multiple colors, thereby minimizing blank wall exposure.
LU 6.1: Accommodate industrial development in accordance with Table CD-2.	**Consistent**. The Project proposes a General Plan amendment for the industrial site to change the land use designation to Light Industrial. The industrial site is located in the DWL and would accommodate the land uses planned for the Light Industrial land use designation in Table CD-2.
LU 6.2: Require all industrial buildings to be distinctive, constructed of high-quality materials, and be of interesting and strong design. All buildings shall be visually attractive from the street, and from adjacent or nearby properties.	**Consistent**. The architecture of the industrial buildings would have a modern design with blue and gray finishings and minor metallic elements, which would be visually attractive from the street. See Figure 3-7.
LU 6.3: Require rooflines and building elevations to be visually attractive from all vantage points.	**Consistent**. The rooflines of the industrial site would vary in height to create a visually interesting design. Parapets would surround the roofs and mechanical equipment would be screened from view.

General Plan Policy	Project Consistency Analysis
LU 6.4: Require site development plans to: • incorporate physical and visual design elements that buffer industrial use from any nearby residential neighborhood or use; • provide elements that link commercial and industrial uses (sidewalks and paths, common architectural design, signage, landscape, etc.); • site commercial buildings around common open spaces and plazas accessible to the public; and • require single level, "at grade" parking facilities to be generously landscaped with shrubs and trees.	**Consistent**. Trees and hedges would provide a visual buffer between the proposed industrial buildings and residential uses to the northeast and east. New sidewalks would be provided along the industrial site frontages and would connect to paths provided to the industrial buildings. The Project would comply with Azusa Municipal Code Section 88.36.090, which requires that trees be planted throughout each parking area at a minimum ratio of one tree for each five parking spaces.
LU 8.9: Require developers of any use whose scale may significantly impact existing open space resources to allocate sufficient lands as permanent open space for recreation, visual amenity, and/or environmental resources protection (by dedication, easement, or other City approved technique).	**Consistent**. The Project site is designated for Recreation and is not public open space; however, it is noted that the residential and industrial portions of the Project would be developed on an approximately 40-acre portion of an existing, privately-operated golf course. The Project applicant would be required to pay park fees established by the City proportional to the number of bedrooms created for the ongoing provision of public recreation opportunities in the City, some of which may provide open space lands.
LU 9.2: Require that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure.	**Consistent**. As discussed in Section 4.17, *Utilities and Service Systems*, implementation of the Project would be constructed where connections to existing utility infrastructure exists. A replacement water pipeline would be installed with the Project. The proposed storm drain facilities would be designed to store and convey peak storm flows. Thus, there is adequate infrastructure to support the proposed type, amount, and location of development.
LU 10.1: Require the consideration and mitigation of noise, light, vehicular, and other impacts on residential properties in the design of commercial and industrial development.	**Consistent**. The Project would not generate significant localized impacts on residential properties related to long-term noise generation, light sources, or vehicle trips exceeding the capacity of local intersections. Mitigation for the significant impact of short-term, construction noise has been considered and is identified to the extent feasible to reduce disturbance to residents, although the impact would not be mitigated below a level of significance. While the Project would have a significant and unavoidable VMT impact, this would not result in localized effects for nearby residential land uses. See Sections 4.1, *Aesthetics*; 4.2, *Air Quality*; 4.8, *Hazards and Hazardous Materials*; 4.11, *Noise*; and 4.15, *Transportation*, for more details regarding potential Project impacts to surrounding residences.

General Plan Policy	Project Consistency Analysis
LU 10.2: Require on-site lighting of institutional, commercial, and industrial uses be constructed or located so that only the intended area is illuminated, off -site glare is minimized, and adequate safety is provided.	**Consistent**. The Project would not result in significant impacts related to light and glare on the surrounding area and would comply with the City's light regulations, as described further in Section 4.1, *Aesthetics*.
LU 10.7: Control the development of industrial and other uses that use, store, produce, or transport toxins, generate unacceptable levels of noise, air emissions, or contribute other pollutants requiring adequate mitigation measures confirmed by environmental review and monitoring.	**Consistent**. As described further in Section 4.8, *Hazards and Hazardous Materials*, future tenants of the Project would be required to comply with all regulations regarding the handling of hazardous materials. The Project industrial uses would not generate unacceptable levels of permanent noise or pollutant emissions with incorporation of the identified mitigation measures for incorporation of a sound barrier, as described in Sections 4.2, *Air Quality*, and 4.11, *Noise*.
LU 11.1: Require all structures to be constructed in accordance with City building and other pertinent codes and regulations, including all new, adaptively re-used, and renovated buildings; allowing appropriate exceptions for historically-significant buildings.	**Consistent**. The Project would be constructed in accordance the CBC and City building codes. Project plans would be reviewed and approved by the City prior to building permit issuance to ensure adherence to these regulations.
LU 11.3: Require all developments including renovations and adaptive reuse of existing structures (except historically significant buildings) be designed to provide adequate space for access, parking, supporting functions, open space, and other pertinent elements.	**Consistent**. The Project is subject to Design Review to ensure that the proposed industrial site development complies with the applicable DWL and other Development Code standards and regulations and General Plan policies. The residential portion of the Project would include a variety of services and amenities including open space, recreation programs, gathering spaces, and programming and services for its residents.
LU 11.7: Require new development and existing development be maintained in a safe manner.	**Consistent**. The residential site development would include an entry gate to limit entries into the community. Ongoing maintenance of brush and landscaping would occur throughout the Project site and security lighting on buildings and within parking areas would be provided.
City Design (Urban Form)	
UF 1.1: Require development projects to establish the historicity of existing buildings and landscapes and require City review and permission to allow for their removal in accordance with California Environmental Quality Act (CEQA) and the Cultural and Historic Preservation Ordinance.	**Consistent**. As described in Section 4.4, *Cultural Resources*, the Project would not impact historically significant buildings given no listed historic resources occur on the site and no demolition of buildings would occur.
UF 2.1: Develop a thoroughfare network to fit specific local streetscape needs and accommodate varying traffic volumes, bicycle travel, and pedestrian needs.	**Consistent**. As described in Section 4.15, *Transportation*, the Project would not result in increases in vehicular traffic exceeding the capacity of existing roadways. Pedestrian facilities would be provided along the Project frontages and within the residential site. Bicycle facilities, including long- and short-term bicycle storage, would be offered at the residential and industrial sites.

General Plan Policy	Project Consistency Analysis
UF 3.1: Require all new multi-family housing developments to have a separate ground floor entrance for each unit, except for mixed-use projects combining commercial and residential units.	**Consistent**. The duplex and triplex buildings would provide separate ground floor entrances for each unit. The stacked flats building would not be required to comply with this policy given the age restriction of the residential community and the requirement to provide single-story units with elevators to each floor.
UF 4.1: Plant all public thoroughfares with rows of trees, as feasible.	**Consistent**. The Project would be designed to include street trees and ample landscaping throughout the site.
UF 4.3: Continue the undergrounding of overhead utilities.	**Consistent**. As described in Section 4.17, *Utilities and Service Systems*, the Project would underground on-site electrical distribution lines for the residential and industrial sites to serve the Project.
UF 4.4: Require signage to be designed considering the scale and materials of adjacent buildings, the desired character of the neighborhood, district, or corridor where the site is located, and pedestrian orientation.	**Consistent**. Signage for the residential portion of the Project is proposed to be incorporated into an entry monument located between the two main entrance driveways along Sierra Madre Boulevard. The signage and associated monument wall would be designed to include natural materials and a color palette compatible with the surrounding land uses. Signage at the industrial site is anticipated to consist of driveway monument signs and identification on buildings but cannot be detailed further given the future tenants are unknown. Future signage installed at the industrial site would be required to comply with Azusa Municipal Code Chapter 88.38 related to signs.
UF 5.1: Encourage new residential projects to be built in a form and scale compatible with and appropriate to their surroundings.	**Consistent**. See Figure 3-10. The residential component of the Project would be compatible with the scale of development in surrounding neighborhoods and would include unique, visually interesting architecture avoiding monotonous facades.
UF 6.1: Encourage front doors and public living spaces of buildings to be located toward the street and garages to be located toward the rear of lots.	**Consistent**. Garages for duplex and triplex units would be oriented away from common open spaces while entrances would face the common open spaces.
UF 8.1: Support the development of multiple housing types in corridors and the districts, require high quality design, construction methods, materials, and maintenance.	**Consistent**. The Project would introduce age-restricted housing to the area, which would diversify housing types in the City. The Project would also incorporate a high-quality, visually interesting design, as shown in Figures 3-9 and 3-10.
Mobility	
M 1.2: Maintain Level of Service D on roadway segments and at signalized intersections throughout the City, except in the downtown area, the University District, and in the vicinity of freeway interchanges where Level of Service E shall be maintained in these areas.	**Consistent**. As concluded in the TIS (Appendix R), the Project would not result in intersection Level of Service (LOS) being degraded below LOS D.

General Plan Policy	Project Consistency Analysis
M 1.3: Require the cost of improvements to the existing circulation system and new circulation system necessitated by new development to be borne by that development that gains benefit.	**Consistent**. As concluded in the TIS (Appendix R), the Project would not generate vehicle trips resulting in the need for improvements to existing intersections. However, safety improvements at crossings across Sierra Madre Avenue would be provided and funded by the Project applicant. The Project would provide new internal circulation elements, including roadways and sidewalks with street trees to serve the proposed development.
M 4.3: Provide sidewalks on all city streets, as appropriate (see Mobility Policy 3.1).	**Consistent**. Refer to Response to Policies LU 4.10 and M 1.3. The Project would provide new sidewalks along North Todd Avenue and West 10th Street where none currently exist.
M 8.1: Plan for an adequate amount, not an oversupply, of parking for autos, carpool vans, and bicycles for each land use.	**Consistent**. The Project would provide 449 parking spaces within the residential site, 446 parking spaces within the industrial site, and 158 parking spaces within the golf course site. These exceed the minimum parking requirements and would provide adequate parking for the proposed land uses.
M 8.4: Plan land uses and design buildings to encourage transit, rideshare or carpool, bicycling, and walking. This includes but is not limited to: • permitting higher densities along transit corridors and around transit stations; • allowing a mix of uses to include residential and commercial uses in the same area in order to reduce the number of vehicular trips made; • locating and designing new developments to encourage access by non-auto modes; • requiring new development to provide direct and convenient pedestrian access to transit and adjacent land uses within walking distances; • requiring the provision of transit facilities/amenities in larger scale developments; • along corridors, requiring off street parking to be located behind buildings so barriers to pedestrians and transit users are not created between the building and the street; and • locating buildings close to the street to be inviting to pedestrians and transit users, as appropriate.	**Consistent**. The Project would provide new sidewalk connections adjacent to the industrial site and would construct sidewalks within the residential site, which would connect on-site amenities for Project residents, such as recreation areas and meeting rooms. The Project would also provide access to roadways with shared bike access and bicycle storage. The Project site is within one mile of bus and metro lines located on and around Foothill Boulevard.
Housing	
H 1.1: Provide a range of residential development types in Azusa, including low density single-family homes, moderate density townhomes, higher density apartments and condominiums, and residential/commercial mixed-use in order to address the City's share of regional housing needs.	**Consistent**. The Project would introduce age-restricted housing, including affordable units, to the area, which would help address the City's share of regional housing needs. A mix of unit types would also be provided, including stacked flats, duplexes, and triplexes.

General Plan Policy	Project Consistency Analysis
H 1.7: Support the provision of high-quality rental housing for large families, students, and senior citizen households.	**Consistent**. Development of the Project would provide housing restricted to those age 55 and older, thereby providing a needed housing type within the community.
Historic/Cultural Resources	
HR 1.1: Determine, early in the planning process, through field surveys and Native American consultation, whether archaeological or cultural resources are located within a proposed development site.	**Consistent**. Potential Project impacts on archaeological and tribal cultural resources are discussed in Section 4.4, *Cultural Resources* and Section 4.16, *Tribal Cultural Resources*, and mitigation measures are provided. As summarized in those sections, the Project would have less than significant impacts on archaeological and cultural resources with implementation of the identified mitigation measures.
Infrastructure	
I 1.4: Minimize electrical consumption through site design, use of efficient systems, and other techniques. **I 1.6**: Continue to require the incorporation of electrical conservation features in the design of all new construction and site development. Encourage the retrofit to existing buildings and development to include electrical conservation features including, but not limited to, wireless technology and solar energy. **I 1.8**: Ensure the costs of improvements to the existing electrical supply and distribution facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.	**Consistent**. Compliance with current building codes, including CALGreen and CBC, would ensure electrical consumption is minimized to the extent possible. The Project would provide solar energy facilities to further reduce the need for purchased electricity. The Project includes, and the Project applicant would fund, infrastructure costs to connect to the existing electrical supply and distribution facilities.
I 2.1: Monitor the demands on the water system, manage development to mitigate impacts and/or facilitate improvements to the water supply and distribution system, and maintain and expand water supply and distribution facilities.	**Consistent.** As described in Section 4.17, *Utilities and Service Systems*, the Project would have a less than significant impact on water supply and would install a replacement water main to improve aging infrastructure.
I 2.4: Require that new development and retrofit existing developments to contain safeguards and measures preventing water supply degradation.	**Consistent**. Project-generated water demands and impacts to the City's existing water supply are analyzed in Section 4.17, *Utilities and Service Systems*. As summarized therein, the Project would have a less than significant impact on water supply and would be designed in compliance with current standards related to water efficiency.

General Plan Policy	Project Consistency Analysis
I 2.5: Require all new development to connect to the sewer system.	**Consistent**. The Project would connect to the City's sewer system. An 8-inch pipeline generally aligned within the residential site's main driveway would connect residential uses to the sewer system and the main located in Sierra Madre Avenue. The industrial site buildings would connect to the existing sewer mains in North Todd Avenue and West 10th Street. Existing connections of the golf course clubhouse to the sewer system would be maintained in place. Refer also to Section 4.17, *Utilities and Service Systems*.
I 2.6: Minimize water consumption through site design, use of efficient systems, and other techniques. **I 2.8**: Continue to require the incorporation of water conservation features in the design of all new construction and site development.	**Consistent**. Water conservation features required by current building codes would be integrated in the Project design and reviewed by the City prior to site plan approval and permit issuance. The Project would also include water efficient landscaping fixtures.
I 2.11: Ensure the costs of improvements to the existing water supply and distribution facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.	**Consistent**. The connection of proposed Project features to existing water mains and construction of off-site utility improvements would be funded by the Project applicant.
I 3.5: Ensure the costs of improvements to the existing sewer collection and treatment facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.	**Consistent**. The construction of sewer pipelines through the residential and industrial sites and connection of proposed Project buildings to existing sewer mains would be funded by the Project applicant.
I 3.8: Continue to monitor businesses that may generate hazardous waste to prevent contamination of waste.	**Consistent**. As described in Section 4.8, *Hazards and Hazardous Materials*, tenants of the proposed industrial buildings could generate hazardous waste but would be required to comply with all relevant regulations or permits regarding the handling of hazardous waste.
I 4.4: Monitor the demands and manage development to mitigate impacts and/or facilitate improvements to the storm drainage system. **I 4.7**: Require improvements to the existing storm drain and flood control facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.	**Consistent.** As described in Section 4.9, *Hydrology and Water Quality*, the Project would not result in a substantial change in the amount of surface runoff, and runoff rates but would be accommodated by existing public infrastructure with the installation of infiltration and detention basins, which would be provided as part of the proposed Project and would be funded by the Project applicant.

General Plan Policy	Project Consistency Analysis
I 4.8: Require new developments to employ the most efficient drainage technology to increase ground percolation, control drainage, and minimize damage to environmentally sensitive areas. **I 4.10**: Encourage using construction methods and technologies that will reduce the size or decrease the number of impervious surfaces in both new development and the retrofit of existing development.	**Consistent**. As described in Section 4.9, *Hydrology and Water Quality*, infiltration/detention systems would be installed in the residential site, golf course parking area, and industrial site to accommodate stormwater runoff from the proposed development. Landscaped areas and the majority of the golf course site would allow percolation.
Economy and Community	
Economic Development	
EC 3.2: Offer a broad mix of housing choices to support a diverse resident workforce.	**Consistent**. The Project would introduce age-restricted housing with affordable units to the area, providing additional diversity of housing opportunities.
EC 4.1: Support the creation of high-quality jobs for relatively low skill levels.	**Consistent**. The Project is anticipated to create approximately 481 full-time equivalent jobs requiring a range of skills. The industrial portion of the Project would provide manufacturing and logistics jobs and the golf course and residential portions of the Project would employ maintenance and service staff.
EC 8.1: Work to ensure a range of housing opportunities for Azusa residents of all ages, incomes, and family structures.	**Consistent**. The Project would introduce age-restricted housing to the area.
EC 9.3: Promote business development that can support the City's property tax base, generate business-to-business sales taxes, and enhance Azusa's economic health and quality of life.	**Consistent**. The Project would introduce new industrial uses to the area which would generate taxes for the City. Residents would also spend money in the City, thereby supporting businesses and generating tax revenue.
EC 11.2: Build long-term value in the community.	**Consistent**. The Project would provide an opportunity for older residents in the City to live in an age-restricted community with others and where many amenities are provided within the site.
EC 11.3: Connect housing development and residential quality to all aspects of the economic development strategy. **EC 11.5**: Create unique, high-quality residential and retail environments, ensuring they are inclusive of the whole range of Azusa's service population.	**Consistent**. Development of the Project would provide housing restricted to those age 55 and older, thereby providing a needed housing type within the community. The residential portion of the Project would promote quality of life for its residents by providing a high-quality environment with services and amenities.
Public Services	
PS 1.3: Require development projects contribute fees based on their proportional impact and demand for new resources, in accordance with State Nexus legislation.	**Consistent**. As described in Section 4.13, *Public Services*, the Project would slightly increase demand for public services (e.g., fire and police); however, impacts would be less than significant. If development impact fees are established for incremental increases in demand for such services and apply to the Project, the Project applicant would pay the required impact fees. School and park fees would be paid by the Project applicant according to the established fees for these services.

General Plan Policy	Project Consistency Analysis
PS 1.8: Ensure that project development site designs provide "defensible space."	**Consistent**. The Project proposes a landscaped areas surrounding roadways and buildings but would maintain defensible space around the proposed residential buildings. The residential site would also be gated at the entrance.
PS 2.5: Require new development be assessed a pro-rated fee to pay for fire facilities and personnel.	**Consistent**. A development fee for fire facilities and personnel has not been established as of the City's 2023 fee schedule. If a fire fee is established and applicable to the Project, the Project applicant would pay the applicable fee to support the City's fire services.
PS 2.6: Require all new development to design site plans and structures with fire and emergency access and safety in mind.	**Consistent**. The Project has been designed in accordance with the California Fire Code and CBC and would therefore be designed in accordance with best practices for fire and emergency access and safety. Confirmation of adherence to these codes would occur during building plan review by the City and LACoFD.
PS 2.7: Ensure that buildings and lots are maintained in a manner that is consistent with fire prevention and personal safety.	**Consistent**. The Project would maintain vegetation setbacks, as required by brush management regulations.
Natural Environment	
Open Space and Biological Resources	
OS 1.3: Strive for the long-term maintenance of all native wildlife species living in the City and the Sphere of Influence including common and sensitive species.	**Consistent.** As described in Section 4.3, *Biological Resources*, impacts to biological resources would be less than significant with the incorporation of identified mitigation measures.
Geology Hazards	
GEO 1.4: Prohibit the location of Sensitive and High-Occupancy facilities within 100 feet of the identified active fault zone or potentially active fault zone of concern, unless it is determined by a qualified geologic engineer that a closer location will not result in undue risks based on detailed site investigations.	**Consistent**. As described further in Section 4.6, *Geology and Soils*, the Project would not place Sensitive and High Occupancy facilities within 100 feet of the identified active fault zone in a manner that would result in undue risks.
Air Quality	
AQ 1.1: Integrate air quality concerns into land use planning decisions. **AQ 1.2**: Integrate air quality concerns into site design review.	**Consistent**. Project impacts related to air quality are summarized in Section 4.2, *Air Quality*, which concludes impacts would be less than significant for sensitive receptor locations near the site.
Noise	
N 1.1: Integrate noise considerations in the City's land use planning and project approval process.	**Consistent**. Project impacts related to noise levels are summarized in Section 4.11, *Noise*, which concludes permanent impacts would be less than significant with incorporation of the identified mitigation measure to comply with noise generation limits at neighboring residential properties. Mitigation is incorporated to the extent feasible to address the Project's significant temporary construction noise impact and conditions of approval would be required to allow the Project's proposed nighttime construction.

General Plan Policy	Project Consistency Analysis
N 1.4: Maintain or reduce noise levels within acceptable levels adjacent to industrial processing and mining activities and the San Gabriel Valley Gun Club.	**Consistent**. As described in Section 4.11, *Noise*, the industrial site would not result in significant permanent noise impacts on the surrounding area with implementation of mitigation.

Azusa Municipal Code

The Project would involve the redevelopment of the Azusa Greens Country Club golf course as an industrial site, an age-restricted residential community, and a reconfigured 9-hole golf course and driving range. The Project requests approval of a tentative tract map for the residential site, a tentative parcel map for the industrial site, and Design Review to evaluate the proposed Project for consistency with the Azusa Municipal Code. Reconfiguration of the golf course and alterations to the clubhouse would not conflict with the zoning for the Project site as it is currently zoned Recreation and would remain Recreation, and the golf course would operate as a 9-hole golf course, consistent with its use permit. To ensure consistency with the Azusa General Plan and Zoning Map, the Zoning Map would be amended alongside approval of the General Plan amendment for the residential and industrial sites. The approval of the zone change is requested to amend the Azusa Zoning Map to change the zoning from Recreation to DWL for the industrial site and Neighborhood General 3 Medium Density Residential for the residential site.

Azusa Municipal Code Section 88.51.060, *Zoning Amendments*, establishes the conditions and requirements for consideration of a zone change. In accordance with Section 88.51.060, in recommending and approving a zone change, the Planning Commission and City Council are required to make findings of fact:

(1) That the proposed amendment is consistent with the goals, policies, and objectives of the general plan, any applicable specific plan, development agreement, owner participation agreement or disposition and development agreement; and

(2) That a proposed zone change will not adversely affect surrounding properties.

The proposed zone change from Recreation to DWL and Neighborhood General 3 Medium Density Residential would allow the use and development of the Project site consistent with the proposed land uses. This is intended to ensure development occurs in a coordinated fashion, with adequate public/private services and infrastructure, rather than as a series of isolated individual projects. Upon adoption of the proposed General Plan amendment and approval of the zone change, the Project would be consistent with the Azusa Municipal Code and Zoning Map. Development within the Project site would undergo Design Review, consistent with Azusa Municipal Code Section 88.51.032 to evaluate the Project for consistency with the permitted uses, development/design standards, and requirements per the proposed Project application materials submitted.

Other Plans

As stated above, SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted 2024 RTP/SCS. SCAG refers to CEQA Guidelines Section 15206, Projects of

Statewide, Regional or Areawide Significance, in determining whether a project meets the criteria to be deemed regionally significant. The following criteria are relevant to the Project:

- Criteria 1: A proposed local general plan, element, or amendment thereof for which an EIR was prepared.

The Project would require discretionary approval of a General Plan amendment that would change the Recreation land use designation for 19.82 acres to Medium Density Residential and 19.33 acres to DWL. Because the Project satisfies Criteria 1 above, it is considered regionally significant and must demonstrate consistency with the 2024 RTP/SCS, which is established through consistency with 2024 RTP/SCS goals and adopted growth forecasts. As discussed in Sections 4.2.5.1 and 4.7.5.2, the Project would conflict with several 2024 RTP/SCS strategies, including Transportation Demand Management, Priority Development Areas, 15-Minute Communities, Sustainable Development, and Air Quality. In addition, because the Project proposes a General Plan amendment for the land use designations on the industrial and residential sites, the Project would result in growth which is not accounted for in the emissions projections used to create the 2024 RTP/SCS. As such, the Project would conflict with SCAG's 2024 RTP/SCS.

Level of Significance Prior to Mitigation

Implementation of the Project would not conflict with a land use plan, policy, or regulation adopted by the City for the purpose of avoiding or mitigating an environmental effect and impacts related to City plans would be less than significant. However, the Project would conflict with SCAG's RTP/SCS, which is adopted for the purpose of reducing environmental effects; therefore, impacts would be potentially significant.

Mitigation Measures

The primary source of the conflict with the SCAG's 2024 RTP/SCS is the Project's VMT impact. As discussed further in Section 4.15, *Transportation*, the Project would generate VMT per capita that would exceed the applicable thresholds, and while mitigation measures TR-1 through TR-4 are identified to reduce Project VMT, the Project's VMT impact would remain significant and unavoidable. Because there would be no feasible mitigation which would reduce the VMT impact or make the Project consistent with the growth projections in the RTP/SCS, there would be no feasible mitigation which would reduce the impact from conflicts with this plan to less than significant.

Level of Significance After Mitigation

Mitigation measures identified in Section 4.15, *Transportation*, would reduce the VMT impacts of the Project but would not reduce these impacts below the applicable threshold. No feasible mitigation measures have been identified that would avoid a conflict with the RTP/SCS. Therefore, impacts would be significant and unavoidable.

4.10.6 Cumulative Impact Analysis

Land uses and development patterns are typically established in local land use planning documents specific to jurisdictions but can have implications on surrounding areas. The geographic scope for the land use cumulative analysis includes the City of Azusa.

Implementation of the proposed Project would not physically divide an established community, as discussed above, and cumulative projects within the City would also occur within developed areas and are not anticipated to divide established communities. In addition, cumulative projects within the City would be required to comply with the General Plan and applicable policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Projects that are not consistent with existing land use designations would require approval of a General Plan amendment, as applicable. Projects that require a General Plan amendment are required to demonstrate conformance with pertinent goals, policies, and recommendations. Where significant or potentially significant impacts are identified, implementation of feasible mitigation would be required to reduce or avoid significant land use impacts. As such, cumulative impacts related to consistency with the City's land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant.

However, given the Project would conflict with SCAG's 2024 RTP/SCS and result in a significant and unavoidable Project-level impact, the cumulative impact of the Project is also considered significant and unavoidable as a result of the Project's inconsistency with the land use patterns planned in the RTP/SCS to reduce VMT in the region.

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4.11 Noise

This section provides an analysis of potential noise impacts resulting from construction and operation of the proposed Project. The existing conditions and regulatory framework related to noise are also provided in this section. The following analysis relies primarily on the assessment of potential noise impacts presented in the Project's Noise and Vibration Technical Report (HELIX 2025c), which is included as Appendix Q to the EIR.

4.11.1 Existing Conditions

4.11.1.1 Noise and Sound Level Descriptors and Terminology

Descriptors

All noise level or sound level values presented herein are expressed in terms of decibels (dB), with A-weighting (dBA) to approximate the hearing sensitivity of humans. Time-averaged noise levels are expressed by the symbol L_{EQ}, with a specified duration. The Community Noise Equivalent Level (CNEL) is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting. This is similar to the Day Night sound level (L_{DN}), which is a 24-hour average with an added 10 dBA weighting on the same nighttime hours but no added weighting on the evening hours. Sound levels expressed in CNEL and L_{DN} are always based on dBA. These metrics are used to express noise levels for both measurement and municipal regulations, as well as for land use guidelines and enforcement of noise ordinances.

Noise Terminology

Sound, Noise, and Acoustics

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is defined as loud, unexpected, or annoying sound. In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. The field of acoustics deals primarily with the propagation and control of sound.

Frequency

Continuous sound can be described by frequency (pitch) and amplitude (loudness). A low-frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz (kHz), or thousands of Hz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

Sound Pressure Levels and Decibels

The amplitude of pressure waves generated by a sound source determines the loudness of that source. Sound pressure amplitude is measured in micro-Pascals (µPa). One µPa is approximately one hundred billionth (0.00000000001) of normal atmospheric pressure. Sound pressure amplitudes for different kinds of noise environments can range from less than 100 to 100,000,000 µPa. Because of this wide range of values, sound is rarely expressed in terms of µPa. Instead, a logarithmic scale is used to describe sound pressure level (SPL) in terms of dBA. The threshold of hearing for the human ear is about 0 dBA, which corresponds to 20 µPa.

Addition of Decibels

Because decibels are logarithmic units, SPL cannot be added or subtracted through standard arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than from one source under the same conditions. For example, if one automobile produces an SPL of 70 dBA when it passes an observer, two cars passing simultaneously would not produce 140 dBA—rather, they would combine to produce 73 dBA. Under the decibel scale, three sources of equal loudness together produce a sound level 5 dBA louder than one source.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear can discern 1-dBA changes in sound levels, when exposed to steady, single-frequency ("pure-tone") signals in the mid-frequency (1,000 Hz–8,000 Hz) range. In typical noisy environments, changes in noise of 1 to 2 dBA are generally not perceptible. It is widely accepted, however, that people begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5-dBA increase is generally perceived as a distinctly noticeable increase, and a 10-dBA increase is generally perceived as a doubling of loudness.

No known studies have directly correlated the ability of a healthy human ear to discern specific levels of change in traffic noise over a 24-hour period. Many ordinances, however, specify a change of 3 CNEL as the significant impact threshold. This is based on the concept of a doubling in noise energy resulting in a 3 dBA change in noise, which is the amount of change in noise necessary for the increase to be perceptible to the average healthy human ear.

4.11.1.2 Vibration Descriptors and Terminology

Ground-borne vibration consists of rapidly fluctuating motions or waves transmitted through the ground with an average motion of zero. The rumbling sound caused by the vibration of surfaces due to ground-borne vibration is called ground-borne noise. Ground-borne noise is highly dependent on the characteristics of the structure subject to vibration. Therefore, this analysis focuses on ground-borne vibrations. Sources of ground-borne vibrations include natural phenomena and anthropogenic causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions). Peak particle velocity (PPV) is defined as the maximum instantaneous positive or negative peak of the vibration wave. Decibels are also used to compress the range of numbers required to describe vibration. Vibration velocity level (L_V) with units of VdB (referenced to one-micro-inch per second velocity) are commonly used in evaluating human reactions to vibrations. For the purposes of this analysis, a PPV descriptor with units of inches per second is used to evaluate construction-generated vibration for building damage and L_V with units of VdB is used to evaluate human reactions.

4.11.1.3 Noise-Sensitive and Vibration-Sensitive Land Uses

NSLUs are land uses that may be subject to stress and/or interference from excessive noise, such as residential dwellings, schools, transient lodging (hotels), hospitals, educational facilities, and libraries. Industrial and commercial land uses are generally not considered sensitive to noise. Noise receptors are individual locations that may be affected by noise. The closest existing NSLUs to the industrial site are multi-family residential properties east and northeast of the southeast corner of the industrial site. The closest existing NSLUs to the industrial site are multi-family residential properties east and northeast of the southeast corner of the industrial site. The closest existing NSLUs to the residential site are single-family residential properties adjacent to the residential site's western property line. Refer to Figure 3-2. As a residential development, the residential site would be a new NSLU.

Land uses in which ground-borne vibration could potentially interfere with operations or equipment, such as research, hospitals, and university research operations (Caltrans 2020a), are considered "vibration-sensitive." The degree of sensitivity depends on the specific equipment that would be affected by the ground-borne vibration. In addition, excessive levels of ground-borne vibration of either a regular or an intermittent nature can result in annoyance to residential uses, schools, or transient lodging. Land uses in the Project area that are subject to annoyance from vibration include the residences described above.

4.11.1.4 Existing Noise Environment

The existing noise environment is dominated by traffic noise from local streets, noise from industrial businesses (trucks, loading docks, building mechanical systems), and typical suburban residential noise (e.g., landscape maintenance equipment, dogs). There is some noise from aircraft overflights in the Project area.

Noise Survey

One long-term (24-hour) and three short-term (15-minute) noise measurements were taken on or near the Project site, as shown on Figure 4.11-1, *Noise Measurement Locations*, to document existing conditions in the Project vicinity. A Piccolo II Noise Meter was used for the noise measurements. The long-term noise measurement (LT-1) was recorded within the industrial site's southeastern edge, near West 10th Street and the apartments northeast and east of the industrial site. The first short-term measurement (ST-1) was recorded along Sierra Madre Avenue, at the approximate location of the residential site's proposed driveway. The second short-term measurement (ST-2) was recorded within the golf course site, near the proposed 7th hole tee box and 8th hole green realignment. The third short-term measurement (ST-3) was recorded at the industrial site's northern edge near Sierra Madre Avenue. Traffic counts were taken during measurements ST-1 and ST-3 for passenger cars, medium trucks and buses, and heavy trucks that passed the street near the noise meter during the measurement. The measured noise levels are shown in Table 4.11-1, *Noise Measurement Results.*

Table 4.11-1
NOISE MEASUREMENT RESULTS

Measurement LT-1	
Date:	March 26 to March 27, 2024
Time:	12:55 p.m. (March 26) – 2:10 p.m. (March 27)
Location:	Within the industrial site's southeastern edge, near West 10th Street.
Measured Noise Level:	55.2 CNEL; 54.9 dBA L_{DN}
Measurement ST-1	
Date:	March 26, 2024
Time:	10:57 a.m. – 11:12 a.m.
Location:	Sierra Madre Avenue, at the approximate location of the proposed residential site driveway.
Measured Noise Level:	66.2 dBA L_{EQ}
Notes:	Primarily traffic noise on local streets, occasional light aircraft overflight.
Traffic Count	105 cars; 2 medium trucks/buses; 3 heavy trucks
Measurement ST-2	
Date:	March 26, 2024
Time:	11:35 a.m. – 11:50 a.m.
Location:	Within the golf course site, near the proposed 7th hole tee box and 8th hole green realignment
Measured Noise Level:	45.2 dBA L_{EQ}
Notes:	Heavy earthmoving equipment audible to the north, occasional light aircraft overflight.
Measurement ST-3	
Date:	March 26, 2024
Time:	12:15 p.m. – 12:30 p.m.
Location:	Industrial site's northern edge near Sierra Madre Avenue.
Measured Noise Level:	57.0 dBA L_{EQ}
Notes:	Primarily traffic noise on local streets, heavy trucks within adjacent industrial business.
Traffic Count	111 cars; 0 medium trucks/buses; 4 heavy trucks

Source: HELIX 2025c
dBA = A-weighted decibel; L_{EQ} = time-averaged noise level; L_{DN} = Day Night noise level

4.11.2 Regulatory Setting

4.11.2.1 State Regulations

California Noise Control Act

The California Noise Control Act is a section within the California H&SC that describes excessive noise as a serious hazard to the public health and welfare, and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. It also finds that there is a continuous and increasing bombardment of noise in the urban, suburban, and rural areas. The California Noise Control Act declares that the state has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the state to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

I:\PROJECTS\O\OvertonMoore_03697\00019_AzusaGreens\Map\EIR\EIR.aprx Fig4.11-1_NoiseMeasLocs : 03697.19.1 : 4/2/2025 - SAB

Source: Aerial (Maxar, 2021)

HELIX Environmental Planning

Noise Measurement Locations

Figure 4.11-1

California Building Code

The CBC sets forth building design and construction requirements relating to fire and life safety, structural safety, and access compliance. Title 24, Part 2, Section 1206, *Sound Transmission*, requires interior noise levels in habitable rooms not to exceed 45 dB. The 45 dB requirement may be measured as either the L_{DN} or CNEL, as used in the applicable general plan noise element.

4.11.2.2 Local Regulations

Azusa General Plan

Chapter 5, *Natural Environment,* of the Azusa General Plan focuses on the natural environment, including noise (City 2004a). The following goals, policies, and implementation programs related to noise are applicable to the proposed Project.

Goal 1. Maintain community noise levels that meet health guidelines and allow for a high quality of life.

Policy 1.1. Integrate noise considerations in the City's land use planning and project approval process.

Policy 1.2. Protect those areas of the City where the existing noise environments are considered unacceptable or "noise sensitive."

N1. Noise as an Evaluation Factor for New Developments: Include noise impacts as an evaluation factor in the consideration of the siting, design and construction of new residential, commercial, industrial developments or public/semipublic facilities such as parks, schools, convalescent homes, assisted living facilities and hospitals. (Table N-1 [reproduced below as Table 4.11-2, *Land Use Compatibility for Community Noise Environments*]).

N4. Address Noise Sensitive Land Uses: Noise sensitive uses are to be specifically addressed in decisions affecting the location of commercial, institutional, and industrial land uses or activities that typically generate excessive noise.

N10. Use Noise Contour Maps to Determine Acceptable Noise Levels for Development: If new development is proposed for an area shown on Noise Element Contour Maps to be within the "Conditionally Acceptable," "Normally Unacceptable," or "Clearly Unacceptable" noise range for the proposed land use (as shown in Table N-1 [reproduced as Table 4.11-2, below]), require acoustical analysis and implementation of provisions to reduce exposure to noise, such as window to reduce exposure to noise, such as window glazing and other forms of sound insulation.

N12. Acoustical Analysis for Commercial, Institutional, and/or Industrial Adjacent Development: Require an acoustical analysis for commercial, institutional, or industrial developments that directly adjoin an existing residential use or residential zone.

Table 4.11-2
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS

Land Use Category	Exterior Noise Exposure (CNEL)						
	50-55	55-60	60-65	65-70	70-75	75-80	80+
Residential – Low Density Single Family, Duplex, Mobile Homes							
Residential – Multiple Family							
Transient Lodging – Motels, Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Businesses, Commercial, and Professional							
Industrial Manufacturing, Utilities, Agriculture							
Normally Acceptable[1]	**Conditionally Acceptable[2]**		**Normally Unacceptable[3]**		**Clearly Unacceptable[4]**		

Source: City 2004a

[1] Normally Acceptable: Specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

[2] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. Outdoor environment will seem noisy.

[3] Normally Unacceptable: New construction or development should generally be discouraged. If new construction does proceed, a detailed analysis of the noise reduction requirements must be made with needed noise insulation features included in the design. Outdoor areas must be shielded.

[4] Clearly Unacceptable: New construction or development should generally not be undertaken. Construction costs to make the indoor environment acceptable would be prohibitive and the outdoor environment would not be usable.

CNEL = Community Noise Equivalent Level

Azusa Municipal Code

Azusa Municipal Code Chapter 46, Article IX, Division 2, *Noise Standards*, contains the majority of the City's policies related to noise generation. Additional noise standards for 24-hour limits on noise generation (L_{DN}) are contained in Azusa Municipal Code Section 88.31.020 within the Development Code. These Azusa Municipal Code sections related to noise that would be applicable to the Project are discussed below.

Exterior Noise Standards

Azusa Municipal Code Section 46-404 assigns noise zones to properties by land use. Residential properties are assigned Noise Zone 1, and industrial properties are assigned Noise Zone 4. Azusa Municipal Code Section 46-405 establishes exterior noise standards by Noise Zone, as shown in Table 4.11-3, *Exterior Noise Standards.*

Table 4.11-3
EXTERIOR NOISE STANDARDS

Noise Zone	Noise Level	Time Period
1	55 dBA	7:00 a.m.-10:00 p.m.
1	50 dBA	10:00 p.m.- 7:00 a.m.
2	55 dBA	Anytime
3	60 dBA	Anytime
4	70 dBA	Anytime

According to Azusa Municipal Code Section 46-406, it is unlawful for any person at any location in the City to create any noise, or to allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person, which causes the noise level when measured on any residential, public institutional, professional, commercial or industrial property, either within or without the City, to exceed the applicable noise standards:

(1) For a cumulative period of more than 30 minutes in any hour;

(2) Plus five dBA for a cumulative period of more than 15 minutes in any hour;

(3) Plus ten dBA for a cumulative period of more than five minutes in any hour;

(4) Plus 15 dBA for a cumulative period of more than one minute in any hour; or

(5) Plus 20 dBA for any period of time.

Standards for the generation of interior noise are provided in Sections 46-407 and 46-408 of the Azusa Municipal Code.

Construction Noise

Azusa Municipal Code Section 46-409, *Construction*, establishes limits on the hours of construction to allow construction schedules to take advantage of the weather and normal daylight hours, and to ensure that nearby residents, as well as nonresidential activities, are not disturbed by early morning or late night construction activities, including potential sources of light or glare. As specified in this section, construction is generally permitted Monday through Saturday, 7:00 a.m. to 6:00 p.m. Extended construction hours and workdays may be allowed by the review authority.

Development Code Noise Standards

Chapter 88.31, *Operational Standards*, of the Azusa Municipal Code establishes operational standards. Azusa Municipal Code Section 88.31.010 states: "[t]his chapter provides standards that regulate various aspects of the operation of an approved land use, for the protection of public health, safety, and welfare." As such, the following standards from Azusa Municipal Code Section 88.31.020, within the Development Code, apply to operational noise sources:

1. Noise Level Limitations. No use, activity, or process within the City shall generate noise in excess of the levels identified by Tables 3-3 [reproduced below as Table 4.11-4, *Maximum Allowable Noise Level by Receiving Land Use*] and 3-4 [reproduced below as Table 4.11-5, *Noise Standards for Short-Duration Events Near Residential Areas*], as the noise is measured at the property line of a noise sensitive land use identified in Tables 3-3 and 3-4.

    a. If the measured ambient noise level exceeds the applicable noise level standard in any category shown in Table 3-3 [reproduced below as Table 4.11-4], the applicable standards shall be adjusted to equal the ambient noise level.

    b. If the intruding noise source is continuous and cannot reasonably be discontinued or stopped to allow measurement of the ambient noise level, the noise level measured while the source is in operation shall be compared directly to the applicable noise level standards identified in Table 3-3 [reproduced below as Table 4.11-4].

    Notwithstanding the above requirements, no person shall allow or cause the generation of any noise of a type, volume, pitch, tone, repetition, or duration that would be found to be a nuisance by a reasonable person beyond the boundaries of the property where the noise is generated.

Table 4.11-4
MAXIMUM ALLOWABLE NOISE LEVEL BY RECEIVING LAND USE

Noise Sensitive Land Use	Outdoor Activity Areas[1, 2] (dBA L_{DN})	Interior Spaces (dBA L_{DN})	Interior Spaces (dBA L_{EQ})
Residential	65	45	N.A.
Transient Lodging	65	45	N.A.
Hospitals, extended care	65	45	N.A.
Theater, auditorium	*[3]	45	35
Meeting facility, public or private	65	45	40
Offices	65	45	45
School, library, museum	65	45	45
Playground, park	70	N.A.	N.A.

[1] Where the location of outdoor activity areas is unknown, the exterior noise level standard shall be applied to the property line of the receiving land use.

[2] Where it is not possible to reduce noise in outdoor activity areas to 65 dB L_{DN}/CNEL or less using a practical application of the best-available noise reduction measures, an exterior noise level of up to 70 dB L_{DN}/CNEL may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.

[3] Subject to an acoustical analysis in compliance with subsection C.2.

dBA = A-weighted decibel; L_{DN} = Day Night sound level; L_{EQ} = time-averaged noise level; N.A. = not applicable.

Table 4.11-5
NOISE STANDARDS FOR SHORT-DURATION EVENTS NEAR RESIDENTIAL AREAS

Sound Level	Maximum Allowable Level Day/Evening (7 a.m. to 10 p.m.)[1]	Maximum Allowable Level Night (10 p.m. to 7 a.m.)[1]
Hourly L_{EQ} (dBA)	50	45
Maximum Level (dBA)	70	65
Maximum Level for Impulsive Noise (dBA)	65	60

[1] If the offensive noise contains a steady, audible tone (e.g., a screech or hum), is a repetitive noise (e.g., hammering), or contains speech or music, the maximum allowable sound level shall be reduced by five dBA.

dBA = A-weighted decibel; L_{EQ} = time-averaged noise level.

2. Acoustical Analysis Required. Where the director determines that a proposed project may generate noise in excess of any limit established by Table 3-3 [reproduced above as Table 4.11-4], and/or where the use may generate noise in outdoor areas in excess of 60 dBA, the land use permit application for the use shall include an acoustical analysis by a qualified professional approved by the director.

    a. Contents. The analysis shall determine the potential for stationary source noise impacts to neighboring land uses, include field measurements to determine more precise locations for existing and projected future noise levels (based on traffic projections in the circulation element of the general plan or as otherwise accepted by the City), and recommend appropriate mitigation measures.

    b. Preferred Mitigation Measures for Receptor Sites. When development is subject to high noise levels requiring mitigation, the following measures shall be considered and preference shall be given where feasible in the following order:

        (1) Site layout, including setbacks, open space separation and shielding of noise sensitive uses with non-noise-sensitive uses;

        (2) Acoustical treatment of buildings; or

        (3) Structural measures such as constructed of earth berms and/or wood or concrete barriers; provided that no sound wall shall be located adjacent to a public street.

Other Noise Standards

Additional sections of the Azusa Municipal Code related to potential noise generated by the Project are reproduced below.

Section 46-411. - Limitation on truck deliveries

Truck deliveries to a commercial or industrial parcel adjacent to a conforming residential use shall be limited to the hours between 7:00 a.m. and 7:00 p.m., unless the director authorizes other delivery times based on the determination that there is either no feasible alternative, or there are overriding transportation and traffic management benefits to scheduling deliveries at night.

Section 46-413. – Exemptions.

The following activities shall be exempt from the provisions of this chapter:

(1) School bands, school athletics, and school entertainment events, provided such events are conducted on school property or authorized by the City;

(2) Activities otherwise lawfully conducted in public parks, public playgrounds, and public or private school grounds;

(3) Any mechanical device, apparatus, or equipment used, related to or connected with emergency machinery, vehicle, or work;

(4) Noise sources associated with construction, repair, remodeling, or grading of any real property; provided a permit has been obtained from the City; and provided said activities take place between the hours enumerated in section 46-409.

(5) Noise sources associated with the maintenance of real property provided said activities take place between the hours of 8:00 a.m. and 8:00 p.m. on any day except Sunday or between the hours of 9:00 a.m. and 5:00 p.m. on Sunday or a federal holiday;

(6) Noise sources associated with the authorized collection of solid waste.

(7) Any activity or equipment to the extent that design regulation thereof has been pre-empted by state or federal laws.

4.11.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential noise impacts are based on Appendix G of the CEQA Guidelines. A significant impact to noise could occur if implementation of the proposed Project would:

a) Generate 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) Generate excessive ground-borne vibration or ground-borne 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.

The determination of significance for threshold a is related to standards established in the Azusa Municipal Code and General Plan. Per Azusa Municipal Code Section 46-413, construction noise is exempt from the Azusa Municipal Code noise limits provided a permit has been obtained from the City and construction activities take place between the hours of 7:00 a.m. and 6:00 p.m. Monday through Saturday (except on City-recognized holidays). Conditions of approval would be required to allow Project construction activity (concrete pours) outside of these hours. Chapter 88.31 of the Azusa Municipal Code contains operational standards for land development and does not apply to Project construction activities. Because the Azusa Municipal Code does not contain quantitative standards applicable to construction noise levels, construction noise would be potentially significant if it would exceed levels set by the National Institute for Occupational Safety and Health (NIOSH; 29 CFR 1926, Subpart D,

Section 1956.52) for the protection of construction workers without personal hearing protective equipment—90 dBA L_{EQ} (8-hour), measured at any off-site NSLU.

In addition, CEQA case law establishes that a project's noise impact analysis must consider the increase in ambient noise levels (*King and Gardiner Farms v. County of Kern*). Neither the City nor any state regulatory agency have established criteria for determining the significance of an increase in ambient noise levels resulting from temporary and short-term construction noise. Therefore, temporary Project construction noise measured at off-site NSLUs would be significant if it would result in a perceived doubling of loudness, estimated to be an increase of 10 dBA above exterior ambient noise levels (Caltrans 2013). This threshold provides a reasonable balance between the need to operate noise generating equipment for most temporary construction activities and the desire to protect NSLUs from temporary disturbances.

Noise generated on the Project site during operations would be significant if it would generate exterior noise levels exceeding 55 dBA L_{EQ} daytime (7:00 a.m. to 10:00 p.m.) or 50 dBA L_{EQ} nighttime (10:00 a.m. to 10:00 p.m.) measured at a residential property line; or exceeding 70 dBA L_{EQ} at any time measured at an industrial property line. Noise generated on the Project site would also be significant if it would generate exterior noise levels of 65 L_{DN} measured at a residential property line.

As described above, CEQA case law requires consideration of the increase in ambient noise levels resulting from a project. The City has not established standards for determining the significance of permanent increases in ambient noise resulting from a development project. Therefore, the standards of significance used in this analysis for operational noise are based on recommendations from the Federal Interagency Committee on Noise (FICON). These thresholds for acceptable increases in ambient noise levels are based on human reactions to aircraft noise but are equally applicable to human reactions to changes in urban ambient noise levels. Impacts would be significant if the Project's contribution to existing ambient noise levels, measured at ground level within an NSLU, would result in (FICON 1992):

- An increase of 5 dBA or more where the existing ambient noise level is less than 60 CNEL; or
- An increase of 3 dBA or more where the existing ambient noise level is between 60 and 65 CNEL; or
- An increase of 1.5 dBA or more where the existing ambient noise level is more than 65 CNEL.

The City has not adopted thresholds of significance for ground-borne vibration. Therefore, based on guidance from the FTA, ground-borne vibration would be potentially significant if the Project would generate vibrations that exceed the architectural damage potential criteria for non-engineered timber and masonry buildings of 0.2 inch per second PPV, for continuous/frequent intermittent construction sources (such as impact pile drivers, vibratory pile drivers, and heavy construction equipment; FTA 2018). In addition, ground-borne vibration which would occur at night would be potentially significant if the Project would result in ground-borne vibration which exceeds 75 VdB L_V (the approximate barely perceivable threshold for occasional events) in buildings where people normally sleep (FTA 2018).

4.11.4 Methodology and Assumptions

4.11.4.1 Noise Modeling Software

Modeling of the exterior noise environment for this report was accomplished using Computer Aided Noise Abatement (CadnaA) version 2022. CadnaA is a model-based computer program developed by DataKustik for predicting noise impacts in a wide variety of conditions. CadnaA assists in the calculation, presentation, assessment, and mitigation of noise exposure. It allows for the input of Project-related information, such as noise source data, barriers, structures, and topography to create a detailed model, and uses the most up-to-date calculation standards to predict outdoor noise impacts. CadnaA traffic noise prediction is based on the data and methodology used in the Traffic Noise Model released by USDOT.

The one-hour L_{EQ} noise level is calculated utilizing peak-hour traffic and the model-calculated one-hour L_{EQ} noise output is approximately equal to the CNEL when peak-hour traffic volumes are typical (around 10 percent of ADT) (Caltrans 2013). Project construction noise was analyzed using the Roadway Construction Noise Model (USDOT 2008), which uses estimates of sound levels from standard construction equipment.

4.11.4.2 Construction Noise Sources

Construction activities required for the Project are described further in Section 4.2.4.1. The most intensive daytime use of heavy construction equipment would occur during site preparation (e.g., clearing and grubbing) and grading using typical earthmoving equipment, including dozers, excavators, graders, and scrapers. The most intensive nighttime use of heavy construction equipment would occur during concrete pouring for the Project's industrial buildings and residential stacked flat buildings, when the primary noise source would be from a concrete pump truck and multiple concrete mixer trucks. Based on the methodology from the FTA's *Transit Noise and Vibration Impact Assessment Manual*, equipment is assumed to operate at the center or centerline of the Project site, and the two noisiest pieces of construction equipment are assumed to operate concurrently in close proximity to each other (FTA 2018).

Project construction truck hauling trips analyzed in the Noise and Vibration Technical Report were based on the truck trips anticipated based on modeling in the Air Quality and Greenhouse Gas Emissions analysis, as described in Section 4.2.4.1.

4.11.4.3 Operational Noise Sources

Anticipated operational noise sources for the industrial site would include trucks with backup alarms; TRUs; typically, a diesel-powered refrigeration unit mounted on the truck trailer or box; rooftop HVAC systems; rooftop-mounted refrigeration condenser units; and vehicular traffic. Anticipated operational noise sources for the residential site would include rooftop and ground-mounted HVAC systems and vehicular traffic.

Building Mechanical Equipment

Industrial Site Building Mechanical Equipment

This analysis assumes the Project would use one commercial-sized HVAC unit located on the rooftop of each building for the proposed office space. The unit used in this analysis is a Carrier 50PG 12-ton HVAC unit, which has a sound power level (S_{WL}) of 80.0 dBA (Carrier 2008). The HVAC systems were assumed to be mounted on the industrial building roofs and would be surrounded by standard parapet walls approximately four feet in height. The Project would include stationary commercial-sized refrigeration units for the refrigerated warehouse space (up to five percent of the Project's industrial building space). Six rooftop refrigeration condensers, one located on the roof of each industrial building and surrounded by standard parapet walls approximately four feet high, were assumed in the modeling. For this analysis, Hussman Proto-Air 3280 refrigeration systems were assumed, which have a S_{WL} of 89.3 dBA when operating at the maximum speed of 1,150 revolutions per minute (Hussmann 2015).

Residential Site Building Mechanical Equipment

The Project would use one residential-sized HVAC unit for each apartment or duplex, with the air conditioning condenser located on the rooftop of the building or on the ground next to the building, and a commercial-sized HVAC unit located on the ground next to the proposed residential clubhouse. Specific details on planned HVAC units were not available at the time of this analysis. A typical system for multi-family building dwelling units would be a Carrier model 38BRC-024-34 2-ton split system, which has a sound power level rating of 76 dBA (Carrier 2005).

Industrial Site Delivery Trucks

Operation of the industrial site would involve diesel-powered heavy trucks for the delivery of goods and would be operational for 24 hours per day. According to the Project's TIS, 88 one-way truck trips would occur each day, with 4 one-way truck trips during the peak hour entering or exiting the site (LLG 2024).

Delivery trucks would access the industrial site via driveways on North Todd Avenue and West 10th Street. To be conservative, the modeling of peak hour noise assumed one delivery truck per hour for each of the six industrial buildings (six peak hour truck trips). Each truck was assumed to circulate on the Project site at an average speed of 10 mph, then reverse to a loading bay at 3 mph. Each truck was assumed to idle at the loading bay for the maximum allowable time of five minutes, in accordance with CCR Title 13, Section 2485. Truck noise typically emanates from three sources: the exhaust stack, the engine compartment, and the tire-pavement interface. For trucks circulating around the Project site, truck noise was modeled using FTA Traffic Noise Model road sources, which split noise between two heights: 5 feet and 12 feet (FTA 2024). These heights represent the engine noise and exhaust stack, respectively. At low speeds and when idling, truck engine noise dominates over other truck noise sources; therefore, noise from trucks idling at loading docks was modeled at a height of 5 feet (engine height) above ground (FTA 2024).

Some trucks would generate noise from the use of TRUs. Specific TRU noise would vary from unit to unit. Typical noise from a TRU was modeled as producing 101.5 dBA S_{WL} (RWDI Consulting Engineers and Scientists 2017). TRUs were modeled at an average height of 9.5 feet above ground, based on images of typical TRUs mounted on truck trailers (CARB 2025c). Only trucks transporting goods to and from the Project's refrigerated warehouse space (five percent of the total Project warehouse space) would be anticipated to be equipped with an operating TRU. Because the location of the potential refrigerated

warehouse space within the Project building was unknown at the time of this analysis, the modeled truck going to each industrial building during the peak hour area was assumed to be equipped with an operating TRU (six TRUs operating on the site during the peak hour). Each TRU was assumed to operate at a 50 percent duty cycle during the analyzed peak noise hour.

There are no state or federal regulations requiring on-road trucks to be equipped with backup warning devices. However, backup alarms are commonly used on delivery trucks due to safety/liability concerns. The most common truck backup alarm is a pulsing single tone, typically at one kHz. Recently, in response to noise complaints, backup alarms that produce a less intrusive pulsing broad-spectrum noise have been introduced. To be conservative, all trucks were assumed to be equipped with a traditional one kHz backup alarm, mounted on the back of the truck at a height of three feet. Backup alarms were modeled with typical noise levels of 109.7 dBA measured at a distance of four feet.

Vehicular Traffic

Modeled traffic noise from the roadways in the Project vicinity was based on PM peak hour volumes provided by the Project's TIS (LLG 2024). The mix of cars and trucks on the analyzed roadways was not provided in the TIS. Therefore, all analyzed road segments were assumed to carry a mix typical of suburban areas: 96 percent cars and light trucks, 3 percent medium trucks, and 1 percent heavy-duty trucks. Project-affected road segments were modeled assuming all vehicles traveling at the posted speed limit of 40 mph for Todd Avenue and Sierra Madre Avenue, and 35 mph for West Foothill Boulevard, Vernon Avenue, North San Gabriel Avenue, and North Azusa Avenue. Traffic noise modeling does not account for reductions in noise levels due to terrain or structures.

4.11.5 Impact Analysis

4.11.5.1 Increase in Ambient Noise Levels

Would the Project generate 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?

Temporary Construction Noise

Construction Off-Road Equipment

Construction of the Project would require the use of heavy off-road equipment for site clearing, grading, installation of underground utilities/infrastructure, construction of new buildings, and paving. The magnitude of noise generated would depend on the type of construction activity, equipment, duration of each construction phase, distance between the noise source and receiver, and any intervening structures. Construction would generate elevated noise levels that may disrupt NSLUs in the area. As described above, the closest existing NSLUs to the industrial site are multi-family residential properties east and northeast of the southeast corner of the industrial site. The closest existing NSLUs to the residential site are single-family residential properties adjacent to its western property line.

Heavy off-road construction equipment would not all operate at the same time or location and would not be in constant use during a typical 8-hour operating day. Further, not all pieces of equipment would be used near off-site residential property lines. The most intensive daytime use of heavy construction equipment would be from earth-moving activities during grading. The most intensive nighttime use of

heavy construction equipment would be from concrete pouring. As described above, based on FTA guidance, the construction noise analysis assumes equipment operates at the center of the Project site and the two noisiest pieces of construction equipment operate concurrently in close proximity to each other The results of the hourly average construction equipment noise levels calculated using the Roadway Construction Noise Model are compared to the NIOSH threshold in Table 4.11-6, *Construction Equipment Hourly Average Noise Levels*.

Table 4.11-6
CONSTRUCTION EQUIPMENT HOURLY AVERAGE NOISE LEVELS

Activity Description	Two Noisiest Off-Road Equipment	Distance Centerline to NSLU (feet)	dBA L_{EQ} at NSLU	Threshold (dBA L_{EQ})	Exceed Threshold?
Residential site daytime grading	Grader, Scraper	180	72.3	90	No
Industrial site daytime grading	Grader, Scraper	160	73.3	90	No
Residential site nighttime concrete pouring	Concrete mixer truck, Concrete mixer truck	180	66.7	90	No
Industrial site nighttime concrete pouring	Concrete mixer truck, Concrete mixer truck	160	67.7	90	No

Source: HELIX 2025c
dBA = A-weighted decibel; L_{EQ} = time-averaged noise level; NSLU = noise sensitive land use

As shown in Table 4.11-6, Project construction activities would not exceed the NIOSH threshold for substantial construction noise generation at nearby NSLUs. The Project would be required to obtain a grading or construction permit for all construction activities and nighttime construction activities require a condition of approval in accordance with the Azusa Municipal Code Section 46-409.

As described above, CEQA case law establishes that a noise impact analysis must also consider the increase over ambient noise levels resulting from a project. Ambient noise is described using CNEL. The CNEL for the Project residential site is estimated to be 45.2 CNEL based on the site measurement (ST2). For the industrial site, the 24-hour measurement (LT1) was 55.2 CNEL, located about 160 feet north of West 10th Street, between West 10th Street and the residential land uses to the north. Existing ambient noise in the multi-family residential area north of industrial site Buildings 5 and 6 was modeled using a road source on West 10th Street calibrated to the measured CNEL at measurement location LT1. The existing ambient noise level is estimated to be 48.5 CNEL at the closest existing residential outdoor area or building façade to the industrial site (about 348 feet north of West 10th Street). Assuming eight hours of continuous construction equipment use and applying the CNEL weighting for evening/nighttime noise levels, the calculated increase over existing ambient noise resulting from Project construction is compared to the 10 dBA increase threshold in Table 4.11-6, *Construction Equipment Increase over Existing Ambient Noise Levels*.

Table 4.11-7
CONSTRUCTION EQUIPMENT INCREASE OVER EXISTING AMBIENT NOISE LEVELS

Activity Description	Construction Equipment Noise at NSLU (CNEL)	Existing Ambient Noise Level at NSLU (CNEL)	Increase (dBA)	Threshold (dBA)	Exceed Threshold?
Residential site daytime grading	67.5	45.2	22.3	10	**Yes**
Industrial site daytime grading	68.5	48.5	20.0	10	**Yes**
Residential site nighttime concrete pouring	71.9	45.2	26.7	10	**Yes**
Industrial site nighttime concrete pouring	72.9	48.5	24.4	10	**Yes**

Source: HELIX 2025c
dBA = A-weighted decibel; LEQ = time-averaged noise level; NSLU = noise sensitive land use

As shown in Tables 4.11-6 and 4.11-7, although on-site Project construction equipment would not result in average noise levels exceeding the safety-based NIOSH threshold, on-site Project construction equipment use would result in temporary increases of ambient noise levels over existing levels exceeding the 10 dBA increase threshold. Therefore, Project construction activity would generate a substantial temporary increase in ambient noise levels in the vicinity of the Project.

Construction Truck Traffic Noise

Peak Project construction truck trips are anticipated to be 87 one-way truck trips per day, resulting in approximately 11 trucks per hour for the import of aggregate, asphalt, and concrete during industrial site paving. It is anticipated that Project construction truck traffic would access the site via North Todd Avenue, a designated truck route. Per the TIS, based on traffic counts taken in 2023, North Todd Avenue between West 10th Street and West Foothill Boulevard has a p.m. peak traffic volume of 1,046 vehicles. Modeling with CadnaA indicates that an additional 11 heavy truck trips per hour would temporarily increase the hourly noise level along that roadway from 68.0 dBA to 68.3 dBA, measured at the closest NSLU approximately 40 feet from the roadway centerline. This increase in noise levels of 0.3 dBA would be well below the just perceivable 3 dBA increase level for noisy outdoor environments. Therefore, construction truck traffic would not generate a substantial temporary increase in ambient noise levels.

Operation Noise

Industrial Site Noise Generation

The Project anticipates industrial site operation could occur 24 hours per day, seven days per week, and may include nighttime truck deliveries. Azusa Municipal Code Section 46-411 limits truck deliveries to a commercial or industrial parcel adjacent to a conforming residential use to the hours between 7:00 a.m. and 7:00 p.m., unless the City authorizes other delivery times for the Project. The Project includes a minor use permit to allow operations 24 hours per day, seven days per week on the industrial site. Therefore, the Project would not conflict with Azusa Municipal Code Section 46-411.

The proposed industrial site would also include truck entry driveways, loading dock areas, rooftop HVAC units, and rooftop refrigeration condensers that would generate noise. The primary noise sources for the loading dock areas are delivery truck engines idling, truck backup alarms, and TRU engines.

Operation of all noise-generating components on the industrial site were modeled using CadnaA. The Project buildings and an existing 6-foot-high sound wall between the existing industrial buildings (Rainbird Corporation) and apartments north of the Project site were included in the model. Ten receivers were placed in the model along the property lines of the single-family residences near Building 1, and the multi-family residential properties near Building 6 (R1 through R10). Nine receivers were placed in the model along the industrial business property line west and north of the industrial site (I1 through I9). Modeled receiver locations are shown on Figure 4.11-2, *Industrial Site Noise Receiver Locations*. The calculated peak hour noise level results are compared to the City's noise standard for the maximum permissible level measured at the receiving property boundary in Table 4.11-8, *Unmitigated Industrial Site Operational Hourly Noise*.

Table 4.11-8
UNMITIGATED INDUSTRIAL SITE OPERATIONAL HOURLY NOISE

Receiver Number	Land Use	Project Noise (dBA L_{EQ})	City Noise Limit Day/Night (dBA)[1]	Exceed Standard?
R1	Residential	44.8	55/50	No
R2	Residential	48.2	55/50	No
R3	Residential	48.4	55/50	No
R4	Residential	**54.9**	55/50	**Yes (Night)**
R5	Residential	**57.5**	55/50	**Yes**
R6	Residential	49.1	55/50	No
R7	Residential	41.1	55/50	No
R8	Residential	39.5	55/50	No
R9	Residential	34.3	55/50	No
R10	Residential	32.4	55/50	No
I1	Industrial	61.2	70/70	No
I2	Industrial	61.7	70/70	No
I3	Industrial	58.4	70/70	No
I4	Industrial	59.0	70/70	No
I5	Industrial	53.4	70/70	No
I6	Industrial	57.3	70/70	No
I7	Industrial	57.0	70/70	No
I8	Industrial	61.3	70/70	No
I9	Industrial	60.4	70/70	No

Source: HELIX 2025c

[1] Noise limit from Azusa Municipal Code Section 46-405.

dBA = A-weighted decibel; L_{EQ} = time-averaged noise level

The Project is anticipated to operate 24 hours per day, seven days per week. As shown in Table 4.11-8, the City's daytime limit of 55 dBA L_{EQ} would be exceeded at receiver R5, and the City's nighttime limit of 50 dBA L_{EQ} would be exceeded at receivers R4 and R5 (north of the Building 6 loading dock area).

Existing ambient noise in the multi-family residential area north of industrial site Buildings 5 and 6 was modeled using a road source on West 10th Street calibrated to the measured CNEL at measurement location LT1. Without the Project, existing ambient noise is calculated to be 51.3 CNEL at receiver location R5 (the modeled residential receiver most affected by Project industrial site operational noise). Accounting for reductions in traffic noise from the Project industrial buildings, traffic noise at receiver R5 would be 45.3 CNEL. The calculated 24-hour noise level for Project industrial site operational noise combined with existing traffic noise (including the evening/nighttime weighting for CNEL) would be 64.3 CNEL for receiver R5, below the City's limit of 65 L_{DN} per Azusa Municipal Code Section 88.31.020.[1] However, the addition of industrial site operational noise would increase the CNEL at R5 from 51.3 CNEL to 64.3 CNEL, an increase of 13 dBA, thereby exceeding the 5 dBA threshold where existing noise levels are below 60 CNEL.

Residential Site Noise Generation

The proposed residential site HVAC units were modeled using CadnaA. The Project buildings and surrounding buildings were included in the model. There were 23 receivers placed in the model along the property lines of the closest single-family residences around the residential site, as shown in Figure 4.11-3, *Residential Site Noise Receiver Locations*.

The calculated peak hour noise level results are compared to the City's noise standard for the maximum permissible level measured at the receiving property boundary in Table 4.11-9, *Unmitigated Residential Site Operational Hourly Noise*.

As shown in Table 4.11-9, the City's daytime limit of 55 dBA L_{EQ} or nighttime limit of 50 dBA L_{EQ} would not be exceeded at receivers representing residential uses surrounding the site.

Based on the short-term noise measurement at location ST2 (45.2 dBA L_{EQ}) and modeling of traffic noise using CadnaA, existing ambient noise levels for NSLUs around the Project residential site range from 60 L_{DN} near Sierra Madre Avenue to 45 L_{DN} in the northern portion of the residential site away from the street. The addition of 22 dBA L_{EQ} to 34.5 dBA L_{EQ} for Project HVAC noise would not result in a noticeable increase in ambient noise levels. For example, at receiver R14, noise from Project HVAC systems would be 34.5 dBA L_{EQ} (one hour), or 40.9 L_{DN} when conservatively assuming all Project HVAC systems would run steadily for 24 hours. When adding this HVAC noise to the traffic noise level at receiver R14 of 54.2 L_{DN}, the resulting noise level would be 54.4 L_{DN}. Therefore, residential site noise would not result in noise levels exceeding the City's limit of 65 L_{DN} per Azusa Municipal Code Section 88.31.020. Additionally, residential site noise would not result in increases in ambient noise exceeding the threshold of 5 dBA where the existing ambient noise level is less than 60 CNEL.

[1] Compared to L_{DN}, CNEL is calculated with an additional 5 dBA weighting for evening hours from 7:00 p.m. to 10 p.m. Therefore, CNEL is always slightly higher than L_{DN}.

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0 350 Feet

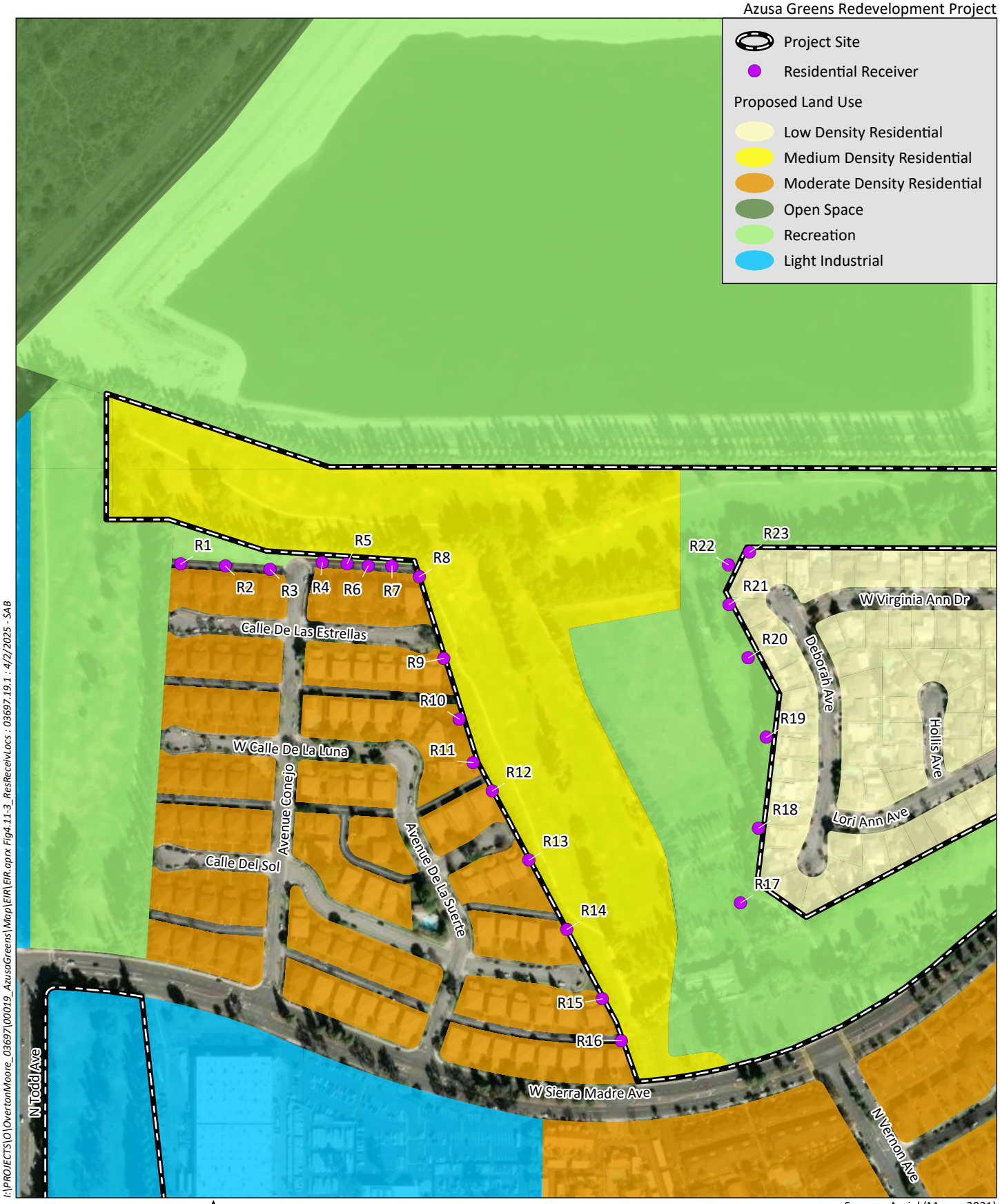
Source: Aerial (Maxar, 2021)

HELIX Environmental Planning

Industrial Site Noise Receiver Locations

Figure 4.11-2

Azusa Greens Redevelopment Project



I:\PROJECTS\O\OvertonMoore_03697\00019_AzusaGreens\Map\EIR\EIR.aprx Fig4.11-3_ResReceivLocs : 03697.19.1 : 4/2/2025 - SAB

0 350 Feet

Source: Aerial (Maxar, 2021)

HELIX Environmental Planning

Residential Site Noise Receiver Locations

Figure 4.11-3

Table 4.11-9
UNMITIGATED RESIDENTIAL SITE OPERATIONAL HOURLY NOISE

Receiver Number	Land Use	Project Noise (dBA L_{EQ})	City Noise Limit Day/Night (dBA)[1]	Exceed Standard?
R1	Residential	27.8	55/50	No
R2	Residential	29.3	55/50	No
R3	Residential	30.9	55/50	No
R4	Residential	33.7	55/50	No
R5	Residential	31.9	55/50	No
R6	Residential	30.3	55/50	No
R7	Residential	32.7	55/50	No
R8	Residential	29.5	55/50	No
R9	Residential	31.1	55/50	No
R10	Residential	32.5	55/50	No
R11	Residential	30.2	55/50	No
R12	Residential	33.4	55/50	No
R13	Residential	34.0	55/50	No
R14	Residential	34.5	55/50	No
R15	Residential	33.0	55/50	No
R16	Residential	22.0	55/50	No
R17	Residential	24.3	55/50	No
R18	Residential	23.9	55/50	No
R19	Residential	24.0	55/50	No
R20	Residential	24.8	55/50	No
R21	Residential	25.3	55/50	No
R22	Residential	25.1	55/50	No
R23	Residential	24.4	55/50	No

Source: HELIX 2025c
[1] Noise limit from Azusa Municipal Code Section 46-405.
dBA = A-weighted decibel; L_{EQ} = time-averaged noise level

Off-Site Transportation Noise Generation

Impacts would be significant in areas where the Project's contribution to traffic noise exceeds: 5 dBA where the existing ambient noise level is less than 60 CNEL; 3 dBA where the existing ambient noise level is between 60 and 65 CNEL; or 1.5 dBA where the existing ambient noise level is more than 65 CNEL.

CadnaA was used to calculate the peak PM hour noise based on traffic volumes provided in the Project's TIS (LLG 2024). Traffic noise modeling includes Project-generated trips for all components and represents a conservative analysis that does not consider topography or attenuation provided by existing structures. The results of the off-site transportation noise modeling are shown in Table 4.11-10, *Off-Site Traffic Noise Levels*.

Table 4.11-10
OFF-SITE TRAFFIC NOISE LEVELS

Roadway Segment	Distance to Nearest NSLU (feet)	Existing (dBA L_{EQ})	Future (2027) (dBA L_{EQ})	Future (2027) + Project (dBA L_{EQ})	Project-Generated Increase[1] (dBA L_{EQ})
Todd Avenue					
Sierra Madre Ave to West 10th Street	67[2]	64.0	64.1	64.3	0.2
West 10th Street to West Foothill Boulevard	40	68.1	68.1	69.1	1.0
Sierra Madre Avenue					
Todd Avenue to Project Residential Site Driveway	70	64.2	64.2	64.4	0.2
Project Residential Site Driveway to Vernon Avenue	70	64.5	64.6	64.8	0.2
Vernon Avenue to North San Gabriel Avenue	70	64.2	64.3	64.3	<0.1
West Foothill Boulevard					
Todd Avenue to Vernon Avenue	58[2]	66.3	66.7	67.0	0.1
Vernon Avenue to North San Gabriel Avenue	55	65.8	66.2	66.6	0.4
North San Gabriel Avenue to North Azusa Avenue	72[2]	65.2	65.6	65.8	0.2
Vernon Avenue					
Sierra Madre Avenue to West Foothill Boulevard	42	60.4	60.5	61.0	0.5
North San Gabriel Avenue					
Sierra Madre Ave to West Foothill Boulevard	52	59.8	60.0	60.0	<0.1
West Foothill Boulevard to East 6th Street	70	61.4	61.7	62.0	0.3
North Azusa Avenue					
Sierra Madre Ave to West Foothill Boulevard	62	60.7	61.2	61.2	<0.1
West Foothill Boulevard to East 6th Street	40	63.2	63.6	63.9	0.3

Source: HELIX 2025c

[1] Increase between Future and Future + Project scenario provided and represents increase attributable to Project trips.

[2] No NSLU along this road segment, distance to the closest commercial or industrial building shown.

As shown in Table 4.11-10, the maximum traffic noise increase because of the addition of Project traffic on an analyzed road segment would be 1.0 dBA on North Todd Avenue between West 10th Street and West Foothill Boulevard. Therefore, the increase in traffic noise resulting from the addition of Project-related traffic would be less than the most restrictive 1.5 dBA increase threshold and the Project would not result in a perceptible increase in ambient noise levels due to vehicle traffic.

Land Use Compatibility

Implementation Policy N1 requires new land uses to be analyzed for their compatibility with the existing noise environment. The table provided in the Azusa General Plan and reproduced as Table 4.11-2 above specifies exterior noise levels up to 65 CNEL as normally acceptable for multifamily residential uses and up to 75 CNEL as normally acceptable for industrial uses (City 2004a).

CadnaA was used to model the anticipated traffic noise at the Project site using the Future Plus Project traffic volumes from the TIS. For the closest Project residential building to Sierra Madre Avenue, the calculated exterior noise level would be 58.4 CNEL. The 15-minute noise measurement at location ST1 (on the sidewalk of Sierra Madre Avenue) was 66.2 dBA L_{EQ}, very close to the 66.5 dBA L_{EQ} peak hour traffic noise calculated by the model for this location. The 15-minute noise measurement at location ST2 (on the golf course, approximately 1,500 feet north of Sierra Madre Avenue) was 45.2 dBA L_{EQ}, close to the 42.7 dBA L_{EQ} peak hour traffic noise calculated by the model. The exterior noise levels on the residential site would not exceed the City's multifamily residential maximum normally acceptable limit of 65 CNEL.

For the closest Project industrial building to North Todd Avenue, Building 3, approximately 55 feet east of the roadway centerline, the calculated exterior noise level would be 65.7 CNEL. In addition, the measured 24-hour noise level for location LT1, on the west end of the industrial site, was 57.5 CNEL. These exterior noise levels would not exceed the City's industrial maximum normally acceptable limit of 75 CNEL. Therefore, the Project's land uses would be compatible with the Azusa General Plan noise standards.

Level of Significance Prior to Mitigation

Project construction equipment would not exceed the safety-based NIOSH standard but would result in temporary increases over ambient noise levels from both the industrial site and residential site, resulting in a potentially significant impact. Project construction and operational traffic would not substantially increase traffic noise levels, and impacts would be less than significant. Operation noise generated on the residential site would not exceed the Azusa Municipal Code standards and would not result in substantial increases over ambient noise levels; therefore, the impact would be less than significant. However, on-site noise generated during operation of the industrial site would exceed the Azusa Municipal Code standards and result in substantial increases over ambient noise level; the impact would be potentially significant.

Mitigation Measures

NOI-1 **Industrial Site Noise Barrier**. The applicant shall construct a sound wall with a minimum height of eight feet along the industrial site property line, extending from the oblique property line corner north of Building 5 to the property line corner northeast of Building 6, approximately 750 feet in length.

The sound attenuation wall shall be solid and may be constructed of masonry, wood, plastic, fiberglass, steel, or a combination of those materials, provided there are no cracks or gaps, through or below the wall. Any seams or cracks must be filled or caulked. The noise barrier shall meet a minimum Sound Transmission Class (STC) rating of 22 to adequately ensure noise reduction. Standard concrete masonry unit walls with no cracks, holes or gaps provide an STC rating of 43 or better, well above the 22 STC

minimum, and would satisfy the requirements of this measure. If alternative sound wall materials are proposed, the applicant shall provide evidence of a minimum STC rating of 22 to the City for approval prior to installation.

The City shall verify the inclusion of the noise barrier meeting the above specifications in the Project plans prior to building permit approval. Compliance with this measure shall be verified prior to issuance of an occupancy permit for the industrial portion of the Project.

NOI-2 **Construction Noise Best Management Practices**. Prior to issuance of any Project construction permit, the City shall confirm that the construction specifications stipulate the following construction noise measures and best management practices shall be implemented by the applicant or designated contractor for all Project construction activity:

- Post a publicly visible sign at the primary Project construction entrance listing the permitted normal construction days and hours. The sign shall also include a listing of telephone numbers to be used during regular construction hours and off-hours to contact both the City and the construction contractor regarding noise complaints; and

- All construction equipment shall have appropriate sound muffling devices, which are properly maintained and used at all times such equipment is in operation; and

- Construction staging areas shall be located the maximum distance practical from the nearest residences to the Project site; and

- Portable equipment (e.g., air compressors; welders, generators) shall be located the maximum distance possible from the nearest residences to the Project site and shall be electrically powered (from the grid) whenever available.

NOI-3 **Industrial Site Sound Wall Timing**. Prior to completing any nighttime construction work (construction occurring outside of the hours of 7:00 a.m. to 6:00 p.m. Monday through Saturday) on the industrial site, the applicant shall complete installation of the sound wall required by mitigation measure NOI-1. Prior to commencing nighttime construction work, the applicant shall provide proof to the City, and the City shall verify, that the noise wall required by mitigation measure NOI-1 has been installed.

NOI-4 **Nighttime Construction Notification**. The Project applicant or designated contractor shall obtain permits for Project construction activities from the City. The City shall ensure all permits contain nighttime work requirements and noise complaint requirements described below for construction occurring outside of the hours of 7:00 a.m. to 6:00 p.m. Monday through Saturday.

If, due to weather conditions (e.g., high temperatures), pouring of concrete at night is required, the Project applicant or designated contractor shall provide written notification of nighttime/weekend concrete work to all residences located within 300

feet of the parcel upon which the nighttime/weekend work is planned. The notification shall:

- Be delivered a minimum of 48 hours prior to commencement of nighttime work;
- Include the days and hours of upcoming concrete pouring nighttime work; and
- Include noise complaint contact information, including phone numbers and email addresses to register noise complaints with both the construction contractor and the City.

The City and the construction contractor shall log all received noise complaints. The construction contractor shall submit to the City a daily log of all noise complaints received, including the date and time of the complaint and address of the complainant (if provided). The City shall work with the construction contractor to respond to noise complaints and limit nighttime work and locations of noise generating equipment to the extent feasible.

Level of Significance After Mitigation

Due to the sound shadow effect of noise barriers, noise near the modeled sound wall at the industrial site would not represent the highest level received on the residential property. With the implementation of mitigation measure NOI-1 requiring the installation of a sound wall, modeling of the wall and noise sources in CadnaA shows that the highest noise levels projected to occur at the nearest receivers R4 and R5 would be 48.4 and 48.9 dBA L_{EQ}, respectively. These reduced noise levels would not exceed the City's 55 dBA L_{EQ} daytime or 50 dBA L_{EQ} nighttime limit for noise received by residential land uses. The 24-hour noise level at receiver R5 would be 55.6 CNEL, or 56.0 CNEL with existing traffic noise. This represents an increase of 4.7 dBA, below the 5dBA threshold. Therefore, with the implementation of mitigation measure NOI-1, operational noise impacts from the industrial site would be less than significant.

Potential mitigation measures to reduce the severity of impacts from construction noise typically include implementation of standard construction noise best management practices and erecting temporary construction noise barriers. Standard construction noise best management practices would be required by mitigation measure NOI-2. However, to be effective, noise barriers must block the line of sight between a noise source and a receiver. Due to the size of the Project site, the mobile nature of construction equipment, and the fact that the residential receivers near the Project site are often two-story buildings with window and balconies on the second floors facing the Project site, effective temporary noise barriers would not be feasible and would not provide the more than 10 dBA of noise attenuation required to reduce construction levels to within 10 dBA of existing ambient noise. Construction of the sound wall required by mitigation measure NOI-1 would provide some attenuation of nighttime concrete pouring noise from the industrial site but would not sufficiently reduce noise levels measured at nearby residential second floor balconies and windows. Mitigation measure NOI-3 would require the sound wall from mitigation measure NOI-1 to be completed prior to nighttime concrete pouring on the industrial site. Mitigation measure NOI-4 would require notification of nearby residents of impending approved nighttime construction work and establish a noise complaint procedure. While mitigation measures NOI-2, NOI-3, and NOI-4 would help lower Project construction noise levels received at nearby NSLUs and establish procedures for resident construction notifications,

noise would not be reduced such that the temporary increase in noise levels would not exceed 10 dBA above existing ambient noise levels. Therefore, the Project would generate a substantial temporary increase in ambient noise levels in the vicinity of the Project, and the impact would be significant and unavoidable.

4.11.5.2 Ground-Borne Vibration

Would the Project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Construction Vibration

Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be conducted by the Project. The piece of construction equipment with the highest typical vibration level that would be used during Project construction activities would be a vibratory roller used for gravel or pavement compaction. A vibratory roller could be used up to 15 feet from the closest off-site structure (a single-family residence on the west side of the residential site). A large vibratory roller would create approximately 0.452 inch per second PPV at 15 feet (FTA 2018), which would exceed the 0.2 inch per second PPV threshold for damage to non-engineered timber and masonry buildings.[2] A large dozer (the piece of construction equipment with the next highest vibration level) would create approximately 0.191 inch per second PPV at 15 feet (FTA 2018), which would not exceed the 0.2 inch per second PPV threshold for damage to non-engineered timber and masonry buildings. Vibrations from all other off-road equipment anticipated to be used during Project construction would produce lower ground-borne vibrations than a large dozer and would not conflict with the threshold for building damage.

A loaded concrete truck operating off-road could travel as close at 25 feet from the nearest single-family residence on the west side of the Project residential site during nighttime concrete pouring. A loaded concrete truck could create approximately 86 VdB L_V at 25 feet, thereby exceeding the FTA criteria of 75 VdB for buildings where people normally sleep.

Operational Vibration

Land uses that may generate substantial operational vibration include heavy industrial or mining operations that would require the use of vibratory equipment. The proposed warehouse industrial land use would not include equipment that would generate excessive vibration. Loaded trucks traveling at highway speeds have the potential to create significate vibrations if the pavement is in poor condition (e.g., potholes, large cracks) (FTA 2018). Loaded trucks circulating slowly in Project driveways, parking lots, and loading dock areas do not have the potential to result in substantial ground-borne vibrations.

Level of Significance Prior to Mitigation

The Project would not generate excessive ground-borne vibration or ground-borne noise levels during operations, and operational impacts would be less than significant. However, construction of the Project could result in temporary vibrations exceeding building damage thresholds and residential sleep disturbance thresholds. Therefore, the construction vibration impact would be potentially significant.

[2] Equipment PPV = Reference PPV * $(25/D)^n$(in/sec), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receptor in feet, and n= 1.5 (the value related to the attenuation rate through the ground); formula from FTA 2018. VdB = 20 * Log ($PPV/4/10^{-6}$).

Mitigation Measures

NOI-5 **Construction Vibration**. The applicant or designated contractor shall ensure all vibratory rollers are used in static mode only (no vibrations) when operating within 30 feet of any off-site building. During nighttime concrete pouring activities, the applicant or designated contractor shall also ensure that loaded heavy trucks do not travel on unpaved surfaces on the Project site within 75 feet of any occupied residence. The City shall ensure these restrictions are reflected on applicable construction permit documents prior to City approval.

Level of Significance After Mitigation

With the implementation of mitigation measure NOI-5, construction vibration impacts would be less than significant.

4.11.5.3 Airport Noise Exposure

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 closest airports to the Project site are the San Gabriel Valley Airport (previously El Monte Airport), located approximately 7 miles southwest of the Project site, and the Brackett Field Airport, located approximately 8 miles southeast of the Project site. According to the County's Airport Land Use Plan, the 70 CNEL noise contours for these airports occur only within the airport properties; therefore, the Project site is well outside of the airport noise contours for the San Gabriel Valley Airport and the Brackett Field Airport and noise from airport activity would attenuate to compatible levels at the Project site given the distance of the airports from the Project site (Los Angeles County Airport Land Use Commission 1991). In addition, the Airport Land Use Compatibility Plan for the Brackett Field Airport was updated in 2015, and the Project site is not located within the Brackett Field Airport influence area or any of the published airport noise contours for this airport (Los Angeles County Airport Land Use Commission 2015). Therefore, although aircraft may be audible in the airspace around the Project site, persons residing or working in the Project area would not be exposed to excessive noise levels from aircraft or airports.

Level of Significance Prior to Mitigation

The Project would not expose people residing or working in the Project area to excessive noise levels from aircraft or airports, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.11.6 Cumulative Impact Analysis

Noise and vibration impacts are limited to the area directly surrounding the Project site, as noise and vibration attenuate with distance and only have the potential to combine with other sources in the immediate vicinity. As such, the geographic scope for the cumulative noise analysis includes the area within 1,500 feet of the Project site.

Construction noise and vibration impacts are localized in nature because they are limited to the site where construction equipment is operating. The nearest cumulative development project to the Project site is approximately 1,700 feet south of the industrial site. Even if construction on these sites were to occur concurrently, construction noise would not combine such that noise levels would substantially increase given the distance between the sites. Vibration attenuates more rapidly than noise, and as there would be no concurrent construction within the vibration impact area (up to 75 feet for resident sleep disturbance), vibrations from the Project construction equipment would not combine with those of the cumulative development project to the south. Therefore, the Project's contribution to cumulative temporary noise increases related to construction would be less than significant and not cumulatively considerable.

The potential for a cumulative noise impact during operation is primarily related to traffic generation when trips generated by multiple projects combine to substantially increase noise levels. On-site generation of operational noise from cumulative projects would be less than significant, as each cumulative development project would be subject to the applicable property line noise limits. A significant cumulative traffic noise impact would occur if the Project, in combination with cumulative projects, would substantially increase traffic noise levels at nearby NSLUs. The traffic noise analysis provided in Table 4.11-10, above, provides traffic noise levels for the existing and future with Project scenarios, which serves as the cumulative analysis for traffic noise given the future condition considers the addition of vehicle trips generated by the cumulative development projects identified in the TIS. The maximum cumulative change in traffic noise would occur on the segment of North Todd Avenue between West 10th Street and West Foothill Boulevard, where noise levels would increase by 1.0 dBA L_{EQ} over existing conditions. This cumulative increase in traffic noise would be far below the increase over ambient threshold of 5 dBA where existing noise levels are below 60 CNEL and below a perceptible level of 3 dBA. Therefore, cumulative operational noise impacts would be less than significant.

As no operational sources of vibration are proposed and the Project would not alter airport operations or be within an airport noise contour, the Project would not contribute to the cumulative impacts of vibration or airport noise in the Project area.

4.12 Population and Housing

This section addresses the potential impacts related to population and housing associated with the implementation of the proposed Project. This section considers population and housing characteristics in the area and discusses Project consistency with regional growth projections. This section also identifies applicable state and local regulations, including the Azusa General Plan (City 2004a).

4.12.1 Existing Conditions

4.12.1.1 Population

The total population within the City is 48,272 as of July 1, 2023. This is a 4.1 percent increase from the total population in 2010, which was 46,361 individuals (U.S. Census Bureau 2023a). According to the SCAG growth forecast adopted with the 2020-2045 RTP/SCS in 2020, the City is projected to have a population of 56,200 individuals by 2045, which would be a 16.4 percent increase from the population in 2023 (SCAG 2020). Population projections by city were not provided in the 2024 RTP/SCS; the County's population overall was anticipated to increase by 7.4 percent from 2019 (10,046,000 individuals) to 2050 (10,793,000 individuals) (SCAG 2024a).

4.12.1.2 Housing

As of 2020, the California Department of Finance estimates that there are a total of 14,651 housing units within the City. The City's housing stock is made up of 60 percent single-family homes, 36 percent multi-family homes, and 4 percent mobile homes and other housing (City 2021). The housing stock consists of approximately 59 percent owner-occupied housing units and 41 percent renter-occupied housing units (SCAG 2022). It is estimated that 2.6 percent of owner units and 2.5 percent of rental units are vacant (City 2021).

According to the 2024 RTP/SCS, the total number of households within the City was 14,600 in 2019, and households in the City are projected to increase to 16,500 by 2035 and 17,100 by 2050 (SCAG 2024a). The projected housing needs and allocation for the City are discussed in the City of Azusa RHNA section below. According to Census data, the average number of persons per households within the U.S. in which the head of the household is aged 55 or older is 2.02 (U.S. Census Bureau 2023b).

4.12.1.3 Employment

According to the 2024 RTP/SCS, the total number of jobs within the City was 19,600 in 2019, while the projected number of jobs by 2035 is estimated to be 20,800 and by 2050 is estimated to be 21,000 (SCAG 2024a). The primary employment sectors within the City include Professional (21.4 percent), Education (14.5 percent), and Manufacturing (14.3 percent). Construction jobs accounted for seven percent of total jobs within the City in 2017, a 25 percent decrease compared to total construction jobs in 2007 (SCAG 2019).

4.12.2 Regulatory Setting

4.12.2.1 State Regulations

California Planning and Zoning Law

The legal framework within which California counties and cities exercise local planning and land use functions is provided in the California Planning and Zoning Law (Sections 65000 through 66499.58 of the California Government Code). Under that law, each county and city must adopt a comprehensive, long-term general plan. The Housing Element is one of the nine mandatory chapters, or elements, required by state law to be included in a city's general plan. The Housing Element must be updated every eight years and is reviewed by the California Department of Housing and Community Development for compliance with state law. The Azusa City Council approved the 2021-2029 Housing Element, titled "Azusa Housing for All", on March 7, 2022. The Housing Element sets forth goals, policies, and actions that help the City plan for the housing needs for all segments of the City's population.

Senate Bill 375

SB 375 (codified in the Government Code and PRC) took effect in 2008 and provides a planning process to coordinate land use planning, RTPs, and funding priorities to help California meet the GHG reduction goals established in AB 32. SB 375 requires MPOs to incorporate an SCS in their RTPs that will achieve GHG emissions reduction targets by reducing VMT from light-duty vehicles through the development of more compact, complete, and efficient communities.

Regional Housing Needs Assessment

A RHNA is mandated by State Housing Law as part of the periodic process of updating local housing elements of a general plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment, and household growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promote transportation mobility, and address social equity and fair share housing needs. The City-specific RHNA is discussed below.

4.12.2.2 Local Regulations

Southern California Association of Governments

SCAG is an association of local governments and agencies that voluntarily convene to address regional issues. It is designated as an MPO under federal law and as a Regional Transportation Planning Agency and Council of Governments under state law. 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. This agency develops long-range regional transportation plans, including SCS and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and a portion of the SCAQMD air quality management plans. SCAG's role in housing has focused on the preparation of the RHNA, as described below, but has recently expanded to support local

government and stakeholders to develop and adopt land use plans which accelerate housing production and meet regional housing goals.

City of Azusa Regional Housing Needs Assessment

In March 2021, SCAG adopted its sixth cycle RHNA allocation plan, which covers the planning period of October 2021 through October 2029. For this cycle, SCAG received a need of 1,341,827 housing units, which was distributed to all 197 SCAG jurisdictions. Based on a methodology that weighs a number of factors (i.e., projected population growth, employment, commute patterns, and available sites), the City received a total of 2,651 housing units in this allocation, with 760 allocated to very-low-income units, 368 to low-income units, 382 to moderate-income units, and 1,141 to above-moderate-income units.

City of Azusa General Plan Housing Element

Applicable 2021-2029 Housing Element goals, policies, and programs pertaining to population and housing include the following:

Goal H 1. Assist in the provision of adequate housing to meet the needs of the community. Establish a balanced approach to meeting housing needs that includes both owner and renter households.

Policy H 1.1. Provide a range of residential development types in Azusa, including low-density single-family homes, moderate-density townhomes, higher-density apartments and condominiums, and residential/commercial mixed-use in order to address the City's share of regional housing needs.

Policy H 1.2. Facilitate development of affordable housing through use of financial and/or regulatory incentives.

Policy H 1.7. Support the provision of high-quality rental housing for large families, students, and senior citizen households.

Goal H 4. Minimize the impact of governmental constraints on housing production and affordability.

Policy 4.1. Provide regulatory incentives, such as density bonuses and reduced parking, to offset the costs of developing affordable housing.

Policy 4.2. Use the specific plan or a similar process as a tool to provide flexible and creative solutions to housing on larger pieces of property.

4.12.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential population and housing impacts are based on Appendix G of the CEQA Guidelines. A significant impact to population and housing could occur if implementation of the proposed 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.

4.12.4 Methodology and Assumptions

The following analysis is based on demographic data provided by the Azusa General Plan 2021-2029 Housing Element (City 2021). The Housing Element also provides existing counts and future capacity for population and housing within the City. For both population and housing, proposed Project increases are compared to City and regional data to determine Project significance.

4.12.5 Impact Analysis

4.12.5.1 Population Growth

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)?

Increases in population, housing, and employment are generally considered to be social or economic effects, as opposed to physical effects, which are the focus of CEQA analysis. There are circumstances where social and economic changes could indirectly cause physical environmental impacts or result in changes to environmental resources, such as air quality, traffic, or noise levels. In other situations, lead agencies may evaluate social or economic change related to a physical change in determining whether the physical change is significant (CEQA Guidelines Section 15131). Additional discussion of economic growth is provided in Section 5.0, *Other CEQA-Required Sections*.

Construction

Construction of the proposed Project would represent a temporary increase in construction employment. According to the Fiscal Economic Analysis prepared for the Project, construction of the industrial site would provide 458 full-time equivalent jobs on-site and 722 jobs countywide, while construction of the residential site would provide 526 full-time equivalent jobs on-site and 759 jobs countywide (Kosmont 2024). Given the relatively common nature and scale of proposed construction associated with the Project, the demand for construction employment is anticipated to be met within the existing and future labor market in the region. The size of the construction workforce would vary during the different stages of construction but would not require a substantial number of workers such that laborers from outside the local area would relocate to the City.

Operation

Once operational, the proposed Project has the potential to directly induce population growth through employment opportunities at the residential site, golf course site, and industrial site. At full buildout, the Project is estimated to support 481 jobs on-site, comprised of 464 full-time equivalent jobs from the industrial site, 5 from the residential site, and 12 from the golf course site. The employment opportunities generated by the Project would represent 2.3 percent of the City's projected employment base by 2035 as presented by the 2024 RTP/SCS and discussed above. In addition, it is anticipated that the majority of these employment opportunities would be filled by existing residents of the Project region, and therefore, no substantial unplanned population growth would result from these new jobs.

The proposed Project would also directly induce growth through the development of 230 age-restricted dwelling units. This increase in housing units would account for approximately 9 percent of the City's RHNA allocation and 12 percent of SCAG's projected increase in households from 2019 to 2035.

Therefore, the Project's increase in residential units would not exceed the planned housing capacity of the City.

The jobs-housing ratio for the City based on 2019 data from SCAG was 1.34 and the Project would increase this ratio to 1.35. The slight change in the jobs-housing ratio from the Project would not substantially alter the need for employees within the City to commute to the City or for City residents to commute for employment opportunities.

According to data from the U.S. Census Bureau, households in which the head of the household is over 55 years in age have an average of 2.02 persons per household (U.S. Census Bureau 2023b). Using this average assumption, the increase of 230 units on the Project site would increase the City's existing population of 48,272 individuals by about 465 persons, for a total population of approximately 48,737 individuals, an increase of approximately one percent. According to SCAG, Azusa's population is projected to grow to 56,200 people by 2045, an increase of 7,928 from the 2023 population of 48,272 individuals. The population increase of 465 people as a result of the proposed residential units would account for 5.9 percent of SCAG's projected population growth for the City. This would be well within the City population projections. Therefore, the proposed Project would not directly induce substantial unplanned population growth.

The proposed Project would not indirectly induce a growth in population as no extension of infrastructure is proposed beyond what is required to adequately serve the Project. The Project would connect to existing utilities, including water, sewer, electricity and telecommunication services, and natural gas. The majority of the surrounding area is already developed, and the connection of proposed buildings to existing infrastructure would not provide new utilities or other infrastructure to support growth in a previously undeveloped area. Therefore, the proposed Project would not indirectly induce unplanned population growth.

Level of Significance Prior to Mitigation

Implementation of the Project would not induce substantial unplanned direct or indirect population growth in the area, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.12.5.2 Displacement

Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The proposed industrial and residential sites would demolish some of the existing golf-related improvements and would install new industrial buildings, a residential community, and various amenities. As such, given that the site does not contain people or housing under existing conditions, the Project would not displace existing people or housing and would not necessitate the construction of

replacement housing. On the contrary, the Project proposes to construct 230 residential units to provide additional housing within the City. The environmental effects from constructing the proposed 230 units have been analyzed throughout this EIR. Therefore, the Project would not reduce, but instead increase, the number of housing units within the City.

Level of Significance Prior to Mitigation

Implementation of the Project would not displace substantial numbers of existing people or housing, and there would be no impact.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

There would be no impact.

4.12.6 Cumulative Impact Analysis

The geographic scope for cumulative analysis regarding impacts to population and housing includes the City of Azusa. As discussed above, the proposed Project would introduce an estimated 465 people resulting from the development of 230 residential units. Based upon regional projections, comparisons to current land use designations, and comparison with the RHNA planning periods, the introduction of the estimated 465 people would not be considered substantial and was anticipated in regional growth projections. The cumulative projects listed in Table 4-1 could also either directly or indirectly induce population growth. Projects that include residential development may increase the population in the City, similar to the proposed Project. The identified cumulative projects would result in a total of 203 additional residential units within the City, and combined with the Project, would increase the City's housing stock by 433 units. The introduction of a new population is not, in and of itself, a significant impact. Per SCAG growth projections, the City is expected to grow by 16.4 percent in population by the year 2045 and 14.6 percent in housing units by 2050. Population and housing generated by the cumulative projects would be included in those growth projections and would not substantially increase growth in the City beyond what is planned. Similarly, the increase in commercial and industrial spaces would generate an increase in employment opportunities in the City, which were anticipated by SCAG to grow by seven percent. Further, the Project would not result in the removal of a barrier of growth that would reasonably result in the intensification or development of land. Utility and infrastructure improvements would be sized to only adequately serve the proposed Project (see Section 4.17, *Utilities and Service Systems*). Additionally, because the Project is surrounded by existing development, it is unlikely that the approval and construction of the Project would lead to an intensification of the land uses in the immediate vicinity of the site. Therefore, cumulative impacts would be less than significant.

4.13 Public Services

This section evaluates potential impacts to public services that could occur from the implementation of the proposed Project. The existing conditions and regulatory setting regarding public services associated with the proposed Project site are also addressed.

4.13.1 Existing Conditions

4.13.1.1 Fire Protection

The City contracts with LACoFD for fire protection services, including fire, rescue, and hazardous materials. LACoFD currently has nearly 3,000 fire service personnel serving 60 incorporated cities and 122 unincorporated areas within the County (LACoFD 2021). The City is served by Fire Station 97, located at 846 Juniper Ridge 1.9 miles from the Project site, and Fire Station 32, located at 605 North Angeleno Avenue 1.2 miles from the Project site. Fire Station 97 has one engine company and one patrol unit and is staffed with four fire personnel. According to the Azusa General Plan, current equipment and staffing are adequate to serve existing development within Fire Station 97's service area. Fire Station 32 has two engine companies (one on reserve), one emergency medical service, one water tender, one utility truck, one unmanned Urban Search and Rescue trailer, and two patrol units. According to the Azusa General Plan, this equipment and staffing are adequate to serve existing development within Fire Station 32's service area (City 2004a).

The proposed Project site is served by both Fire Station 97 and Fire Station 32 (LACoFD 2024). The fire station boundary is defined along Sierra Madre Avenue, which also bisects the proposed Project site. The proposed industrial site and southeast portion of the proposed golf course site are served by Fire Station 32, while the proposed residential site and northwest portion of the proposed golf course site are served by Fire Station 97.

Areas in the San Gabriel Mountains are within a VHFHSZ (City 2004a). Both the Forest Division of the LACoFD and the USFS, in a mutual aid agreement, can respond to a forest fire depending on the severity and complexity of an emergency.

4.13.1.2 Police Protection

The Azusa Police Department (APD) operates centrally from its main facility at 725 North Alameda Avenue, 1.9 miles from the Project site. This facility was upgraded in March 1999 and expanded to house 146 sworn and nonsworn officers, equipment, and related needs. The space is considered adequate to accommodate a projected Citywide build-out population of approximately 63,500 persons (City 2004a). The department currently has 55 sworn police officers providing law enforcement services (APD 2024). The sworn officer-to-population ratio is approximately 1.14 sworn officers for every 1,000 residents, based on the City's population of 48,272 individuals in 2023 (U.S. Census Bureau 2023a). This ratio is nearly at but remains below the City's target ratio of 1.30 officers per 1,000 residents.

The APD's operations are divided among three Service Area Commands. The proposed Project site is located within Service Area Command 2, which generally covers areas south of the San Gabriel Mountains, north of First Street, west of Dalton Avenue, and east of Irwindale Avenue (APD 2024). The APD currently does not maintain records of their target response times.

4.13.1.3 Schools

The Azusa Unified School District (AUSD) provides school services to the City. As of 2024, 6,370 students were enrolled in a K-12 AUSD facility (California Department of Education 2024). The AUSD is made up of eight elementary, one middle, and two high schools, as well as an Adult School and Alternative Education school. The proposed Project site is located nearest to Longfellow Victor Hodge Elementary School, Gladstone Middle School, and Azusa High School, which had 483, 1,420, and 1,729 students enrolled in 2024, respectively (California Department of Education 2024).

4.13.1.4 Parks

The City has 22 public parks with over 70 acres of open space and recreational facilities (City 2024d). An additional 186 acres of recreational space are available at public school facilities through joint-use agreements with the City and AUSD. Currently, the park per capita ratio is 1.45 acres per 1,000 persons, based on the 2023 population of 48,272 (U.S. Census Bureau 2023a). This park per capita ratio achieves the goal outlined in the Azusa General Plan of maintaining the 2004 park per capita ratio of 1.14 acres per 1,000 persons, as further discussed in Section 4.13.5.4 below. No public parks or recreational facilities occur within the site under existing conditions. Additional information regarding parks is provided in Section 4.14, *Recreation.*

4.13.1.5 Other Public Services

The City operates its own public library program from a single facility located at 729 North Dalton Avenue, located 1.2 miles from the proposed Project site. The Azusa City Library was built in 1959 and has not been expanded since. The building is 18,000 SF and has over 100,000 items in English, Spanish, and Chinese. The library also provides access to a variety of online resources, including a provider of free virtual classes for older adults, eBook catalogs, a historical newspaper collection, and a variety of language courses. The library also provides passport, literacy, internet access, and printing services (City 2024e).

In addition, the City owns and operates the Azusa Senior Center, located 1.5 miles from the Project site. The Azusa Senior Center can accommodate up to 200 individuals aged 50 years and up and offers a senior nutrition program, senior health and wellness programs, and social activities, including indoor games, movie screenings, and day trips (City 2024f).

4.13.2 Regulatory Setting

4.13.2.1 State Regulations

California Code of Regulations Title 24 – Fire Codes

CCR Title 24 refers to the CBSC, which contains complete regulations and general construction building standards of state agencies, including administrative, fire and life safety, and field inspection provisions. Part 2 was updated in 2008 to reflect changes in the base document from the Uniform Building Code to the IBC. CBSC Part 9 refers to the California Fire Code, which contains other fire safety-related building standards. In particular, the CBSC Chapter 7A, *Materials and Construction Methods for Exterior Wildfire Exposure*, addresses fire safety standards for new construction.

California Public Resources Code Sections 4290-4299 and General Code Section 51178

A variety of state codes, particularly PRC Sections 4290-4299 and General Code Section 51178, require minimum statewide fire safety standards pertaining to: roads for fire equipment access; signage identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and fire fuel breaks and greenbelts. They also identify primary fire suppression responsibilities among the federal, state, and local governments. In addition, any person who owns, leases, controls, operates, or maintains a building or structure in or adjoining a mountainous area, or forest-covered, brush-covered or grass-covered land, or any land covered with flammable material, must follow procedures to protect the property from wildland fires. These regulations address fire safety, adequate access to outlying properties for emergency responders, and safe evacuation routes for residents.

Leroy F. Greene School Facilities Act of 1998 (SB 50)

SB 50 was enacted by the state Legislature in 1998 and made significant amendments to state law governing school fees. Specifically, SB 50 amended prior California Government Code Section 65995(a) to prohibit state or local agencies from imposing school impact mitigation fees, dedications or other requirements in excess of those provided in the statute in connection with "any legislative or adjudicative act...by any state or local agency involving...the planning, use, or development of real property..." The legislation also amended California Government Code Section 65996(b) to prohibit local agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any "legislative or adjudicative act [involving] the planning, use or development of real property." SB 50 states that the fees imposed by school districts shall constitute the exclusive method of considering and mitigating impacts on school facilities caused by a development project. Further, SB 50 established the base amount of allowable developer fees: $1.93 per square foot for residential construction and $0.31 per square foot for commercial. These base amounts are commonly called "Level 1 fees" and are the same caps that were in place at the time SB 50 was enacted. Level 1 fees are subject to inflation adjustment every two years.

In certain circumstances, for residential construction, school districts can impose fees that are higher than Level 1 fees. School districts can impose Level 2 fees, which are equal to 50 percent of land and construction costs if they: (1) prepare and adopt a school needs analysis for facilities; (2) are determined by the State Allocation Board to be eligible to impose these fees; and (3) meet at least two of the following four conditions:

- At least 30 percent of the district's students are on a multi-track year-round schedule;
- The district has placed on the ballot within the previous four years a local school bond that received at least 50 percent of the votes cast;
- The district has passed bonds equal to 30 percent of its bonding capacity; or
- At least 20 percent of the district's teaching stations are relocatable classrooms.

Additionally, if the state's bond funds are exhausted, a school district that is eligible to impose Level 2 fees is authorized to impose even higher fees. Commonly referred to as "Level 3 fees," these fees are equal to 100 percent of land and construction costs of new schools required as a result of new developments.

Quimby Act and Assembly Bill 1359

Cities and counties have been authorized since the passage of the 1975 Quimby Act (Government Code Section 66477) to pass ordinances requiring that developers set aside land, donate conservation easements, or pay fees for park improvements. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities. The dedicated land or fees may only be used for the development or rehabilitation of neighborhood or community parks or recreational facilities in the subdivision for which they were provided, according to AB 1359 (Chapter 412, Statutes of 2013), unless certain requirements are met and an exception is made. The goal of the Quimby Act is to require developers to help mitigate the impacts of property improvements. The act gives authority for the passage of land dedication ordinances only to cities and counties. Special districts must work with cities and/or counties to receive parkland dedication and/or in-lieu fees. The fees must be paid, and land conveyed directly to the local public agencies that provide park and recreation services communitywide.

4.13.2.2 Local Regulations

Los Angeles County Fire Code

The Los Angeles County Fire Code (County Fire Code) is incorporated as Title 32 of the Los Angeles County Code of Ordinances and adopts by reference portions of the 2022 California Fire Code and the 2021 version of the International Fire Code. The purpose of the County Fire Code is to establish minimum requirements consistent with nationally recognized good practice for providing a reasonable level of life safety and property protection from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide a reasonable level of safety to firefighters and emergency responders during emergency operations.

Specifically, the County Fire Code establishes regulations affecting or relating to structures, processes, premises, and safeguards regarding:

- Conditions affecting the safety of the firefighters and emergency responders during emergency operations; and

- Fire hydrant systems, water supply, fire equipment access, posting of fire equipment access, lot identification, weed abatement, combustible brush and vegetation that represents an imminent fire hazard, debris abatement, combustible storage abatement including flammable liquid storage, hazardous material storage and use, open-flame and open-burning, and burglar bars at state-regulated mobile home and special occupancy parks within the jurisdiction of the LACoFD as per California H&SC Sections 18691 and 18873.5.

Azusa General Plan

Chapter 4 of the Azusa General Plan, *Economy and Community*, includes a Public Services section that addresses community services that improve City residents' quality of life, such as police protection, fire protection, emergency medical services, government administration, libraries, and schools. The Public Services section of Chapter 4 of the Azusa General Plan includes goals and policies to address the City's fire protection, police protection, school, and library needs. The following goals and policies are relevant to the proposed Project.

Goal 1. Protect the community from criminal activity, reduce the incidence of crime, and provide other necessary services within the City.

Policy 1.1. Maintain personnel and facilities in the City's Police Department necessary to provide the best response time feasible.

Policy 1.2. Ensure that police services are maintained through a periodic condition and needs assessment of department services, facilities, and personnel.

Policy 1.3. Require development projects contribute fees based on their proportional impact and demand for new resources, in accordance with state Nexus legislation.

Goal 2. Ensure adequate protection from fire and medical emergencies for Azusa residents and property owners.

Policy 2.1. Work with LACoFD to locate fire stations in a manner that will enable emergency fire response times to meet a five-minute or less standard.

Policy 2.4. Work with LACoFD to ensure adequate facilities and personnel by evaluating population growth, response times, and fire hazards.

Policy 2.5. Require new development be assessed a pro-rated fee to pay for fire facilities and personnel.

Goal 4. Ensure that a high level of library services and facilities are provided to the City's residents.

Policy 4.1. Construct new library facilities and expand the new facilities as required to meet the needs of the library users.

Policy 4.2. Consider establishing library outreach services for seniors and others who are physically unable to visit the library facility.

Goal 5. Promote a strong public school system that advocates high-quality education promote the maintenance and enhancement of the existing educational systems facilities, and opportunities for students and residents of the city to enhance the quality of life for existing and future residents.

Policy 5.1. Continue the dialogue between the City of Azusa and local schools regarding:

- Measures to accommodate student population growth; and
- "Shared responsibility agreements" for property/facilities maintenance and operation where public recreation activities occur at local school sites.

In addition, the Recreation section of Chapter 5 of the Azusa General Plan, *Natural Environment*, includes goals and policies to address the current and projected needs of the City's parks. The following goals and policies are relevant to the proposed Project.

Policy 2.1. Maintain the current park per capita ratio of 1.14 acres per 1,000 persons.

Policy 2.2. Strive to achieve the National Parks and Recreation Association's recommended per capita ratio of 3.0 acres per 1,000 persons. When the City has met the 3.0 ratio, strive to achieve the NPRA's suggested per capital ratio of 5.0 acres per 1,000 persons.

Policy 6.4. Encourage commercial recreational facilities to provide recreational services and facilities that may not be otherwise provided in the City.

4.13.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential public services impacts are based on Appendix G of the CEQA Guidelines. A significant impact to public services could occur if implementation of the proposed Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

a) Fire protection;

b) Police protection;

c) Schools;

d) Parks; or

e) Other public facilities.

4.13.4 Methodology and Assumptions

The following analysis is based on the public service goals of the Azusa General Plan Public Services Element (City 2004a) and data from local and regional public service providers, including LACoFD, APD, AUSD, the City Parks Division, and the Azusa City Library. For the public services listed, proposed Project increases in the demand for public services are compared to City and regional data where available to determine the potential effects of the Project on these services.

4.13.5 Impact Analysis

4.13.5.1 Fire Protection

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

The proposed Project does not involve the construction of any new or physically altered fire protection facilities. Construction activities could create a temporarily increased demand for LACoFD services. However, all construction activities would be subject to compliance with applicable state and local regulations in place to reduce the risk of construction-related fire events, including County Fire Code requirements for the performance of a daily fire safety inspection at the Project site. The inspection would require documentation that heating equipment is maintained away from combustible material,

fire hydrants are available, temporary wiring is not exposed, flammable materials are properly stored, and more.

The Project's residential site would increase demand for LACoFD services due to an increase in population. The industrial site would also cause an increase in demand for LACoFD services, as these warehouse facilities may pose fire risks as they become operational. However, neither of these potential impacts would require the construction of new LACoFD facilities or the expansion of existing fire protection facilities. This Project site is within the existing service areas of LACoFD Fire Stations 32 and 97 and has already been accounted for in terms of areas within the City that the LACoFD has been contracted to service. The proposed Project components would not generate excessive fire risk, as the Project design would be in accordance with applicable state and local regulations in place to reduce the risk of fire, including the CBC and County Fire Code requirements for building materials, fire sprinklers, smoke alarms, and other features. In addition, the proposed Project site plans would be required to undergo review by LACoFD prior to the start of construction to ensure that necessary safety features are incorporated into the Project to prevent increased fire risk. For the reasons described above, the Project would not adversely affect service ratios, response times, or other performance objectives and would, therefore, not require any new or altered fire protection facilities, which could cause a significant environmental impact. While no new fire protection facilities would be required to serve the Project, the Project applicant may be required to contribute standard development fees for incremental increases in demand for fire protection services, which provide funding for future improvements by LACoFD or the City. Such improvements would undergo separate environmental review at the time they are proposed.

Level of Significance Prior to Mitigation

Implementation of the Project would not result in the need for new or altered fire protection facilities, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.13.5.2 Police Protection

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

The proposed Project does not involve the construction of any new or physically altered police protection facilities. The proposed Project site is within the existing boundary of APD Service Area Command 2 and has already been accounted for as part of the APD service area during operation of the golf course use of the site. During construction, the Project would be subject to the requirements of the Project-specific Traffic Control Plan, which would ensure that emergency access during construction is maintained. No substantial increase in the need for police protection services is anticipated during Project construction. Once operational, the Project would increase demand for APD services due to an

increase in residential units and industrial space within the City. However, this increased need for police protection would not require the construction of new APD facilities or the expansion of existing police protection facilities.

In addition, the Azusa General Plan states that the current police facilities are designed to service a build-out population of 63,500 individuals in the City, which is far above the anticipated City population with the increase in population from the Project. The 55 sworn officers currently serving the City equate to a service ratio of 1.13 sworn officers for every 1,000 residents. Although this number is below the City's target service ratio of 1.30, the population growth caused by the Project would not cause it to further decrease to the point where new APD facilities would need to be built. Therefore, the proposed Project would not adversely affect service ratios, response times, or other performance objectives and would not require any new or altered police protection facilities which could cause a significant environmental impact. While no new police protection facilities would be required to serve the Project, the Project applicant may be required to contribute standard development fees for incremental increases in demand for police protection services, which provide funding for future improvements by APD. Such improvements would undergo separate environmental review at the time they are proposed.

Level of Significance Prior to Mitigation

Implementation of the Project would not result in the need for new or altered police protection facilities, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.13.5.3 Schools

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

The proposed Project does not involve the construction of any new or physically altered schools. The proposed Project involves the construction of an age-restricted residential community. This age restriction dictates that no individual under the age of 55 would be permitted as a primary resident of the housing facilities. Due to this restriction, the direct population growth associated with the Project would not include school-aged individuals requiring new services from AUSD. There is the potential for a minimal increase in the number of families residing in the City, including school-aged individuals, resulting from the additional employment opportunities generated by the Project. However, it is anticipated that the majority of these employment opportunities would be filled by existing residents and no substantial demand for public services, including schools, is expected.

In addition, the Project applicant would be required to pay school mitigation fees pursuant to California Education Code Section 17620 et seq. and Government Code Sections 65995(h) and 65996(b) in effect at

the time of building permit issuance. Payment of these fees would assist in funding AUSD's long-range plans. SB 50 states that the fees imposed by school districts shall constitute the exclusive method of considering and mitigating impacts on school facilities caused by a development project. Such payment shall provide "full and complete mitigation of the impacts of any legislative or adjudicative act...on the provision of adequate school facilities" (Government Code Section 65995[h]). Therefore, the proposed Project would not result in the need for additional or altered schools, the construction of which could cause significant environmental impacts, and would not adversely impact performance objectives such as teacher-student ratios or capacities for schools in the area.

Level of Significance Prior to Mitigation

Implementation of the Project would not result in the need for new or altered schools, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.13.5.4 Parks

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

The City offers a variety of recreational activities, including 22 public parks. As outlined above, the current park per capita ratio is 1.45 acres per 1,000 persons, based on the City's 2023 population of 48,272 persons. The Azusa General Plan states that the City is expected to maintain the 2004 park per capita ratio of 1.14 acres per 1,000 persons, while striving to achieve the National Parks and Recreation Association's recommended per capita ratio of 3.0 acres per 1,000 persons. Additional information regarding the City's parks can be found in Section 4.14, *Recreation.* Although the City has not reached the National Parks and Recreation Association's recommended ratio, it has provided community members with a park per capita ratio over the goal set in 2004.

The proposed Project would cause an increase in population, and, therefore, could increase the use of the City's existing parks. However, as discussed in Section 4.12, *Population and Housing*, the Project is estimated to increase the City's population to 48,737 persons, which would generate a park per capita ratio of 1.44 acres per 1,000 persons. Therefore, the Project would not cause the park per capita ratio to decrease below the City's standard of 1.14 acres per 1,000 persons. In addition, the proposed Project would offer residents of the age-restricted community additional recreational amenities such as meeting areas, fitness rooms, an outdoor pool and spa, outdoor recreation areas, and dining areas, as well as access to the existing on-site golf course. Because the proposed Project includes these amenities for residents, Project residents are not anticipated to substantially increase the use of City parks such that there would be a need for new or physically altered parks in the City. In addition, the Project would contribute fees to the City for park redevelopment in compliance with the Quimby Act and outlined in

the City's Schedule of Fees and Charges (City 2023c). This payment would offset the potential increase in use of parks that the Project may induce.

The proposed redevelopment of a portion of the Azusa Greens Golf Course would not decrease the available public park land in the City, as it is privately owned and operated. The proposed Project site does not include existing public parks or joint-use facilities on-site. As the park per capita ratio is currently above the goal set forth by the City, and the population growth caused by the proposed Project would not substantially alter this ratio, no adverse physical impacts associated with the provision of new or physically altered park facilities would occur, and City objectives regarding parks would be maintained.

Level of Significance Prior to Mitigation

Implementation of the Project would not result in the need for new or altered parks, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.13.5.5 Other Public Facilities

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

The City owns and operates the Azusa City Library, which provides community members with a variety of resources, as discussed above. In addition, the City owns and operates the Azusa Senior Center, which offers a variety of resources to community members over 50 years of age. Although the Project would generate an increase in population and, therefore, an increase in the use of the City's library and senior center, it would not require the provision of new or physically altered library or senior center facilities. The population increase would be minimal in comparison with the City's existing and projected population as further discussed in Section 4.12, *Population and Housing*, and the current resources offered by the library and senior center would be sufficient to provide services to the additional residents brought about by the Project. In addition, Azusa Municipal Code Chapter 42 Article I authorizes the City Council to levy taxes for the purpose of maintaining and operating the Azusa City Library and the Project applicant would pay applicable fees if enacted by City Council and applicable to the Project. The Project would also generate additional sales and property tax revenue over time, which would contribute to the funds available for library maintenance and operation. No new library or senior center facilities would be required to serve the Project residents and, therefore, no significant environmental impacts would be caused by the provision of such facilities.

Level of Significance Prior to Mitigation

Implementation of the Project would not result in the need for new or altered public facilities, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.13.6 Cumulative Impact Analysis

The provision of public services is often specific to jurisdictional providers or confined by service boundaries. Typically, changes in development influence the demand for public services to be provided within a local city, county, or service district. The geographic scope for analysis of cumulative impacts to public services is the City of Azusa.

As discussed above, the Project's impact to City public services due to an increase in population resulting from the residential site would not be significant. Fire and police services are provided at the site under existing conditions, and the increase in population from the Project would not substantially decrease the ability of the City to provide other public services. In addition, impacts to public services would be offset by the development fees contributed by the Project applicant as well as the generation of sales and property taxes over time, which would contribute funding available to add personnel, facilities, or equipment to maintain adequate service ratios outlined in the Azusa General Plan. As detailed above, the Project would be required to comply with all applicable federal, state, and local standards and regulations regarding public services within the City and would be required to undergo review by the City, LACoFD, and APD to ensure that all safety standards are met by the Project. Similarly, cumulative projects in the City would generate new revenue in the City and pay development fees where applicable. Cumulative projects would additionally be required to comply with federal, state, and local public services-related standards, regulations, and review requirements.

Population growth associated with the proposed residential site could result in an increased use of public services, as discussed above; however, it would not necessitate the construction of new fire or police stations, schools, parks, libraries, or senior centers. The identified cumulative projects within the City, which propose a total of 203 additional residential units, are not anticipated to result in the need for additional facilities to be built due to the minor increase in population growth that would occur. In addition, the growth projections that future public service needs within the City are based on account for the population growth induced by the identified cumulative projects. However, if future development in the City results in the need for new or altered facilities to maintain acceptable service ratios or other objectives related to the public service, the City may propose new public service facilities. The approval for construction of such facilities would be subject to environmental analysis requirements in accordance with CEQA, and applicable mitigation measures would be applied to such a project; however, the discussion of potential impacts related to such a facility would be speculative at this time. The proposed Project would not result in a cumulatively considerable contribution to impacts related to public services.

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4.14 Recreation

This section addresses the potential impacts related to recreation associated with the implementation of the proposed Project. This section discusses existing recreation facilities in the area and identifies applicable state and local regulations and policies related to such facilities, including the Azusa General Plan.

4.14.1 Existing Conditions

4.14.1.1 Park Facilities

The City has 22 public parks and recreational facilities with over 70 acres of open space, 36 of which are turf acres (City 2024d). Table 4.14-1, *Azusa Park Locations*, outlines the specific acreage and location of each of the public parks in the City. An additional 186 acres of park space are available at public school facilities through joint-use agreements between the City and AUSD (City 2004a). In addition to the parks listed below, City residents can utilize the open space in the Angeles National Forest, which is just north of the City and provides 700,000 acres of recreational opportunities (USDA 2024). The San Gabriel River Trail also provides trail space near the Project site and includes access to the Azusa Rockery and Geology Park.

Table 4.14-1
AZUSA PARK LOCATIONS

Park	Location	Acres/Turf Acres
Alisal Park	661 East Boxwood Lane	1.6 acres/0.5 turf acres
Arroyo North	1512 Azusa Veterans Way	7 acres/0.5 turf acres
Arroyo South	1204 North MacNeil Drive	12 acres/0.5 turf acres
Azusa Bike Trail Head	San Gabriel Canyon Road and North Ranch Road	0.9-mile-long trail connects to San Gabriel River Bike Trail
Canyon Park	1401 North San Gabriel Canyon Road	1 acre/0.5 turf acres
Citrus Grove Park	600 Gardenia Drive	0.56 acres/0.275 turf acres
Craftsman Park	503 East Sierra Madre Avenue	0.75 acres/0.25 turf acres
Edwards Park	600 North Azusa Avenue	0.20 acres/0.20 turf acres
Gladstone Park	414 South Pasadena Avenue	4.6 acres/3.41 turf acres
Memorial Park Recreation Center	340 North Orange Place	-
Northside Park	600 Block West 11th Street	15.09 acres/13.05 turf acres
Oak Hill Park	701 East Heather Circle	0.6 acres/0.13 turf acres
Olive Hill Park	1238 MacNeil Drive	0.6 acres/0.13 turf acres
Pioneer Park	1360 North Dalton Avenue	4.1 acres/3.5 turf acres
Rancho Park	1357 MacNeil Drive	1 acres/0.125 turf acres
Ridgeview Park	1305 Vosburg Drive	1.31 acres/0.27 turf acres
San Gabriel Canyon Gateway Center	1950 North San Gabriel Canyon Road	2 acres/0.75 acres native garden and Memorial Grove
Sierra Madre Park	579 Orange Blossom Way	1.38 acres/0.5 turf acres
Slauson Park	501 East Fifth Street	5.5 acres/2.6 turf acres
Summit Park	708 East Camelia Way	0.88 acres/0.25 turf acres
Veteran's Freedom Park	213 Foothill Boulevard	6.24 acres/3.93 turf acres
Zacatecas Park	924 West 1st Street	7 acres/5.58 turf acres

Source: City 2024d

4.14.1.2 Recreational Programs and Events

The City's Recreation Division offers a variety of recreational programs, including youth, adult, and senior programs, aquatics programs, facilities rentals, and City special events.

The Adult Programs are run by the Community Resources Department and include co-ed, women's, and men's adult sports such as baseball, basketball, kickball, softball, and volleyball. For each sport, teams are required to provide a team registration fee as well as a fee for game officials. Youth sports include flag football, volleyball, basketball, T-ball, and soccer. These programs require a registration fee and include five to seven weeks of instruction. Senior programs run by the City include day trips, which require a fee; free senior activities such as Bingo, Loteria, and other indoor games; a free senior support group focusing on areas such as emotional support, coping skills, grief and loss, and addiction recovery; and free Tuesday movies.

The City also hosts a variety of seasonal community special events. These include an Easter egg hunt at Zacatecas Park, the Outdoor Recreation & Eco-Fair at Memorial Park, the CommUNITY Festival and Fun Run/5K at Memorial Park, showings of a variety of family-friendly movies throughout the year at Memorial Park, the Summer Concert series, the Teen Festival hosted at Memorial Park, the BOXFAM BBQ & Boxing Showcase, a weeklong celebration of the City of Azusa hosted by the Golden Days Committee, Halloween Fright Fest at Memorial Park, and the Festival of Lights on the City Hall front lawn (City 2024g).

4.14.1.3 Recreational Facilities

The James Slauson Community Pool offers the Learn to Swim program, a Red Cross Certified swim program that requires a registration fee. During the Learn to Swim program hours, swimmers aged 16 and up are also welcome to take part in Lap Swim. In addition, this pool offers safety classes and a movie night on Friday nights. The Azusa Community Garden was opened in 2011 on Garden Celebration Day in Memorial Park North Recreation Center. The garden offers 40 garden plots for rent to community members or organizations to promote sustainable living practices. The garden is funded by grants from ALW, the Canyon City Foundation, and the Rivers and Mountains Conservancy to California Resource Connections.

The City also operates a variety of other facilities in which community members can host events, attend classes, and more. The Azusa Senior Center can accommodate up to 200 guests and offers a senior nutrition program, meeting and dining rooms, and a stage. The Azusa Women's Club can accommodate up to 250 guests and offers a banquet hall, patio, and in-house catering. The newly restored National Guard Armory can accommodate up to 250 guests and offers meeting rooms, an indoor gymnasium, and mirrored classrooms (City 2024g). Currently, the City does not offer public recreational facilities other than those described above and within Section 4.13, *Public Services*. A number of privately owned and operated recreational facilities are offered in the City, which include the golf course on the Project site. Because the golf course within the Project site is privately owned and operated, it is not part of the City's park and recreational facility programming.

4.14.2 Regulatory Setting

4.14.2.1 State Regulations

Public Park Preservation Act

The primary instrument for protecting and preserving parkland is the state Public Park Preservation Act. Under the PRC, cities and counties may not acquire any real property that is used as a public park for any non-park use unless compensation, or land, or both, are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

Quimby Act and Assembly Bill 1359

Cities and counties have been authorized since the passage of the 1975 Quimby Act (Government Code Section 66477) to pass ordinances requiring that developers set aside land, donate conservation easements, or pay fees for park improvements. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities. The dedicated land or fees may only be used for the development or rehabilitation of neighborhood or community parks or recreational facilities in the subdivision for which they were provided, according to AB 1359 (Chapter 412, Statutes of 2013), unless certain requirements are met and an exception is made. The goal of the Quimby Act is to require developers to help mitigate the impacts of property improvements. The act gives authority for the passage of land dedication ordinances only to cities and counties. Special districts must work with cities and/or counties to receive parkland dedication and/or in-lieu fees. The fees must be paid, and land conveyed directly to the local public agencies that provide park and recreation services communitywide.

4.14.2.2 Local Regulations

City of Azusa General Plan

The Azusa General Plan outlines specific goals and policies related to recreation in the Recreation section of Chapter 5, *Natural Environment*. Applicable goals, policies, and programs pertaining to recreation include the following:

Policy 2.1. Maintain the current park per capita ratio of 1.14 acres per 1,000 persons.

Policy 2.2. Strive to achieve the National Parks and Recreation Association's recommended per capita ratio of 3.0 acres per 1,000 persons. When the City has met the 3.0 ratio, strive to achieve the National Parks and Recreation Association's suggested per capita ratio of 5.0 acres per 1,000 persons.

Policy 6.4. Encourage commercial recreational facilities to provide recreational services and facilities that may not be otherwise provided in the City.

4.14.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential recreation impacts are based on Appendix G of the CEQA Guidelines. A significant impact to recreation could occur if implementation of the proposed 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; or

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.14.4 Methodology and Assumptions

The following analysis is based on information provided by the Azusa Recreation Division and goals and policies outlined in the Azusa General Plan related to recreation. The potential impacts of the proposed Project are evaluated in comparison to the existing recreation opportunities of the City to determine their level of significance.

4.14.5 Impact Analysis

4.14.5.1 Use of Existing Recreational Facilities

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?

The City offers a variety of parks and recreational facilities and programs, as outlined above. The proposed Project would cause an increase in the City's population and, therefore, an increase in the use of the City's existing parks and recreational facilities and programs. However, the proposed Project would offer Project residents additional private recreational amenities such as fitness rooms, an outdoor pool and spa, outdoor recreation areas, as well as access to the existing on-site golf course. Because the proposed Project includes these amenities for residents, it is not anticipated that the use of the City's existing parks and reactional facilities would increase such that substantial physical deterioration would occur or be accelerated. Additional information and analysis regarding the City's parks can be found in Section 4.13, *Public Services*.

Additionally, the Quimby Act authorizes cities and counties to require the dedication of land for parks or the payment of fees in lieu of park land dedication from developers. The City's Schedule of Fees and Charges, which is reviewed and updated on an annual basis by the Azusa City Council, outlines the Park and Recreation Redevelopment Fees that developers must pay to the City on a per-bedroom basis for residential development (City 2023b). The Project developer would provide payment to the City for park redevelopment, which would offset the potential increase in use of parks, recreational facilities, and recreational programs that the Project may induce. Therefore, physical deterioration, which may occur to existing recreational facilities as a result of the proposed Project, would be compensated for by the Project developer.

Level of Significance Prior to Mitigation

Implementation of the Project would not increase the use of existing parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.14.5.2 Expansion of Recreational Facilities

Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The proposed Project includes the construction of new private recreational facilities and would modify existing private recreational facilities. All Project components would be constructed on private land and would not require the conversion of land designated for public open space or other recreational use. The residential site would include fitness rooms, an outdoor pool and spa, and other open outdoor recreation areas. The golf course site would include light renovations to the existing golf course clubhouse, redevelopment of the existing parking lot, and a reconfiguration of nine of the existing holes on the golf course. While these elements of the proposed Project do have the potential to cause an adverse physical effect on the environment, these potential impacts are discussed throughout this EIR as part of the proposed Project, and mitigation measures have been prescribed where potentially significant impacts are identified as feasible. No off-site construction or expansion of recreational facilities would occur such that the Project would have an adverse physical effect on the environment beyond what has been described throughout the relevant sections of this EIR.

Level of Significance Prior to Mitigation

Implementation of the Project, including the construction and expansion of proposed recreational facilities, would not result in adverse physical effects or significant impacts beyond those identified in the relevant sections of this EIR. Impacts associated with this environmental issue area would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.14.6 Cumulative Impact Analysis

The geographic area for the analysis of cumulative impacts related to recreation is the City of Azusa. Changes in development typically influence the demand for recreational facilities which serve residents on a community-wide basis.

As discussed above, the population growth associated with the proposed residential site could result in an increase in use of the City's various recreational programs and facilities. However, the increase in use would not result in substantial physical deterioration of recreational facilities to occur or be accelerated, and would not require the construction or expansion of existing recreational facilities outside of the Project site. The Project would include the construction of new private recreational facilities (on-site residential amenities) and the modification of existing private recreational facilities (Azusa Greens Golf Course) and, therefore, has the potential to cause an adverse physical effect on the environment; however, these potential impacts are discussed throughout the EIR as part of the proposed Project, and, where feasible, mitigation measures have been prescribed where potentially significant impacts are identified. Additionally, the Project would be required to provide Park and Recreation Redevelopment Fees as authorized by the Quimby Act, which would provide the City with a source of funding should facilities require repair or expansion due to increased development in the City.

The identified cumulative projects have the potential to cause substantial physical deterioration of existing neighborhood and regional parks or recreational facilities due to an increase in use. Additionally, these projects could include the construction or expansion of recreational facilities, which could have an adverse physical effect on the environment. However, all cumulative projects within the City would be required to pay the City's Park and Recreation Redevelopment Fees, which would offset potential impacts to recreational facilities and provide the City with funding to provide repairs, expansion, or construction of new recreational facilities to adequately serve the community. Any recreational development proposed by the cumulative projects would be subject to environmental review, and if there is a potential for adverse physical effects on the environment due to the construction or expansion of recreation facilities, feasible mitigation measures would be identified. Therefore, cumulative project impacts would be less than significant, and the proposed Project would not result in a cumulatively considerable contribution to impacts related to recreation.

4.15 Transportation

This section addresses the potential transportation- and traffic-related impacts associated with the implementation of the proposed Project. This analysis is based in part on the TIS prepared by LLG, which is included as Appendix R to the EIR. The TIS analyzes the proposed Project's transportation impacts under CEQA utilizing a VMT metric. The City requires additional intersection operation and site access studies to identify a proposed project's effect on local transportation infrastructure, which is evaluated using Level of Service (LOS); however, these studies do not determine Project impacts under CEQA.

4.15.1 Existing Conditions

4.15.1.1 Transportation Analysis Metrics

Vehicle Miles Traveled

VMT is a metric that accounts for the number of vehicle trips generated and the length or distance of those trips. VMT does not directly measure traffic operations but instead is a measure of network use or efficiency, especially if expressed as a function of population or employment (e.g., VMT/capita). VMT tends to increase as land use density decreases and travel becomes more reliant on the use of the automobile due to the long distances between origins and destinations. VMT can also serve as a proxy for impacts related to energy use, air pollutant emissions, GHG emissions, safety, and roadway maintenance. The relationship between VMT and energy or emissions is based on fuel consumption. The traditional use of VMT in environmental impact analysis is to estimate mobile air pollutant emissions, GHG emissions, and energy consumption.

Level of Service

LOS is the term used to denote the different operating conditions which occur on a given roadway segment under various traffic volume loads. It is a qualitative measure used to describe a quantitative analysis taking into account factors such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, and safety. LOS provides an index to the operational qualities of a roadway segment or an intersection. LOS designations range from A to F, with LOS A representing free-flowing operating conditions and LOS F representing jammed operating conditions. The LOS designation is reported differently for signalized and unsignalized intersections, as well as for roadway segments. Changes in LOS are not considered impacts under CEQA but are considered by the City in the evaluation of project design and circulation infrastructure needs, as well as in considering a project's consistency with General Plan policies.

4.15.1.2 Roadway Network

Todd Avenue is a four-lane north-south roadway designated as a Secondary Arterial roadway in the Azusa General Plan. A Secondary Arterial is typically a two-to-four-lane street that services local and commuter traffic. This roadway is also a truck route. The posted speed limit is 40 mph.

Sierra Madre Avenue is a four-lane east-west roadway that is designated as a Secondary Arterial roadway in the Azusa General Plan. A Secondary Arterial is typically a two-to-four-lane street that services local and commuter traffic. This roadway is also a truck route. The posted speed limit is 40 mph.

10th Street is a two-lane east-west roadway that is designated as a Local Street in the Azusa General Plan. A Local Street is meant to distribute traffic within a neighborhood and is not intended for use as a through-street or a link between higher-capacity facilities. Local Streets are often fronted by residential uses. This street is not a truck route, and has a posted speed limit of 25 mph.

Vernon Avenue is a four-lane north-south roadway designated as a Collector roadway in the Azusa General Plan. Collector roadways are streets that provide access and traffic circulation within residential and non-residential (e.g., commercial and industrial) areas. They connect local streets to arterials and are typically designed with two travel lanes that may accommodate on-street parking. This roadway is not a truck route, and has a posted speed limit of 35 mph.

San Gabriel Avenue is a four-lane southbound roadway within SR 39 designated as a Local Street between Sierra Madre Avenue and 9th Street and as a Collector roadway south of 9th Street. Local Streets distribute traffic within a neighborhood, or similar adjacent neighborhoods, and are fronted by residential uses, while Collector roadways are streets that provide access and traffic circulation within residential and non-residential (e.g., commercial and industrial) areas. They are often designed to accommodate on-street parking and access to abutting properties. This roadway is not a truck route. The posted speed limit is 35 mph.

Azusa Avenue is a two-to-three-lane northbound roadway within SR 39 that is designated as a Secondary Arterial roadway in the Azusa General Plan. A Secondary Arterial is typically a two-to-four-lane street that services local and commuter traffic. This roadway is not a truck route, and the posted speed limit is 35 mph.

Foothill Boulevard is a four-lane east-west roadway that is designated as a Principal Arterial roadway in the Azusa General Plan. Principal Arterial roadways are typically four-or-more lane roadways and serve both local and regional through-traffic. This street is also a truck route. The posted speed limit ranges from 35 to 45 mph.

Irwindale Avenue is a six-lane north-south roadway that is designated as a Major Highway in the City of Irwindale General Plan Update. This roadway is a truck route, and has a posted speed limit of 40 mph.

1st Street is a four-lane east-west roadway that is designated as a Secondary Arterial roadway in the Azusa General Plan. A Secondary Arterial is typically a two-to-four-lane street that services local and commuter traffic. This roadway is also a truck route, and has a posted speed limit of 35 mph.

4.15.1.3 Public Transit Network

Public transit services are provided within the Project TIS study area by Foothill Transit and LA Metro. Public light rail transit is provided in the City by the LA Metro A Line. The Azusa Downtown Station is located northeast of the Azusa Avenue/Foothill Boulevard intersection and is approximately 0.6 mile southeast of the Project site. Light rail transit service is provided approximately every 10 minutes during the morning and evening peak commute hours.

A total of four bus routes provide public transit service in the vicinity of the Project site. Each line provides service approximately every 15 to 30 minutes during the morning and evening peak commute hours. Regular public bus transit services are provided along Foothill Boulevard, San Gabriel Avenue, and Azusa Avenue to the south and east of the proposed Project site. No public transit bus lines currently provide service along North Todd Avenue or Sierra Madre Avenue. The nearest public bus stop to the

Project site is provided by Foothill Transit Line 185 approximately 0.1 mile east of the site at the intersection of San Gabriel Avenue and Sierra Madre Avenue. Additional bus stops for Foothill Transit Lines 185, 187, 188, and 280 are provided at the San Gabriel Avenue and Foothill Boulevard intersection approximately 0.7 mile southeast of the Project site.

4.15.1.4 Pedestrian Facilities

Public sidewalks are provided along most roadways within the vicinity of the Project site under existing conditions, including along Todd Avenue, Vernon Avenue, San Gabriel Avenue, Azusa Avenue, Sierra Madre Avenue, and Foothill Boulevard. Currently, the proposed industrial site frontage along North Todd Avenue and West 10th Street does not provide public sidewalks, although public sidewalks are provided elsewhere along these roadways. Striped crosswalks with pedestrian signals are provided at the signalized intersections in the vicinity of the Project site. In addition, striped crosswalks are provided across the east and west legs of Sierra Madre Avenue at the unsignalized intersections of Todd Avenue/Sierra Madre Avenue and Vernon Avenue/Sierra Madre Avenue. Speed feedback signs are provided for the westbound approach at Vernon Avenue/Sierra Madre Avenue, and flashing lights activated by pedestrian push-buttons are installed at the crosswalks; however, at the time of the TIS facility review, the push-button activated flashing lights were non-operational. ADA curb ramps with tactile warning strips consisting of yellow or grey truncated dome pads are provided at most major intersections in the vicinity of the Project site, although truncated dome pads are not provided for all existing curb ramps at the intersections of Todd Avenue/Sierra Madre Avenue adjacent to the Project site. Golf cart crossings are accommodated at the Todd Avenue/Sierra Madre Avenue pedestrian crossing.

4.15.1.5 Bicycle Facilities

Class I bike paths are exclusive, car-free facilities that are typically located outside of a roadway area. Currently, the San Gabriel River Path, a Class I bike lane, is provided west of the Project site. In addition, a Class I bicycle path connector is provided between the Azusa Rockery and Geology Park (along the San Gabriel River Path) and the Todd Avenue/Sierra Madre Avenue intersection. There are no existing bicycle facilities that provide direct access to the residential site or industrial site; however, bicyclists are able to share existing roadway facilities with vehicles.

4.15.2 Regulatory Setting

4.15.2.1 Federal Regulations

Highway Capacity Manual

The Highway Capacity Manual, prepared by the federal Transportation Research Board, is the result of a collaborative multiagency effort between the Transportation Research Board, Federal Highway Administration, and American Association of State Highway and Transportation Officials. The Highway Capacity Manual 6th Edition contains concepts, guidelines, and procedures for computing the capacity and quality of service of various highway facilities including freeways, signalized and unsignalized intersections, rural highways, and the effects of transit, pedestrian, and bicycles on the performance of these systems.

Title 23, Code of Federal Regulations

CFR Title 23, Section 450.220, *Highways*, requires each state to carry out a continuing, comprehensive, and intermodal statewide transportation planning process. This planning process must include development of a statewide transportation plan and transportation improvement program that facilitates the efficient, economical movement of people and goods in all areas of the state.

4.15.2.2 State Regulations

California Department of Transportation

Caltrans is the primary state agency responsible for transportation issues. One of its duties is the construction and maintenance of the state highway system. Caltrans has established standards for street traffic flow and has developed procedures to determine if intersections require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities but may influence traffic flow and LOS at such facilities, Caltrans may recommend measures to mitigate the traffic impacts of such projects. In addition, Caltrans must review proposals to signalize freeway ramp interchanges through their Intersection Control Evaluation process (Caltrans Traffic Operations Policy Directive #13-01).

As required by state law, Caltrans has formally adopted VMT as the metric for evaluating the transportation impacts of local development projects on the State Highway System. Caltrans' Transportation Impact Study Guide relies on the December 2018 *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory) prepared by the OPR as the basis for its guidance on VMT assessment. The Transportation Impact Study Guide states:

> Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues.

While the final guidance is still being developed, Caltrans has released a memorandum with interim safety guidance that was consulted in preparation of the TIS as it relates to intersections with I-210 (Caltrans 2020b).

Statewide Transportation Improvement Program

As indicated above, CFR Title 23, Section 450.220, requires the preparation of statewide transportation plans. Pursuant to this requirement, California adopted the California Statewide Transportation Improvement Program (STIP). The STIP is prepared by Caltrans in cooperation with the MPO and the regional transportation planning agencies. In Los Angeles County, the MPO and regional transportation planning agency is SCAG. The STIP contains capital and non-capital transportation projects or identified phases of transportation projects for funding under the Federal Transit Act and Title 23 of the CFR, including federally funded projects.

Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743 into law, which changed the way transportation impact analysis is conducted under CEQA. These changes include the elimination of auto delay, LOS, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts under CEQA. Previously, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, as measured by LOS. Under SB 743, the Legislature directed that the focus of transportation analysis shift from driver delay to the reduction of GHG emissions, the creation of multimodal networks, and the promotion of a mix of land uses. SB 743 required OPR to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts for transit-oriented infill projects, and authorized OPR to recommend such an alternative for the analysis of transportation-related impacts associated with all land use projects under CEQA.

In response to the directive, OPR elected to utilize VMT as the metric upon which a project's transportation-related impacts would be assessed under CEQA. VMT is defined as a measurement of miles traveled by vehicles within a specified region for a specified period and is a measure of network use or efficiency. Since the OPR determination to utilize VMT as the metric going forward, the state has approved CEQA Guidelines Section 15064.3, which implements that change. To assist CEQA practitioners in complying with the new requirements, OPR also issued the Technical Advisory, which provides recommendations for conducting VMT analysis in compliance with the new Guidelines. The City has not yet adopted transportation guidelines for VMT analyses. Therefore, the Project-specific VMT assessment was prepared in compliance with the methodology recommended in the OPR Technical Advisory.

4.15.2.3 Local Regulations

Los Angeles County Metropolitan Transportation Authority

LA Metro is responsible for implementing an efficient and effective transportation system for the County of Los Angeles within a service area of 1,433 square miles. As the Congestion Management Agency for the County, LA Metro is responsible for implementing the Congestion Management Program (CMP).

Pursuant to Proposition 111, every county in California is required to develop a CMP that examines the relationships between land use, transportation, and air quality. The CMP addresses the impact of local growth on the regional transportation system. Proposition 111 also established a nine percent per gallon gas tax, staged over a five-year period, for the purpose of funding transportation-related improvements statewide. To be eligible for Proposition 111 revenues, the CMP legislation (originally AB 471, amended by AB 1791) requires that a CMP be developed, adopted, and updated biennially for every county that includes an urbanized area and shall include every city and the county government within that county. The CMP includes highway and roadway system monitoring, multimodal system performance analysis, transportation demand management, land use analysis, and local conformance. The CMP is consistent with the SCAG 2024 RTP/SCS and requires review of significant individual projects which could have an impact on the CMP transportation system.

Azusa Municipal Code

In accordance with Azusa Municipal Code Chapter 62, *Streets, Sidewalks, and Other Public Places*, work within a street or public right-of-way requires the issuance of a permit from the City Engineer. As part of these permit requirements, Azusa Municipal Code Section 62-50 requires that during work within the

right-of-way, warning devices are placed to warn vehicular traffic and pedestrians of the work under construction. For work within the City, the nature and placement of the warning devices shall meet or exceed the requirements for the type of work as set forth in the latest edition of Work Area Traffic Control Handbook published by the Southern California Chapter of the American Public Works Association. Work within a state highway would require warning devices to be placed in accordance with the Caltrans Traffic Manual.

Azusa General Plan

Chapter 3, *The Built Environment,* of the Azusa General Plan includes the Mobility section, which discusses goals and policies related to the existing transportation system within the City. The Mobility section goals, policies, and implementation programs related to transportation facilities are as follows:

Goal 1. Balance the roadway with the planned land uses in the City.

Policy 1.2. Maintain Level of Service D on roadway segments and at signalized intersections throughout the City, except in the downtown area, the University District, and in the vicinity of freeway interchanges where Level of Service E shall be maintained in these areas.

Policy 1.3. Require the cost of improvements to the existing circulation system and new circulation system necessitated by new development to be borne by that development that gains benefit.

Goal 2. Fully develop the street system to allow access to all areas of the City. Complete missing links in the City's street system.

Policy 2.5. Improve the operational efficiency of the roadway system, with implementation of traffic management measures, to minimize delay and congestion but without adversely impacting transit vehicles, bicyclists, and pedestrians.

Goal 3. Provide a connected, balanced, and integrated transportation system that enables Azusans to walk, bike, and take transit rather than using their car.

Policy 3.1. Develop and maintain a citywide pedestrian network of both on-street and off-street walkways. Network shall link new neighborhoods with existing neighborhoods, connect neighborhood centers, schools, parks, commercial centers, and citywide destinations such as Downtown, the San Gabriel River, and Civic Center.

Policy 3.3. Provide pedestrian amenities (such as benches, seats, water fountains, shady street trees, etc.) and conditions that enhance the pedestrian experience along the pedestrian network.

Policy 3.4. Develop and maintain a citywide bicycle network of both on-street bike lanes and off-street bike paths in accordance with the Bicycle Routes. The network provides for off-street paths along the San Gabriel River, railroad rights-of-way, alongside flood control channels, and within existing and new neighborhoods, where feasible. The network improves connections between residential neighborhoods, schools, and commercial centers, as well as providing connections to citywide destinations such as Downtown, the University District, the San Gabriel River, and Civic Center.

Goal 4. Design/redesign streets to encourage pedestrians and bicycles and to accommodate vehicles. Make city streets more pedestrian-friendly and bicycle-friendly.

Policy 4.3. Provide sidewalks on all city streets, as appropriate (see Mobility Policy 3.1).

Policy 4.4. Provide bicycle lanes where possible on city streets

Goal 8. Encourage walking, biking, and the use of transit through a variety of land use development and urban design measures.

Policy 8.1. Plan for an adequate amount, not an oversupply, of parking for autos, carpool vans, and bicycles for each land use.

Policy 8.2. Allow and encourage shared-use parking in order to gain the maximum efficiency from the parking supply and to minimize the overall amount of parking provided in the City.

Azusa Walks: City of Azusa Pedestrian Master Plan

Azusa Walks is the City's 2022 Pedestrian Master Plan that prioritizes and guides investments to create a safer and more walkable Azusa. The Plan goals are to (1) Transform Azusa into a more livable community, (2) Educate the community on the benefits of a walkable community, (3) Address mobility as population and congestion grows, (4) Increase pedestrian access to key destinations, and (5) Create more walkable communities alongside new transit and economic development investments.

The Pedestrian Master Plan identifies the intersection of San Gabriel Avenue and Foothill Boulevard as a priority intersection for pedestrian improvements, and portions of San Gabriel Avenue, Azusa Avenue, and Foothill Boulevard within the TIS study area as priority roadway segments for pedestrian improvements. Priority intersections and segments represent locations and corridors that, if improved, would have the greatest impact towards equity, safety, connectivity, and access factors. Specifically, at the San Gabriel Avenue and Foothill Boulevard intersection, high visibility crosswalks are recommended for each leg as well as curb extensions into San Gabriel Avenue (e.g., bulb-outs) on each corner. Other recommendations in the Pedestrian Master Plan include providing high visibility crosswalks and installing missing curb ramps at Vernon Avenue and Foothill Boulevard, and high visibility crosswalks and leading pedestrian intervals across all legs of Azusa Avenue and Foothill Boulevard.

4.15.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential transportation impacts are based on Appendix G of the CEQA Guidelines. A significant impact to transportation could occur if implementation of the proposed 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.

According to PRC Section 21099(b)(2), following certification of CEQA Guidelines Section 15064.3, which occurred in December 2018, "automobile delay, as described solely by [LOS] or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to" CEQA. Rather, and as provided in CEQA Guidelines Section 15064.3, VMT is now considered the most appropriate measure of transportation impacts. As such, the City utilizes VMT as the metric for determining environmental impacts. The City has not yet adopted transportation assessment guidelines for VMT analyses; therefore, the VMT assessment has been prepared in compliance with the methodology recommended by the OPR in the Technical Advisory.

As advised in the Technical Advisory, a reasonable threshold of significance would be a VMT per capita or VMT per employee that is 15 percent below the VMT of existing development. As such, a project exceeding a level of 15 percent below (i.e., 0 percent to less than 15 percent below) existing VMT per capita may indicate a significant transportation impact. The City's 2023 baseline VMT utilizes the 2016 SCAG RTP/SCS, which defines the residential baseline VMT as 18.0, the industrial baseline VMT as 19.64, and the commercial baseline VMT as 19.64. Therefore, a potentially significant impact to transportation would occur as a result of the Project if the residential site exceeds 15.3 VMT per capita, the industrial site exceeds 16.7 VMT per employee, or the golf course site exceeds 16.7 VMT per employee.

While LOS is not the appropriate metric for evaluating transportation impacts under CEQA, the Azusa General Plan includes a policy to maintain intersections with LOS D or better; therefore, the evaluation of consistency with circulation policies presented in Section 4.15.5.1, below, considers whether the Project would generate trips that would cause study intersections to operate at LOS E or F.

4.15.4 Methodology and Assumptions

The Project-specific TIS prepared by LLG (refer to Appendix R) includes an analysis of the proposed Project's existing transportation network context, existing traffic volumes, a forecast of cumulative baseline conditions, a forecast of Project-generated traffic, an assessment of potential Project-related transportation impacts, and recommendations for transportation network improvement measures. The Project's VMT impacts were forecast using the San Gabriel Valley Council of Governments (SGVCOG) VMT Evaluation Tool.

City requirements related to a proposed project's effect on local transportation infrastructure have also been met through preparation of the TIS, which studied 10 City-owned study intersections and 4 freeway ramp intersections under the jurisdiction of Caltrans. Additional detail regarding the circulation analysis can be found in Appendix R.

4.15.5 Impact Analysis

4.15.5.1 Circulation Programs, Plans, Ordinances, and Policies

Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Roadway Facilities

The generation of vehicular traffic during construction could result in temporary vehicle delays; however, such delays would be brief and infrequent and are not anticipated to substantially alter traffic

circulation in the Project vicinity. Staging for Project construction would occur within the Project site and is not expected to impede vehicle circulation in the area. Temporary changes to the circulation system would occur during some phases of Project construction as connections to utilities in adjacent roadways and pedestrian improvements are constructed. Specifically, the Project would involve construction within public rights-of-way to install new public sidewalks, curbs, and gutters along the Project site frontage on North Todd Avenue and West 10th Street; replace a water main in North Todd Avenue and West 10th Street; and construct connections to existing utility infrastructure for water, sewer, electricity, natural gas, stormwater, and telecommunications in Sierra Madre Avenue, North Todd Avenue, and West 10th Street. These improvements would result in temporary lane closures within the Project area. Work within rights-of-way requiring temporary transportation facility alterations or closures would be subject to the City's Traffic Control Plan Requirements as well as the requirements outlined in the Work Area Traffic Control Handbook pursuant to Azusa Municipal Code Section 62-50. Temporary traffic control measures included in the Traffic Control Plan would be required on construction document specifications, including placing temporary signage and advanced detour notifications, providing for safe pedestrian and bicycle passage or detour, and protecting existing site improvements that are planned to remain in place. Therefore, construction of the Project would not conflict with policies related to circulation on roadways surrounding the Project site.

While impacts related to LOS are not considered significant impacts under CEQA, in accordance with City policies and General Plan Mobility Policy 1.2, the TIS considered the effects of Project-generated trips and trip generation from nearby projects on the existing circulation system. General Plan Mobility Policy 1.2 states LOS D shall be maintained on roadway segments and at signalized intersections throughout the City, except in the downtown area, the University District, and in the vicinity of freeway interchanges where LOS E shall be maintained. All intersections studied in the TIS would operate at LOS D or better during the AM and PM peak hours with construction of the Project. Therefore, the Project would not generate substantial delays, and the Project would not conflict with planned circulation operations or General Plan policies related to roadway LOS.

Pedestrian, Bicycle, and Transit Facilities

As described above, construction of the Project would require work within the public rights of way of Sierra Madre Avenue, North Todd Avenue, and West 10th Street. These improvements would result in temporary lane closures within the Project area that could also alter pedestrian and bicycle routes along these roadways. However, work within rights-of-way would be subject to the City's Traffic Control Plan Requirements and temporary traffic control measures, including providing for safe pedestrian and bicycle passage or detour, would be implemented. Therefore, the construction of the Project would not conflict with pedestrian or bicycle facility use. As there are no transit routes along these Project frontages, no conflict with public transit would occur during Project construction.

The Project would provide sidewalks, curbs, and gutters along internal Project roadways in order to accommodate pedestrian access to the planned residential units and site amenities. The internal sidewalks within the residential site would connect to the public sidewalks provided along Sierra Madre Avenue adjacent to the Project site. In addition, the Project would construct new sidewalks, curbs, and gutters along the Project frontage on North Todd Avenue and West 10th Street where there are existing gaps in the pedestrian circulation system. The proposed pedestrian improvements would be constructed with ADA-compliant curb ramps and high-contrast tactile warning strips (i.e., yellow truncated dome pads). The Project site is not adjacent to any of the priority intersections or priority roadway segments in the Pedestrian Master Plan. As such, the Project would not preclude the City from installing the

recommended pedestrian infrastructure improvements. Thus, the Project would be consistent with the goals and policies of the Pedestrian Master Plan and the Azusa General Plan Mobility Element as they relate to pedestrian facilities.

The Azusa General Plan Mobility section identifies planned Class II bike lanes along the Project site's frontage with Sierra Madre Avenue. The Project would not construct permanent improvements within the Sierra Madre Avenue right-of-way that would preclude installation of this facility. There are also no existing or planned public transit facilities adjacent to the Project site; therefore, the Project would not conflict with public transit facilities in the City.

Level of Significance Prior to Mitigation

Implementation of the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.15.5.2 Vehicle Miles Traveled

Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The VMT assessment prepared for the Project was conducted in accordance with the OPR Technical Advisory. The Technical Advisory outlines various screening criteria which may be applied to screen proposed projects out of detailed VMT analysis. The proposed Project does not meet the small project screening criterion (projects which would generate less than 110 daily vehicle trips), as the Project would generate 2,823 ADT. The Project site is not within a low VMT area and would, therefore, fail to meet the low VMT screening criterion. Lastly, the Project would not screen out via the Transit Priority Area screening criterion, as the Project site is not within 0.5 mile of a major transit stop or along an existing high-quality transit corridor. Therefore, the TIS included a detailed VMT analysis.

The Technical Advisory recommends that residential projects be evaluated based on home-based VMT and that office projects be evaluated based on home-based work trip VMT. It further recommends that for projects with more than one land-use type, each component can be analyzed separately and evaluated against the applicable significance thresholds. Therefore, the residential site was analyzed using the recommended methodology and thresholds for residential projects, while the industrial site was analyzed using the recommended methodology and thresholds for office projects. The proposed re-opening of the golf course site is expected to result in shorter trips by golf course patrons in the region, as they will no longer be required to drive to other golf courses in the region; therefore, a quantitative analysis of VMT for golf course patrons was not conducted. However, the golf course clubhouse component was analyzed quantitatively for employee VMT using the methodology for commercial land uses.

As described in Section 4.15.3 above, a potentially significant impact related to VMT would occur if the Project exceeds VMT per capita/employee of 15 percent below the regional baseline. This would occur if the residential site exceeds 15.3 VMT per capita, the industrial site exceeds 16.7 VMT per employee, or the golf course site exceeds 16.7 VMT per employee. Based on the SGVCOG VMT Evaluation Tool, the TIS concluded that the residential site would generate 18.0 VMT per capita, the industrial site would generate 21.7 VMT per employee, and the golf course clubhouse would generate 21.7 VMT per employee. Therefore, the Project's VMT would exceed the applicable thresholds for both residents and employees.

Level of Significance Prior to Mitigation

Implementation of the Project could exceed VMT thresholds and conflict with CEQA Guidelines Section 15064.3, subdivision (b); therefore, impacts would be potentially significant.

Mitigation Measures

TR-1 **Pedestrian Crossing Repairs**. Prior to issuance of a certificate of occupancy for use of residential buildings, industrial buildings, or the renovated golf course clubhouse within the Project site, the Project applicant shall provide a financial contribution to the City of Azusa to repair the push-button activated flashing lights at the pedestrian crossing located across Sierra Madre Avenue at the intersection of Vernon Avenue/Sierra Madre Avenue.

TR-2 **Bicycle Parking Facilities.** The proposed Project shall ensure that secure, well-lit, long-term bicycle parking be provided for use by employees at each of the six industrial buildings and the golf course clubhouse.

TR-3 **Commute Trip Reduction Marketing and Education**. The City shall confirm that future tenants of the industrial buildings, as well as the operator of the golf course, provide information to employees regarding available travel options to and from the Project site in a clear and easily accessible location (e.g., a bulletin board in a common employee area and/or employee welcome package with travel information), including information on where transit passes may be purchased online or in person. The industrial tenants and golf course operator shall designate an employee transportation coordinator or Human Resources representative, or engage a third party who will provide information and/or administer a guaranteed ride-home service. Such services may consist of providing free or subsidized rides upon request via taxis or other transportation network companies such as Uber or Lyft for employees who utilize alternate travel modes.

TR-4 **Ride-Sharing Program**. Each of the future industrial building tenants, as well as the golf course operator, shall provide designated parking spaces for carpool vehicles in a convenient or preferential location, and a designated waiting area for employees participating in ride-sharing, which is comfortable and convenient. The industrial tenants and golf course operator shall facilitate the process of arranging ride-sharing or carpooling matches, either through a website/app or via an employee transportation coordinator or Human Resources representative, as described in mitigation measure TR-3. The ride-sharing programs shall be offered to all employees of the industrial buildings and the golf course.

Level of Significance After Mitigation

The SGVCOG VMT Evaluation Tool estimates the effectiveness of potential VMT reduction strategies based on research documented in CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* report (CAPCOA 2010). The SGVCOG VMT Estimation Tool utilizes the methodology provided by CAPCOA, which includes the application of caps or VMT reduction maximums based on a project's locational context or place type. Given the Project's location in a suburban setting, the maximum potential VMT reduction that could be applied in the SGVCOG VMT Evaluation Tool is capped at 20 percent. However, this VMT reduction cap of 20 percent does not mean that there are measures provided in the CAPCOA report that could feasibly reduce each project's VMT by 20 percent. Rather, this is a theoretical maximum established to avoid overestimating VMT reductions in a locational context that may not support low-VMT development at large.

Mitigation measure TR-1 contributes to the pedestrian infrastructure in the area surrounding the residential site, thereby reducing VMT. However, VMT reductions applied as a result of Project characteristics, including land use density, residential affordability or unit diversity, and pedestrian infrastructure improvements, are considered part of the proposed Project in the SGVCOG VMT Evaluation Tool and are not calculated as reductions in VMT. Therefore, with consideration of project design and mitigation measure TR-1, the Project's VMT per resident would remain at 18.0, above the threshold of 15.3 VMT per capita. There are no other measures from the CAPCOA report that would reduce residential site VMT, as transportation demand management programs, including school pools, City-wide bike or car sharing, or employer-sponsored commute reduction programs, do not apply to the proposed Project type or location. These are further detailed in Table 4.15-1, *VMT Reduction Measure Feasibility*. As there are no feasible mitigation measures to reduce this impact below a level of significance, a significant and unavoidable residential VMT impact would occur.

The combination of project design features and mitigation measures TR-1 through TR-4 would result in Project VMT of 20.6 VMT per employee for the industrial site and golf course clubhouse, which exceeds the threshold of 16.7 VMT per employee. It should be noted that even if the maximum VMT reduction of 20 percent were able to be achieved via transportation demand management programs, employee VMT could not be reduced below the applicable significance threshold. Nevertheless, feasible mitigation measures are applied to the Project to achieve VMT reductions. Other potential VMT reduction measures that can be applied in the SGVCOG VMT Evaluation Tool, such as parking cash-out, transit subsidies, telecommuting schedules, and transit service expansion, were determined to be infeasible for the Project location or proposed industrial land use. The specific reasoning that each SCVCOG VMT reduction measure is or is not applicable in the Project context is provided in Table 4.15-1. There are no feasible mitigation measures to reduce this impact below a level of significance, and a significant and unavoidable employee VMT impact for the industrial and golf course land uses would occur.

Table 4.15-1
VMT REDUCTION MEASURE FEASIBILITY

VMT Reduction Measure	Project Feasibility Statement
Tier 1: Project Characteristics	
PC 01 Increase Residential Density – This measure provides a foundation for implementing other measures that would benefit from increased densities.	**Consistent.** The Project would result in the construction of new residential dwelling units where none currently exist, resulting in greater residential density. This strategy is a feature of the Project and does not require action by the Project applicant.

VMT Reduction Measure	Project Feasibility Statement
PC 02 Increase Development Diversity – This strategy implements different types of land uses near one another to can decrease VMT since trips between land use types are shorter and may be accommodated by non-auto modes of transport.	**Consistent.** The proposed Project would provide a mix of land use types and residential dwelling types resulting in greater land use diversity. This strategy is a feature of the Project and does not require action by the Project applicant or future Project tenants.
PC 03 Affordable Housing – This strategy encourages building a greater percentage of affordable and below market rate housing.	**Consistent.** The proposed Project would offer a minimum of 15 percent of the senior living dwelling units at affordable rates. This is a feature of the Project.
PC 04 Increase Employment Density – This strategy encourages higher employment density to decrease the distances people commute and provide greater options for the modes of travel they choose.	**Consistent.** The proposed Project would result in the construction of new industrial space where no commercial development currently exists, resulting in greater employment density. This strategy is a feature of the Project and does not require action by the Project applicant or future Project tenants.
Tier 2: Multimodal Infrastructure	
MI 01 Increase Bike Access – This strategy requires the project developer to provide funding for or construct bicycle facilities that close gaps in the bicycle network and/or lower the level of traffic stress on the existing bicycle network.	**Not Applicable.** As described further in Section 4.15.1.5, there are limited separated bicycle facilities near the Project site. Access to the Class I bike path connecter from the intersection of North Todd Avenue and Sierra Madre Avenue would remain but the provision of bicycle facilities near the Project would not measurably address existing gaps in the network.
MI 02 Improve Connectivity – This strategy encourages the building of a new street connection and/or connecting cul-de-sacs to provide pedestrian and bicycle access enhances walkability, connectivity, and street accessibility within a neighborhood.	**Not Applicable.** VMT reductions related to this strategy are based on increased intersection density. The Project would provide internal connectivity for vehicles, bicycles, and pedestrians but would not substantially increase intersection density in a neighborhood.
MI 03 Increase Transit Availability – This strategy encourages changing the distance between a project site and the nearest transit station or stop with high-quality service.	**Not Applicable.** There are no transit stops along the Project frontage with North Todd Avenue or Sierra Madre Avenue, and the Project applicant cannot decrease the distance between the Project site and the nearest transit stop at the intersection of San Gabriel Avenue and Sierra Madre Avenue.
MI 04 Traffic Calming – This strategy requires the project design to include pedestrian/bicycle safety and traffic calming measures both on-site and in the surrounding neighborhood such that people are encouraged to walk or bike instead of driving.	**Not Applicable.** Traffic calming is intended to slow vehicles speeds; therefore, it is generally not appropriate on roadways designated as arterials, such as North Todd Avenue and Sierra Madre Avenue which have posted speed limits of 40 mph. These roadways are also designated as truck routes and typical traffic calming features (e.g., speed humps, traffic circles, chicanes, etc.) would be incompatible with this designation. Therefore, traffic calming features are not appropriate in the Project locational context.

VMT Reduction Measure	Project Feasibility Statement
MI 05 Pedestrian Networks – This strategy requires the project design to include pedestrian improvements both on-site and in the surrounding neighborhood.	**Applicable.** This strategy was determined to be applicable to the Project. As part of the Project, public sidewalks would be constructed where none are currently provided on North Todd Avenue and West 10th Street adjacent to the industrial site, thus reducing existing gaps in the pedestrian network. As specified in mitigation measure TR-1, the Project shall also provide a financial contribution to the City to repair the push-button activated flashing lights at the Vernon Avenue/Sierra Madre Avenue pedestrian crossing.
Tier 3: Parking	
PK 01 Limit Parking Supply – This strategy would require the development to decrease parking supply at the project site to rates lower than those documented in the Institute of Transportation Engineers Parking Generation manual or to those documented by the municipal code.	**Not Applicable.** This measure only applies if street parking is not free or unrestricted during typical working hours. As free, unmetered street parking is provided along Sierra Madre Avenue and West 10th Street, this strategy would not apply to the proposed Project.
PK 02 Provide Bike Facilities – This strategy requires the project developer to provide and maintain facilities for bicycle users at the project site.	**Applicable.** This strategy was determined to be applicable to the Project. As specified in mitigation measure TR-2, the proposed Project shall ensure that secure, well-lit, long-term bicycle parking is provided for use by employees at each of the six industrial buildings and the golf course clubhouse.
Tier 4: Transportation Demand Management Programs	
TP 01 School Pool Programs – The strategy would require the organization of a program that matches families in carpools for school pick-up and drop-off.	**Not Applicable.** This strategy applies to residential development. As an age-restricted residential development, no school-age children would reside at the proposed residential site who could utilize a school pool program.
TP 02 Bike Sharing Programs – This strategy requires the project developer to dedicate space for or provide subsidies to a bike sharing system, ideally one with high penetration in a larger area.	**Not Applicable.** There is no existing bike sharing program in the City for which the Project could dedicate space within the site.
TP 03 Car Sharing Programs – This strategy requires the project to provide subsidies and promotions, as well as dedicated parking spaces, for car sharing services such as ZipCar, Car2Go, and/or GetAround.	**Not Applicable.** There is no existing car sharing service in the City and the addition of shared cars within the Project without a reliable network of car sharing services would not effectively reduce regional VMT.
TP 04 Commute Trip Reduction Marketing and Education – This strategy requires implementing a marketing campaign, targeting all project employees and visitors, that encourages the use of transit, shared rides, and active modes and thereby reducing VMT.	**Applicable.** This strategy was determined to be applicable to the Project and the applicable marketing and education requirements are specified in mitigation measure TR-3.

VMT Reduction Measure	Project Feasibility Statement
TP 05 Implement Commute Trip Reduction Program – This strategy requires providing a comprehensive program to reduce the number of drive-alone commute trips to the project and to actively monitor and react to changes in mode share.	**Not Applicable.** This is a grouped strategy of which some components (TP 08, TP 17) are not applicable to the Project as discussed below. This strategy also overlaps with strategies PK 02 (Provide Bike Facilities) and TP 04 (Commute Trip Reduction Marketing and Education), which would be implemented by the Project as specified in mitigation measures TR-2 and TR-3. As portions of this measure are infeasible and overlapping measures are not permitted in the SGVCOG VMT Evaluation Tool, this strategy cannot be applied to the Project.
TP 06 Employee Parking Cash-Out – This strategy requires project employers to offer employee parking "cash-out," which gives employees the choice to forgo subsidized/free parking for a cash payment equivalent to the cost that the employer would otherwise pay for the parking space.	**Not Applicable.** The strategy is less effective in suburban and low transit neighborhood place types than in urban and high transit neighborhood place types. In addition, free, unmetered street parking is provided near the Project site. Therefore, free public parking would be available to employees and this strategy would not be effective in the Project context.
TP 07 Subsidized Transit Program – This strategy requires project employers or building operators to provide either partially or fully subsidized transit passes for all project affiliates (employees and/or residents).	**Not Applicable.** As public transit facilities do not exist within close proximity to the Project site, the provision of transit passes to future employees of the Project would not be effective in reducing VMT.
TP 08 Telecommuting and Alternative Work Schedules – This strategy requires project employers to allow and encourage employees to telecommute from home when possible, or to shift work schedules such that travel occurs outside of peak congestion periods.	**Not Applicable.** Currently, the future tenants of the industrial site are not known, and telecommuting and/or alternative work schedules may not be feasible for some employment sectors. Therefore, this strategy is infeasible and not applicable to the proposed Project.
TP 09 Free Door-to-Door Transit Fleet – This strategy requires project employers to provide direct shuttle service to the project site from areas with high concentrations of employees.	**Not Applicable.** The Project is not located in a major employment center and would not recruit employees from a single high-concentration location; therefore, provision of a transit fleet is not justified. This strategy also overlaps with strategy TP 13 (Ride-Sharing Programs), which would be implemented by the Project as specified in mitigation measure TR-4. As overlapping measures are not permitted in the SGVCOG VMT Evaluation Tool, this strategy cannot be applied to the Project.
TP 10 Price Workplace Parking – This strategy would require commuters to pay for parking on-site which would provide a disincentive to driving and would encourage commuters to use other modes.	**Not Applicable.** Free, unmetered street parking is provided along the proposed Project frontage on Sierra Madre Avenue. Therefore, it would not be effective to require commuters to pay for parking on-site, and this strategy would not apply to the Project.

VMT Reduction Measure	Project Feasibility Statement
TP 11 Alternative Transportation Benefits – This strategy requires the project employers to provide general commute benefits to employees, which may include financial subsidies or pre-tax deductions for transit, carpooling, and vanpooling activities.	**Not Applicable.** As public transit facilities do not exist within close proximity of the Project site, providing alternative transportation benefits to future employees of the Project would not be effective in reducing VMT.
TP 12 Neighborhood Schools – This strategy requires the project to contribute to the development of a neighborhood school that would serve families living in the development.	**Not Applicable.** As an age-restricted residential development, no families with school-age children would reside at the proposed residential site who would utilize a neighborhood school.
TP 13 Ride-Sharing Programs – This strategy would require project employers or building operators to organize a carpool matching program for individuals who have similar commute patterns.	**Applicable.** This strategy was determined to be applicable to the Project and requirements for an employee ride-sharing program are specified in mitigation measure TR-4.
TP 14 Transit Service Expansion – This strategy requires the project developer to subsidize transit service through fees and other contributions to the transit provider, thereby improving transit service to the project.	**Not Applicable.** There are no known, planned public transit routes or facilities along the Project frontages to which contributions of the Project applicant would provide expanded transit service.
TP 15 Behavioral Intervention – This strategy requires a project to provide intensive one-on-one counseling and encouragement, along with subsidies, to encourage individuals to use non-drive alone modes.	**Not Applicable.** This strategy overlaps with strategy TP 04 (Commute Trip Reduction Marketing and Education), which achieves the intent of this strategy and would be implemented by the Project as specified in mitigation measure TR-3. As overlapping measures are not permitted in the SGVCOG VMT Evaluation Tool, this strategy cannot be applied to the Project.
TP 16 Unbundle Parking Costs from Property Cost (On Site Parking) – This strategy applies to residential development and requires project developers or building operators to unbundle the cost of parking spaces from the price of the property. Residents must rent or purchase parking spaces separately from their residential units.	**Not Applicable.** For a project to be eligible for this strategy, surrounding streets must have parking restrictions in place, such as metered parking, time limits restricting overnight parking, and residential parking permits for which project residents are not eligible. As free, unmetered street parking is provided along the proposed residential site frontage with Sierra Madre Avenue, this strategy would not apply to the Project.
TP 17 Vanpool Incentives – This strategy requires project employers or building operators to provide subsidies for individuals forming new vanpools for their commute.	**Not Applicable.** The project site is not within a major employment center where a dedicated vanpool is anticipated to be supported. This strategy also overlaps with strategy TP 13 (Ride-Sharing Programs), which is more appropriate for the Project context and would be implemented by the Project as specified in mitigation measure TR-4. As overlapping measures are not permitted in the SGVCOG VMT Evaluation Tool, this strategy cannot be applied to the Project.

VMT Reduction Measure	Project Feasibility Statement
TP 18 Voluntary Travel Behavior Change Program – This strategy requires project employers or building operators to administer a program that targets individual attitudes and behaviors towards travel and provides tools for individuals to analyze and alter their travel behavior.	**Not Applicable.** This strategy overlaps with strategy TP 04 (Commute Trip Reduction Marketing and Education), which achieves the intent of this strategy and would be implemented by the Project as specified in mitigation measure TR-3. As overlapping measures are not permitted in the SGVCOG VMT Evaluation Tool, this strategy cannot be applied to the Project.

Source: Fehr & Peers 2020

4.15.5.3 Hazardous Design Features

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)?

Driveways and Intersections

As described in Section 4.15.5.1, construction of the Project would require temporary lane closures along the Project frontages to provide utility connections and pedestrian improvements. The work within rights-of-way would be subject to City approval of a Traffic Control Plan and traffic control permit pursuant to Azusa Municipal Code Section 62-50, which would ensure construction document specifications include measures for appropriate signing, flagging, and directing of traffic. The implementation of these measures would ensure construction activities occurring in a roadway do not result in hazards to users of the circulation system.

Access to the residential site would be provided via two driveways located on Sierra Madre Avenue west of Vernon Avenue. The easterly residential site driveway would accommodate left- and right-turning inbound and outbound vehicles and was determined to provide adequate sight distance for drivers performing either turning movement given ongoing maintenance of surrounding landscape areas. However, the westerly Project driveway along Sierra Madre Avenue is located approximately 40 to 50 feet east of an existing median break and westbound left-turn pocket. To discourage exiting vehicles from attempting to access the provided left turn pocket to conduct a U-turn maneuver at the median break, this intersection would be restricted to right-turning movements enforced through signs, on-site pavement markings, and/or physical measures such as bollards or channelizing islands. All internal roadways within the residential site would be constructed in accordance with applicable City roadway standards.

Access to the industrial site would be provided via four driveways along North Todd Avenue and four driveways along West 10th Street. The southernmost driveway along North Todd Avenue would be restricted to right-turning inbound and outbound movements only enforced through signs, on-site pavement markings, and/or physical measures such as bollards or channelizing islands. All other industrial site driveways would accommodate left- and right-turning inbound and outbound vehicles.

The Project would not modify the existing driveway providing access to the golf course site located at the Vernon Avenue/Sierra Madre Avenue intersection. However, a signal warrant analysis was completed for this unsignalized intersection as well as the unsignalized North Todd Avenue/Sierra Madre Avenue intersection. These intersections did not meet the warrant criteria for signalization based on peak-hour traffic volumes (including the addition of Project-generated trips) or the history of

collisions. Therefore, these intersections would continue to safely operation with implementation of the Project.

In addition, all Project site access points and on-site circulation elements have been designed in accordance with applicable City standards related to roadway safety and design. With the incorporation of the turning restrictions recommended in the TIS and described in Section 3.0, *Project Description*, the Project would not increase hazards due to hazardous design features or incompatible uses at proposed driveways or intersections.

Rail Crossing

A comment on the NOP submitted by LA Metro requested an analysis of impacts at the at-grade rail crossing south of the North Todd Avenue/West 10th Street intersection. This rail line terminates near the intersection of North Angeleno Avenue/West Crescent Drive, approximately 0.85 mile to the east of the North Todd Avenue/West 10th Street intersection near the Project site. The crossing is equipped with flashing light signals and automatic gate arms on both approaches to the crossing. Therefore, vehicular traffic generated by the Project would be able to safely use this crossing while traveling on North Todd Avenue. As it relates to pedestrians, the Project plans to redevelop the industrial site (nearest area to the rail crossing) with industrial uses, which are not expected to generate significant pedestrian trip activity. The proposed residential site is located approximately 0.6 mile (via walking path along Sierra Madre Avenue and North Todd Avenue) from the existing rail crossing, and approximately 1.0 mile from the Foothill Boulevard commercial and industrial corridor. Due to the distance from the residential site and lack of pedestrian-scale retail and restaurant opportunities along this corridor, very few senior residents are expected to utilize the rail crossing. Therefore, development of the Project is not expected to substantially increase hazards at the existing rail crossing for Project occupants.

Golf Cart Crossings

Construction of the Project would require temporary lane closures along Sierra Madre Avenue, where existing crossings provide for pedestrian and golf cart passage. As described above, work within rights-of-way is subject to City approval of a Traffic Control Plan and traffic control permit pursuant to Azusa Municipal Code Section 62-50. In accordance with the Traffic Control Plan, measures to facilitate safe crossing of pedestrians and golf carts would be implemented. Temporary detours or movement of crossings from their existing location could occur but would not result in incompatible uses, given these routes would be marked and planned in accordance with the traffic control permit. Therefore, construction of the Project would not result in hazards at existing Sierra Madre Avenue crossings.

Operation of the golf course site would reintroduce the use of two existing golf cart crossings across Sierra Madre Avenue, one approximately 250 feet west of the Lori Ann Avenue-Point O Woods Drive/Sierra Madre Avenue intersection and the second approximately 85 feet west of the Sunset Avenue/Sierra Madre Avenue intersection. The Project would provide safety improvements at these existing crossings, including the addition of pedestrian crossing ahead signs, yield signs and roadway lines ahead of the crossings, and pedestrian crossing signs with rectangular rapid flashing beacons at the crossings. With the addition of these safety features as described in Section 3.0, *Project Description*, the use of the golf course site would not be incompatible with existing circulation features.

Level of Significance Prior to Mitigation

Implementation of the Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.15.5.4 Emergency Access

Would the Project result in inadequate emergency access?

During construction of the Project, roadway users, including emergency vehicles, may experience temporary delays on roadways surrounding the Project site as a result of deliveries and the hauling of construction materials. However, such delays would be infrequent, brief, and temporary. Construction staging would occur within the boundaries of the Project site. Temporary lane closures along Sierra Madre Avenue, North Todd Avenue, and West 10th Street necessary to construct the proposed sidewalk alterations and utility connections would be subject to City approval of a Traffic Control Plan and traffic control permit to maintain roadway safety and accessibility for emergency vehicles. Therefore, emergency access, while potentially altered at times, would remain available throughout the Project construction period.

The industrial site would include four access driveways along North Todd Avenue and four access driveways along West 10th Street, as well as 28-foot-wide fire lanes throughout the site. The residential site would include two main entrance driveways at the southern end and a 26-foot-wide drive aisle along the eastern residential site boundary and eventually along the northern site boundary, providing access to each of the proposed buildings. In addition, the golf course clubhouse, parking lot, and driving range would be accessible from an existing entrance driveway along Sierra Madre Avenue. On-site circulation would provide adequate emergency access and accommodate emergency vehicles consistent with the City standards for emergency access. Therefore, the Project would provide adequate emergency access to the site.

Level of Significance Prior to Mitigation

Implementation of the Project would not result in inadequate emergency access, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.15.6 Cumulative Impact Analysis

The geographic scope for the cumulative transportation operations analysis includes the surrounding transportation network that was evaluated in the Project-specific TIS (LLG 2024) that is included as EIR Appendix R. The LOS analysis presented in the TIS and summarized in Section 4.15.5.1, above, includes consideration of the transportation impacts of the Project with the identified cumulative projects. As described above, the Project would not degrade the LOS of the studied intersections below LOS D. Cumulative impacts to circulation plans would be less than significant.

Regarding cumulative transportation hazards and emergency access, the Project's infrastructure improvements would be in accordance with applicable City standards, as would other cumulative projects in the area. The Project is also not adjacent to other cumulative projects such that temporary construction closures are anticipated to combine to substantially alter existing circulation patterns or emergency access. As such, cumulative transportation impacts related to traffic hazards or emergency access would be less than significant.

Project-level VMT cannot be combined with the VMT of other projects because VMT is provided as a per capita metric. In addition, VMT is a metric intended to capture trips and trip lengths at a larger scale than individual intersections located near a specific site. As such, the geographic scope for the cumulative VMT analysis includes the SCAG region, where the 2024 RTP/SCS is the applicable transportation planning document developed to meet air pollution and GHG emissions reduction goals. Typically, a project that falls below an efficiency-based threshold aligned with relevant plans (i.e., the RTP/SCS) has no cumulative impact distinct from the project impact, while a project that exceeds an applicable efficiency-based threshold and does not contribute to the implementation of the relevant plan would contribute to a significant cumulative impact. The proposed Project has been determined to have a significant and unavoidable VMT impact. Therefore, the Project is considered to have a cumulatively considerable contribution to a significant unavoidable cumulative VMT impact.

4.16 Tribal Cultural Resources

This section identifies existing tribal cultural resources within and around the Project site and assesses the significance of such resources. Mitigation measures are recommended, as necessary, to minimize impacts of the proposed Project. This section is primarily based on the Cultural Resources Survey prepared by HELIX (2025b) and information provided by local Native American tribes through the consultation process. The Cultural Resources Survey is attached to this EIR as Appendix D.

4.16.1 Existing Conditions

4.16.1.1 Terminology

PRC Section 21074(a) defines tribal cultural resources as either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the CRHR.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

PRC Section 21074 further states that a cultural landscape that meets the criteria above is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. A historical resource, unique archaeological resource, or a nonunique archaeological resource may also be a tribal cultural resource if it conforms with the criteria above.

4.16.1.2 Tribal History

Please refer to Section 4.4, *Cultural Resources*, of this EIR for further discussion regarding the existing cultural and historical setting of the Project area, including history of the Gabrielino people. As described in the Cultural Resources Survey prepared for the proposed Project (Appendix D), the Project site is located within the territory that has traditionally been occupied by the Takic-speaking Gabrielino and Fernandeño people. Other Indigenous groups in the surrounding areas include the Chumash to the north and northwest, the Tataviam/Alliklik to the north, the Serrano to the east, and the Luiseño and Juaneño to the south. The Gabrielino settlement pattern included both primary subsistence villages in use continuously, possibly by more than one kin group; and smaller, temporary, family unit, camp locations, likely based on the seasonal availability of certain resources in particular areas of their territory. Prehistorically, the distribution of village units generally correlated with available water sources such as stream courses and springs.

4.16.1.3 Tribal Cultural Resources

HELIX contacted the NAHC on September 8, 2023, for an SLF search and a list of Native American contacts for the Project area. In a response dated October 23, 2023, the NAHC indicated that at least one sacred land or tribal cultural resource was identified in the SLF for the Project vicinity. The NAHC did not provide any additional information regarding the sacred land or tribal cultural resource but recommended reaching out to the Gabrieleno Band of Mission Indians – Kizh Nation, who listed the resource. However, the Gabrieleno Band of Mission Indians – Kizh Nation prefers to provide information directly to the Lead Agency and has the opportunity to do so during government-to-government consultation.

HELIX sent outreach letters on February 16, 2024, to Native American representatives and interested parties identified by the NAHC to request information pertaining to tribal cultural resources that would be affected by the proposed Project. No responses have been received to date. If any responses are received, they will be forwarded to City staff and may be discussed during formal consultations.

4.16.2 Regulatory Setting

4.16.2.1 Federal Regulations

See Section 4.4, *Cultural Resources*, for a discussion of federal cultural resources regulations. Cultural resources listed in the NRHP may also be considered tribal cultural resources.

4.16.2.2 State Regulations

See Section 4.4, *Cultural Resources*, for a discussion of California's cultural resources regulations. Cultural resources listed in the CRHR may also be considered tribal cultural resources. PRC Section 5097.98, detailed therein, provides the specific procedure to follow in the event that human remains are determined to be of Native American origin.

Senate Bill 18

SB 18, the Traditional Tribal Cultural Places Bill of 2004, requires local governments to consult with Native American tribes during the project planning process, specifically before adopting or amending a General Plan or a Specific Plan, or when designating land as open space for the purpose of protecting Native American cultural places. The intent of this legislation is to encourage consultation and assist in the preservation of Native American places of prehistoric, archaeological, cultural, spiritual, and ceremonial importance. Through consultation required under SB 18, governments should develop appropriate and dignified treatment of identified cultural resources.

Assembly Bill 52

On September 25, 2014, Governor Brown signed AB 52 to require consultation with Native American tribes. AB 52, effective July 1, 2015, introduced tribal cultural resources as a class of cultural resources and additional considerations relating to Native American consultation into CEQA. As such, a project that would have an adverse effect on a significant tribal cultural resource would have a significant impact under CEQA. See Section 4.16.1.1 above for the definition of a tribal cultural resource provided by PRC Section 21074.

AB 52 also established a government-to-government consultation process for consultation between lead agencies and Native American tribes for projects subject to CEQA that are not subject to consultation under SB 18. Within 14 days of finalizing a decision to undertake a project, the lead agency must provide formal notification to the appropriate tribes, which then have 30 days to respond to request consultation. By requiring consideration of tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and tribal governments, public agencies, and project proponents would have information available early in the project planning process to identify and address potential adverse impacts to tribal cultural resources.

PRC Section 5020.1(k)

PRC Section 5020.1(k) provides a definition of "local register of historical resources" as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

PRC Section 5024.1

PRC Section 5024.1 establishes the CRHR and defines the criteria for listing on the CRHR. For listing in the CRHR, a historical resource must be significant at the local, state, or national level under one or more of the following four criteria:

- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Criterion 2: It is associated with the lives of persons important in our past.
- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.
- Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

4.16.2.3 Local

The City's General Plan policies related to tribal cultural resources are described in Section 4.4, *Cultural Resources*.

4.16.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential tribal cultural resources impacts are based on Appendix G of the CEQA Guidelines. A significant impact to tribal cultural resources could occur if implementation of the proposed 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, or 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 CRHR, 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 subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.16.4 Methodology and Assumptions

In addition to the records search, historic aerial photograph and map review, and pedestrian survey described in Section 4.4, *Cultural Resources*, the Cultural Resources Survey included a summary of an SLF search and Native American outreach that contributed to the assessment of potential tribal cultural resources impacts. HELIX contacted the NAHC on September 8, 2023, for an SLF search and a list of Native American contacts for the Project area. HELIX sent outreach letters on February 16, 2024, to Native American representatives and interested parties identified by the NAHC to request information pertaining to tribal cultural resources that would be affected by the proposed Project. An archaeologist and Native American monitor surveyed the Project area on November 14, 2023.

The Project requires the opportunity for Tribes to engage in formal government-to-government consultation with the City under AB 52 and SB 18. The City sent letters inviting the appropriate tribes to consult under AB 52 and SB 18 on April 11, 2024.

4.16.5 Impact Analysis

4.16.5.1 Historical Resources

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, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k)?

As described in Section 4.4, *Cultural Resources*, the Project site does not contain historic resources that are listed in or meet the criteria for listing in the CRHR or a local register. Therefore, no historical resources, including tribal cultural resources, listed or eligible for listing in the CRHR or a local register would be adversely affected by the Project.

Level of Significance Prior to Mitigation

The Project would not cause a substantial adverse change in the significance of a historical tribal cultural resource, and there would be no impact.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

There would be no impact.

4.16.5.2 Significant Tribal Cultural Resources

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, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1? In applying the criteria set forth in subdivision (c) of PRC § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Although no recorded prehistoric resources were identified in the SCCIC records search as being within or surrounding the Project site, the NAHC SLF search identified at least one tribal cultural resource listed within the Project vicinity. However, details pertaining to the listed SLF resource were not provided by the NAHC, and the NAHC noted information regarding the resource should be discussed with the Gabrieleno Band of Mission Indians – Kizh Nation as part of government-to-government consultation. The City sent letters inviting tribes to consult under AB 52 and SB 18 on April 11, 2024, and no responses were received during the 30-day response period. Therefore, no consultation with the Gabrieleno Band of Mission Indians – Kizh Nation or other tribes has occurred. Nonetheless, the identification of a tribal cultural resource by the NAHC, along with the location of the Project site in an alluvial area, where there is a potential for buried cultural resources, suggests that there is a potential for the Project to disturb tribal cultural resources.

Level of Significance Prior to Mitigation

The Project has the potential to cause a substantial adverse change in the significance of a tribal cultural resource. Impacts would be potentially significant.

Mitigation Measures

In addition to TCR-1 below, please refer to mitigation measures CUL-1 through CUL-4, provided in Section 4.4, *Cultural Resources*.

TCR-1 **Unanticipated Discovery of Tribal Cultural Resources**. If any archaeological resources are unearthed during Project demolition and construction activities, the resource shall be evaluated by the qualified archaeologist and Native American monitor approved by the Gabrieleno Band of Mission Indians – Kizh Nation. If the resources are determined to be Native American in origin, the Gabrieleno Band of Mission Indians – Kizh Nation shall coordinate with the property owner regarding the treatment and curation of the resource(s). Typically, the Native American tribe will request reburial or preservation for educational purposes. If a resource is determined by the qualified archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or as a "unique archaeological resource" pursuant to PRC Section 21083.2(g), the qualified archaeologist and Native American monitor shall coordinate with the Project applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resource(s). The treatment plan established for the resource(s) shall be in

accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Section 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) shall be considered as the preferred manner of treatment. If preservation in place is not feasible, treatment may include the implementation of archaeological data recovery excavations to remove the resource, along with subsequent laboratory processing and analysis.

Level of Significance After Mitigation

With the implementation of mitigation measures TCR-1 and CUL-1 through CUL-4, as provided in Section 4.4, *Cultural Resources*, impacts to tribal cultural resources would be less than significant.

4.16.6 Cumulative Impact Analysis

The geographic area for the analysis of cumulative impacts related to tribal cultural resources is the Los Angeles County region. Cumulative projects located in the County have the potential to result in a cumulative impact associated with the loss of tribal cultural resources through development activities that could cause a substantial adverse change in the significance of a tribal cultural resource. Cumulative projects that involve ground-disturbing activities have the potential to result in significant impacts on tribal cultural resources. These projects would be regulated by applicable federal, state, and local regulations; however, the loss of tribal cultural resources on a regional level may not be adequately mitigated through the data recovery and collection methods specified in these regulations, as their value may also lie in cultural values and religious beliefs of applicable groups. Therefore, the cumulative destruction of significant tribal cultural resources from planned construction and development projects in the region could be cumulatively significant. Additionally, past projects involving development and construction have already affected tribal cultural resources in the region.

As described above, the NAHC identified at least one tribal cultural resource documented within the Project vicinity. Additionally, there is potential for Project construction to result in significant impacts on unknown subsurface tribal cultural resources. This significant impact would be mitigated to a level of less than significant with the implementation of mitigation measures CUL-1 through CUL-4 in Section 4.4, *Cultural Resources*, as well as TCR-1 (refer to Section 4.16.5.2). Cumulative projects in the area would also have the potential to impact known and previously unknown tribal cultural resources and would be required to implement similar monitoring and resource recovery programs. Thus, while cumulative projects would have the potential to result in a significant cumulative impact to tribal cultural resources, the Project's contribution would not be considered cumulatively considerable with the implementation of mitigation measures CUL-1 through CUL-4 and TCR-1.

4.17 Utilities and Service Systems

This section describes the existing conditions and regulatory framework related to utilities and service systems within the vicinity of the proposed Project and evaluates potential impacts to utilities and service systems that could occur as a result of the implementation of the proposed Project. Some environmental issue areas addressed in this section are further examined in other areas of this EIR, including Section 4.5, *Energy*, and Section 4.9, *Hydrology and Water Quality*.

4.17.1 Existing Conditions

4.17.1.1 Water

Water Supply and Demand

The proposed Project site is serviced by ALW, a municipal utility owned and operated by the City. ALW provides water to a population of approximately 110,044 throughout its service area, or 23,000 customer accounts (ALW 2020). ALW's service area encompasses about 8,900 acres (14.2 square miles) in the San Gabriel Valley, including portions of five cities, including the City of Azusa and portions of the cities of Glendora, Covina, West Covina, and Irwindale, as well as portions of unincorporated Los Angeles County.

The total water demand for the 110,044 people served by ALW was more than 18,100 acre feet (AF) of potable water for the 2020 calendar year, which is approximately 22 percent less than the average demand in the service area between 1996 and 2005. ALW estimates that the total population served by ALW in 2045 will be 119,287, an increase of 8.4 percent.

ALW produces groundwater from 11 groundwater wells that pump water from the Main San Gabriel Basin. Well No. 9 and the Aspan well are currently inactive due to water quality issues. The City's wells range in capacity from 900 gallons per minute (gpm) to 3,000 gpm and provide 65 percent of the total ALW water supply. In 2020, total groundwater production was 11,770 AF. In addition to groundwater, ALW also diverts San Gabriel River water from either the San Gabriel Reservoir or Morris Reservoir and treats it at its Joseph F. Hsu Water Filtration Plant (Plant). The Plant has a capacity of 12 million gallons per day (MGD) and provides approximately one-third of ALW's potable water supply. ALW distributes water through a 281-mile network of distribution mains ranging from 2 to 30 inches in diameter. The water system consists of five pressure zones and two small pressure-reduced zones in order to provide service to its customers with acceptable service pressure.

ALW's imported water supply is delivered through its connection to the Upper San Gabriel Valley Municipal Water District, which receives water from the Metropolitan Water District of Southern California's Middle Feeder System. Imported water accounts for less than one percent of ALW's supply and is used for emergency purposes only.

The existing water infrastructure in the vicinity of the proposed industrial site consists of a 12-inch water main that extends along West 10th Street and North Todd Avenue. The existing infrastructure in the vicinity of the proposed residential site consists of a 12-inch water main along Sierra Madre Avenue.

Alternative Water Sources

Currently, ALW does not use recycled water and does not have the ability to use recycled water due to a lack of infrastructure; however, ALW indirectly benefits from regional uses of recycled water. Seawater desalination is a process in which seawater is treated to remove salts and other constituents to develop both potable and non-potable supplies. However, as ALW's service area is not located adjacent to the ocean, there are no plans to incorporate desalinated seawater into its supply sources (ALW 2020).

Water Conservation

The California Water Efficiency Partnership's mission is to maximize urban water efficiency and conservation throughout California by supporting and integrating innovative technologies and practices; encouraging effective public policies; advancing research, training, and public education; and building collaborative approaches and partnerships (ALW 2020). The California Water Efficiency Partnership drafted the Memorandum of Understanding regarding urban water conservation, which outlines five BMPs that define policies, programs, practices, rules, regulations, or ordinances that result in the more efficient use or conservation of water. These BMPs include Utility Operations, Public Education & Outreach, Residential Programs, Commercial, Industrial, & Institutional Programs, and Landscape Programs.

4.17.1.2 Wastewater

The City owns, operates, and maintains the local sewer lines that collect wastewater generated within the City. The existing sewer lines include a gravity collection system comprised of approximately 80 miles of trunk sewer lines ranging from 6 to 24 inches in diameter. The City's sewer system currently conveys an average of 20.5 MGD of wastewater (ALW 2020).

Wastewater collected in the City's trunk sewer lines flows south to the LACSD wastewater treatment facilities (City 2015b). The trunk sewer lines connect to the San Jose Creek Water Reclamation Plant (SJCWRP), located in the City of Whittier, and the A.K. Warren Water Resource Facility (Warren Facility) located in the City of Carson, formerly known as the Joint Water Pollution Control Plant. The SJCWRP consists of two hydraulically interconnected facilities that are situated on the east and west sides of the San Gabriel River freeway (I-605). It currently provides primary, secondary, and tertiary treatment, and has a design capacity of 100 MGD. The SJCWRP serves a large residential population of approximately one million people and treats approximately 100 MGD, of which 42 MGD are reused. If the daily amount of wastewater received at the SJCWRP exceeds the facility's design capacity, the additional wastewater flow is diverted to the Warren Facility. The Warren Facility currently provides primary and secondary treatment for approximately 260 MGD. It has a design capacity of 400 MGD, and serves over 4.8 million residents, businesses, and industries (LACSD 2024).

The existing wastewater infrastructure located in the vicinity of the industrial site consists of 8-inch sewer mains in West 10th Street and North Todd Avenue. The existing wastewater infrastructure located in the vicinity of the residential site includes an 8-inch sewer main located along Sierra Madre Avenue. An 8-inch sewer main from North Vernon Avenue also extends across Sierra Madre Avenue and through the golf course site.

4.17.1.3 Stormwater

The City maintains and operates a limited number of drainage facilities in the City, while the LACFCD is responsible for operating and maintaining major flood control facilities located throughout the County.

Under the existing drainage condition, runoff from the proposed residential site and golf course site north of Sierra Madre Avenue generally flows south-westerly towards Sierra Madre Avenue. An existing inlet is located in Sierra Madre Avenue adjacent to the parking lot near the golf course parking entrance to intercept a portion of the flows generated on-site. The northerly portion of the site flows southerly along Avenida Conejo and the golf course, which ultimately routes to downstream inlets located along Sierra Madre Avenue. These inlets connect to a LACFCD 11.25-foot by 12-foot box drain which runs along Sierra Madre Avenue and intercepts runoff generated from the residential site.

A water basin is located directly north of the residential site and the slope of the basin descends northerly approximately 40 feet in height based on topographic data. When the infiltration/retention system reaches full capacity, excess runoff is routed to the connection to the LACFCD public storm drain via a weir system. In cases of a larger storm events, runoff ponds at the localized sump inlets. The site is graded to overflow towards Sierra Madre Avenue following historical drainage patterns (C&V Consulting, Inc. 2025a).

Runoff from the proposed industrial site drains to three main areas. The northerly landscaped frontage sheet flows off-site to Sierra Madre Avenue. Flows are captured in an existing catch basin located at the corner of North Todd Avenue and Sierra Madre Avenue. The westerly portion of the industrial site sheet flows off-site to a curb and gutter along North Todd Avenue. The easterly portion of the industrial site sheet flows off-site to West 10th Street where flows are collected in an existing catch basin and conveyed southerly in an existing 27-inch storm drain. There is an existing 36-inch corrugated metal pipe storm drain that runs north to south through the industrial site and connects to an existing curb-opening catch basin in West 10th Street at its downstream end. Additional information regarding stormwater infrastructure can be found in Section 4.9, *Hydrology and Water Quality*.

4.17.1.4 Solid Waste

Solid waste disposal services for the proposed Project site would be contracted through Athens Services, which provides both residential and commercial solid waste collection services to the City. The City's solid waste is collected by Athens Services and taken to either the City of Industry Material Recovery Facility or the Sun Valley Material Recovery Facility, where it is sorted (Athens Services 2024). Paper, glass, plastics, and metals are recovered and recycled, and the remaining solid waste is hauled to one of the solid waste sites listed in Table 4.17-1, *County Landfills Summary*, below. In 2022, the City generated 55,025 tons of solid waste, or 6.1 pounds per person per day (CalRecycle 2022). Table 4.17-1 also shows a summary of County-wide solid waste disposal for 2021, as well as the permitted yearly capacity and remaining capacity of landfills within the County.

Table 4.17-1
COUNTY LANDFILLS SUMMARY

Facility	Amount Disposed in 2021 (tons)	Permitted Yearly Capacity (tons)	Remaining Capacity (tons)
Antelope Valley Public Landfill	943,160	1,123,200	8,541,999
Azusa Land Reclamation Co. Landfill	439,825	2,440,000	51,715,125
Burbank Landfill Site No. 3	48,910	57,600	4,238,976
Calabasas Landfill	442,380	1,081,500	4,134,026
Chiquita Canyon Sanitary Landfill	2,371,040	3,120,000	49,349,195
Lancaster Landfill & Recycling Center	151,110	936,000	9,712,689
Mesquite Regional Landfill	Not operational	7,300,000	660,000,000
Pebbly Beach Disposal Site	4,015	17,885	22,022
San Clemente Island Landfill	730	991	34,921
Scholl Canyon Landfill	504,795	1,050,600	2,530,063
Sunshine Canyon City/County Landfill	3,059,430	3,775,200	51,681,972
Whittier (Savage Canyon) Landfill	107,310	109,200	3,794,613
Total	**8,072,705**	**21,012,176**	**845,755,601**

Source: LACDPW 2023

4.17.1.5 Electricity and Natural Gas

ALW currently provides electricity to the Project site and area. In addition to their 23,000 customer accounts for water service, ALW serves approximately 16,500 electricity customers. According to the City, ALW customers consume approximately 250,000 MW of electricity annually (City 2024b). The City has signed long-term agreements for wind and hydropower totaling approximately 17.2 MW of capacity and entered into multiple photovoltaic projects since 2013. The electrical infrastructure within the vicinity of the proposed industrial site includes utility poles carrying electric lines along West 10th Street. Existing electrical infrastructure within the vicinity of the proposed residential and golf course sites includes utility poles carrying electric lines along the northern edge of the proposed residential site and underground distribution lines through the residential site to Ave Conejo and towards the existing golf course clubhouse.

SoCalGas supplies natural gas to the City and Project vicinity. The majority of natural gas used in California is sourced from out-of-state natural gas basins. The state does not receive liquefied natural gas supplies. Biogas, including gas from wastewater treatment plants and dairy farms, has recently begun to be used, and the state has been encouraging its development and expansion. Natural gas from out-of-state production basins is delivered to California via the interstate natural gas pipeline system. This gas is then delivered via SoCalGas and Pacific Gas and Electric's statewide network to local transmission and distribution pipelines, or local storage fields (CPUC 2024). Additional information regarding these topics is available in Section 4.5, *Energy.* Existing natural gas infrastructure adjacent to the industrial site includes a 2-inch gas main located in West 10th Street, a 4-inch high pressure gas main in North Todd Avenue, and a 2-inch gas distribution main extending north in North Todd Avenue from the intersection with West 10th Street to where it is capped just past the proposed Building 3. Existing natural gas infrastructure adjacent to the residential and golf course site includes a 3-inch gas main located on the south side of Sierra Madre Avenue and an existing service line to the existing golf course clubhouse.

4.17.1.6 Telecommunication Services

Telecommunication services within the City, such as landline service and internet connection, are provided by a variety of private service providers, including Charter Spectrum and Frontier. Infrastructure related to the provision of telecommunication services is owned and maintained by the private service providers. Existing telecommunication infrastructure within the vicinity of the industrial site includes utility poles carrying telecommunication lines and a Frontier connection box along West 10th Street. Existing telecommunication infrastructure within the vicinity of the residential and golf course sites includes a pull box owned by Frontier located on the south side of Sierra Madre Avenue and a pedestal owned by Charter Spectrum located in an adjacent residential property approximately 165 feet north of Sierra Madre.

4.17.2 Regulatory Setting

4.17.2.1 Federal Regulations

Safe Drinking Water Act of 1974

The Safe Drinking Water Act authorizes the USEPA to set national health-based standards for drinking water to protect against both naturally-occurring and man-made contaminants that may be found in drinking water. The USEPA, individual states, and water system service providers then work together to make sure that these standards are met. Originally, the Safe Drinking Water Act focused primarily on treatment as the means of providing safe drinking water at the tap. Amendments in 1996 greatly enhanced the existing law by recognizing source water protection, operator training, funding for water system improvements, and public information as important components of safe drinking water. This approach ensures the quality of drinking water by protecting it from source to tap. The Safe Drinking Water Act applies to every public water system in the U.S.

Clean Water Act

The CWA's primary goals are to restore and maintain the chemical, physical, and biological integrity of the nation's waters and to make all surface waters fishable and swimmable. The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the NPDES, effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint-source discharge programs, and wetlands protection. The USEPA has delegated the responsibility for administration of CWA portions to state and regional agencies. In California, the SWRCB administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The SWRCB works in coordination with the RWQCBs to preserve, protect, enhance, and restore water quality.

Resource Conservation and Recovery Act

The RCRA gives the USEPA the authority to control hazardous waste from the "cradle-to-grave." Refer to Section 4.8.2.1 for further discussion of the RCRA as it relates to hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid waste. Regulations established regarding solid waste include a ban on open dumping of waste and set minimum federal criteria for the operation of municipal waste and industrial waste landfills, including design criteria, location restrictions, financial assurance, corrective action (cleanup), and closure requirements.

4.17.2.2 State Regulations

Senate Bill 610

For certain types of large projects, SB 610 requires that the associated environmental document includes a discussion of the availability of water to meet the projected water demands of a project for a 20-year planning horizon, including single and multiple dry years. SB 610 specifies the types and sizes of projects that are subject to the provisions of this law, which include developments that would demand more water than 500 equivalent dwelling units.

California Assembly Bill 1881

AB 1881, the Water Conservation in Landscaping Act of 2006, requires DWR to prepare an updated Model Water Efficient Landscaping Ordinance (MWELO) in accordance with specified requirements to conserve water through efficient irrigation and landscaping. By January 1, 2010, local agencies were to adopt either the updated MWELO or a local landscape ordinance that is at least as effective in conserving water as the MWELO. Pursuant to state law, the City amended its Landscape Regulations (Azusa Municipal Code Chapter 78, Article VI, Division 7) and Landscape Standards to expand water conservation in landscaping. The Landscape Standards implement the requirements of the Landscape Regulations. All landscape plans and installations are required to comply with the Landscape Standards.

Urban Water Management Act

The Urban Water Management Plan Act was passed in 1983 and codified as Water Code Sections 10610 through 10657. Since its adoption in 1983, the Urban Water Management Plan Act has been amended on several occasions. Some of the more notable amendments include an amendment in 2004, which required additional discussion of transfer and exchange opportunities, non-implemented demand management measures, and planned water supply projects. Also, in 2005, another amendment required water use projections (required by Water Code Section 10631) to include projected water use for single-family and multi-family residential housing needed for lower-income households. In addition, Government Code Section 65589.7 was amended to require local governments to provide the adopted housing element to water and sewer providers. The Urban Water Management Plan Act requires “every urban water supplier providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually, to prepare and adopt, in accordance with prescribed requirements, an urban water management plan.” Urban water suppliers must file these plans with DWR every five years, describing and evaluating reasonable and practical efficient water uses, reclamation, and conservation activities. As required by the Memorandum of Understanding Regarding Urban Water Conservation in California and AB 11, the 2005 Urban Water Management Plan Act incorporated water conservation initiatives and a Water Shortage Contingency Plan.

Integrated Waste Management Act

As discussed further in Section 4.8, *Hazards and Hazardous Materials*, the California IWMA of 1989 (AB 939), which is administered by CalRecycle, requires counties to develop an IWMP that describes local waste diversion and disposal conditions, and lays out realistic programs to achieve the waste diversion goals. IWMPs compile Source Reduction and Recycling Elements prepared by each local government, to focus diversion efforts and provide a framework to meet waste reduction mandates. The goal of the solid waste management efforts is not to increase recycling, but to decrease the amount of waste entering landfills. AB 939 required all cities and counties to divert a minimum of 50 percent of

all solid waste from landfill disposal. In 2011, the state legislature enacted AB 341 (PRC Section 42649.2), increasing the diversion target to 75 percent statewide. AB 341 also requires the provision of recycling service to commercial and residential facilities that generate 4 CY or more of solid waste per week.

AB 1826

In October 2014, Governor Brown signed AB 1826, Chesbro (Chapter 727, Statutes of 2014), which requires businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. For businesses that generate 8 CY or more of organic waste per week, this requirement became effective on April 1, 2016; for those that generate 4 CY or more of organic waste per week, the requirement became effective on January 1, 2017. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings that consist of five or more units. Mandatory recycling of commercial organics would be phased in over time, and an exemption process is available for rural counties.

Water Recycling Act

The Water Recycling Act of 2013 (AB 803) eliminates inconsistent recycled water spill reporting thresholds by making those in the H&SC consistent with those in the Porter-Cologne Water Quality Control Act. In addition, AB 803 authorizes RWQCBs to permit the introduction of Advanced Treated Purified Water into conveyance systems prior to comingling with any raw water or other water source. The bill defines Advanced Treated Purified Water as wastewater treated by a method at least as effective as membrane filtration, reverse osmosis, advanced oxidation, disinfection, and engineered reliability features.

Water Conservation Act

The Water Conservation Act of 2009 (SB X7-7) requires all water suppliers to increase water use efficiency. The legislation set an overall goal of reducing per capita water use by 20 percent by 2020, with an interim goal of 10 percent by 2015. Effective in 2016, urban retail water suppliers that did not meet the water conservation requirements established by this bill were not eligible for state water grants or loans. SB X7-7 requires urban retail water suppliers to determine baseline water use and set reduction targets according to specified standards.

CALGreen

Portions of CALGreen relevant to water use and solid waste are described here. CALGreen provides mandatory water efficiency and conservation measures for both residential and non-residential development. The mandatory measures specify allowable flow rates for different appliances and require compliance with the MWELO (or applicable, more stringent local ordinance). CALGreen also requires at least 65 percent of non-hazardous construction and demolition debris is recycled and/or salvaged for reuse during construction. Refer to Section 4.5.2.2 for further discussion of CALGreen (CCR Title 24, Part 11), especially as it relates to energy efficiency and GHG emission reductions.

4.17.2.3 Local Regulations

Water

2020 Urban Water Management Plan

In compliance with Water Code Sections 10610 through 10656 of the Urban Water Management Planning Act, the ALW Utility Board adopted its Urban Water Management Plan (UWMP) in June 2021. The California Urban Water Management Planning Act requires urban water suppliers to prepare and adopt a UWMP and update that plan at least once every five years. The UWMP supports ALW's long-term resource planning to ensure adequate water supplies are available to meet existing and future water needs. Within this UWMP, urban water suppliers must do the following:

- Assess the reliability of water sources over a 20-year planning time frame;
- Describe demand management measures and water shortage contingency plans;
- Report progress toward meeting a targeted 20 percent reduction in per-capita (per-person) urban water consumption by the year 2020; and
- Discuss the use and planned use of recycled water.

Azusa General Plan

Chapter 3 of the Azusa General Plan, *The Built Environment*, outlines various goals and policies to address the current and future needs of the City in relation to water within the Infrastructure section. The following goals and policies related to water are relevant to the proposed Project:

Goal 2. Provide a water supply system that is able to meet the projected water demands; upgrade and expand water treatment, supply, and distribution facilities; and pursue funding sources to reduce the cost of water provision for the City.

Policy 2.1. Monitor the demands on the water system, manage development to mitigate impacts and/or facilitate improvements to the water supply and distribution system, and maintain and expand water supply and distribution facilities.

Policy 2.2. Continue to update the water master plan and an associated capital improvements program, and evaluate the adequacy of the water supply and distribution supply.

Policy 2.4. Require that new development and retrofit existing developments to contain safeguards and measures preventing water supply degradation.

Policy 2.6. Minimize water consumption through site design, use of efficient systems, and other techniques.

Policy 2.8. Continue to require the incorporation of water conservation features in the design of all new construction and site development.

Policy 2.10. Require the use of reclaimed water for landscaped irrigation, grading, and other non-contact uses in new developments, where available or expected to be available.

Policy 2.11. Ensure the costs of improvements to the existing water supply and distribution facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.

Azusa Municipal Code

Azusa Municipal Code Chapter 78, Article VI, Division 5, *System Development Fee* establishes a water system fee structure to impose upon future development within the water system service area.

Azusa Municipal Code Chapter 78, Article VI, Division 7, *Landscape and Irrigation Standards*, states that, "No building permit shall be issued for buildings until the public works superintendent, or designee, reviews and approves a landscape plan for the project. A certificate of occupancy shall be issued only if landscaping and an irrigation system is installed in compliance with the approved landscape plan consisting of the elements set forth below. The landscape plan shall include the following elements: a calculation of water consumption for the landscaped area, a planting scheme, an irrigation plan, and a grading plan if found to be necessary by the community development director. Projects that must adhere to these standards are: apartments, condominiums, any multiple-unit residential developments, commercial developments, industrial developments, single-family residential, and recreational developments."

Wastewater

Azusa General Plan

Chapter 3 of the Azusa General Plan, *The Built Environment*, outlines various goals and policies to address the current and future needs of the City in relation to wastewater in the Infrastructure section. The following goals and policies related to wastewater are relevant to the proposed Project:

Policy 2.5. Require all new development to connect to the sewer system.

Goal 3. Provide a wastewater (sewer) collection and treatment system that is able to support permitted land uses, upgrading existing deficient systems, and pursue funding sources to reduce costs of wastewater provision in the city.

Policy 3.1. Ensure the City provides and maintains a sewer collection and treatment facilities system that adequately conveys and treats wastewater generated by existing and planned development at a maximized cost efficiency.

Policy 3.2. Update the sewer master plan to reflect anticipated growth and current capacities.

Policy 3.3. Work with the County of Los Angeles to determine if the existing sewer collection systems are adequate to meet existing and anticipated future demand.

Policy 3.5. Ensure the costs of improvements to the existing sewer collection and treatment facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.

Policy 3.8. Continue to monitor businesses that may generate hazardous waste to prevent contamination of waste.

Water Quality Control Plan

As discussed further in Section 4.9, *Hydrology and Water Quality*, the LARWQCB develops and enforces water quality objectives and implementation plans that safeguard the quality of water resources in its region. Chapter 4 of the Basin Plan outlines policies and regulations for municipal wastewater treatment, disposal, and reclamation. The standards contained within the Basin Plan are designed to provide developers with a uniform approach for the design and installation of adequate systems to control wastewater, wastewater treatment, and sewage disposal impacts and to prevent any potential contamination to groundwater at the discharge site.

Azusa Municipal Code

Chapter 78, Article IV, *Sewers and Sewage Disposal*, of the Azusa Municipal Code, includes public sewer development standards and specifications and states that no person shall make or maintain any connection with any public sewer of the City unless a permit from the City engineer has been obtained.

Stormwater

Azusa General Plan

Chapter 3 of the Azusa General Plan, *The Built Environment*, outlines various goals and policies to address the current and future needs of the City in relation to stormwater drainage and conveyance within the Infrastructure section. The following goals and policies related to stormwater are relevant to the proposed Project:

Goal 4. Provide a flood control system that is able to support the permitted land uses while preserving the public safety, upgrade existing deficient systems, and pursue funding sources to reduce the costs of flood control provision in the City.

Policy 4.1. Maintain existing public storm drains and flood control facilities, upgrade and expand storm drain and flood control facilities.

Policy 4.4. Monitor the demands and manage development to mitigate impacts and/or facilitate improvements to the storm drainage system.

Policy 4.7. Require improvements to the existing storm drain and flood control facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.

Policy 4.8. Require new developments to employ the most efficient drainage technology to increase ground percolation, control drainage, and minimize damage to environmentally sensitive areas.

Policy 4.10. Encourage using construction methods and technologies that will reduce the size or decrease the number of impervious surfaces in both new development and the retrofit of existing development.

Azusa Municipal Code

As described further in Section 4.9.2.4, Azusa Municipal Code Chapter 60, *Stormwater and Urban Runoff Pollution Prevention*, requires development projects adding more than 5,000 SF of impervious surfaces to the City to install appropriate BMPs in accordance with NPDES permit requirements. This chapter of the Azusa Municipal Code also requires the installation and maintenance of these BMPs addressing stormwater discharges.

Solid Waste

Azusa General Plan

Chapter 3 of the Azusa General Plan, *The Built Environment*, outlines various goals and policies to address the current and future needs of the City in relation to solid waste in the Infrastructure section. The following goals and policies related to solid waste are relevant to the proposed Project:

Goal 5. Maintain solid waste collection and disposal services in accordance with the California Integrated Waste Management Act of 1989, pursue funding sources to reduce the cost of the collection and disposal services in the City.

Policy 5.1. Maintain adequate solid waste collection for commercial, industrial, and residential developments in accordance with state law.

Policy 5.3. Monitor reduction and recycling programs to ensure proper implementation and achievement of mandated solid waste reduction and diversion goals. Revise and replace programs that do not achieve their intended purpose.

Azusa Municipal Code

In compliance with the California IWMA, Azusa Municipal Code Chapter 58, *Solid Waste*, addresses aspects of solid waste handling, including, but not limited to, frequency of solid waste collection, means of collection, transportation, level of service, charges and fees, and details regarding solid waste handling services.

4.17.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential impacts related to utilities and service systems are based on Appendix G of the CEQA Guidelines. A significant impact to utilities and service systems could occur if implementation of the proposed Project would:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;

b) Have insufficient 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 does not have adequate 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) Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

4.17.4 Methodology and Assumptions

An evaluation of potential impacts related to utilities and service systems that may result from construction and operation of the proposed Project has been conducted below. This analysis is based on existing federal, state, and local regulations and assessments of utility and service system capacities within the vicinity of the Project site to determine the potential effects of Project demands on these utilities and service systems.

4.17.5 Impact Analysis

4.17.5.1 Relocation or Construction of Utilities

Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Construction Period

Construction of the proposed Project would require minimal amounts of water and power and would not result in the need for the relocation or construction of new or expanded facilities. The Project would comply with all applicable federal and state regulations regarding energy consumption during construction. In addition, the Project would be required to implement all construction BMPs outlined in the SWPPP to protect downstream water quality and ensure compliance with the Construction General Permit, which requires that non-stormwater discharges from construction sites be eliminated or reduced to the maximum extent practicable. As no relocation or construction of new or expanded utilities would be required for construction, no environmental impacts associated with such construction would occur.

Water

The industrial site requires the replacement of a 12-inch water main from the intersection of West 10th Street and North Todd Avenue, approximately 1,000 feet to the east (to the central portion of proposed Building 5) and approximately 500 feet to the north (to the southern end of Building 3). However, this water main would be installed within the same disturbed roadway area as the existing water main and would not increase capacity compared to existing conditions. The residential site would include the construction of a 6-inch domestic water pipeline and an 8-inch fire water pipeline which would connect to the existing 12-inch water main along Sierra Madre Avenue. These would extend from existing mains in Sierra Madre Avenue through the residential drive aisles and provide connection points for laterals to individual buildings within the residential site. Both the construction and operational impacts of

providing water infrastructure to the proposed buildings have been assessed throughout this EIR. Further, as discussed in Section 4.17.5.2 below, no relocation or construction of additional off-site water facilities that would cause environmental effects is required. In addition, the construction of this water main would occur in compliance with the City's Public Works regulations and the Azusa Municipal Code, and utility connection fees would be provided to ALW which would assist with ongoing maintenance and potential future upgrades due to incremental increases in water use by the Project.

Wastewater Treatment

An 8-inch sewer pipeline would be constructed within the residential site from a connection at the existing main in Sierra Madre Avenue through the residential drive aisles. This pipeline would provide the connection points for laterals to individual buildings within the residential site. Existing 8-inch sewer mains in West 10th Street and North Todd Avenue would provide points of connection for the proposed industrial buildings. The existing golf course clubhouse and restroom facilities throughout the golf course site would be maintained in place. Construction of sewer connections throughout the Project site is included in the analysis of the proposed Project construction activities provided throughout the EIR, and these connections would be constructed in accordance with applicable City standards. Further, utility connection fees would be provided to ALW which would assist with ongoing maintenance and potential future upgrades due to incremental increases in wastewater production by the Project Refer to Section 4.17.5.3 below for additional details regarding capacity of wastewater treatment infrastructure and estimated Project wastewater contributions. No other new, relocated, or expanded off-site sewer infrastructure would be required, and no associated environmental effects would occur.

Stormwater Drainage

As discussed further in Section 4.9, *Hydrology and Water Quality*, the Project would install interconnected underground infiltration/detention systems with pipelines to accommodate anticipated stormwater runoff. In addition, the Project would replace a damaged portion of the existing 36-inch corrugated metal pipe storm drain through the site. The resulting peak flow rates from the industrial site would be lower than the existing peak flow rates to the same areas; therefore, the existing 36-inch corrugated metal pipe storm drain could adequately convey the on-site peak flow rate in addition to the flows from the adjacent property to the north, and no off-site expansion of storm drain capacity would be required. While the peak flow rate from the residential site would increase slightly, it would be accommodated within existing infrastructure after on-site capture and detention. Construction of these Project features to accommodate stormwater runoff would attenuate flows from the Project site such that new off-site stormwater infrastructure would not be required, and no associated environmental effects would occur. The construction and operation of stormwater detention and treatment features throughout the Project site is considered in the analysis of the proposed Project provided throughout the EIR, and these connections would be constructed in accordance with applicable City standards.

Electricity/Natural Gas

Electricity and natural gas connections for the proposed Project buildings would be made primarily to existing infrastructure within the rights-of-way surrounding the industrial site and from existing electrical distribution lines and equipment within the proposed residential site. Natural gas would only be provided to the residential clubhouse building. Some electrical connections and infrastructure would be relocated and undergrounded to serve the proposed buildings; however, the effects of constructing this infrastructure are addressed throughout the EIR. Further, utility connection fees would be provided to ALW for electrical connections and SoCalGas for natural gas connection, which would assist with

ongoing maintenance and potential future upgrades due to incremental increases in electricity and/or natural gas use by the Project.

Telecommunications

Telecommunication connections for the proposed Project buildings would be made primarily to existing infrastructure within the rights-of-way surrounding the industrial and residential sites. The two companies that provide telecommunication services to the proposed Project site are Frontier and Charter Spectrum.

The assumed points of connection for the residential site would be a Frontier 3-inch by 5-inch pull box located on the south side of Sierra Madre Avenue across from the proposed residential site entrance and the Charter Spectrum pedestal located on the north side of Sierra Madre Avenue at the proposed residential site entrance. The assumed points of connection for the industrial site would be a Frontier pole on the south side of West 10th Street, a Frontier manhole located on the east side of North Todd Avenue across from the proposed location of Building 3, and a Charter Spectrum pole, located on the south side of West 10th Street. Some of these points of connection would require the addition of risers and extensions to serve the proposed buildings; however, the effects of this would be minimal, and would occur within the already disturbed roadway. Further, the Project would provide utility connection fees to Charter Spectrum and Frontier for telecommunication connections which would assist with ongoing maintenance and potential future upgrades due to incremental increases in telecommunication use resulting from the Project.

Level of Significance Prior to Mitigation

Implementation of the Project would require the relocation or construction of new water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, but would not result in significant environmental effects beyond those described in the relevant sections of this EIR, and impacts associated with this issue area would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.17.5.2 Water Supplies

Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

Construction of the proposed Project would require minimal amounts of water in comparison with available supplies and would not result in insufficient water supplies available to serve the Project during the construction period. The Project would comply with all applicable federal and state regulations regarding water use and conservation during construction.

Within the UWMP, ALW provides projections related to water supply for the years 2025, 2030, 2035, 2040, and 2045. These projections include the water service area population, the demand based on population growth, and the water supply during normal years, single dry years, and multiple dry years. ALW predicts that by 2035, 115,500 people will make up their water service area population. The following analysis is based on projections for the year 2035 for each of these potential water supply conditions. The projected water demand for the industrial site is approximately 13,272 gallons per day, or approximately 15 AF per year (Thienes Engineering, Inc. 2024a). This consumption rate corresponds to 70.6 equivalent dwelling units. The residential site development corresponds to 230 equivalent dwelling units. Based on CalEEMod defaults (see Appendix A of Appendix B), the residential portion of the Project would require 41,363 gallons per day (approximately 46 AF per year). As watering of the golf course has continued since the Azusa Greens Country Club golf course ceased operations in 2020, the water usage associated with the golf course site is assumed in the baseline conditions and would not increase with implementation of the Project. Therefore, the Project's total water demand would be approximately 301 equivalent dwelling units. As the Project would not require water supplies equivalent to the demand from 500 dwelling units, the Project can be considered to be consistent with the UWMP projections related to water supply for the City, and no formal water supply assessment per SB 610 is required.

Normal Year

A normal year is defined as a year in which the various water supply sources of ALW (imported water, groundwater, and surface water) are all at maximum capacity. During a normal year, water supply is projected to be 38,450 AF, while the water demand is projected to be 19,160 AF (ALW 2020). The Project would introduce new residential and industrial uses to the City and cause a 0.3 percent increase in the demand for water supplies. However, as ALW's projected normal year supply is 201 percent of the projected demand, the increase in demand from the Project would be accommodated by the City's water supply during a normal year.

Single Dry Year

The Project would cause a 0.3 percent increase in the demand for water supplies. A single dry year is defined as a year in which the various water supply sources of ALW are at 67 percent capacity. The projected water supply for 2035 during a single dry year is 25,667 AF, while the demand is 20,362 AF. This supply in a single dry year accounts for 126 percent of the projected demand; therefore, during a single dry year, the increase in water supply demand caused by the proposed Project would be served by the City's water supply.

Multiple Dry Years

The Project would cause a 0.3 percent increase in the demand for water supplies. The ALW projection for 2035 under the multiple dry years condition assumes that the total water supply capacity is at 80 percent in 2031, 77 percent in 2032, 71 percent in 2033, 61 percent in 2034, and 61 percent in 2035. The projection of water supply in 2035 based on multiple dry year conditions is 23,447 AF, while the demand is 18,135 AF. This supply accounts for 129 percent of projected demand, and it is, therefore, reasonable to assume that during a year preceded by multiple dry years, the increase in water demand caused by the proposed Project would be adequately served by the City's water supply.

Level of Significance Prior to Mitigation

There would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.17.5.3 Wastewater Treatment

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?

The LACSD has two facilities which provide wastewater treatment for the Project area: the SJCWRP and the Warren facility. As discussed above, the SJCWRP has a design capacity of 100 MGD, and if this facility ever reaches capacity, the wastewater would be diverted to the Warren facility, which currently has a capacity of approximately 400 MGD. The Warren facility currently estimates that it treats 260 MGD of wastewater, meaning it operates far below its capacity. The City's sewer system currently conveys approximately 20.5 MGD of wastewater on average. Based on estimated average daily sewage flows for residential uses by LACDPW and potential daily water use estimated for the industrial site, the proposed Project would cause an increase in demand for wastewater treatment of up to 66,172 gallons per day (Thienes Engineering, Inc. 2024a; LACDPW 2025). This increase in demand would represent 0.3 percent of the total City wastewater conveyed to LACSD, which is well within the capacity of LACSD to treat wastewater. In addition, the Sewer System Analysis prepared for the Project (C&V Consulting, Inc. 2024) determined that when combined with existing flows, the proposed Project would not contribute to a peak sewage flow rate above the threshold identified in the City of Azusa Sewer System Master Plan. The Project would not result in a determination by the LACSD that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

Level of Significance Prior to Mitigation

Implementation of the Project would not cause the wastewater treatment provider to exceed the wastewater treatment capacity of existing facilities, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.17.5.4 Solid Waste Generation

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?

Solid waste generated by the proposed Project during construction and operation would be collected by Athens Services, before it is sorted at either the City of Industry Material Recovery Facility or the Sun Valley Material Recovery Facility. Athens Services currently contracts with the City to provide commercial and residential solid waste services, and all applicable fees to Athens Services would be paid before services are provided to the Project site. Solid waste would then be sent to one of the landfill facilities listed in Table 4.17-1 above. As shown in Table 4.17-1, the landfill facilities located in Los Angeles County have a remaining capacity of approximately 845,755,601 tons. Based on default assumptions in the CalEEMod modeling of the Project (refer to Appendix B), the Project would generate 649 tons of solid waste per year, which would be minimal compared to this remaining regional capacity. During construction, the Project would comply with all local and regional regulations regarding the disposal of construction-related material. In addition, operation of the industrial and residential sites would comply with all regulations related to industrial and household waste, as discussed in Section 4.8, *Hazards and Hazardous Materials,* in addition to regulations related to waste reduction and recycling requirements, as discussed in Section 4.17.5.5 below. Therefore, the Project would not generate solid waste in excess of applicable standards or available capacity for disposal.

Level of Significance Prior to Mitigation

Implementation of the Project would not generate solid waste in excess of state or local standards, or in excess of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.17.5.5 Solid Waste Regulations

Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

During the construction of the proposed Project, the construction contractor and all subcontractors would be required to comply with applicable statutes and regulations related to construction waste diversion. This includes CALGreen Construction Waste Management Requirements, which require that projects recycle and/or salvage for reuse a minimum of 65 percent of the non-hazardous construction and demolition debris generated during construction. In addition, the construction and operation of the residential, industrial, and golf course sites would comply with the requirements of the California IWMA, including the implementation of diversion programs and the provision of recycling and organic waste disposal options. Further, the proposed Project would adhere to the provisions of AB 341 and AB 1826, which require businesses and multi-family residential uses, such as those proposed by the Project, to

provide facilities for recycling and organic waste, respectively. The Project would provide recycling and organic waste disposal bins and arrange for disposal of the waste in accordance with these laws. Per the Azusa General Plan, the City will continue to monitor reduction and recycling programs to ensure proper implementation and achievement of mandated solid waste reduction and diversion goals, including monitoring of the Project. The Project would additionally comply with the policies outlined in Azusa Municipal Code Chapter 58 which pertains to solid waste handling services. Therefore, the Project would comply with federal, state, and local regulations related to solid waste.

Level of Significance Prior to Mitigation

Implementation of the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.17.6 Cumulative Impact Analysis

The geographic scope for utilities and service systems in the service area for each utility provider. Although public utilities can be specific to jurisdictions, some service providers operate throughout the region and across multiple jurisdictions. Therefore, changes in development influence the demand for utilities across the region and could drive the need for new or expanded utility infrastructure.

As discussed above, the proposed Project would require the construction of water and sewer pipelines and connections, the installation of underground infiltration/detention systems, the replacement of existing storm drains, relocation of utility poles, and connections to existing electrical, natural gas, and telecommunication infrastructure. All utility alterations and additions would extend from existing infrastructure. Potential impacts associated with the construction of these utility alterations and additions have been analyzed throughout this EIR, including in the cumulative analysis for each environmental issue area. The identified cumulative projects could require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. However, the provision of these utility facilities would be analyzed in the environmental review associated with the individual project, and compliance with all relevant state, regional, and local regulation regarding the provision of new or expanded utility systems would be required. As is the case for the Project, cumulative project developers would be required to contribute utility connection fees to assist with ongoing maintenance and potential future upgrades resulting from incremental increases in utility use and demand.

The Project would result in an increase in demand for water supplies, as discussed above. However, based on the UWMP, the City has adequate water supply for normal, dry, and multiple dry years, and the minimal increase in demand caused by the Project in combination with the identified cumulative projects would not cause the City to have insufficient water supplies available. The Project would also require additional wastewater treatment services. The two facilities that currently provide the City with wastewater treatment have adequate capacity to serve current and future development, including the

Project and cumulative projects, in the City as well as the greater Los Angeles region. Similarly, the Project would require solid waste services during construction and operation; however, the Project and cumulative projects would not generate solid waste in excess of state or local standards, and landfills within the County have adequate capacity for solid waste generated by the Project in combination with the identified cumulative projects, each of which requires separate environmental review. Further, the Project and cumulative projects would be required to pay service fees to the solid waste collection service provider which would assist with ongoing maintenance and potential future upgrades resulting from incremental increases in demand for solid waste services. Therefore, cumulative project impacts would be less than significant, and the proposed Project would not result in a cumulatively considerable contribution to impacts related to the provision of utilities and service systems.

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4.18 Wildfire

This section evaluates potential wildfire impacts that could occur from the implementation of the proposed Project, including the potential for the proposed Project to exacerbate wildfire risks. An overview of existing conditions related to wildfire and the applicable regulatory framework is also provided in this section.

4.18.1 Existing Conditions

4.18.1.1 Climate

Southern California, including Los Angeles County and the Project site, experiences a Mediterranean climate characterized by wet winters and dry summers with mild seasonal changes. A seasonal, migratory subtropical high-pressure cell in the Pacific Ocean known as the "Pacific High" influences this pattern by preventing storms from making landfall in the winter, when the cell is the most active. The consequentially low amount of summer rainfall has a large influence on wildfire risk. The Mediterranean climate pattern is occasionally interrupted by extreme periods of hot weather, winter storms, or dry, easterly Santa Ana winds.

As described in Section 4.2.1.2, the annual average maximum temperature in the Project area is approximately 77.8°F, and the annual average minimum temperature is approximately 47.7°F. Precipitation in the Project area averages approximately 19.0 inches annually and occurs mostly during the winter and relatively infrequently during the summer (Western Regional Climate Center 2024).

The prevailing wind is an on-shore flow from the Pacific Ocean, which is located approximately 30 miles to the southwest of the Project site. Hot, dry Santa Ana winds, which typically occur in the fall, but have in recent years also occurred in the spring (May, in particular), are usually from the northeast and can gust to speeds of 50 mph or higher. The Santa Ana winds are the result of occasional pressure gradients between the high pressure in the plateaus of the Great Basin and the lower pressure gradient over the Pacific Ocean (Murphree et al. 2018). Drying vegetation is possible during the summer months and becomes fuel available to advancing flames should an ignition occur.

4.18.1.2 Vegetation (Fuels)

The potential for wildland fires is a hazard where development occurs adjacent to open space or within close proximity to wildland fuels. Vegetation is important relative to wildfire as some vegetation, such as grassland habitats, are highly flammable, while other vegetation, such as chaparral and oak riparian forest, may be more difficult to ignite but would burn under more intense fire conditions. While the Project site itself is not within a VHFHSZ (CAL FIRE 2024), it is within an interface area of the WUI, as shown in Figure 4.18-1, *Wildfire Hazards*. The WUI is a zone of transition between wilderness and human civilization that experiences a heightened risk of wildfire (USFS 2023). The interface areas of the WUI are where housing is in the vicinity of wildland vegetation while the intermix WUI is where housing and wildland vegetation intermingle. The foothills of the San Gabriel Mountains adjacent to the northwestern portion of the Project site and approximately 600 feet east of the northeastern portion of the Project site are within the VHFHSZ and provide additional sources of fuel that increase the risk of wildfire in the area. Urban development surrounds the remainder of the Project site and is within the interface area of the WUI. No intermix WUI is adjacent to the Project site.

4.18.1.3 Fire History

Fire history information provides an understanding of fire frequency, fire type, vulnerable areas, and significant ignition sources. Fire history represented in this section relies on the Fire and Resource Assessment Program database, which summarizes fire perimeter data dating to the late 1800s but is incomplete because it only includes fires over 10 acres in size and does not have complete perimeter data, especially for the first half of the twentieth century (CAL FIRE 2025).

There have been two recorded fires on the Project site, occurring in 1943 (188 acres) and 1947 (351 acres). Five fires of unknown/unidentified activity, including the two on the Project site, are recorded in the urbanized area of the City, while larger and more frequent fires have occurred in the adjacent foothills of the San Gabriel Mountains, where vegetation provides ample fuel (CAL FIRE 2025).

4.18.2 Regulatory Setting

4.18.2.1 State Regulations

California Building Code

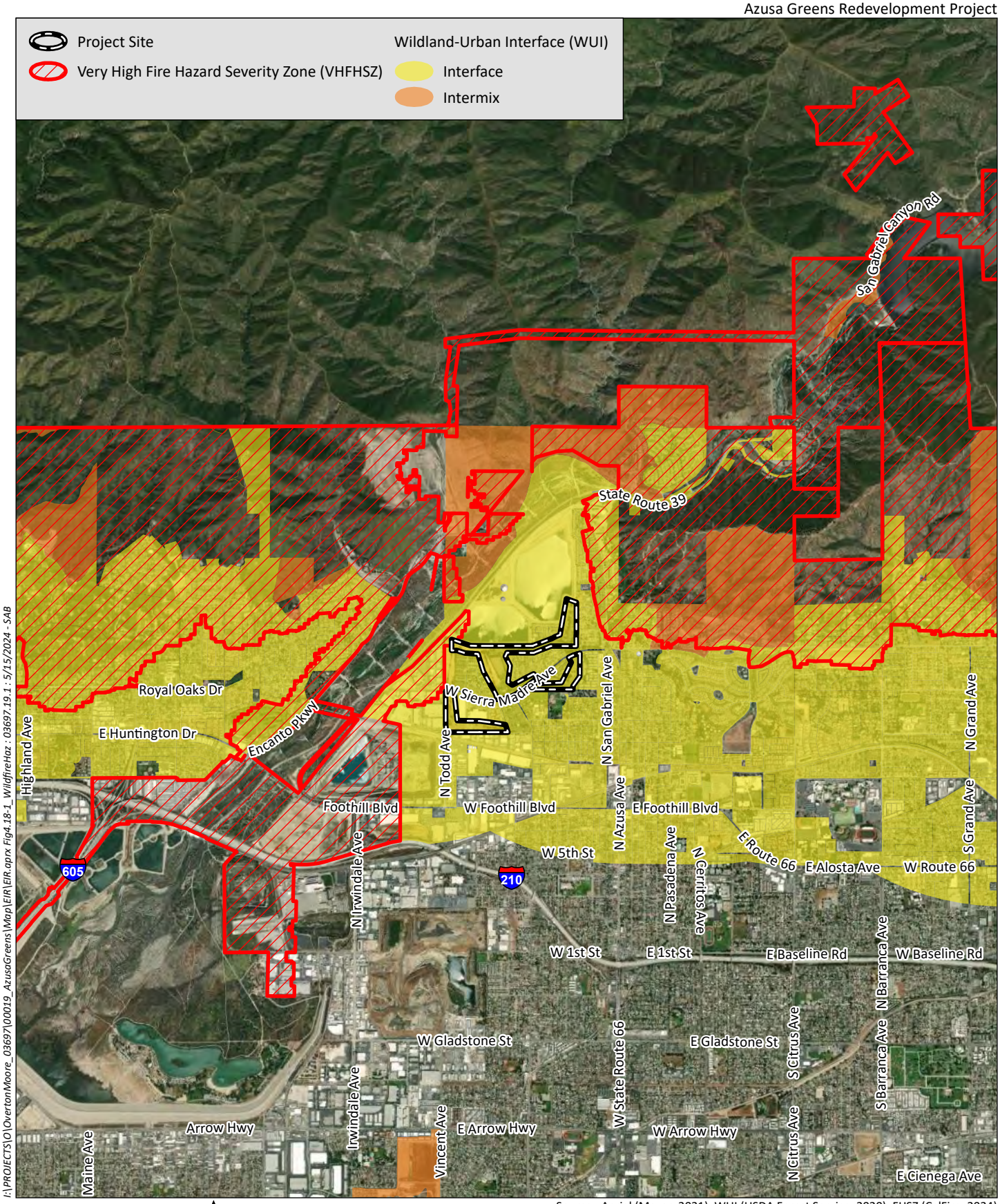
The CBC (CCR Title 24, Part 2) contains regulations that must be followed to satisfy minimum acceptable levels of safety for buildings and non-building structures. Chapter 7A focuses primarily on fire-resistive construction methods for exterior wildfire exposure for preventing ember penetration into buildings, which is a leading cause of structure loss from wildfires.

California Department of Forestry and Fire Protection

CAL FIRE protects the people of California from fires, responds to emergencies, and protects and enhances more than 31 million acres of California's privately-owned wildlands. CAL FIRE's firefighters, fire engines, and aircraft responded to 5,975 wildland fires in 2022, which burned approximately 75,221 acres (CAL FIRE 2022). As part of the CAL FIRE team since 1995, the Office of the State Fire Marshal supports the CAL FIRE mission to protect life and property through fire prevention engineering programs, law, and code enforcement and education.

California Fire Code

The California Fire Code (CCR Title 24, Part 9) contains regulations consistent with nationally recognized accepted practices for safeguarding, to a reasonable degree, life and property from the hazards of the following: fire and explosion; hazardous conditions in the use or occupancy of buildings or premises; and dangerous conditions arising from the storage, handling, and use of hazardous materials and devices. It also contains provisions to assist emergency response personnel. The California Fire Code and the CBC use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment.



Source: Aerial (Maxar, 2021), WUI (USDA Forest Service, 2020), FHSZ (CalFire, 2024)

HELIX Environmental Planning

Wildfire Hazards

Figure 4.18-1

California Public Resources Code

Fire Hazard Severity Zones

PRC Sections 4201 through 4204 apply to SRAs, and Government Code Sections 51175 to 51189 direct CAL FIRE to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. The Fire Hazard Severity Zones direct the application of various mitigation strategies to reduce the risk associated with wildland fires. Fire hazard designations are based on topography, vegetation, and weather, among other factors, with higher hazard category sites including steep terrain, unmaintained fuels/vegetation, and WUI locations. Projects situated in VHFHSZs require fire hazard analysis and application of fire protection measures that have been developed to specifically result in defensible communities in these WUI locations.

California Strategic Fire Plan

The California Strategic Fire Plan, developed and adopted in response to PRC Sections 4114 and 4130, is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE. By placing the emphasis on what needs to be done long before a fire starts, the California Strategic Fire Plan looks to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health. The Strategic Fire Plan has a vision for a natural environment that is more fire resilient, buildings and infrastructure that are more fire resistant, and a society that is more aware of and responsive to the benefits and threats of wildland fire—all achieved through local, state, federal, tribal, and private partnerships (CAL FIRE 2018).

Subdivision Map Act

In 2012, SB 1241 added Section 66474.02 to Title 7, Division 2, of the California Government Code, commonly known as the "Subdivision Map Act." The statute prohibits subdivision of parcels within a designated VHFHSZ, or that are in an SRA, unless certain findings are made prior to approval of a proposed tentative map. The statute requires that a city or county planning commission make three new findings regarding fire hazard safety before approving a subdivision proposal. The three findings are (1) the design and location of the subdivision and its lots are consistent with defensible space regulations found in PRC Sections 4290 and 4291; (2) structural fire protection services would be available for the subdivision through a publicly funded entity; and (3) ingress and egress street standards for fire equipment are met per any applicable local ordinance and PRC Section 4290.

State Fire Regulations

Fire regulations for California are established in Section 13000 et seq. of the California H&SC and include regulations for structural standards (similar to those identified in the CBC); fire protection and public notification systems; fire protection devices, such as extinguishers and smoke alarms; standards for high-rise structures and childcare facilities; and fire suppression training.

4.18.2.2 Local Regulations

Azusa General Plan

Chapter 4, *Economy and Community*, of the Azusa General Plan (City 2004a), discusses fire protection and emergency medical services in the Public Services section. The Fire/Emergency Medical portion of this section provides fire-related goals and policies as follows:

Goal 2. Ensure adequate protection from fire and medical emergencies for Azusa residents and property owners.

Policy 2.7. Ensure that buildings and lots are maintained in a manner that is consistent with fire prevention and personal safety.

Policy 2.8. Continue to work with the LACoFD to provide fire prevention, first aid, and lifesaving public education programs.

City of Azusa Wildfire Mitigation Plan

The City's Wildfire Mitigation Plan was established in 2019 and identifies ignition sources and wildfire risks related to the City's electric grid. The Wildfire Mitigation Plan identifies wildfire mitigation activities that shall be conducted by the City, such as undergrounding of facilities in fire threat areas, developing a vegetation management program, deploying non-explosion fuses, and providing noticing to customers (City 2023b).

2018 Hazard Mitigation Plan

The City's LHMP was prepared to identify hazards that threaten the City, determine likely impacts, and set mitigation goals and strategies. The LHMP discusses historical instances and future vulnerabilities for dam failures, floods, earthquakes, drought, liquefaction, landslides, wildfires, and other severe weather events. Goals of the LHMP include:

- **Goal 1**: Minimize risk and vulnerability of Azusa to natural hazards and protect lives, and prevent losses to property, public health, economy, and the environment.
- **Goal 2**: Increase community education, awareness, and preparedness to hazards of concern and promote participation and action to reduce hazard-related losses.
- **Goal 3**: Improve community's capabilities to prevent/mitigate hazard-related losses and to be prepared for, respond to, and recover from a disaster event.

Los Angeles County Fire Code

The 2023 County Fire Code incorporates the 2022 Edition of the California Fire Code, CCR Part 9, Title 24, and the 2021 International Fire Code. The California Fire Code includes regulations requiring all new commercial or residential development to install sprinkler systems, the minimum required unobstructed street widths for fire apparatus access, and requirements that include a Fire Protection Plan for development in WUI areas. Refer to Section 4.13.2.2 for further discussion of the County Fire Code.

Azusa Municipal Code

Chapter 30 of the Azusa Municipal Code adopts the 2017 County Fire Code which references the 2016 CBC. The Azusa Municipal Code builds upon the County Fire Code and CBC by establishing the responsibilities of the LACoFD and regulations regarding fireworks. Although the City has most recently adopted the 2016 CBC, the Project was designed according to the 2022 CBC, as adopted in the 2023 County Building Code, which is the most recent version of the state code available.

4.18.3 Thresholds of Significance

Thresholds used to evaluate the Project's potential wildfire impacts are based on Appendix G of the CEQA Guidelines. A significant impact related to wildfire could occur if implementation of the proposed Project would occur within or near SRAs or lands classified as VHFHSZs and would:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan;

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

While the Project site is not within an SRA or VHFHSZ, it occurs adjacent to areas classified as VHFHSZs and is within the WUI. Therefore, each of the wildfire thresholds from Appendix G of the CEQA Guidelines are evaluated below for the Project.

4.18.4 Methodology and Assumptions

The evaluation of potential impacts associated with wildfire consisted of a review of secondary sources, including the City's adopted VHFHSZ map. Potential impacts are evaluated based on adherence to applicable fire protection regulations as well as the potential for the Project to exacerbate potential wildfire risks or to expose Project occupants to risks related to wildfire.

4.18.5 Impact Analysis

4.18.5.1 Emergency Plans

Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Emergency response in the City, including the Project site, is guided by regional and local plans and policies, such as the Wildfire Mitigation Plan and LHMP, as described in the regulatory framework above. Such plans are focused on preparing local resources and training fire personnel to respond to emergencies. The proposed Project would include residential, recreational, and industrial uses, which

would not impair the implementation of or physically interfere with the City's emergency response efforts as they would be developed within the boundary of existing recreational land uses that are served by the City and County emergency response teams. The Project would not conflict with the goals of the Wildfire Mitigation Plan or LHMP. The Project site is not within an SRA or a VHFHSZ defined by CAL FIRE (CAL FIRE 2024) but is located within a WUI area. As specified in the Wildfire Mitigation Plan, the CPUC has designated areas within and adjacent to the City as either Fire-Threat Tier 2 (Elevated) or Fire-Threat Tier 3 (Extreme), both of which require existing and future utilities to be underground. The proposed Project is not within a Fire-Threat Tier 2 or Tier 3 zone, and therefore existing on-site utilities are not required to be undergrounded. However, as stated in the City's Wildfire Mitigation Plan, all newly constructed distribution facilities are required to be underground (City 2023b). On-site, private electrical lines serving the Project would be undergrounded. The existing distribution facilities within and surrounding the Project site include a mix of overhead and underground electrical lines. Although not required, some existing electrical distribution lines and equipment would be relocated and undergrounded on the site to serve the proposed buildings.

Furthermore, the Project would be required to comply with the Azusa General Plan and Municipal Code, which address emergency response and emergency evacuation. During construction of the proposed Project, temporary lane closures along Sierra Madre Avenue, North Todd Avenue, and West 10th Street necessary to construct the proposed sidewalk alterations and utility connections would be subject to City approval of a Traffic Control Plan to maintain roadway safety and accessibility for emergency vehicles. In addition, construction of the Project would comply with applicable CBC and County Fire Code building standards. Once operational, Project access locations and internal circulation elements would comply with regulations related to evacuation and safety, as the proposed fire lanes for the Project are 26 to 28 feet wide, which exceeds the California Fire Code requirement of 20 feet for fire apparatus access roadways. In addition, the Project would not interfere with evacuation via the nearest disaster routes to the Project site, Azusa Avenue and Foothill Boulevard (LACDPW 2008). The Project plans have been reviewed and approved by LACoFD based on their conformance with emergency access requirements. Therefore, the Project would not impair the implementation of emergency response and evacuation plans.

Level of Significance Prior to Mitigation

The Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.18.5.2 Wildfire Risks

Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The Project site is within an urbanized part of the City and is not located within a VHFHSZ but is within the WUI. During construction, the Project would be required to comply with applicable state and local regulations in place to reduce the risk of construction-related fire events, including County Fire Code requirements for the performance of a daily fire safety inspection at the Project site. The inspection would require documentation that heating equipment is maintained away from combustible material, fire hydrants are available, temporary wiring is not exposed, flammable materials are properly stored, and more. Therefore, construction activities associated with the Project would not substantially exacerbate wildfire risks.

The Project was designed according to the 2023 County Fire Code, which imposes requirements that minimize fire hazards and outline design measures to be considered in all new development. Because the Project site is within the WUI, the Project may, at the discretion of the fire code official, be required to produce a Fire Protection Plan in accordance with Section 4903.1 of the County Fire Code describing ways to minimize potential losses due to wildfire exposure. The Project site is relatively flat with no significant slopes. Additionally, the Project site is surrounded by existing development and does not typically experience severe winds. There are no other factors that would cause the Project to exacerbate wildfire risks. As stated above, the Project may underground utilities, further reducing wildfire risk, and fire lanes would be constructed at a width greater than the minimum width required by the California Fire Code. The Project would not exacerbate wildfire risks and expose Project occupants to substantial fire-related effects.

Level of Significance Prior to Mitigation

The Project would not exacerbate wildfire risks, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.18.5.3 Infrastructure Installation

Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The proposed Project identifies new roadways, pedestrian and bicycle facilities, and other infrastructure and public facilities improvements throughout the Project site. Roadway extensions throughout the residential portion of the Project site and connections to electricity, natural gas, and water for the entire Project would be required. However, these utilities would be connected to existing infrastructure and

would not represent an extension of infrastructure within an undeveloped area that would exacerbate fire risks. In addition, as described further in Section 4.17, *Utilities and Service Systems*, these facilities are part of the proposed Project and the potential impacts of their construction are considered throughout this EIR. Furthermore, the Project is not located in an SRA or a VHFHSZ but is located within a WUI and would therefore be required to comply with the requirements outlined in Chapter 7A of the CBC, which would further reduce fire risk associated with the Project. The required infrastructure needed to serve the Project site would not exacerbate fire risk or result in temporary or ongoing impacts on the environment.

Level of Significance Prior to Mitigation

Implementation of the Project would not require the installation of infrastructure that may exacerbate fire risk, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.18.5.4 Post-Fire Risks

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?

Wildfires can greatly reduce the amount of vegetation on hillsides. Slope failures, mudflows, and landslides are common in areas where steep hillsides and embankments are present, and such conditions would be exacerbated in a post-fire environment where vegetative cover has been removed. The Project area is generally flat and surrounded by developed land with minimal areas of open vegetation; therefore, landslides are not anticipated to occur on or near the Project site, and the risk of post-fire instability within and surrounding the site would be minimal. In addition, as discussed in Section 4.6, *Geology and Soils*, and Section 4.9, *Hydrology and Water Quality*, the development of the proposed Project would not result in significant changes to runoff, slope stability, landslides, erosion, or drainage. These conditions would not be substantially altered in the event of wildfire within or near the Project site, and the Project would not expose people or structures to significant post-fire risks.

Level of Significance Prior to Mitigation

Implementation of the Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes, and impacts would be less than significant.

Mitigation Measures

No significant impact would occur; therefore, no mitigation is required.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation.

4.18.6 Cumulative Impact Analysis

The study area for the assessment of cumulative impacts related to wildfire is the City. Development within the proposed Project site would not physically interfere with any emergency response or evacuation plans because the Project would not include any features that would prevent continued implementation of these plans. In addition, the Project would be subject to the requirements of the Project-specific Traffic Control Plan, which would include the maintenance of emergency access during construction and would be subject to City approval. Additionally, applicable General Plan Safety Element policies and the Municipal Code would continue to be implemented to ensure adequate citywide emergency response and preparedness. While none of the Project components are within an SRA or a VHFHSZ, the Project site is adjacent to a VHFHSZ and within a WUI and could potentially result in impacts related to wildfire. However, the development of the proposed Project would be required to adhere to all regulatory requirements in place to minimize wildfire hazards including applicable sections of the City's LHMP, fire and building codes, and requirements from the fire chief that would be identified during future building permit reviews.

Cumulative projects in the area would similarly require review by the LACoFD and be required to be constructed in accordance with applicable fire codes. All impacts associated with infrastructure improvements including any required measures to address fire safety would be evaluated in the respective environmental documents for discretionary projects, as necessary. Like the Project, all identified cumulative projects would be required to comply with applicable LHMP goals and policies and building and fire code regulations that would reduce the potential for cumulative impacts. The Project's incremental contribution to impacts related to wildfire would not be cumulatively considerable.

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5.0 OTHER CEQA-REQUIRED SECTIONS

This section includes CEQA considerations not contained elsewhere in this EIR that are required to be included per CEQA Guidelines Section 15126. Specifically, discussions of significant irreversible environmental effects (CEQA Guidelines Section 15126[c]) and growth-inducing impacts (CEQA Guidelines Section 15126[d]) are provided in this section. A summary of significant and unavoidable environmental effects, as required by CEQA Guidelines Section 15126(b), is provided in this section based on the impact determinations provided in Section 4.0, *Environmental Analysis*, which provides further discussion of these impacts and also provides discussion meeting the requirements of CEQA Guidelines Section 15126 (a) and (e). Alternatives to the proposed Project are discussed in Section 6.0, *Project Alternatives*, to meet the requirements of CEQA Guidelines Section 15126(f).

5.1 Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(c) requires an EIR to describe any significant impacts that cannot be avoided, including those impacts that can be mitigated but not reduced to a less than significant level. Section 7.0, *Effects Not Found to Be Significant*, of this EIR analyzes and discusses the CEQA environmental topics where the Project would not have a significant impact. Section 4.0, *Environmental Analysis*, of this EIR identifies the potential environmental impacts of the Project and recommends mitigation measures to reduce impacts, where feasible. As described further in Section 4.15, *Transportation*, the Project would have a significant impact related to resident- and employee-generated VMT that would remain significant and unavoidable even with the incorporation of Project features and mitigation measures. Primarily as a result of the significant and unavoidable VMT impact of the Project, the Project would conflict with air quality, GHG emissions reduction, and regional growth (land use) plans for the region and result in significant and unavoidable impacts related to conflicts with these plans. In addition, the Project would result in significant and unavoidable GHG emissions impacts, as the Project would generate GHG emissions that cannot be mitigated below the applicable threshold. Lastly, short-term construction would result in significant noise impacts (increase over ambient noise levels) that would remain significant and unavoidable with the incorporation of feasible mitigation measures. In summary, the Project would result in significant and unavoidable impacts related to air quality (air quality plans), GHG emissions (GHG emissions and GHG emission reduction plans), land use (land use plans), noise (short-term construction), and transportation (VMT). Additional discussion of these impacts is provided in the relevant sections of Section 4.0, *Environmental Analysis*.

5.2 Significant and Irreversible Effects

CEQA Guidelines Section 15126.2(d) requires a discussion of significant irreversible environmental changes that would be caused by a proposed project. Per CEQA Guidelines Section 15127, irreversible changes are only required to be addressed in EIRs when connected with the adoption, amendment, or enactment of a local plan, policy, or ordinance of a public agency; adoption by a local agency formation commission of a resolution making determinations; or when a project is subject to the National Environmental Policy Act and requires an Environmental Impact Statement. The Project proposes a General Plan amendment and, thus, consideration of irreversible environmental changes is required.

CEQA Guidelines Section 15126.2(d) further notes that significant and irreversible environmental changes may occur as a result of the use of nonrenewable resources during the initial and continued phases of a project since a large commitment of such resources makes removal or nonuse thereafter

unlikely. Irreversible environmental changes typically fall into one of the following three categories: primary impacts, meaning the use of nonrenewable resources for a project; secondary impacts, such as highway or roadway improvements that provide access to a previously inaccessible area, thereby committing future generations to similar uses; and environmental accidents resulting in environmental changes. CEQA Guidelines Section 15126.2(d) states that irretrievable commitments of resources should be evaluated to ensure that such current consumption is justified.

5.2.1 Irreversible Commitment of Resources

The proposed Project would include the reconfiguration of the existing Azusa Greens Country Club to construct a 230-unit age-restricted residential community site, a 19.33-acre industrial site, 9-hole golf course, renovated golf course clubhouse, and associated infrastructure for each of these components.

Construction of the proposed Project would require the use of renewable resources such as lumber and other forest products, which could be expected to be replenished over the lifetime of the Project because sustainably harvested lumber supplies are increased as seedlings mature into trees. As such, the development of the Project would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources during construction of the Project.

Construction of the Project would also result in the use of nonrenewable resources, including building materials (e.g., concrete asphalt, petrochemical construction materials, steel, copper and other metals, and sand and gravel) and fossil fuels, including the use of fossil fuels for construction equipment, the transport of construction materials to the Project site and the transportation of construction workers to and from the Project site (e.g., natural gas, gasoline, diesel fuel, and other petroleum-based products). These materials and the resources used in their production are available in a finite supply and are generally not retrievable, although some of the materials are recyclable. Construction materials like concrete and asphalt, for example, can be crushed and recycled as road base. However, the recycling of these resources for Project construction cannot be assured, and the Project should be considered to result in an incremental increase in the demand for nonrenewable construction materials and fuels.

During Project operation, the Project would result in an irretrievable commitment of nonrenewable resources, such as energy resources and fossil fuels. Long-term energy resources include fuel consumed for the heating and cooling of buildings, transportation of people and goods, as well as for lighting and other energy-related needs. Electricity consumption during operation would increase the consumption of oil, coal, and natural gas. Accordingly, this represents a long-term commitment to the continued consumption of these resources. While statewide energy resources are increasingly generated by renewable resources, the Project would not solely rely on renewable energy resources and would incrementally increase long-term demand for nonrenewable energy resources. As discussed in Section 4.5, *Energy*, of this EIR, the Project would not result in significant impacts related to wasteful use of energy, including fuel consumption, and electricity or natural gas use.

5.2.2 Irreversible Environmental Changes

Implementation of the proposed Project would result in irreversible environmental changes. Irreversible environmental changes are typically associated with the environmental topics of agricultural and forestry resources, biological resources, cultural resources, paleontological resources, mineral resources, and tribal cultural resources.

The Project site is currently developed, and no agricultural, forestry, or mineral resources occur on the site. As such, implementation of the Project would not result in irreversible changes to agricultural and forestry resources or mineral resources. Further discussions of Project impacts related to these resources are provided in Section 7.0, *Effects Found Not to be Significant*.

As identified in Section 4.3, *Biological Resources*, the Project site does not contain any sensitive vegetation communities or riparian habitat areas, and the Project would not have a substantial adverse effect on any sensitive natural community. Project implementation would not result in direct impacts to biological resources through the removal of sensitive habitat or aquatic resources. Impacts to nesting birds would be reduced below a level of significance with identified mitigation measures, and trees removed from the Project site would be replaced at a ratio of 3:1 with the implementation of mitigation measure BIO-2. Therefore, no substantial loss of habitat or special-status species would occur.

The Project site is developed with an existing golf course and related structures, including the golf course clubhouse, which would undergo interior renovations as part of the Project. As discussed in Section 4.4, *Cultural Resources*, no historical structures were identified on the Project site; therefore, the Project would not result in irreversible environmental changes to historic resources. The NAHC states the Project area is sensitive for prehistoric and/or tribal cultural resources; thus, Project implementation has the potential to cause a substantial adverse change to unknown archaeological or tribal cultural resources. Mitigation measures are identified in Section 4.4, *Cultural Resources*, which would reduce impacts to below a level of significance such that no irreversible changes to archaeological or tribal cultural resources would occur.

With regard to paleontological resources, the Project area is entirely underlain by Holocene-age alluvial gravel and sand, which are relatively young deposits with a consequentially low potential to contain significant paleontological resources. The closest reported fossil localities were more than 10 miles from the Project site. Additional discussion of impacts related to paleontological resources is provided in Section 4.6, *Geology and Soils*, which concludes the Project does not have the potential to disturb paleontological resources. No irreversible changes to paleontological resources would occur as a result of the Project.

The Project would involve the creation of new roads throughout the residential site but would not involve road or highway improvements that would provide access to previously inaccessible areas. Installation of sidewalks along the West 10th Street and North Todd Avenue industrial site frontages and along internal roadways in the residential site would provide improved connectivity in the Project area where existing pedestrian access already exists. As such, the Project would not result in significant irreversible secondary impacts.

5.2.3 Potential Environmental Damage from Accidents

Project construction would involve the on-site use and/or storage of hazardous materials/wastes such as fuels, lubricants, solvents, concrete, paint, and portable septic system wastes. While these substances could pose a potential health risk to construction workers and to the public during transport, handling of these materials would occur in accordance with Cal/OSHA guidelines and would be disposed of in accordance with DTSC and County regulations. The residential land use would involve the limited use of typical household cleaning products as well as chemical pesticides, and fertilizers required to maintain the proposed landscaping, and chemicals associated with the maintenance of the swimming pool. Regulated materials would be properly handled, used, stored, transported, and/or disposed of in

accordance with applicable regulatory standards. The golf course use would involve the application of fertilizers and some limited pesticides and herbicides to the course as occurs under existing conditions. Fertilizers are not considered a potential human health risk or threat to groundwater. The use of pesticides and herbicides on the golf course site would not be considered an environmental concern given users of the golf course would be located outdoors and for a relatively short duration of time. The proposed industrial site does not have identified tenants. Potential uses of the industrial buildings could include light manufacturing, direct-to-consumer marketing, warehouse/distribution, and other uses permitted within the DWL zone. As such, it is possible that hazardous materials would be used and/or stored on-site. However, all use and storage of hazardous materials would be subject to applicable regulations, which are intended to reduce the potential for accident conditions and associated risks to the public and the environment.

As described in Section 4.8, *Hazards and Hazardous Materials*, the Project site has been used as a golf course since 1966 and has applied pesticides and herbicides throughout the proposed residential site. However, on-site soils in portions of the site were evaluated and determined to contain concentrations below applicable screening thresholds or background concentration levels. Mitigation is identified for the handling of ACM and LBP found in the golf course clubhouse during construction to prevent accidental release of these materials. Therefore, the potential for the proposed Project to cause significant irreversible environmental damage from an accident or upset of hazardous material would be less than significant.

The Project site is located within a seismically active region and would be exposed to ground shaking during a seismic event. To address the potential for moderate to severe ground-shaking that may occur during the lifetime of the proposed structures, the Project would comply with engineering and design parameters in accordance with the most recent edition of the CBC.

5.3 Growth Inducing Impacts

CEQA Guidelines Section 15126(d) requires that an EIR discuss a project's potential impacts related to growth inducement. CEQA Guidelines Section 15126.2(e) further states that an EIR should describe the ways in which a proposed project could directly or indirectly foster economic growth, population growth, or additional housing, and how that growth would affect the surrounding environment.

A project can have direct and/or indirect growth inducement potential. Direct growth inducement can result from the construction of new housing that would result in new residents moving to an area. Indirect growth can be induced in a number of ways, including the stimulation of economic activity within a region that would result in the need for additional housing and services to support the new employment demand, or through the elimination of obstacles to growth, including both physical and regulatory obstacles. These topics are discussed in Sections 5.3.1 through 5.3.3 below.

Growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Since the general plan of a community defines the location, type, and intensity of growth, it is the primary means of regulating development and growth in that community.

5.3.1 Direct Population Growth

Refer to Section 4.12, *Population and Housing*, of this EIR for a full discussion of population and housing impacts associated with the Project. As discussed therein, the Project would directly facilitate growth through the development of 230 residential units, which would introduce new residents to the area. Based on the average number of persons per household for heads of households 55 and older, the Project would increase the City's existing population of 48,272 by about 465 persons, to approximately 48,737, or by approximately one percent. This small population increase would not be likely to adversely affect the City or its services. The physical environmental impacts associated with the proposed Project's construction and operation as a multi-family residential development are analyzed in Sections 4.1 through 4.18 of this EIR. The analysis has demonstrated that there are adequate services available to serve the Project.

5.3.2 Economic Growth

The Project would involve residential and industrial development on land currently occupied by a golf course. Construction of the Project and the introduction of new industrial uses would create new jobs in the City and spur economic growth. The size of the construction workforce would vary during the different stages of construction but would not require a substantial number of workers such that laborers from outside the local area would relocate to the City. Once operational, the proposed Project has the potential to directly induce population growth through employment opportunities at the residential site, golf course site, and industrial site. As described in Section 4.12, *Population and Housing*, the Project is estimated to support 481 jobs on-site, comprised of 464 full-time equivalent jobs from the industrial site, 5 from the residential site, and 12 from the golf course site at full buildout. However, it is anticipated that the majority of these employment opportunities would be filled by existing residents of the Project region and, therefore, no substantial unplanned population growth would result from these new jobs. No significant physical effects are anticipated to result from economic growth generated by the proposed Project. The proposed Project would, however, have minor beneficial economic effects on local retailers and service providers.

5.3.3 Removing Obstacles to Growth

The removal of either physical or regulatory obstacles to growth is considered to be a growth-inducing impact. A physical obstacle to growth typically involves the lack of public service and/or utility infrastructure. A project could trigger growth if it would result in infrastructure with excess capacity or if it would remove an obstacle to growth in an area, such as providing infrastructure to an area that was previously not available. A regulatory obstacle to growth typically involves a change in zoning or land use regulations that allow for an increase in growth.

The Project is located in a developed area served by existing public utilities and services. The Project does not include any extension or expansion of public services beyond connections or upgrades to the existing infrastructure in the immediate vicinity that are required to serve the Project. The Project would connect to existing utilities within Sierra Madre Avenue, West 10th Street, and North Todd Avenue, including water, sewer, stormwater, electricity, telecommunication, and natural gas (which would only be newly provided to the residential clubhouse building). The Project would not result in the need for new or physically altered facilities related to fire services, police services, schools, or libraries. Water and sewer service in the Project area is provided by the City and would serve the Project. Solid waste disposal for the Project site would continue to be provided by Athens Services and taken to a landfill

with sufficient capacity. Refer to Sections 4.13, *Public Services*, and 4.17, *Utilities and Service Systems*, for further details.

The Project would construct new sidewalks, curbs, and gutters along the industrial site Project frontage on West 10th Street and North Todd Avenue. New internal roadways and associated pedestrian infrastructure would be constructed within the residential site. Improvements within Sierra Madre Boulevard would facilitate safe golf cart and pedestrian crossings. These circulation improvements are additions to the existing circulation system that would improve safety and connectivity but would not provide access to previously inaccessible areas such that they would facilitate future development elsewhere. As such, proposed roadway improvements would not trigger growth in the area.

As stated in Sections 5.3.1 and 5.3.2 above, the population and economic growth induced by the Project's proposed zone changes and General Plan amendment would not be significant. In addition, these changes in land use would only apply to the Project site. The Project would not involve additional regulatory actions that would remove obstacles to growth within the City or region.

Based on the above, the Project would not remove obstacles to growth by extending infrastructure to new areas or allowing for additional development via new regulations, nor would it result in significant adverse environmental impacts beyond those analyzed in this EIR due to the expansion of infrastructure such as water supply facilities, wastewater treatment plants, roads, or freeways. The Project would not remove obstacles to growth resulting in growth beyond that proposed by the Project.

6.0 PROJECT ALTERNATIVES

6.1 Introduction

CEQA Guidelines Section 15126.6(a) requires that EIRs describe "…a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." CEQA Guidelines Section 15126.6(f) further states that "the range of alternatives 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."

CEQA requires that alternatives be feasible, which is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (PRC Section 21061.1). CEQA Guidelines Section 15126.6(f)(1) states that factors that should be considered with regard to the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site. An EIR is not required to consider alternatives that are infeasible, have effects that cannot be reasonably ascertained, or are remote and speculative.

The alternatives should avoid or substantially lessen one or more significant environmental impacts that would occur under the proposed Project. As such, this analysis focuses on the issues discussed in EIR Sections 4.1 through 4.18 because of their potential to result in significant impacts on the environment. Environmental issues discussed in Section 7.0, *Effects Found Not to be Significant*, are not carried forward into this alternatives analysis because it was determined that the Project would result in less than significant impacts on the environment for these resources.

Additionally, the CEQA Guidelines require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the Project, if feasible. CEQA Guidelines Section 15126.6(c) also requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection. Based on the alternatives analysis, an environmentally superior alternative is to be identified.

In developing the Project alternatives to be addressed in this EIR, the potential alternatives were evaluated in terms of their ability to meet the basic objectives of the Project, while reducing or avoiding the environmental impacts of the Project, in accordance with CEQA Guidelines Section 15126.6(a). An EIR need not evaluate the environmental effects of alternatives in the same level of detail as the Project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the Project. The following discussion covers a reasonable range of feasible alternatives that focus on avoiding or substantially lessening significant effects of the Project, even if the alternatives would not attain all of the Project objectives or would be more costly. The analysis is designed to foster meaningful public participation and informed decision-making.

6.2 Project Objectives

An EIR must only discuss in detail an alternative that is capable of feasibly attaining most of the basic objectives associated with the action, while at the same time avoiding or substantially lessening any of

the significant effects associated with the proposed Project. As described in Section 3.3, *Project Objectives*, of this EIR, the following are the primary objectives of the proposed Project:

1. Provide new infill senior housing within an established residential neighborhood that offers a mix of unit types and affordability levels, including low and moderate affordable units, to accommodate a range of household incomes and address the City's shortage of senior housing.
2. Offer an amenity-rich residential community for seniors that encourages physical and emotional health and wellness by providing project residents access to a community of their peers as well as private recreational facilities and a nearby golf course.
3. Reopen an upgraded and reconfigured Azusa Greens Golf Course to provide additional recreational and employment opportunities within the region.
4. Provide contemporary industrial spaces that accommodate a variety of business and operational activities, including local or regional headquarters, light manufacturing/assembly, and warehouse, while generating employment opportunities within the City.
5. Develop a project that helps the City achieve economic development goals and provides fiscal benefit through enhanced property taxes, sales taxes, and utility revenues.
6. Create a distinct project design that includes attractive architecture for buildings and landscaping and outdoor recreational spaces that are in harmony with the surrounding neighboring uses.

6.3 Significant Environmental Effects of the Project

Based on the evaluations in Section 4.0, *Environmental Analysis*, of this EIR, the proposed Project would result in significant but mitigable impacts related to the following environmental topics:

- Air Quality (localized construction PM emissions)
- Biological Resources (sensitive species and tree preservation)
- Cultural Resources (archaeological resources and human remains)
- Hazards and Hazardous Materials (accidental releases)
- Noise (operational noise generation; construction vibration)
- Tribal Cultural Resources (significant tribal cultural resources)

Direct and/or cumulative impacts related to the environmental resources listed above would be reduced to less than significant levels with the incorporation of mitigation measures identified in this EIR. Significant and unavoidable impacts resulting from Project implementation are anticipated to be related to the following:

- Air Quality (air quality plans)
- Greenhouse Gas Emissions (GHG emissions and GHG reduction plans)
- Land Use and Planning (land use plans)
- Noise (construction noise)
- Transportation (VMT)

All other environmental topics were concluded to result in less than significant impacts in Section 4.0, *Environmental Analysis*, and less than significant or no impact in Section 7.0, *Effects Found Not to be Significant*. Because proposed alternatives should avoid or substantially lessen one or more significant environmental impacts that would occur under the proposed Project, the alternatives discussed in this section are intended to reduce the significant environmental effects listed above.

6.4 Alternatives Considered but Rejected

CEQA Guidelines Section 15126.6(c) requires that an EIR identify alternatives that were considered and rejected as infeasible, and briefly explain the reasons for their rejection. Alternatives considered but rejected from further study for the Project include an alternative location, residential-only alternative, recreation land uses alternative, increased residential density alternative, and adjusted residential site plan alternative.

6.4.1 Alternative Location Alternative

In accordance with CEQA Guidelines Section 15126.6(f)(2), an alternative location for a project should be considered if the development of another site is feasible and if such development would avoid or substantially lessen the significant impacts of that project. Factors that may be considered when identifying an alternative site location include the size of the site, its location, the General Plan land use designation, and the availability of infrastructure. CEQA Guidelines Section 15126.6(f)(2)(A) states that a key question in addressing an off-site alternative is "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." Another one of the factors for the feasibility of an alternative site is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site."

Given the unique characteristics of the Project site, there is no alternative location available to accommodate the proposed Project. The proposed Project site contains an existing golf course and is uniquely located between a mix of residential and industrial land uses. While there may be sites within the City that could be combined to create an approximately equivalent site in size to the Project site, such sites would not be suitable for redevelopment with a golf course, age-restricted residential community, and industrial buildings. In addition, the Project applicant does not control another site of comparable land area that is available for development of the Project within the City. As such, an alternative location alternative was rejected from further analysis in the EIR.

6.4.2 Residential-Only Alternative

A residential-only alternative is considered for the purpose of fulfilling Objective 1 to a greater extent than would occur with the proposed Project. However, the proposed industrial site has limitations for residential use, given the existing surrounding industrial operations and the presence of an Alquist-Priolo Fault Zone that renders the site infeasible for residential construction. In addition, the alternative land use of the proposed industrial site area would not substantially lessen the significant environmental impacts of the proposed Project, as residential redevelopment would require a similar level of ground disturbance and would continue to generate a significant VMT impact.

6.4.3 Recreation Land Uses Alternative

The No Project alternative analyzed below pursuant to CEQA Guidelines Section 15126.6(e) discusses what would be reasonably expected to occur in the foreseeable future if the Project were not approved. If the Project is not approved, the proposed residential and industrial sites are not anticipated to be developed due to the lack of entitlements and associated financial constraints. If redevelopment of the complete Project site (including the golf course site) were to occur pursuant to the Recreation land use designation and zoning, allowable development types would include equestrian facilities, golf courses, parks, accessory offices, and day care centers. Given the large site area and unique location, the development of one of these uses is not a reasonably foreseeable use of the site, as none of these uses is expected to be financially feasible. This alternative also would not achieve the Project objectives. As such, this alternative was rejected from further analysis.

6.4.4 Increased Residential Density Alternative

An alternative project proposal previously submitted by the applicant included the development of a 300-dwelling unit multi-family residential development on the current residential site. Under this alternative, the industrial site and golf course site components would be equivalent to the proposed Project. However, the increased density on the residential site would be associated with an increase in vehicle trips and would similarly have a significant impact related to VMT per resident given its location. Therefore, the severity of significant environmental impacts would increase compared to the proposed Project and this alternative was rejected from further analysis.

6.4.5 Adjusted Residential Site Plan Alternative

An alternative project proposal previously submitted by the applicant included the development of the currently proposed 230-dwelling unit age-restricted residential development on a slightly expanded version of the current residential site. This proposal would have included 4 additional duplex units and 4 fewer stacked flat units, with the stacked flat buildings extending further to the east. This slight adjustment to the layout of the residential site would not lessen impacts of the proposed Project given the same residential, industrial, and golf course land uses would be developed over the same total site area as the Project. Also, the residential site layout proposed under this alternative included a proposed pickleball court that required mitigation to reduce noise impacts below a level of significance. While this alternative would meet the basic Project objectives, it would not lessen any significant impacts. As such, this alternative was rejected from further analysis.

6.5 Project Alternatives Analysis

Consistent with CEQA Guidelines Section 15126(d), the alternatives described below are analyzed to include sufficient information to allow a meaningful analysis and comparison with the Project. The following sections include a discussion of the impacts of the alternatives compared to the Project. For purposes of this analysis, those subject areas included in Section 4.0, *Environmental Analysis*, are also included in the analysis of the alternatives. The conclusion for each alternative also provides an overview of how the alternative meets, partially meets, or fails to meet the Project objectives. A No Project Alternative, Reduced Residential Density Alternative, and Reduced Industrial Alternative are carried forward and evaluated in this EIR as alternatives to the proposed Project. The following rationale was considered when developing this range of alternatives:

- The No Project Alternative is required per CEQA Guidelines Section 15126.6(e). It provides a basis for comparing the impacts that would occur if the Project were approved, relative to what would occur if the Project were not approved.
- The Reduced Residential Density Alternative is included to evaluate whether any identified impacts would be avoided or substantially reduced when compared to the Project due to an overall reduction in residential density.
- The Reduced Industrial Alternative is included to evaluate whether any identified impacts would be avoided or substantially reduced when compared to the Project due to a change in the proposed industrial site plan near existing residential land uses.

These alternatives represent a reasonable range of alternatives, as defined in the CEQA Guidelines, because they provide feasible alternate development patterns that would reduce (but not eliminate) the significant impacts associated with the Project. The impacts associated with these alternatives are compared to those identified for the Project in the following analysis, and the alternatives are assessed relative to their ability to meet the basic objectives of the Project. Table 6-1, *Comparison of Project and Alternatives Impacts,* provides a comparative summary of the potential impacts that would occur under the proposed Project and each alternative, as discussed in detail below. Where the alternative would result in the same impact conclusion as the proposed Project, Table 6-1 indicates whether the alternative would reduce, increase, or keep consistent the degree of that impact.

Table 6-1
COMPARISON OF PROJECT AND ALTERNATIVES IMPACTS

Environmental Issue Area	Proposed Project	No Project	Reduced Residential Density	Reduced Industrial
Aesthetics	LS	LS<	LS=	LS=
Air Quality	SU	SM	SU<	SU<
Biological Resources	SM	SM<	SM=	SM=
Cultural Resources	SM	LS	SM=	SM=
Energy	LS	LS<	LS<	LS<
Geology and Soils	LS	LS=	LS=	LS=
Greenhouse Gas Emissions	SU	LS	SU<	SU<
Hazards and Hazardous Materials	SM	SM=	SM=	SM=
Hydrology and Water Quality	LS	LS<	LS=	LS=
Land Use and Planning	SU	LS	SU<	SU<
Noise	SU	SU<	SU<	SU<
Population and Housing	LS	LS<	LS<	LS=
Public Services	LS	LS<	LS<	LS<
Recreation	LS	LS<	LS<	LS<
Transportation	SU	LS	SU<	SU<
Tribal Cultural Resources	SM	LS	SM=	SM=
Utilities and Service Systems	LS	LS<	LS<	LS<
Wildfire	LS	LS<	LS=	LS=

SU = significant and unavoidable impacts; SM = significant but mitigable impacts; LS = less than significant impacts;
N = no impacts
< represents comparatively reduced impact relative to the Project (if impact designation is the same and impact varies)
> represents comparatively greater impact relative to the Project (if impact designation is the same and impact varies)
= represents same/similar impacts relative to the Project

6.5.1 No Project Alternative

6.5.1.1 Description

CEQA Guidelines Section 15126.6(e) requires that a "no project" alternative be evaluated along with its impacts to allow decision makers to compare the impacts of approving the Project with the impacts of not approving the Project. The "no project" analysis is required to discuss the existing conditions at the time the NOP is published, as well as what would be reasonably expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services.

As the proposed Project site has existing entitlements to operate as a 9-hole golf course and driving range, reopening of the golf course use is evaluated under this No Project Alternative. While the golf course was not operating at the time the NOP was published, it has since reopened and would be expected to continue operating if the proposed Project is not approved. The No Project Alternative assumes alterations to the driving range, interior golf course clubhouse renovations, and light course renovations proposed under the Project would proceed to improve the existing golf course use. However, the interior golf course clubhouse renovations would not result in the creation of a banquet space, as this would require additional discretionary approvals. Rather, the golf course clubhouse would be reopened with its existing capacity for food and drink service, with minor interior upgrades requiring ministerial building and safety permits.

The remaining seven golf course holes, identified as the industrial site and residential site under the proposed Project, would remain as open space zoned for Recreation but would not reopen as part of the golf course use. As is proposed under the Project, hole 8 would be shortened from its existing configuration, the tee box for hole 7 would be relocated, and adjustments to the driving range would occur. The golf cart crossing safety improvements would also be implemented. These minor improvements would be allowed under existing entitlements for the site and would involve only minor grading and landscaping activity. As the same number of golf holes would be opened as proposed by the Project, this alternative is anticipated to generate 273 ADT, consistent with the number of vehicle trips generated by the golf course site under the Project. The No Project Alternative assumes no residential buildings, industrial uses, or associated off-site improvements would be constructed.

6.5.1.2 Comparative Environmental Analysis

Aesthetics

Under the No Project Alternative, the Project site would generally appear as it does under existing conditions, with minor improvements to the golf course that would not be highly visible from surrounding areas as these improvements would not involve new structures, buildings, or other objects that would be considered new prominent visual elements. The primary visual difference from public roadways between the proposed Project and the No Project Alternative would be the area along North Todd Avenue, where the views of former golf course areas lined with trees would remain instead of being replaced by light industrial buildings under the Project. However, northern-facing scenic views of the San Gabriel Mountains from along North Todd Avenue would not be obstructed, similar to the proposed Project. While this alternative would not include the proposed residential development under the Project, the residential buildings were not anticipated to be visible from Sierra Madre Avenue, and little to no visual change would occur between the Project and the No Project Alternative. Future

development under the No Project Alternative would be limited to minor improvements to the golf course and building interiors that would require ministerial approvals, such as building and safety permits. The Azusa General Plan and Municipal Code regulations would apply to these ministerial approvals, similar to the proposed Project, including requirements for outdoor lighting. Similar to the Project, the No Project Alternative would not include architectural elements that would be highly reflective or result in adverse glare effects. The residential, light industrial, and banquet space components of the proposed Project would involve more developed elements on the Project site compared to the No Project Alternative. Aesthetics impacts would remain less than significant but be slightly reduced compared to the Project.

Air Quality

The No Project Alternative would not require the General Plan amendments proposed by the Project and would substantially reduce the amount of construction activity and vehicle trips associated with the proposed Project. As no change in the land use would occur, this alternative would be consistent with assumptions in air quality planning documents and would avoid the Project's significant and unavoidable impact associated with air quality plan conflicts. Renovation of the golf course and clubhouse would result in a substantial decrease in total air pollutant emissions during construction, and emissions would remain below the daily thresholds. Operation of the golf course site would generate vehicle trips and result in some area and energy emissions; however, pollutant emissions during operation would also be substantially reduced compared to those that would occur with the Project. Localized PM emissions would be decreased compared to the Project but mitigation would still be required to reduce localized emissions below a level of significance. This alternative would also incrementally reduce the generation of TACs and odors near sensitive receptors, given the residential and industrial sites would not be developed, and the TAC and odor impacts would remain less than significant, similar to the Project. This alternative would also incrementally reduce emissions associated with the proposed Project construction and operations, thereby slightly reducing the Project's less than significant impact to air quality standard attainment. Overall, the No Project Alternative would avoid the significant and unavoidable air quality impact of the Project, resulting in less impact than the Project.

Biological Resources

Under the No Project Alternative, physical land disturbances from grading activities at the Project site would be substantially reduced as the residential and light industrial sites would not be developed, and improvements to the existing 9-hole golf course would be limited to minor modifications within the existing golf course green. Significant but mitigable impacts under the Project to nesting birds and tree preservation would be decreased under the No Project Alternative since tree and vegetation clearing would be more limited compared to the Project. As there are no sensitive habitats, wetlands, or wildlife corridors at the Project site, these impacts would remain less than significant under the No Project Alternative. This alternative would not involve extensive tree or vegetation removal and would reduce the Project's mitigable biological resources impacts.

Cultural Resources

The No Project Alternative would not involve ground disturbances associated with residential and industrial development under the proposed Project. Potential impacts to archaeological resources and human remains would be avoided under the No Project Alternative given grading would occur within surficial fills, and mitigation measures would not be required. Impacts related to historic resources

would not occur under the No Project Alternative, similar to the proposed Project, as no historic resources were identified. This alternative would not involve substantial land disturbing activities that could potentially impact archaeological resources or human remains and would avoid the Project's cultural resources impacts.

Energy

Future redevelopment under the No Project Alternative would be limited to minor improvements to the 9-hole golf course and would not include the banquet space identified for the golf course clubhouse in the proposed Project. The No Project Alternative would result in decreased energy use compared to the Project as no changes to land uses or zoning would be proposed, and additional event space would not occur at the golf course clubhouse. The proposed residential, industrial, and golf course clubhouse components of the proposed Project would require greater energy use compared to the No Project Alternative, where these areas would remain unmanaged open space. The No Project Alternative would use energy only for the operation of the golf course site in accordance with applicable regulations; therefore, impacts associated with energy would remain less than significant, but the quantity of energy resources used would be reduced compared to the Project.

Geology and Soils

The No Project Alternative would not result in increased geology and soils impacts compared to the Project as limited grading would occur for the golf course renovations and structures would not be constructed on the industrial and residential sites. While the No Project Alternative would not include new development on an active fault, impacts associated with the proposed Project were concluded to be less than significant due to appropriate building setbacks from the fault and compliance with other policies of the Azusa Municipal Code and General Plan for ground shaking. As described in Section 4.6, *Geology and Soils*, the Project would result in less than significant impacts to geology and soils, and no mitigation measures would be required related to landslides, ground failure, liquefaction, soil erosion, expansive soils, septic tanks, and paleontological resources. Impacts associated with geology and soils would remain less than significant, similar to the Project.

Greenhouse Gas Emissions

Consistent with the discussion of air quality impacts for the No Project Alternative, this alternative would decrease GHG emissions associated with construction and operation compared to the proposed Project. GHG emissions would continue to be generated by energy use and vehicle trips associated with golf course operations; however, such emissions would not exceed the applicable threshold with operation of only the golf course use. In addition, this alternative would avoid the significant and unavoidable VMT impact of the Project (see discussion of Transportation impacts below) and, therefore, would not conflict with GHG emission reduction plans for the state or region that aim to decrease VMT. As such, this alternative would avoid the significant and unavoidable impacts of the Project related to GHG emissions.

Hazards and Hazardous Materials

As described in Section 4.8, *Hazards and Hazardous Materials*, the age of the golf course clubhouse and surveys of the structure indicate the potential for building materials to contain ACMs or LCMs that could be disrupted and released during renovations. Impacts related to ACMs, LCMs, and LBP could still occur under the No Project Alternative with the building renovations of the clubhouse. The less than

significant impacts related to schools, hazardous materials sites, airports, emergency response plans, and wildland fires would remain less than significant under this alternative. Significant but mitigable hazardous building materials impacts related to golf course clubhouse renovations would remain under the No Project Alternative, consistent with the Project.

Hydrology and Water Quality

The No Project Alternative would involve limited to minor improvements to the 9-hole golf course and would not include the addition of the impervious surfaces or alterations of drainage conditions associated with the proposed residential and light industrial uses of the Project. Therefore, this alternative would reduce the degree of change associated with the Project's less than significant impacts to water quality standards, groundwater supplies or recharge, drainage patterns, flood hazards, and water quality and groundwater management plans. As the Project would involve more changes to on-site drainage conditions than the No Project Alternative, impacts associated with hydrology and water quality would remain less than significant but be reduced compared to the Project.

Land Use and Planning

The No Project Alternative would involve minor improvements to the 9-hole golf course and would not include the discretionary approvals associated with residential and light industrial development of the proposed Project, including but not limited to zone changes, a tentative parcel map, a tentative tract map, and a General Plan amendment. As this alternative would not alter the boundaries of the existing golf course use, the reopening of the golf course use would not divide an established community, consistent with the impact of the Project. However, the No Project Alternative would avoid the proposed Project's significant and unavoidable impact associated with land use plan conflicts (as a result of VMT) as it would not involve discretionary approvals affecting land use and density at the Project site.

Noise

The No Project Alternative would require minor construction activity, which would occur within the permitted daytime construction hours; therefore, the mitigation required for nighttime construction would not be required given no nighttime construction would occur. However, daytime construction would still require the use of heavy-duty construction equipment on the golf course site similar to that required for the residential site that would substantially increase ambient noise levels (more than 10 dBA) at nearby residences and mitigation to reduce this temporary increase in noise levels below a level of significance is not feasible, as described for the Project. Despite the remaining significant increase in noise levels, the duration of construction would be reduced compared to the Project. Construction vibration would occur further than 30 feet from off-site residences and the significant but mitigable construction vibration impact would be avoided. There would be no operational industrial or residential site noise sources under the No Project Alternative, and the significant but mitigable noise impacts related to industrial site operations would be avoided. There would also be no operational sources of vibration and no significant aircraft noise levels at the site, consistent with the proposed Project. Overall, the No Project Alternative would avoid the significant but mitigable construction vibration and operational noise impacts of the Project but would continue to result in substantial increases over ambient noise levels during construction. This represents a decrease in impacts associated with noise despite the remaining significant construction noise impact.

Population and Housing

The No Project Alternative would involve minor improvements to the 9-hole golf course and would not include the direct population increase associated with the residential component of the proposed Project. Therefore, this alternative would not result in unplanned population growth and would reduce population growth compared to the Project. As there would be no reconfiguration of land uses and no residences occur within the site, this alternative also would not displace existing populations from the Project site, consistent with the Project. Under the No Project Alternative impacts associated with population and housing would remain less than significant but be reduced compared to the Project.

Public Services

The No Project Alternative would involve minor improvements to the 9-hole golf course and would not include an increase in public services associated with the residential, light industrial, and golf course components of the proposed Project. As described in Section 4.13, *Public Services,* the Project would result in additional residents and employees and would result in less than significant impacts related to new or altered public facility services. There would be no increase in population associated with the No Project Alternative, and no associated increase in demand for these services would occur. Impacts associated with public services would remain less than significant under the No Project Alternative but would be reduced compared to the Project.

Recreation

The No Project Alternative would involve minor improvements to the 9-hole golf course and would not include an increase in demand for recreational services to accommodate the additional residential population anticipated with the proposed Project. As described in Section 4.14, *Recreation*, the Project would result in less than significant impacts related to new or altered recreational facilities. Impacts associated with recreation would remain less than significant under the No Project Alternative but would be incrementally reduced compared to the Project.

Transportation

The minor improvements that would occur under the No Project Alternative would result in the generation of new vehicle trips to the golf course site. However, there would still be no conflicts with applicable transportation plans, as is the case for the proposed Project. The golf course site would also continue to be renovated with safety improvements under this alternative and would not create transportation hazards or result in inadequate emergency access. The VMT impacts related to resident VMT from the residential site and employee VMT from the industrial site would be avoided with the No Project Alternative. The golf course site would generate approximately 273 ADT; however, patron trips to the golf course would decrease regional VMT, given the opening of a golf course within the community. The remaining employee trips (estimated to require 12 employees) could increase regional VMT but would be below the small project screening threshold of 110 ADT and would not result in a significant VMT impact. Therefore, the No Project Alternative would avoid the significant and unavoidable VMT impact of the Project, and transportation impacts would be less than for the Project.

Tribal Cultural Resources

The No Project Alternative would involve the operation of a 9-hole golf course and limited renovations to existing buildings requiring ministerial approvals and would not involve substantial ground

disturbances associated with residential and industrial development under the proposed Project. Significant but mitigable impacts to tribal cultural resources would be avoided under the No Project Alternative, and mitigation measures would not be required. This alternative would not involve land-disturbing activities at a depth that could potentially impact tribal cultural resources and would avoid the Project's tribal cultural resources impacts; therefore, such impacts would be decreased from the Project.

Utilities and Service Systems

The No Project Alternative would involve minor improvements to the 9-hole golf course and would not include an increase in utilities and service systems associated with the residential, light industrial, and golf course components of the proposed Project. As described in Section 4.17, *Utilities and Service Systems*, the Project would result in additional residents and employees but would result in less than significant impacts related to new or expanded water or wastewater treatment, water supplies, or solid waste generation. Impacts associated with utilities and service systems would remain less than significant under the No Project Alternative; however, there would be a limited increase in the use of these utilities and services, and the impact would be incrementally reduced compared to the Project.

Wildfire

The No Project Alternative would involve minor improvements to the 9-hole golf course and would not include an increase in wildfire risks associated with the residential, light industrial, and golf course components of the proposed Project. However, this alternative would not introduce additional residents and employees to the site, thereby reducing the increased risk from wildfire to these populations. The No Project Alternative would not result in changes to emergency response, wildfire risk, infrastructure, or post-fire risks. Impacts associated with wildfire would remain less than significant under the No Project Alternative but be reduced compared to the Project.

6.5.1.3 Conclusion

The No Project Alternative would avoid the proposed Project's significant and unavoidable VMT impact, thereby also avoiding significant and unavoidable impacts to air quality, GHG emissions, and land use plans. However, the significant and unavoidable construction noise impact would remain. As no substantial ground disturbance would be required, the No Project Alternative would also avoid the significant but mitigable impacts of the Project to cultural and tribal cultural resources. The significant but mitigable construction vibration and operational noise impacts would also be avoided without the implementation of the industrial or residential site development. The significant but mitigable impacts related to localized construction emissions and the release of hazardous materials from golf course clubhouse renovations would remain. Significant but mitigable impacts to biological resources would continue to occur but be reduced under this alternative. Drainage conditions also would not be substantially altered, and the Project's less than significant impacts to hydrology and water quality would be incrementally decreased. As no population growth would be directly induced under this alternative, an incremental decrease in the Project's less than significant impacts to population and housing, public services, recreation, utilities and service systems, and wildfire would occur. Less than significant, but incrementally reduced, impacts to aesthetics and energy would also occur with this alternative. No change in impacts related to geology and soils would occur.

The No Project Alternative would meet one of the six Project objectives, as it would reopen the Azusa Greens Golf Course (objective 3). However, the Project site would remain as a 9-hole golf course without new uses on the rest of the site, which would remain as unmanaged open space. Therefore, this alternative would not achieve the other five objectives of the Project, as no new housing and limited employment opportunities and associated economic benefits would be created.

6.5.2 Reduced Residential Density Alternative

6.5.2.1 Description

The Reduced Residential Density Alternative would involve industrial and golf course improvements consistent with the proposed Project but would construct only 162 dwelling units within the residential site. Under this alternative, the residential site would require a zone change to the Low Density Residential zone in Neighborhood General 3, which allows 8 units per acre, resulting in up to 162 dwelling units for the residential site. The increased density allowed for age-restricted apartment uses would not be utilized. To achieve this density, single-story duplex and triplex buildings similar to those proposed with the Project would be constructed in the northeast portion of the residential site in place of the stacked flat and community buildings. Under the Reduced Residential Density Alternative, approximately 698 ADT would be generated by the residential land use, for a total of 2,690 ADT under this alternative.

6.5.2.2 Comparative Environmental Analysis

Aesthetics

Under the Reduced Residential Density Alternative, the golf course and industrial sites would be developed consistent with the proposed Project while the residential site would have shorter buildings in place of the stacked flats. As the area where the building heights would be reduced is not visible from public vantage points, there would not be a substantial change in the appearance of the Project site under this alternative. Visual effects related to the industrial buildings would remain the same as under the Project. The location of light sources within the residential site would be slightly altered, but no change in the effects related to light and glare would occur compared to the Project. The Reduced Residential Density Alternative would not substantially impact aesthetics, and impacts would remain less than significant, similar to the Project.

Air Quality

The Reduced Residential Density Alternative would result in similar but slightly reduced air pollutant emissions when compared to the proposed Project because it would involve the construction of fewer structures and less dwelling units (162 instead of 230), generating fewer trips. However, the General Plan amendments for the conversion of land uses would continue to be required, thereby resulting in the same significant and unavoidable impact related to air quality plan conflicts as the Project. Construction emissions would decrease only slightly, as the majority of site preparation and grading would result in a similar level of construction activity as under the proposed Project. A slight reduction in pollutant emissions generated by operations would occur because vehicle trips would be reduced by 133 ADT. There would be no substantial change in localized effects of construction or operation and impacts to sensitive receptors would be significant but mitigable. Odor impacts would also remain less than significant. While the Reduced Residential Density Alternative would incrementally reduce

emissions from the Project, the significant and unavoidable air quality impacts associated with the Project would remain for this alternative.

Biological Resources

As construction of the Reduced Residential Density Alternative would occur within the same footprint as the proposed Project, impacts to biological resources would be the same as those that would occur with implementation of the proposed Project. The exact number of trees to be removed and/or replaced may be slightly altered but would continue to be subject to City requirements for replacement. Potentially significant but mitigable impacts to nesting birds and tree preservation policies would occur, and mitigation measures BIO-1 and BIO-2 would be required to reduce these potential impacts below a level of significance. Impacts to biological resources under the Reduced Residential Density Alternative would be significant but mitigable, similar to those of the Project.

Cultural Resources

Construction of the Reduced Residential Density Alternative would occur within the same footprint and require similar ground-disturbing activities to the proposed Project. Therefore, impacts to cultural resources would be the same as those that would occur with the Project. Potentially significant but mitigable impacts to archaeological resources and human remains would occur and mitigation measures CUL-1 through CUL-4 would be required to reduce these potential impacts below a level of significance. Impacts to cultural resources under the Reduced Residential Density Alternative would be significant but mitigable, similar to those of the Project.

Energy

Similar to the discussion of air quality impacts above, the Reduced Residential Density Alternative would slightly decrease energy resources required for construction and operations compared to the proposed Project. The construction of smaller residential structures would result in slight decreases in the amount of energy required to construct the proposed residential buildings and the smaller number of dwelling units would reduce energy use for building operations as well as vehicle trips. Consistent with the Project, this energy use would not be wasteful and would not conflict with energy efficiency or renewable energy plans. Therefore, the Reduced Residential Density Alternative would incrementally reduce the less than significant energy impacts associated with the Project.

Geology and Soils

The Reduced Residential Density Alternative would involve construction within the same footprint as the proposed Project. As such, ground-disturbing activity would occur within the same soils and geologic units as those that would occur with the implementation of the proposed Project; therefore, potential geologic hazards under this alternative would be the same as for the Project. The Reduced Residential Density Alternative would be required to comply with applicable recommendations of a geotechnical investigation, and it is expected that these recommendations would be similar as those applicable to the Project. This alternative would also require the implementation of a SWPPP, which would avoid impacts related to erosion, and no septic tank installation would be required. The Reduced Residential Density Alternative would also occur within the same footprint as the Project where there is low potential for paleontological resources to occur. Impacts related to geology and soils would be similar and less than significant for both the Project and this alternative.

Greenhouse Gas Emissions

Like the discussion of air quality impacts above, the Reduced Residential Density Alternative would have slightly decreased GHG emissions impacts in comparison with the proposed Project but would continue to conflict with applicable planning documents. The decreased building area to be constructed would reduce the total amount of construction activity and associated GHG emissions. During operation, slight decreases in GHG emissions from energy use and vehicle trips would occur; however, these reductions would not result in GHG emissions below the SCAQMD threshold. As such, GHG emissions impacts would remain significant and unavoidable. While the number of residents would be reduced, the significant and unavoidable VMT impact of the Project would also occur under this alternative and the Project would conflict with the applicable GHG emission reduction plans for the state and region. Therefore, the Reduced Residential Density Alternative would result in significant and unavoidable GHG emissions impacts but with less GHG emissions than the proposed Project.

Hazards and Hazardous Materials

The Reduced Residential Density Alternative would occur within the same footprint as the proposed Project and would require building renovation activities that would potentially encounter LCMs, ACMs, and LBPs consistent with the proposed Project. Therefore, a potentially significant but mitigable impact would occur with the implementation of mitigation measure HAZ-1. Less than significant impacts related to the use of hazardous materials, airport hazards, emergency response, and wildland fires would remain under the Reduced Residential Density Alternative, given the same land uses would be constructed and regulations related to the safe handling of hazardous materials are adhered to. Impacts related to hazards and hazardous materials under the Reduced Residential Density Alternative would be significant but mitigable and similar to those associated with the proposed Project.

Hydrology and Water Quality

The Reduced Residential Density Alternative would involve construction activity within the same footprint as the proposed Project and would, therefore, have a similar impact on hydrology and water quality. The Reduced Residential Density Alternative would be required to comply with City stormwater standards and water quality regulations (including the NPDES Construction General Permit, preparation of a SWPPP, and implementation of construction BMPs). The amount of landscaping and impervious surface for either scenario would be expected to be similar and stormwater capture and treatment systems for this alternative would be required consistent with the Project. As a result, the less than significant hydrology and water quality impacts associated with the Project would be similar to those associated with the Reduced Residential Density Alternative.

Land Use and Planning

Under the Reduced Residential Density Alternative, the site would continue to be developed with multi-family residential, industrial, and recreational uses; however, the General Plan amendment and zone change would convert the residential site to Low Density Residential. The same footprint would be developed, and no community division would occur. The change in land use would be similar, but decreased in density from the Project, and would still conflict with the RTP/SCS, thereby resulting in a significant and unavoidable land use impact. Therefore, land use impacts would be significant and unavoidable under both the Project and this alternative but would be incrementally reduced under this alternative, given total VMT would be decreased.

Noise

The Reduced Residential Density Alternative would result in similar construction noise and vibration activities when compared to the proposed Project, and impacts would remain significant for increases in noise and significant but mitigable for vibration. The significant but mitigable industrial site noise impact would also remain. The less than significant impact associated with traffic noise would be decreased under this alternative, given fewer mobile trips would be generated. There would still be no impact related to airport noise levels. Overall, noise associated with this alternative would be slightly reduced compared to the Project but impacts would remain consistent with those for the Project.

Population and Housing

The Reduced Residential Density Alternative would provide 162 new dwelling units on the site, generating population growth of 327 people based on the average household size of 2.02 people. This would represent a smaller direct increase in the City's population than under the proposed Project; however, neither scenario would induce unplanned population growth in the City. The decrease in units would not substantially change the number of jobs created during construction and operation, and these jobs would continue to be filled by the existing regional population. Consistent with the Project, no residential units would be removed, given none occur on-site. There would be a slight decrease in population growth under the Reduced Residential Density Alternative. Impacts would remain less than significant but be slightly reduced from the proposed Project.

Public Services

Impacts related to demand for most public services and facilities, including police, fire, libraries, senior centers, and parks, would be incrementally reduced under this alternative compared to the Project, as the number of dwelling units on the site would be less with the Reduced Residential Density Alternative. This reduced development density would correlate to a reduction in demand for public services and facilities. Both the Project and this alternative would contribute Park and Recreation Redevelopment Fees to the City based on the number of proposed bedrooms to offset potential impacts to parks. Both scenarios would implement age restricted (55 years and older) residences that would not generate students or place a demand on public schools. While this alternative would decrease the new demand for public services compared to the Project, neither would require the construction of new public service facilities that would generate environmental effects. Overall, the Reduced Residential Density Alternative would place less demand on public services than the Project and incrementally reduce the less than significant impact of the Project related to public services.

Recreation

The Reduced Residential Density Alternative would induce a smaller amount of population growth and, therefore, a smaller increase in use of recreational facilities compared to the proposed Project. Similar to the Project, this alternative would be required to provide Park and Recreation Redevelopment Fees to the City corresponding to the number of bedrooms created. The Reduced Residential Density Alternative would decrease the construction of new recreational facilities within the residential site but would continue with the reconfiguration of the golf course site. However, the construction impact footprint would remain consistent with the Project, and potential adverse environmental effects of recreational facility construction are addressed throughout the applicable impact discussions. The

Reduced Residential Density Alternative would place less demand on off-site recreational facilities than the Project, thereby incrementally reducing the less than significant impact of the Project.

Transportation

The Reduced Residential Density Alternative would result in similar but reduced transportation impacts when compared to the proposed Project. This alternative would remain consistent with applicable transportation plans for both roadways and alternative transportation facilities. It would also continue to provide sufficient emergency access. There would also be no change in the less than significant impact of the Project related to hazardous design features. While the Reduced Residential Density Alternative would reduce the number of residents at the site, the location of the site would be the same, and VMT per resident, as well as industrial and golf course employee VMT, would remain above the applicable thresholds even with the incorporation of the identified mitigation measures. Therefore, this alternative would continue to result in a significant and unavoidable VMT impact but would reduce total VMT attributable to the Project.

Tribal Cultural Resources

Similar to the discussion of cultural resource impacts for this alternative above, impacts to tribal cultural resources would not be altered by the Reduced Residential Density Alternative, given the same footprint would be developed. Potentially significant but mitigable impacts to tribal cultural resources would occur, and mitigation measures CUL-1 through CUL-4 and TCR-1 would be required under the Reduced Residential Density Alternative, similar to the proposed Project.

Utilities and Service Systems

As the Reduced Residential Density Alternative would involve the construction and operation of fewer dwelling units than the Project, it would result in reduced demand for additional water, wastewater treatment, and solid waste disposal services. Similar to the proposed Project, this alternative would not result in the need for the relocation or construction of new public utility facilities and would construct private utility pipelines and connections to existing infrastructure, except for a replacement water main near the industrial site. This alternative would generate slightly less waste but maintain compliance with policies related to solid waste generation and disposal. Impacts related to demand for public utilities under the Project and this alternative would both be less than significant; however, impacts under the Reduced Residential Density Alternative would be comparatively less than the Project.

Wildfire

The construction and operation of the Reduced Residential Density Alternative would occur within the same footprint as the Project and, therefore, be subject to similar wildfire risks. The alternative would be subject to the same regional and local plans and policies related to wildfire as the proposed Project, such as the Wildfire Mitigation Plan, the LHMP, the California Fire Code, and the Azusa General Plan and Municipal Code. Like the Project, as the Reduced Residential Density Alternative would also occur within the WUI, a Fire Protection Plan may be prepared to address ways to minimize fire danger. As both the Project and the Reduced Residential Density Alternative would be required to comply with these policies and regulations, impacts related to wildfire hazards would be less than significant and similar.

6.5.2.3 Conclusion

The Reduced Residential Density Alternative would result in significant and unavoidable construction noise impacts and significant but mitigable operational noise impacts consistent with the Project. The reduction in proposed residences would slightly reduce the severity of the significant and unavoidable air quality, GHG emissions, land use, and transportation impacts but would not avoid these impacts. Similarly, a reduction in energy use would occur and impacts would remain less than significant. Significant but mitigable impacts to biological resources, cultural resources, hazards and hazardous materials, and tribal cultural resources would remain the same under the Reduced Residential Density Alternative, given the development footprint and grading activity would remain the same. Other less than significant impacts of the Reduced Residential Density Alternative would be substantially similar to those related to the Project, including aesthetics, geology and soils, hydrology and water quality, and wildfire. Direct population growth from the Project would be reduced and an associated incremental decrease in the Project's less than significant impacts to population and housing, public services, recreation, and utilities and service systems would occur.

The Reduced Residential Density Alternative would meet five of the six Project objectives but to a lesser degree than the proposed Project due to the reduced number of dwelling units that would be created. This alternative would not meet Project objective 2, as the common amenity space would be replaced with residential units. The decrease in dwelling units would decrease the housing stock to be provided and would detract from the Project's ability to provide below market rate units. Under this alternative, the site would be utilized for multi-family residences but would not provide the same mix of unit types or affordability levels to assist the City in addressing the shortage of senior housing.

6.5.3 Reduced Industrial Alternative

6.5.3.1 Description

The Reduced Industrial Alternative would involve residential and golf course improvements consistent with the proposed Project but would eliminate the construction of Building 6 on the industrial site. Therefore, this alternative would result in the construction of 296,585 SF of industrial space, a reduction of approximately 15 percent of the proposed industrial space. This would also result in the nearest industrial building (Building 5) being located approximately 150 feet from the existing residential land uses to the northeast and approximately 600 feet from those to the east. Under this alternative, the remainder of the industrial site would be finished with a mix of hardscape and landscape, allowing for vehicle parking and storage. With the reduction in industrial building space, this alternative would generate approximately 1,444 vehicle trips from the industrial site, including 74 truck trips, for a total of 2,548 ADT for this alternative.

6.5.3.2 Comparative Environmental Analysis

Aesthetics

Under the Reduced Industrial Alternative, the golf course and residential sites would be developed consistent with the proposed Project, while the industrial site would no longer involve the construction of Building 6. Because Building 6, as proposed with the Project, would not alter views along North Todd Avenue, where views of the San Gabriel Mountains occur, the removal of Building 6 under this alternative would not change the Project's less than significant impacts related to scenic resources. The

location of light sources within the industrial site would be slightly altered and moved away from residences to the east, but no change in the effects on views in the area related to light and glare would occur. The Reduced Industrial Alternative would not substantially alter the aesthetic effects of the Project, and impacts would remain less than significant, similar to the Project.

Air Quality

The Reduced Industrial Alternative would result in similar but reduced air pollutant emissions, when compared to the proposed Project, because it would involve construction of one less structure and operation of less industrial square footage, thereby generating fewer trips. However, the General Plan amendments for the conversion of land uses would continue to be required, thereby resulting in the same significant and unavoidable impact related to air quality plan conflicts as the Project. Construction emissions would decrease only slightly, as the majority of site preparation and grading would require the same intensity of construction as under the proposed Project, with slight reductions in building construction emissions with the exclusion of Building 6. The localized construction impact would be decreased compared to the Project but mitigation would still be required to reduce localized emissions below a level of significance. Greater reductions in pollutant emissions generated by operational traffic would occur because ADT would be reduced by approximately 275 trips. Without construction of Building 6, loading docks would be located further from residential receptors, and the Project's less than significant impact to sensitive receptors during operations would be comparatively reduced. Impacts related to odors would be the same as for the Project. Overall, the Reduced Industrial Alternative would incrementally reduce emissions from the Project but would not avoid the significant and unavoidable air quality impacts associated with the Project.

Biological Resources

As construction of the Reduced Industrial Alternative would occur within the same footprint as the proposed Project, impacts to biological resources would be the same as those that would occur with the implementation of the proposed Project. Potentially significant but mitigable impacts to nesting birds and tree preservation policies would occur, and mitigation measures BIO-1 and BIO-2 would be required to reduce these potential impacts below a level of significance. Impacts to biological resources under the Reduced Industrial Alternative would remain significant but mitigable, similar to the Project.

Cultural Resources

Construction of the Reduced Industrial Alternative would occur within the same footprint and require similar ground-disturbing activities to the proposed Project. Therefore, impacts to cultural resources would be the same as those that would occur with the Project. Potentially significant but mitigable impacts to archaeological resources and human remains would occur, and mitigation measures CUL-1 through CUL-4 would be required to reduce these potential impacts below a level of significance. Impacts to cultural resources under the Reduced Industrial Alternative would be significant but mitigable and similar to the Project.

Energy

Similar to the discussion of air quality impacts above, the Reduced Industrial Alternative would have slightly decreased energy resource impacts compared to the proposed Project. The construction of one less building on the industrial site would result in slight decreases in the amount of energy required to construct and operate the proposed industrial buildings. In addition, this alternative would reduce

energy use for vehicle trips. Consistent with the Project, this energy use would not be wasteful and would not conflict with energy efficiency or renewable energy plans. Therefore, the Reduced Industrial Alternative would incrementally reduce the less than significant energy impacts associated with the Project.

Geology and Soils

The Reduced Industrial Alternative would involve construction within the same footprint as the proposed Project. As such, ground-disturbing activity would occur within the same soils and geologic units as the proposed Project, and the same geologic hazards would be present. The Reduced Industrial Alternative would be required to comply with applicable recommendations of a geotechnical investigation, and it is expected that these recommendations would be similar as those applicable to the Project. This alternative would also require the implementation of a SWPPP, which would avoid impacts related to erosion, and no septic tank installation would be required. The Reduced Industrial Alternative would also occur within the same footprint as the Project, where there is low potential for paleontological resources to occur. Impacts related to geology and soils would be less than significant and similar to the Project.

Greenhouse Gas Emissions

Like the discussion of air quality impacts above, the Reduced Industrial Alternative would have slightly decreased GHG emissions in comparison with the proposed Project but would continue to conflict with applicable planning documents. The decreased building area to be constructed would reduce the total amount of construction activity and associated GHG emissions. During operation, slight decreases in GHG emissions from energy use would occur and a decrease in GHG emissions due to vehicle trips would occur; however, GHG emissions would remain above the SCAQMD threshold. The significant and unavoidable VMT impact would also occur under this alternative and would conflict with the applicable GHG emission reduction plans for the state and region. Therefore, the Reduced Industrial Alternative would result in significant and unavoidable GHG emissions impacts but with less GHG emissions than the proposed Project.

Hazards and Hazardous Materials

The Reduced Industrial Alternative would occur within the same footprint as the proposed Project and would require building renovation activities that would potentially encounter LCMs, ACMs, and LBPs consistent with the proposed Project. Therefore, a potentially significant but mitigable impact would occur with the implementation of mitigation measure HAZ-1. Impacts related to the use of hazardous materials, airport hazards, emergency response, and wildland fires would remain less than significant under the Reduced Industrial Alternative, given the same land use would be constructed and regulations related to the safe handling of hazardous materials are adhered to. Impacts related to hazards and hazardous materials under the Reduced Industrial Alternative would be significant but mitigable and similar to those associated with the proposed Project.

Hydrology and Water Quality

The Reduced Industrial Alternative would involve construction activity within the same footprint as the proposed Project and would, therefore, have a similar impact on hydrology and water quality. The Reduced Industrial Alternative would be required to comply with City stormwater standards and water quality regulations (including the NPDES Construction General Permit, preparation of a SWPPP, and

implementation of construction BMPs). The amount of landscaping and impervious surface for either scenario would be expected to be similar and stormwater capture and treatment systems for this alternative would be required consistent with the Project. As a result, the less than significant hydrology and water quality impacts associated with the Reduced Industrial Alternative would be similar compared to the Project even though the building square footage on the site would be slightly reduced.

Land Use and Planning

Under the Reduced Industrial Alternative, the site would continue to be developed with age-restricted residential, industrial, and recreational uses, requiring General Plan amendments and zone changes for the residential and industrial sites. The same footprint would be developed and no community division would occur. The change in land use would be the same as the Project, but with less industrial building space constructed, and this alternative would still conflict with the RTP/SCS, thereby resulting in a significant and unavoidable land use impact. Therefore, land use impacts would be significant and unavoidable under both the Project and this alternative but would be incrementally reduced under this alternative, given total VMT would be decreased.

Noise

The Reduced Industrial Alternative would result in similar construction noise and vibration activities when compared to the proposed Project, and construction impacts would remain significant and unavoidable for increases in noise and significant but mitigable for vibration. This alternative would result in loading docks and industrial buildings being located further from residential receptors and would avoid the daytime noise limit conflict but would not avoid the nighttime noise limit conflict. Therefore, the mitigation measure requiring a sound wall between the industrial site and residences would be required to reduce the impacts of this alternative to below a level of significance. The less than significant impact associated with traffic noise would be incrementally decreased under this alternative, given fewer mobile trips would be generated. There would still be no impact related to airport noise levels. The Reduced Industrial Alternative would reduce noise generated by the Project but would not avoid significant and unavoidable construction noise impacts or significant but mitigable construction vibration and operational noise impacts of the Project.

Population and Housing

The Reduced Industrial Alternative would continue to provide 230 new dwelling units on the site, generating direct population growth of 465 people based on the average household size of 2.02 people. The Reduced Industrial Alternative would result in one less industrial building, resulting in slightly fewer construction and industrial employment opportunities. Similar to the proposed Project, employment during the construction and operation of the proposed industrial site would be accommodated from the region and would not result in substantial growth. Consistent with the Project, no residential units would be removed since none occur on-site. There would be a slight decrease in population growth under the Reduced Industrial Alternative, but impacts would remain less than significant and similar to the proposed Project.

Public Services

Impacts related to demand for most public services and facilities, including police, fire, libraries, senior centers, and parks, could be incrementally reduced under the Reduced Industrial Alternative compared to the Project, as the number of industrial buildings would be reduced. This reduced development

would result in fewer individuals being employed at the industrial site; however, employees are anticipated to mostly be existing residents of the region. Both the Project and this alternative would contribute development fees to the City based on the number of proposed dwelling units to offset potential impacts to public services. Both scenarios would implement age-restricted (55 years and older) residences that would not generate students or place a demand on public schools. While this alternative would incrementally decrease the new demand for public services compared to the Project, neither would require the construction of new public service facilities that would generate environmental effects. Overall, the Reduced Industrial Alternative would place slightly less demand on public services than the Project; however, impacts under either scenario would be less than significant.

Recreation

The Reduced Industrial Alternative would reduce the number of jobs created by the Project and, therefore, result in a smaller increase in use of recreational facilities compared to the proposed Project. Similar to the Project, this alternative would be required to provide Park and Recreation Redevelopment Fees to the City. The Reduced Industrial Alternative would continue with the construction of new and expanded recreational facilities, such as amenities in the residential site and the reconfiguration of the golf course site. Like the Project, potential adverse environmental effects of this construction are addressed in the EIR. The Reduced Industrial Alternative would place slightly less demand on recreational facilities than the Project; however, impacts under either scenario would be less than significant.

Transportation

The Reduced Industrial Alternative would result in slightly reduced transportation impacts when compared to the proposed Project. This alternative would remain consistent with applicable transportation plans for both roadways and alternative transportation facilities. There would also be no change in the less than significant impact of the Project related to hazardous design features and emergency access. While the Reduced Industrial Alternative would reduce the number of employees at the site, the location of the site would result in the same VMT per employee. Residential and golf course employee VMT would also remain above the applicable thresholds with incorporation of the identified mitigation measures. Therefore, this alternative would continue to result in a significant and unavoidable VMT impact but would reduce total VMT attributable to the Project.

Tribal Cultural Resources

Similar to the discussion of cultural resource impacts for this alternative, impacts to tribal cultural resources would not be altered by the Reduced Industrial Alternative, given the same development footprint would be disturbed. Potentially significant but mitigable impacts to tribal cultural resources would occur and mitigation measures CUL-1 through CUL-4 and TCR-1 would be required under the Reduced Industrial Alternative.

Utilities and Service Systems

As the Reduced Industrial Alternative would involve the construction and operation of one less industrial building than the Project, it would result in reduced demand for additional water, sewer, and solid waste disposal services. Similar to the proposed Project, this alternative would not result in the need for the relocation or construction of new public utility facilities and would construct private utility pipelines and connections to existing infrastructure, except for a replacement water main near the industrial site. This

alternative would generate slightly less waste but maintain compliance with policies related to solid waste generation and disposal. Impacts related to demand for public utilities under the Project and this alternative would both be less than significant overall; however, impacts under the Reduced Industrial Alternative would be slightly less than the Project.

Wildfire

The construction and operation of the Reduced Industrial Alternative would occur within the same footprint as the Project and therefore be subject to similar wildfire risks. This alternative would be subject to the same regional and local plans and policies related to wildfire as the proposed Project, such as the Wildfire Mitigation Plan, the LHMP, the California Fire Code, and the Azusa General Plan and Municipal Code. Like the Project, as the Reduced Industrial Alternative would also occur within the WUI, a Fire Protection Plan would be prepared to address ways to minimize and mitigate fire danger. As both the Project and the Reduced Industrial Alternative would be required to comply with these policies and regulations, impacts related to wildfire hazards would be less than significant and similar under either scenario.

6.5.3.3 Conclusion

The Reduced Industrial Alternative would not avoid any of the significant impacts associated with the Project. The reduction in industrial space would slightly reduce the severity of the significant and unavoidable air quality, GHG emissions, land use, and transportation impacts but would not avoid these impacts. Similarly, a reduction in energy use would occur and impacts would remain less than significant. Construction noise increases would remain significant and unavoidable with construction vibration and operational noise impacts being significant but mitigable. Significant but mitigable impacts to biological resources, cultural resources, hazards and hazardous materials, and tribal cultural resources would remain the same under this alternative as the development footprint and grading activity would remain the same. Other less than significant impacts of the Reduced Industrial Alternative would be substantially similar to those related to the Project, including aesthetics, geology and soils, hydrology and water quality, and wildfire. Direct population growth from the Project would be reduced but the impact would remain less than significant; however, an incremental decrease in the Project's less than significant impacts to public services, recreation, and utilities and service systems would occur.

The Reduced Industrial Alternative would meet all six of the Project objectives but would achieve objectives 4 and 5 to a lesser degree than the proposed Project due to the reduced amount of industrial square footage that would be created. This decrease would result in fewer new employment opportunities within the City. Under this alternative, the Project site would still be utilized for multi-family residences, industrial uses, and recreational uses but would not provide the same amount of industrial square footage to accommodate a variety of business and operational activities and increase employment opportunities.

6.6 Environmentally Superior Alternative

The CEQA Guidelines require the identification of an environmentally superior alternative among the alternatives analyzed in an EIR, which is typically selected based on an ability to avoid or substantially reduce significant environmental effects associated with the Project. CEQA Guidelines Section 15126.6(e)(2) also requires that if the No Project Alternative is identified as the environmentally

superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on a comparison of the overall environmental impacts for the described alternatives, the No Project Alternative is identified as the environmentally superior alternative. This alternative would avoid the significant and mitigable and less than significant impacts that would occur with the proposed Project. However, the No Project Alternative does not meet five of the Project objectives.

Of the remaining alternatives, the environmentally superior alternative is the Reduced Industrial Alternative. This alternative would meet the Project objectives, although to a lesser degree than the proposed Project, given the reduced industrial building space that would be provided. This alternative would not eliminate any significant and unavoidable impacts of the Project but would have the lowest trip generation of the alternatives, thereby resulting in the greatest decrease in VMT. No increase in the severity of impacts would occur under the Reduced Industrial Alternative.

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7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires that an EIR contain a brief statement disclosing the reasons why possible environmental effects of a project were found not to be significant and, therefore, were not discussed in detail in the EIR. As a result of the environmental scoping process, which included preparation of the Initial Study checklist provided in Appendix A, the impacts associated with Agriculture and Forestry Resources and Mineral Resources were found to not be significant as a result of the proposed Project. A brief explanation indicating the reasons that the effects on these resources would not be significant is provided under each subheading below.

7.1 Agriculture and Forestry Resources

The Project site is developed with non-agricultural uses and mapped as Urban and Built-Up Land by the DOC Division of Land Resources Protection, Farmland Mapping and Monitoring Program (DOC 2018), and does not contain areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project site is also not zoned for agricultural use or under a Williamson Act contract. The Williamson Act applies to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland or at least 40 acres of land not designated as Prime Farmland. Its purpose is to preserve agriculture and open space lands by discouraging premature and unnecessary conversion to urban uses. The Project site is currently zoned Recreation; however, as part of the proposed Project, the industrial site would be rezoned to DWL, and the residential site would be rezoned to Neighborhood General 3 Moderate Density Residential. A portion of the existing golf course would remain zoned Recreation and be renovated as part of the proposed Project. Therefore, the Project would not conflict with existing zoning for agricultural use and no impacts to agricultural resources would occur.

The existing Project site does not contain forestlands, timberlands, or timberland zoned Timberland Production. Moreover, there is no land zoned as forest land or timberland that exists within the Project site or within its vicinity. The area surrounding the Project site includes industrial and residential uses. Therefore, the Project, including proposed zone changes, would not conflict with existing zoning for or cause a rezoning of forest land, timberland, or timberland zoned Timberland Production. No impacts to forestry resources would occur.

7.2 Mineral Resources

The City is situated on sand and gravel deposits formed at the base of the San Gabriel Mountains, known as the San Gabriel Fan District. These aggregate deposits are designated by the DOC as mineral resources of regional importance. The City has been a site of mining since gold was discovered in the area in 1857. While as much as $12 million worth of gold was historically extracted from the Azusa area, presently, only aggregate and Portland Concrete Cement are commercial commodities extracted in the City. Three active aggregate mining pits lie within the City, two operated by Vulcan Materials, and the third by Cemex on property owned by Waste Management, Inc. Other areas of the City containing aggregate resources are not mined, but are devoted to other uses, including agriculture, residential, and industrial uses (City 2004a).

The Surface Mining and Reclamation Act of 1975 required the classification of land into mineral resource zones (MRZs), according to known or inferred mineral resource potential. As such, the DOC classifies the availability of mineral resources in a region into one of four MRZ categories: MRZ 1 for no mineral

resources, MRZ 2 for significant resource areas with known quality and quantity, MRZ 3 for significant resource areas of unknown quality and quantity, and MRZ 4 for areas with no information. According to the Azusa General Plan (City 2004a), areas within the City are designated as either MRZ-2 or MRZ-3. This classification is due to the City being underlain by an alluvial fan created by the San Gabriel River. Known as the San Gabriel Fan mining district, the area is composed of rich and deep alluvial fan deposits at the base of the San Gabriel Mountains.

According to the DOC map of MRZs for the region, the Project site is within MRZ-2, but is not located within an active aggregate mine (DOC 2010). In addition, the Mines Online Map (DOC 2016), indicates that no mines are located on or adjacent to the proposed Project site. The Project site is not used for mineral extraction, is not known or designated as a locally important mineral resource recovery site, and is not designated for mineral extraction uses. Therefore, the implementation of the proposed Project would not result in the loss of availability of a regionally or locally important mineral resource. No impacts to mineral resources would occur.

8.0 INDIVIDUALS AND AGENCIES CONSULTED

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Overton Moore Properties
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8.2 Environmental Impact Report Consultant

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Arborist Report

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Asbestos and Lead-Containing Materials Survey Report

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Ibrahim M. Sobeih, Director of Industrial Hygiene and Safety

Preliminary Low Impact Development Report and Hydrology Study

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Ryan Bittner, PE, CEO

Low Impact Development Report and Preliminary Hydrology Calculations

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