

IRWINDALE BREW YARD SPECIFIC PLAN

DRAFT ENVIRONMENTAL IMPACT REPORT

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IRWINDALE BREW YARD SPECIFIC PLAN EIR

for City of Irwindale

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EXECUTIVE SUMMARY

ES.1 INTRODUCTION

This executive summary has been prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines Section 15123. This Draft Environmental Impact Report (EIR) addresses the environmental effects associated with the implementation of the proposed Irwindale Brew Yard Specific Plan. CEQA requires that local government agencies consider the environmental consequences before acting on projects over which they have discretionary approval authority. An EIR analyzes potential environmental consequences to inform the public and support informed decisions by local and State governmental agency decision makers.

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

ES.2 ENVIRONMENTAL PROCEDURES

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

1. Disclose to decision makers and the public the significant environmental effects of proposed activities.
2. Identify ways to avoid or reduce environmental damage.
3. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
4. Disclose to the public reasons for agency approval of projects with significant environmental effects.
5. Foster interagency coordination in the review of projects.
6. Enhance public participation in the planning process.

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

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

ES.2.1 Draft EIR Organization

Executive Summary. Summarizes the background and description of the proposed project, the format of this EIR, project alternatives, any critical issues that need to be resolved, and the potential environmental impacts and recommended mitigation measures identified for the project.

Chapter 1: Introduction. Describes the purpose of this EIR, background on the project, the notice of preparation, the use of incorporation by reference, and Final EIR certification.

Chapter 2: Project Description. Provides a detailed description of the project, including its objectives, its area and location, approvals anticipated to be required as part of the project, necessary environmental clearances, and the intended uses of this EIR.

Chapter 3: Environmental Analysis. Each environmental topic is analyzed in a separate section that discusses: the applicable regulatory framework; existing conditions; the significance criteria used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the potential adverse and beneficial effects of the project; the level of impact significance with and without mitigation; and the potential cumulative impacts of the proposed project and other existing, approved, and proposed projects in the area.

Chapter 4: Alternatives to the Proposed Project. Describes the alternatives and compares their impacts to the impacts of the proposed project. Alternatives include the No Project Alternative, the Reduced Intensity Alternative and the Importing Fill by Rail Alternative.

Chapter 5: Other CEQA Considerations. Provides a discussion of effects found not to be significant, significant and unavoidable impacts, significant irreversible changes to the environment, and growth-inducing effects.

Chapter 6: Report Preparers and Organizations Consulted. Includes a list of people and organizations that prepared or were contacted during the preparation of this Draft EIR.

Appendices. The appendices for this document include the following supporting documents:

- **A1**: Notice of Preparation (NOP)
- **A2**: NOP and Scoping Meeting Comments
- **B**: Brew Yard Specific Plan, Kimley-Horn Associates, May 2026
- **C**: Draft Operations Plan (IDEFO), Heavy Iron Contracting, LLC, December 1, 2025
- **D**: Air Quality Analysis, Urban Crossroads, June 1, 2026
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- **G1**: Cultural and Paleontological Resources Assessment, Cogstone, January 2026
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- **K**: Phase I Environmental Site Assessment, Anacapa Geoservices, Inc., December 17, 2024
- **L1**: Preliminary Hydrology and Low Impact Development Plan, Kimley Horn, March 13, 2026
- **L2**: Water Supply Assessment, City of Azusa, November 2023
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- **R2**: Transportation Support Tables, LLG

ES.2.2 Type and Purpose of This Draft EIR

As described in the CEQA Guidelines, different types of EIRs are used for varying situations and intended uses.

This Draft EIR has been prepared as a "Project EIR," defined by CEQA Guidelines Section 15161 (California Code of Regulations, Title 14, Division 6, Chapter 3). This type of EIR examines the environmental impacts of a specific development project and should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation.

ES.3 PROJECT LOCATION

The 150.1-acre Brew Yard Specific Plan (Specific Plan) area is in the northeast portion of the City of Irwindale, Los Angeles County, California. From a regional standpoint, the City of Irwindale is approximately 14.5 miles northeast of downtown Los Angeles. Interstate 210 (I-210) abuts the project site to the north, Interstate 605 (I-605) is approximately 0.8 mile to the west of the site, and Interstate 10 (I-10) is approximately 3.5 miles to the south of the site. The property does not have a street address but is adjacent to the Brew Yard facility, which is at 15801 First Street. At the local scale, the brewery and Irwindale Avenue form the eastern project site boundary, First Street forms the southern project site boundary, and the Sante Fe Dam Recreation Center forms the western project site boundary. The San Gabriel River Trail is 0.1 mile to the west of the site. The project site and surrounding area are shown in Figure 2-1, *Regional Location,* and Figure 2-2, *Local Vicinity*. Local access to the project site is primarily from First Street, and regional access is provided from Irwindale Avenue.

Figure 2-3, *Project Site Boundary/Aerial*, depicts the site relative to the surrounding land uses. The Specific Plan area is composed of all or portions of the following tax parcels: Tentative Assessor's Parcel Numbers (APNs): 8533-009-026, 8533-009-028, 8533-009-029, and 8533-011-052. The APNs that comprise the project area are subject to change, and the Specific Plan will be updated accordingly prior to adoption. A site topography map is provided as Figure 2-4, *Site Topography*.

ES.4 SUMMARY OF THE PROPOSED PROJECT

The Specific Plan consists of two separate planning areas that would allow for a range of development types. Upon adoption of the Specific Plan, the planning areas depicted in Figure 2-6, *Conceptual Land Use: Planning Areas*, would apply to the project site and replace the previous M-2 (Heavy Industrial) zoning designation.

At buildout, the Specific Plan would permit 3,000,000 building square feet of new industrial/business park uses in Planning Area 1 (Industrial/Business Park) and 12,000 building square feet of commercial uses in Planning Area 2 (Commercial), as summarized in Table ES-1, *Land Use Plan Statistical Summary*. In addition to structures, development would consist of loading docks, truck trailer and automobile parking, vehicular and pedestrian circulation, landscaping, and associated infrastructure improvements. Permitted, conditional, and ancillary

uses for Planning Area 1 and Planning Area 2 are detailed in Table ES-1 of the Specific Plan and summarized below.

Table ES-1 Land Use Plan Statistical Summary

Planning Area	Land Use Designation	Acres		Building Square Footage (SF)
		Industrial Business Park	Commercial	
Planning Area 1	Industrial/Business Park	143.9		3,000,000 (maximum)
Planning Area 2	Commercial		6.2	12,000 (maximum)
	Total	**143.9**	**6.2**	**3,012,000**

Planning Area 1: Industrial Business Park

Planning Area 1 would comprise approximately 143.9 acres and include the primary new development area. This Planning Area would restore the historic mining areas to economically productive uses and include, at build-out, 3,000,000 building square feet in a combination of light industrial buildings, e-commerce and logistics distribution, warehousing, cold storage, light manufacturing, research and development, or showroom space on Irwindale Building Code–compliant "engineered certified fill." Individual buildings would be serviced via an internal private street that would connect with First Street on the Planning Area's southern edge. A full list of permitted, conditionally permitted, and other potentially allowed uses is detailed in Section 2.6.5 of the *Project Description*.

Planning Area 2: Commercial Uses

The approximately 6.2-acre Commercial/Retail planning area would be the most visible part of the Specific Plan Area to residents and city stakeholders who travel on the local streets adjacent to the Specific Plan area (primarily Irwindale Avenue and to a lesser extent First Street) and would be in close proximity to the Irwindale Metro Station with access to the Metro A-Line.

The parts of the city adjacent to Planning Area 2 are predominantly an urban corridor with a mix of office park, industrial, and other retail uses. This Planning Area is designed to allow commercial and retail uses that can successfully adapt to market conditions over time. Permitted uses include, among other similar uses in Section 3-1 of the Specific Plan, automobile and truck repair and fueling stations, public self-storage, retail and food sales (including alcoholic beverage sales), commercial services, eating establishments (quick-serve, dine-in, and drive through [with issuance of a Conditional Use Permit]). Uses would activate this frontage in a manner that is supportive of the surrounding community and of the industrial land uses in

other planning area. Planning Area 2 would allow phased development of individual retail tenants on separate pads, depending on future development and market needs.

ES.5 ALTERNATIVES

ES.5.1 No Project Alternative

This alternative would involve no development on the project site. Under this alternative, implementation of the Brew Yard Inert Debris Engineered Fill (IDEFO) Operation Plan would not be implemented and the proposed project would not be developed. The large expanses of disturbed and paved land, rail corridors, utility infrastructure associated with historic industrial and logistics-related uses, and the two former quarry pits would remain on the project site (see Figure 2-3, *Project Site Boundary/Aerial*).

Impacts of the No Project/No Development Alternative would be similar for agricultural, biological, and mineral resources; population and housing; and recreation. Impacts would be less for air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, transportation, noise, public services, tribal cultural resources, utilities and service systems, and wildfire. Impacts would be greater for aesthetics, hydrology and water quality. The significant, unavoidable project-related impacts would be eliminated under the No Project alternative. Overall, impacts under this alternative would be decreased in comparison to the proposed project.

The No Project/No Development Alternative does not meet any of the proposed project's objectives.

ES.5.2 Reduced Intensity Alternative

The Reduced Intensity Alternative includes the same land uses as the proposed project but assumes that the industrial/warehousing square footage is reduced sufficiently to eliminate the significant operational air quality impact of the proposed project. It would accommodate up to 655,000 square feet (SF) of warehousing and industrial use (an approximate 78 percent reduction) and 12,000 SF of commercial uses. Additionally, this alternative assumes that the northwest pit would not be filled to eliminate the significant construction air quality impact. The northwest pit would be fenced off and access to the pit would be prohibited.

This alternative would result in similar impacts to 5 impact categories, reduce or eliminate impacts to 12 environmental impacts, and increase impacts to three 3 categories. Impacts would be similar for agriculture and forestry resources; geology and soils; population and housing; recreation; and wildfire. This alternative would reduce impacts for air quality; biological resources; cultural resources; energy; greenhouse gas emissions; hazards and

hazardous materials; mineral resources; noise; public service; transportation; tribal cultural resources; and utilities and service systems. The significant and unavoidable project-related impacts for air quality would be eliminated under this alternative. Because the beneficial improvements under the proposed project for aesthetics, hydrology and water quality, and land use and planning would not occur under this alternative, the impacts to these categories would be considered greater than the proposed project. Overall, impacts under this alternative would be reduced in comparison to the proposed project.

Although this alternative could partially achieve the project objectives, it would fall short of the proposed project in fully meeting many of the objectives. For example, it would not as effectively generate economic opportunities or jobs. Moreover, since much of the site would remain vacant or underutilized, it would be challenging to design a successful, comprehensive, master plan. Moreover, it may or may not be economically viable. There is no certainty that the substantial reduction of the industrial/warehousing use under this alternative could generate the revenue required to finance the required infrastructure and amenities outlined in the Specific Plan.

ES.5.3 Importing Fill by Rail Alternative

The Importing Fill by Rail Alternative includes filling the two former quarries on the project site. The northwestern quarry would require approximately 6 million cubic yards to fill, and the southeastern quarry would require approximately 2 million cubic yards to fill. No export of materials is anticipated during the pit-filling process. Filling activities would begin in the southeast pit with transfer of approximately 2 million cubic yards of material from the northwest pit to the southeast pit. Filling of the northwest pit would begin concurrently with filling of the southeast pit and require approximately 8 million cubic yards of material. Unlike the southeast pit, fill material for the northwest pit would be imported from off-site locations throughout Los Angeles County. For the proposed project, all fill material was assumed to be hauled exclusively by trucks requiring 1,004 haul trips over 1,120 working days.

For the Importing Fill by Rail alternative, all imported soil would be hauled by rail. Rail hauling activities were assumed to occur 365 days per year over a period of approximately 2.5 years, or approximately 913 total working days, with two trainloads of soil, or four one-way train trips delivered to the site per day. It is assumed that the trains would consist of one diesel locomotive and 50 railcars travelling at 35 miles per hour, and that each load would be hauled an average distance of 45 miles. Four- or six-axle line haul freight locomotives would be used.

The Burlington Northern Sante Fe Railway (BNSF) runs along the western portion of the Specific Plan area (see Figure 2-23, *Brew Yard Railroad Spurs*). Based on current operations, the BNSF along the western portion of the site averages two deliveries per week. The Union Pacific Railroad (UPRR) Azusa Industrial Lead runs along the eastern boundary of the project site and

provides service to the brewery. The UPRR Azusa Industrial Lead that runs along the eastern boundary of the project site averages four deliveries to the brewery per week. Under this alternative, and the proposed project, the BNSF and UPRR deliveries would not cease. This alternative assumes that import material would be transported on-site via the BNSF tracks along the site's western boundary.

This alternative would result in similar impacts to 15 impact categories, reduce impacts to 3 environmental impacts, and increase impacts to 2 categories. Impacts would be similar for aesthetics; agriculture and forestry resources; cultural resources; geology and soils; hydrology and water quality; land use and planning; mineral resources; noise; population and housing; public service; recreation; transportation; tribal cultural resources; utilities and service systems; and wildfire. This alternative would reduce impacts for energy; greenhouse gas emissions; and hazards and hazardous materials. No significant and unavoidable project-related impacts would be eliminated under this alternative. This alternative would increase impacts to air quality, and biological resources. Overall, impacts under this alternative would be slightly reduced in comparison to the proposed project.

The Import Fill by Rail alternative would offer uses that are identical to the proposed project, and the same level of development. It is assumed that a Specific Plan would be approved and implemented (Objectives Nos. 1, 2, 3, and 5). Along with City and service providers' requirements and review, the Specific Plan would ensure that infrastructure plans (water, sewer, drainage, and roads) are adequately designed (Objective No. 6). The Specific Plan would also provide detailed guidelines and standards for modern and economically efficient buildings including architecture, walls, fencing, signage, lighting, and entry treatment requirements per the Specific Plan (Objectives No. 4 and 7).

ES.6 ISSUES TO BE RESOLVED

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

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

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

ES.7 AREAS OF CONTROVERSY

In accordance with Section 15123(b)(2) of the CEQA Guidelines, the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. Prior to preparation of the Draft EIR, the City of Irwindale issued a Notice of Preparation (NOP) on February 7, 2024. The CEQA-mandated scoping period for this EIR was between February 9, 2024, and March 12, 2024, during which interested agencies and the public could submit comments about the potential environmental impacts of the proposed project. During this time, the City of Irwindale received comment letters from federal, State, regional, and local agencies; Native American tribal representatives; organizations; and members of the public. Commenters raised issues related to aesthetics, air quality, biological resources, greenhouse gas emissions, hydrology and water quality, land use and planning, mineral resources, noise, public services, transportation, tribal cultural resources, and utilities and service systems. These comments were considered during preparation of this Draft EIR and helped inform the scope of the environmental analysis. Appendix X, *Notice of Preparation and Scoping Comments*, of this Draft EIR contains the NOP as well as the comments received by the City of Irwindale in response to the NOP.

The following list includes issues that are likely to be of particular concern to agencies and interested members of the public during the environmental review process. Though every concern applicable to the CEQA process is addressed in this Draft EIR, this list is not necessarily exhaustive; rather, it attempts to capture concerns that are likely to generate the greatest interest based on the input received during the scoping process.

- Impacts on air quality.
- Impacts to biological resources, wildlife habitat, and sensitive species associated with the adjacent Santa Fe Dam Recreation Area.
- Impacts to traffic circulation and safety.
- Impacts to tribal cultural resources.

ES.8 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table ES-2, *Summary of Significant Environmental Impacts and Mitigation Measures*, summarizes the conclusions of the environmental analysis in this EIR. Impacts are identified as

significant, potentially significant, less than significant, or no impact, and mitigation measures are identified for all significant impacts. The level of significance after imposing the mitigation measures is also presented.

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
AESTHETICS			
Significance Criterion a: Would the project have a substantial adverse effect on a scenic vista?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion b: Would the project substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings?	No Impact	No mitigation measures are required	No Impact
Significance Criterion c: In nonurbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion d: Would the project expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant (construction and operation)	No mitigation measures are required	Less Than Significant (construction and operation)
AIR QUALITY			
Significance Criterion a: Would the project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant	**Mitigation Measure AQ-1:** The construction contractor(s) shall specify in the construction bid that the construction contractor(s) shall:	Significant and Unavoidable

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impacts associated with regional construction emissions could result in inconsistency with the 2022 AQMP. **(Impact AQ-1)** Impacts associated with regional operation emissions could result in inconsistency with the 2022 AQMP. **(Impact AQ-2)** Impacts associated with regional operation emissions due to the overlap of Phase I operations and Phase II construction could result in inconsistency with the 2022 AQMP. **(Impact AQ-3)**		▪ Provide electrical hook ups to the power grid rather than use diesel-fueled generators for electric construction tools such as saws, drills, and compressors, and shall use such electric tools. ▪ Keep all equipment maintenance records and data sheets, including design specifications and emission control tier classifications, on-site or at the contractor's office and furnish documents to the Lead Agency or other regulators upon request. ▪ Place legible, durable, weather-proof signs at construction staging areas within the project site. At a minimum, each sign shall include: 1) instructions for construction workers to shut off engines when not in use; 2) instructions for operators of heavy-duty diesel construction equipment to restrict idling to no more than three (3) minutes once the vehicle is stopped, the transmission is set to “neutral” or “park,” and the parking brake is engaged; and 3) telephone numbers of the building facilities manager to report violations. ▪ Require that all diesel-fueled off-road equipment of 25 horsepower or greater to comply with Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 4 Final off-road emissions standards or equivalent and ensure that all construction equipment is tuned and maintained in accordance with the manufacturer’s specifications. ▪ Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the City of	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		Irwindale Public Works/Engineering and Community Development Departments clearly show these requirements. The City of Irwindale shall conduct an on-site inspection to verify compliance. **Mitigation Measure AQ-2:** The project applicant/developer shall include a note on grading plans that prohibit grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone in the Project area. Daily Air Quality Index forecasts for the next day of grading shall be checked via the airnow.gov system the day prior by the project contractor(s). Prior to grading, the project applicant/developer shall ensure that all grading plans submitted to the City of Irwindale Public Works/Engineering and Community Development Departments clearly show this requirement. **Mitigation Measure AQ-3:** The project designer and contractor(s) shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g., bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor(s) shall be required to utilize "Super-Compliant" VOC paints, which are defined in South Coast AQMD's Rule 1113. The construction contractor shall be required to utilize "Super-Compliant" VOC paints, which are defined in South Coast AQMD's Rule 1113. Prior to construction, building specifications submitted to the City of Irwindale Public Works/Engineering and Community Development Departments	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		should clearly show these construction requirements. The City of Irwindale shall conduct an on-site inspection to verify compliance. **Mitigation Measure AQ-4:** The project applicant/developer shall identify a person to act as a community liaison concerning on-site construction activities and provide contact information for the community liaison to the surrounding community. The contact of the community liaison shall be provided to the City Planning Division and be posted on the construction site prior to issuance of a demolition permit. The City of Irwindale shall conduct an on-site inspection to verify compliance. **Mitigation Measure AQ-5:** Prior to construction, the project applicant/developer shall provide documentation to the City demonstrating that information on transit and ridesharing programs and services shall be provided to construction employees. The City of Irwindale shall conduct an on-site inspection to verify compliance. **Mitigation Measure AQ-6**: Prior to the shell building permit approval, the project applicant shall provide documentation to the City demonstrating that an electrical room(s) and/or exterior area(s) of the site shall be designated where future electrical panels would be located for the purpose of supplying power to on-site charging facilities for electric-powered trucks. Conduits shall be installed from this designated area where the panel would be located to the on-site location where the charging facilities would be located and where electric-powered trucks	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		would park and connect to charging facilities to charge the batteries that power the motors of the electric-powered trucks. **Mitigation Measure AQ-7**: Prior to issuance of an Occupancy Permit for a new tenant/business entity, the Project Developer/Successor-in-interest shall provide documentation to the City demonstrating that building occupants shall be provided with information related to South Coast AQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles. Information shall also include, but not be limited to, the health effect of diesel particulates, benefits of reduced idling time, and CARB regulations. Tenants shall be notified about the availability of: ▪ Alternatively fueled cargo handling equipment. ▪ Grant programs for diesel-fueled vehicle engine retrofit and/or replacement. ▪ Access to alternative fueling stations proximate to the site that supply compressed natural gas. ▪ The EPA's SmartWay program. **Mitigation Measure AQ-8**: Prior to issuance of a Certificate of Occupancy, legible, durable, weather-proof signs shall be installed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations. At a minimum, each sign shall include the following instructions for truck drivers to shut off engines when not in use:	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		▪ Instructions for drivers of diesel trucks to restrict idling to no more than five minutes once the vehicle is stopped, the transmission is set to "neutral" or "park" and the parking brake is engaged. ▪ Telephone numbers of the building facilities manager and CARB to report violations. The project applicant/developer shall ensure that building design plans submitted to the City of Irwindale Public Works/Engineering and Community Development Departments clearly show these requirements. Mitigation Measure AQ-9: Prior to issuance of an Occupancy Permit for a new tenant/business entity, the project developer/facility owner and tenant/business entity shall provide to the City of Irwindale Community Development Department a signed document (verification document) noting that the project developer/facility owner has disclosed to the tenant/business entity the requirement to implement the following measures: ▪ Sites shall clearly mark entry and exit points for trucks and service vehicles. ▪ Facility operators shall maintain records of their fleet equipment owned by the facility and ensure that all diesel-fueled Medium-Heavy Duty Trucks (MHDT) and Heavy-Heavy Duty Trucks (HHD) use year CARB 2010 or newer engines. The records should be maintained on-site and be made available for inspection by the City.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		▪ Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. ▪ Signs should be posted in the appropriate locations and/or handouts should be provided that show the locations of the nearest food options, fueling, truck maintenance services, and other similar convenience services. ▪ Each facility shall designate a Compliance Officer responsible for implementing the measures described herein. Contact information shall be provided to the City and updated annually, and signs shall be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community. The Compliance Officer shall also coordinate with CARB and South Coast AQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations. ▪ Signs shall be posted in the appropriate locations noting that heavy truck shall park and perform any self-maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets. ▪ Project plans and specifications shall include signs at every truck exit driveway providing directional information to the truck route. **Mitigation Measure AQ-10**: Prior to issuance of building permits, the following features shall be demonstrated on the project's	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		building plans to the extent feasible over minimum California Code of Regulations Title 24 requirements. Installation shall be verified by the City prior to issuance of a Certificate of Occupancy. ▪ For use by employees and visitors conducting business at the building, install automobile electric vehicle (EV) charging stations shall be installed at the minimum number required by the California Code of Regulations Title 24. All charging stations shall be equipped with Level 2 or faster chargers. Signs shall be posted indicating that the charging stations are for exclusive use by the building's employees and by visitors conducting business at the building. ▪ Install appropriate electrical infrastructure sufficiently sized to accommodate the potential installation of additional auto and truck EV charging stations in the future. ▪ Install raceways for conduit to tractor-trailer parking areas in logical, gated locations determined by the project applicant during construction document plan check, for the purpose of accommodating the future installation of EV truck charging stations at such time this technology becomes commercially available. The charging station location(s) are to be located inside the gated and secured truck courts. **Mitigation Measure AQ-11**: Prior to issuance of building permits, the following features shall be demonstrated on the project's building and landscape plans to the extent feasible. Installation shall be verified by the City prior to issuance of a Certificate of Occupancy.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		▪ Install Energy Star-rated heating, cooling, lighting, and appliances. ▪ Structures shall be equipped with outdoor electric outlets in the front and rear to facilitate use of electrical lawn and garden equipment. ▪ Design buildings that exceed the 2019 Title 24 building envelope energy efficiency standards by at least 50 percent. **Mitigation Measure AQ-12**: Prior to issuance of a Certificate of Occupancy, the following language shall be included within tenant lease agreements to reduce operational air pollutant emissions to the extent feasible: ▪ Information about energy efficiency, energy-efficient lighting and lighting control systems, energy management, and existing energy incentive programs. ▪ Information about funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment. ▪ Requirements to use the cleanest technologies available and to provide the necessary infrastructure to support zero-emission vehicles, equipment, and appliances that would be operating on-site at such time this technology becomes commercially available. This requirement shall apply to equipment such as forklifts, handheld landscaping equipment, yard trucks, office appliances, etc.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		▪ Requirements to operate in compliance with and to monitor compliance with all current and applicable air quality regulations for on-road trucks, including the CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation. ▪ Requirements and identification of the responsible party to maintain, replace, and upgrade rooftop solar panels per the manufacturer's recommendations for the life of the lease. The proposed project would comply with existing solar requirements per the California Energy Code in effect during permitting of the project (at the time of construction drawing plan check submittal). In the case that the tenant requires additional solar capacity, this shall be addressed during the tenant improvement process. The proposed project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed project. ▪ Requirements and identification of the responsible party to maintain, replace, and repair the legible, durable, weather-proof signs that were installed at initial building occupancy placed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations. ▪ The tenant agreement shall include notification that the tenant shall comply with CARB Truck and Bus regulation, including requirements that only haul trucks meeting model	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		year 2010 engine emission standards shall be used for the on-road transport of materials to and from the project site. ▪ Requirements for the building owner to provide a green cleaning products and paint education program available to the building tenant, to keep at the building's office, break room, leasing space, or on an accessible website. **Mitigation Measure AQ-13**: The City Occupancy Permit shall require that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2014 model year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators that own vehicles subject to Section 2025 shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and State upon request.	
Significance Criterion b: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? Impacts associated with regional construction emissions could result in a cumulatively	Potentially Significant	Mitigation Measures AQ-1 through AQ-5	Significant and Unavoidable

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
considerable net increase of criteria pollutants for which the project region is in nonattainment. **(Impact AQ-4)** Impacts associated with regional operational emissions could result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment. **(Impact AQ-5)**			
Significance Criterion c: Would the project expose sensitive receptors to substantial pollutant concentrations?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion d: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less Than Significant	No mitigation measures are required	Less Than Significant
BIOLOGICAL RESOURCES			
Significance Criterion a: Would the project have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of	Potentially Significant	**Mitigation Measure BIO-1:** San Diego Legless Lizard. Due to the presence of suitable habitat for San Diego legless lizard (*Anniella stebbinsi*), a pre-construction survey shall be conducted by a qualified biologist within suitable habitat (leaf litter with high soil moisture) no more than 14 days prior to soil disturbance. The survey shall be conducted when soil temperatures are between 60 and 70 degrees Fahrenheit, as feasible with timing of construction. A hand rake shall be used to gently search for	Less Than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Fish and Wildlife or U.S. Fish and Wildlife Service? Construction-related activities could result in direct impacts to candidate, sensitive, or special-status species within the project site if such species are present on the project site prior to ground-disturbing activities. **(Impact BIO-1)** Construction and operation of the proposed project could result in indirect noise-related impacts to wildlife utilizing adjacent open space habitats. **(Impact BIO-2)** Construction and operation of the proposed project could result in indirect lighting-related impacts to wildlife utilizing adjacent open space habitats. **(Impact BIO-3)** Construction-related activities associated with construction noise, lighting, pesticide use, and the introduction or spread of invasive plant species could result in indirect impacts to nearby open space areas, including the Santa Fe Dam Recreation Area, which may support candidate,		individuals in loose litter and soil. If California or Southern California legless lizards are encountered, a qualified biologist with an appropriate Scientific Collecting Permit shall relocate individuals to suitable habitat outside of the project footprint. For purposes of this and Mitigation Measure BIO-1 through Mitigation Measure BIO-5, the Biological Monitor shall: (1) have a bachelor's degree in biology or a closely related field; (2) be knowledgeable and experienced in the biology and natural history of local plant and wildlife resources; (3) be able to identify resources that are or have the potential to be present on the project site; and (4) have previous biological monitoring experience on construction projects. **Mitigation Measure BIO-2**: Sensitive Bat Species. Due to the presence of potentially suitable habitat (i.e., trees) for sensitive bat species, the following avoidance and minimization measures shall be implemented to avoid potential impacts to these species. Pre-construction Survey: A qualified biologist experienced with bats shall conduct a pre-construction survey within all suitable habitat on the project site to determine whether occupied hibernacula, night roosts, and/or maternity roosts occur within the project site. The pre-construction survey shall be conducted no more than 30 days prior to commencing construction activities (i.e., earthwork, clearing, grubbing, and fuel modification [including off-site fuel modification on private property]) and shall consist of two (2) separate surveys conducted no more than a week apart. The second and final survey shall be conducted no	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
sensitive, or special-status species. **(Impact BIO-4)** Operational lighting associated with the proposed project could result in indirect lighting-related impacts to candidate, sensitive, or special-status wildlife species utilizing adjacent open space habitats. **(Impact BIO-5)**		more than seven days prior to commencing construction activities. The pre-construction surveys shall be conducted using a detector for echolocation calls, such as an Anabat bat detector system. The results of the pre-construction survey shall be documented by the qualified biologist. If the qualified biologist determines that no sensitive bat roosts are present, the activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that big free-tailed bat, pallid bat, and/or western yellow bat roosts are present, the following avoidance and minimization measures shall be implemented: Maternity Roosts: If occupied maternity roost(s) are identified during the pre-construction survey, no construction activities shall occur within 500 feet during the maternity roosting season (March 1 through September 30) or until a qualified bat biologist determines the roost is no longer active. A qualified biologist shall clearly delineate the 500-foot no-work buffer(s), which shall be clearly marked with flags and/or fencing prior to the initiation of construction activities. Night Roosts and Hibernacula: To the extent feasible, no construction activities shall occur within 500 feet of active night roosts and/or hibernacula. The 500-foot no-work buffer shall be left in place until project construction is completed or until a qualified bat biologist determines the roost/hibernaculum is no longer active. No project construction shall occur between 1.5 hours before sunset and 1.5 hours after sunrise.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		If avoidance of active night roosts and/or hibernacula is not feasible, the qualified biologist shall prepare a Bat Roost Relocation Plan to remove active night roosts/hibernacula and construct alternative bat roost outside of the work area. The Relocation Plan shall be submitted to CDFW for review prior to construction activities. The qualified biologist shall implement the Relocation Plan, and new roost sites shall be constructed before the commencement of any project construction (i.e., earthwork, clearing, grubbing, and fuel modification [including off-site fuel modification on private property]). Removal of roosts will be guided by accepted exclusion and deterrent techniques. **Mitigation Measure BIO-3:** Crotch's Bumble Bee. Due to the presence of suitable habitat for Crotch's bumble bee (Bombus crotchii) within the project site, the following measures shall be implemented to reduce potential impacts to this species. Pre-construction Survey: If construction activities occur during the flight season (February 1 through October 31), a qualified biologist with expertise in surveying for bumble bees shall conduct a pre-construction survey for Crotch's bumble bee queens, gynes, and colonies. The survey shall be conducted no more than 14 days prior to construction during optimal weather conditions (e.g., warm, sunny days between 65- and 90-degrees Fahrenheit). The pre-construction survey shall be based on recommendations described in the Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, released by the CDFW on June 6, 2023, or the most	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		current version at the time of construction. If the pre-construction survey is negative, no further assessment shall be required, and construction activities shall be allowed to proceed without any further requirements. If habitat occupied by Crotch's bumble bee is detected during the pre-construction survey, the measures below shall be implemented. The measures below shall only be required if Crotch's bumble bee remains as a candidate State endangered species or is listed as a state endangered species at the time of project construction. If Crotch's bumble bee is delisted, the measures below shall not be required. CESA Compliance: Prior to issuance of a grading permit, it shall be demonstrated that CESA-required consultation with CDFW regarding the project's effects to occupied Crotch's bumble bee habitat has occurred, and, if take of Crotch's bumble bee is expected, that CDFW has authorized such take through an incidental take permit, as applicable. In addition, if an incidental take permit is issued for the project that covers Crotch's bumble bee, that document shall supersede any inconsistent measures provided in this report. Compensatory Mitigation: Compensatory mitigation for permanent direct impacts to occupied Crotch's bumble bee habitat shall be offset through compensatory mitigation, which may include, but is not limited to, on-site or off-site habitat preservation, enhancement, restoration, and/or creation at a ratio of no less than 1:1. However, if an incidental take permit is issued	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		for the project that covers Crotch's bumble bee, that document shall supersede any measures and mitigation ratios provided in this report. **Mitigation Measure BIO-4**: Burrowing Owl. Due to the presence of potentially suitable habitat within the project site, the following measures shall be implemented to reduce potential impacts to this species. Take Avoidance Surveys: Take avoidance surveys shall be conducted 14 days or more prior to construction activities (i.e., demolition, earthwork, clearing, and grubbing) to determine presence of BUOW (Athene cunicularia). If ground-disturbing activities occur, but the project site is left undisturbed for more than 14 days, a pre-construction survey must be conducted again to confirm BUOW has not colonized the project site since it was last disturbed. If take avoidance surveys are negative and BUOW is confirmed absent, then ground-disturbing activities shall be allowed to commence, and no further measures shall be required. Protection and Relocation Plan: If BUOW(s) is observed during the take avoidance surveys, CDFW will be immediately informed of the observation location(s) and status(es). Active burrows shall be avoided by the project in accordance with the CDFW's Staff Report. If avoidance of direct and/or indirect impacts to active burrows is not feasible, a BUOW Protection and Relocation Plan (Plan) shall be prepared by a qualified biologist. The plan must be approved by CDFW prior to construction activities (i.e., demolition, earthwork, clearing, and grubbing). The plan shall	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		include measures to minimize direct and/or indirect impacts to BUOWs during construction, and if direct impacts are unavoidable, the plan shall provide measures to conserve all nesting, occupied, and satellite burrows and/or BUOW habitat such that the habitat acreage and number of burrows and BUOW individuals impacted are maintained and/or replaced. Further coordination with CDFW shall occur to mitigate for direct loss of habitat through the acquisition, conservation, and management of in-kind habitat. Lands conserved to mitigation for direct impacts shall include: (1) sufficiently large acreage with fossorial mammals present; (2) permanent protection through a conservation easement for the purpose of conserving BUOW habitat and prohibiting activities incompatible with BUOW use; (3) development and implementation of a Mitigation Land Management Plan to address long-term ecological sustainability and maintenance of the site for BUOWs; and (4) funding for the maintenance and management of mitigation land through the establishment of a long-term funding mechanism, such as an endowment. **Mitigation Measure BIO-5:** Nesting Birds: To the extent feasible, construction activities (i.e., earthwork, clearing, and grubbing) shall occur outside of the general bird nesting season for migratory birds, which is February 15 through August 31 for songbirds and January 1 to August 31 for raptors. When construction activities (i.e., earthwork, clearing, and grubbing) occur during the general bird nesting season for	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		migratory birds and raptors, a qualified biologist shall perform a pre-construction survey of potential nesting habitat within 300 feet of disturbance areas (500 feet for raptors and special-status species) to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the Migratory Bird Treaty Code and California Fish and Game Code. The pre-construction survey shall be performed no more than seven (7) days prior to the commencement of construction activities. The qualified biologist shall document the results of the pre-construction survey. If construction is inactive for more than seven (7) days, an additional nesting bird survey shall be conducted. If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that an active migratory bird or raptor nest is present, no construction activities within 300 feet (500 feet for raptors) of the active nest shall occur until the young have fledged the nest and the nest is confirmed to no longer be active. The biological monitor may modify the buffer or propose other recommendations to minimize disturbance to nesting birds. The results of the surveys, including graphics showing the locations of any active nests detected and documentation of any avoidance measures taken, shall be submitted to the City of Irwindale within 14 days of completion of the pre-construction surveys or construction monitoring to document compliance with	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		applicable State and federal laws pertaining to the protection of native birds. In addition to the requirements for qualified biologists set forth in Mitigation Measure BIO-1, the qualified biologist implementing this measure shall have at least three (3) years of experience of conducting nesting bird surveys in the project region. **Mitigation Measure BIO-6:** Noise: The construction contractor shall stage equipment in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receptors nearest the project during all construction. The contractor's activities shall be confined to the hours between 7:00 a.m. and 7:00 p.m. Monday through Friday, excluding holidays. **Mitigation Measure BIO-7**: Lighting: Perimeter night lighting shall be directed away from adjacent undeveloped open space areas to protect species occupying native habitats from direct night lighting. Shielding shall be incorporated in project designs to ensure ambient lighting in the adjacent open space is not increased. **Mitigation Measure BIO-8:** Pesticide Use. During construction and in the post-construction condition, the use of rodenticides along the project perimeter and facility exteriors should be avoided. To further reduce the risk of indirect impacts to native small mammals, raptors, pollinators or other foraging animals, weed removals along the project perimeter and exterior spaces	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		will be first done through mechanical means, then followed by spot treatments with aquatic-safe herbicides. **Mitigation Measure BIO-9**: Invasive Plant Species. The project will not use landscape plant species on the California Invasive Plant Species Inventory (https://www.cal-ipc.org/plants/inventory/).	
Significance Criterion b: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? The proposed project would result in permanent impacts to Goodding's willow riparian woodland and forest, a sensitive natural community identified by the CDFW. **(Impact BIO-6)**	Potentially Significant	**Mitigation Measure BIO-10**: CDFW Jurisdiction. Prior to issuance of a grading permit, the City shall obtain proof of a Streambed Alteration Agreement from CDFW. Permanent impacts to CDFW jurisdiction shall be mitigated through: (1) on-site preservation, enhancement, restoration, and/or creation of jurisdictional streambed at a ratio of no less than 2:1; (2) off-site preservation, enhancement, restoration, and/or creation of jurisdictional streambed at a ratio of no less than 2:1; and/or (3) purchase of credits at an approved mitigation bank at a ratio of no less than 1:1, provided that the credits represent successfully implemented streambed creation. BMPs to minimize and avoid impacts to CDFW jurisdiction during and after construction shall be addressed as part in the Streambed Alteration Agreement. Minimization and avoidance measures may include, but are not limited to: ▪ Construction-related equipment shall be stored in developed/disturbed areas, outside of drainages. No equipment maintenance shall be done within or adjacent to the drainage.	Less than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		▪ Mud, silt, spoil sites, raw cement, asphalt, or other pollutants from construction activities shall not be placed within or adjacent to the drainage. ▪ Open trenches or other excavated areas shall be properly secured at the end of the day to avoid entrapment of animals, or an escape ramp shall be provided. ▪ To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site. ▪ Construction personnel shall strictly limit their activities, vehicles, equipment, and construction material to the proposed project footprint, staging areas, and designated routes of travel. ▪ Exclusion fencing shall be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities. ▪ To the extent feasible, construction shall be conducted outside of the nesting bird season (see Mitigation Measure BIO-5).	
Significance Criterion c: Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Potentially Significant	**Mitigation Measure BIO-11**: RWQCB Jurisdiction. Prior to issuance of a grading permit, the City shall obtain proof of appropriate regulatory permits from RWQCB. Regulatory permits are anticipated to include a Waste Discharge Requirements for impacts to non-federal waters through preparation and submittal of a SWRCB Report of Waste Discharge. Compensatory mitigation	Less than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
The proposed project would result in permanent direct impacts to Waters of the State, including wetland Waters of the State regulated by the RWQCB. **(Impact BIO-7)**		for permanent impacts to RWQCB jurisdiction shall be required as part of subsequent permitting requirements. Permanent impacts to RWQCB jurisdiction shall be mitigated through: (1) on-site preservation, enhancement, restoration, and/or creation of jurisdictional streambed at a ratio of no less than 2:1; (2) off-site preservation, enhancement, restoration, and/or creation of jurisdictional streambed at a ratio of no less than 2:1; and/or (3) purchase of credits at an approved mitigation bank at a ratio of no less than 1:1, provided that the mitigation is creation of streambed and has already been successfully implemented. BMPs to minimize and avoid impacts to RWQCB jurisdiction during and after construction shall be addressed as part of the Nationwide Permit, Water Quality Certification, and Waste Discharge Requirements. Minimization and avoidance measures may include, but are not limited to, the following: Construction-related equipment shall be stored in developed/disturbed areas, outside of the drainage. No equipment maintenance shall be done within or adjacent to the drainage. ▪ Source control and treatment control BMPs shall be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs shall be implemented throughout the project to capture and treat potential contaminants.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		▪ Substances harmful to aquatic life shall not be discharged into the drainage. Harmful substances include, but are not limited to, chemical discharges such as oil, gas, hydraulic fluid, wet concrete, certain herbicides and pesticides, and plastics. All hazardous substances shall be properly handled and stored. ▪ A Storm Water Pollution Prevention Plan shall be prepared to prevent sediment from entering the drainage during construction. ▪ To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site. ▪ Construction personnel shall strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel. ▪ Exclusion fencing shall be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities.	
Significance Criterion d: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?	Potentially Significant	Implement Mitigation Measure BIO-5 and BIO-11.	Less than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Project-related impacts to RWQCB-jurisdictional drainages could result in localized interference with wildlife movement or habitat functions associated with waters of the State. **(Impact BIO-8)**			
Significance Criterion e: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion f: Would the project conflict with the provisions of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state habitat conservation plan?	Less Than Significant	No mitigation measures are required	Less Than Significant
CULTURAL RESOURCES			
Significance Criterion a: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	No Impact	No mitigation measures are required	No Impact
Significance Criterion b: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	Potentially Significant	**Mitigation Measure CUL-1**: Prior to the issuance of any permits allowing ground-disturbing activities, the project proponent/operator shall retain a Qualified Archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology (U.S.	Less than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
There is a possibility of encountering undocumented resources and therefore impacting archaeological resources. **(IMPACT CUL-1)**		Department of the Interior, 2011), to carry out all mitigation measures related to archaeological resources. The contact information for this Qualified Archaeologist shall be provided to the City of Irwindale Planning Department prior to the commencement of any construction activities on-site. **Mitigation Measure CUL-2**: In the event that unanticipated cultural resources are encountered during any phase of project construction, all construction work within 50 feet of the find shall cease and the Qualified Archaeologist and designated Native American representative, as defined in Mitigation Measure TCR-2 (Section 3.15, Tribal Cultural Resources), shall assess the find for importance. Construction activities may continue in other areas. If the discovery is determined to not be significant by the Qualified Archaeologist and/or designated Native American representative, work will be permitted to continue in the area. If a find is determined to be important by the Qualified Archaeologist and designated Native American representative, he or she shall immediately notify the City. The City shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the California Register of Historical Resources (CRHR). Work may not	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		resume within the no-work radius until the lead agency, through consultation as appropriate, determines that the site either: (1) is not eligible for the CRHR; or (2) that the treatment measures have been completed to their satisfaction.	
Significance Criterion c: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	Potentially Significant	Implement Mitigation Measures CUL-1 and CUL-2.	Less than Significant
ENERGY			
Significance Criterion a: Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion b: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant	No mitigation measures are required	Less Than Significant
GEOLOGY AND SOILS			
Significance Criterion a: Would the project subject residents [or occupants, visitors, etc.] to potential seismic-related hazards, including the risk of loss, injury, or death involving:	Potentially Significant	**Mitigation Measure GEO-1:** Prior to the issuance of a grading permit, the Project Applicant shall submit a Final Geotechnical Report to the Irwindale Public Works/Engineering Building and Safety Department for review and approval. The Final Geotechnical Report shall meet the design standards of Chapter 15.04 of the City's municipal code, the County of Los Angeles	Less than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.) ii) Strong seismic ground shaking. iii) Seismic-related ground failure, including liquefaction iv) Landslides. Impacts associated with interim conditions during the construction phase could result in slope instability and seismically induced landslides. **(Impact GEO-1)** Differential settlement of engineering fill versus natural alluvium could result in impacts to utilities passing from the engineered fill into the natural alluvium. **(Impact GEO-2)**		Department of Public Works' Geotechnical and Materials Engineering Division 2021 Administrative Manual, and the following City of Irwindale guidelines: ▪ Guidelines for Above-Water Backfilling of Open-Pit Mines (dated November 23, 2005) ▪ Guidelines for Underwater Backfilling of Open-Pit Mines, Irwindale (dated May 20, 2005) ▪ Irwindale Mining Bulletin – Settlement of Mine Backfills (dated November 22, 2022) **Mitigation Measure GEO-2:** The Final Geotechnical Report shall include a slope stability analysis that considers the interim conditions present during the phased construction. Slope stability should be evaluated for cut slopes and should include both static and seismic analyses. The slope stability analysis shall be conducted per the City of Irwindale's Guidelines for Stability Analyses of Open-Pit Mine Slopes.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion b: Would the project result in substantial soil erosion or the loss of topsoil?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion c: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? Impacts associated with the existing non-engineered fill within the Specific Plan area and fill differentials at the edges of the quarries could result in excessive post-grading settlement and collapse. Potential differential building movements may also result from conditions where the proposed building pads have significant differentials in engineered fill thickness. **(Impact GEO-3)**	Potentially Significant	**Mitigation Measure GEO-4:** The Final Geotechnical Report shall include requirements for excavating native materials beneath the bottoms of proposed foundations near the edges of the quarries. These requirements shall include the depth of excavation required to ease abrupt transitions from native materials to engineering fill. Quantitative estimates of the potential static settlement shall be developed, as necessary, and compared to the total and differential settlement tolerances for structures. **Mitigation Measure GEO-5:** The Final Geotechnical Report shall require settlement monitors within the engineering fills and include recommendations for settlement monument arrays. **Mitigation Measure GEO-6:** The Final Geotechnical Report shall include requirements for a maximum differential fill thickness across any building pad. These requirements should consider the significant depth of fill that would be placed and be designed to minimize post-grading settlement.	Less Than Significant
Significance Criterion d: Would the project be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less Than Significant	No mitigation measures are required	Less Than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion e: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No Impact	No mitigation measures are required	No Impact
Significance Criterion f: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less Than Significant	No mitigation measures are required	Less Than Significant
GREENHOUSE GAS EMISSIONS			
Significance Criterion a: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? The proposed project's construction and operation GHG emissions would exceed the South Coast AQMD's numeric threshold of 3,000 MTCO2e/yr and would therefore have a significant impact on the environment. **(Impact GHG-1)**	Potentially Significant	Implement Mitigation Measures AQ-1 through AQ-13	Significant and Unavoidable

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion b: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? The proposed project's construction and operation GHG emissions would exceed the South Coast AQMD's numeric threshold and would therefore conflict with the 2022 CARB Scoping Plan. **(Impact GHG-2)**	Potentially Significant	Implement Mitigation Measures AQ-1 through AQ-13	Significant and Unavoidable
HAZARDS AND HAZARDOUS MATERIALS			
Significance Criterion a: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion b: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion c: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste	Less Than Significant	No mitigation measures are required	Less Than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
within one-quarter mile of an existing or proposed school?			
Significance Criterion d: Would the project be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	No Impact	No mitigation measures are required	No Impact
Significance Criterion e: For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No mitigation measures are required	No Impact
Significance Criterion f: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion g: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	Less Than Significant	No mitigation measures are required	Less Than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
HYDROLOGY AND WATER QUALITY			
Significance Criterion a: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion b: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion c: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that 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 that would result in flooding on- or offsite?	Less Than Significant	No mitigation measures are required	Less Than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? iv) Impede or redirect flood flows?			
Significance Criterion d: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion e: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant	No mitigation measures are required	Less Than Significant
LAND USE AND PLANNING			
Significance Criterion a: Would the project physically divide an established community?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion b: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No mitigation measures are required	Less Than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
MINERAL RESOURCES			
Significance Criterion a: Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion b: Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	Less Than Significant	No mitigation measures are required	Less Than Significant
NOISE			
Significance Criterion a: 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?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion b: Would the project generate excessive groundborne vibration or groundborne noise levels?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion c: For a project 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	Less Than Significant	No mitigation measures are required	Less Than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
public use airport, would the project expose people residing or working in the project area to excessive noise levels?			
PUBLIC SERVICES			
Significance Criterion a: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion b: Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less Than Significant	No mitigation measures are required	Less Than Significant
TRANSPORTATION			
Significance Criterion a: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system,	Less Than Significant	No mitigation measures are required	Less Than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
including transit, roadway, bicycle, and pedestrian facilities?			
Significance Criterion b: Would the project conflict or be inconsistent with CEQA Guidelines Section15064.3, subdivision (b)? The project-level VMT impact of the proposed project would be significant. **(Impact TRA-1)**	Potentially Significant	**Mitigation Measure TRA-1** (based on CAPCOA Measure T-8): Provide Ridesharing Program: A ridesharing program shall be implemented by individual tenants or operators and promoted through a multifaceted approach, identified in the ridesharing program proposed by the project applicant, which measures may include, but not necessarily be limited to, the following features: ▪ Designating a certain percentage of desirable parking spaces for ridesharing vehicles. ▪ Designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles. ▪ Providing an app or website for coordinating rides. ▪ The individual tenants and operators of future development projects resulting from the Specific Plan shall designate preferential parking spaces for carpool/vanpool vehicles. Similarly, safe and convenient loading zones for carpool/vanpool passengers shall be required. ▪ All tenants of future development projects within the Specific Plan shall provide an app, website, or other convenient means of digital ride coordination if a Project-wide system is not otherwise provided, as described below. To boost the potential for identifying ride matches, it is recommended that one single app or website be deployed for all tenants at the Specific Plan site. One single ride matching app or website will also allow	Potentially Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		future tenants to pool resources for the development and operation of the service. Designated employee transportation coordinators should include information regarding the app or website in the required commute trip reduction marketing materials. **Mitigation Measure TRA-2** (based on CAPCOA Measure T-9): Implement Subsidized or Discounted Transit Program According to CAPCOA, this measure reflects the provision of subsidized or discounted, or free transit passes being offered to employees. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT. Projects implementing this strategy should be within 1.0 mile of high-quality transit service, 0.5 mile of local or less frequent transit service, or along a designated shuttle route providing last-mile connections to rail service. Note: within approximately 0.5 miles of the LA Metro A Line Irwindale Station, the light rail transit service, provided approximately every 7 to 8 minutes during the morning and evening peak commute hours, qualifies as high-quality transit service to the project site. ▪ The individual tenants and operators of future development projects resulting from the Specific Plan shall offer free transit passes to all employees on a monthly basis. Employees who accept the offer shall be provided a monthly transit pass to the transit service of their choice (e.g., Metro, Foothill Transit, etc.)	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		at no cost to themselves (i.e., a 100% subsidy). The transit passes may either be obtained by the future employers and provided to employees, or the employee may be fully reimbursed for the cost of the transit pass. The transit pass subsidy program should be regularly marketed to employees by designated employee transportation coordinators as well as in the required commute trip reduction marketing materials (MM T-7, above). **Mitigation Measures TRA-3 OR TRA-4** – Applicant shall implement ONE of the following two measures. The following two measures each target employee commute behaviors by providing a price signal for employees to consider other travel modes for their work commute: the first measure actively charges all employees to park, while the second measure reimburses employees who do not park. Based on the information provided in the CAPCOA 2021 Handbook, it is understood that the measures are considered mutually exclusive and that only one of the measures should be applied to a proposed project at a time. This restriction reflects the fact that both measures target the same underlying travel behaviors through differing approaches, and prevents double-counting the effectiveness of associating a monetary value with parking. The following two measures are recommended to be implemented in the Specific Plan area, with each future employer required to implement either one of the two measures.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion c: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion d: Would the project result in inadequate emergency access?	Less Than Significant	No mitigation measures are required	Less Than Significant
TRIBAL CULTURAL RESOURCES			
Significance Criterion a: Would the project cause a substantial adverse change in the significance of a tribal cultural resource , defined in Public Resources Code Section 21074, as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k)?	Less Than Significant	No mitigation measures are required	Less Than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? There is a possibility of encountering tribal cultural resources. **(IMPACT TCR-1)**	Potentially Significant	**Mitigation Measure TCR-1**: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities a) The project applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any ground-disturbing activity for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). Ground-disturbing activity shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. b) A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. c) The monitor shall complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered Tribal Cultural Resources (TCRs), including but not limited to, Native American cultural and historical artifacts, remains, places	Less Than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the project applicant/lead agency upon written request to the Tribe. d) On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs. **Mitigation Measure TCR-2**: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) a) Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh shall recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		Mitigation Measure TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects a) Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. b) If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. c) Human remains and grave/burial goods shall be treated alike according to the California Public Resources Code section 5097.98(d)(1) and (2). d) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. e)Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.	
UTILITIES AND SERVICE SYSTEMS			
Significance Criterion a: Would the project require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects?	Less Than Significant	No mitigation measures are required	Less Than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion b: Would the project result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion c: Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion d: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion e: Would the project require or result in the relocation or construction of new or expanded storm water drainage facilities, the construction or relocation of which could cause significant environmental effects?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion f: Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local	Less Than Significant	No mitigation measures are required	Less Than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
infrastructure, or otherwise impair the attainment of solid waste reduction goals?			
Significance Criterion g: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less Than Significant	No mitigation measures are required	Less Than Significant
Significance Criterion h: Would the project require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less Than Significant	No mitigation measures are required	Less Than Significant

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1. INTRODUCTION

1.1 PURPOSE OF THE EIR

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This draft environmental impact report (DEIR) has been prepared to satisfy CEQA and the CEQA Guidelines. The environmental impact report (EIR) is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage and to identify alternatives to the project. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

The lead agency means "the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment" (CEQA § 21067). The City of Irwindale has the principal responsibility for approval of the Irwindale Brew Yard Specific Plan. For this reason, the City of Irwindale is the CEQA lead agency for this project.

The intent of the DEIR is to provide sufficient information on the potential environmental impacts of the proposed Irwindale Brew Yard Specific Plan to allow the City of Irwindale to make an informed decision regarding approval of the project. Specific discretionary actions to be reviewed by the City are described in Section 2.8, *Intended Uses of the Draft EIR*.

This DEIR has been prepared in accordance with requirements of the:

- **California Environmental Quality Act** (CEQA) of 1970, as amended (Public Resources Code, §§ 21000 et seq.)
- **State Guidelines for the Implementation of the CEQA of 1970** (CEQA Guidelines), as amended (California Code of Regulations, §§ 15000 et seq.)

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

1.2 ENVIRONMENTAL REVIEW PROCESS

1.2.1 Notice of Preparation

The City of Irwindale determined that an EIR would be required for this project and issued a Notice of Preparation (NOP) on February 7, 2024 (see Appendix A). A public scoping meeting was held on February 22, 2024, to elicit comments on the scope of the DEIR. Table 3-1, Summary of Comments on the NOP, in Chapter 3, Environmental Analysis, summarizes the comments received during the NOP public review period and identifies the section(s) of this DEIR where the issues are addressed.

1.2.2 Draft EIR

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

The information in Chapter 2, *Project Description*, establishes the basis for analyzing the proposed project-related environmental impacts.

1.2.3 Final EIR Certification

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

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

- **Irwindale City Hall –** 5050 Irwindale Avenue, Irwindale, CA 91760
- **Irwindale Public Library –** 5050 Irwindale Avenue, Irwindale, CA 91706
- **Irwindale Planning Division –** 1602 Arrow Highway, Irwindale, CA 91706

This Draft EIR is also available online: [provide link]

1.3 MITIGATION MONITORING

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

The Mitigation Monitoring Program for the proposed project will be completed prior to consideration of the project by the Irwindale City Council.

1.4 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this Draft EIR, consistent with Section 15150 of the CEQA Guidelines, and they are available for review at the City of Irwindale Community Development Department – Planning Division, Second Floor, 16102 Arrow Highway, Irwindale, CA, 91706, and on the City's website.

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2. PROJECT DESCRIPTION

2.1 INTRODUCTION

The purpose of this section is to describe the proposed Irwindale Brew Yard Specific Plan project (proposed project) (IBYSP) to the public, reviewing agencies, and decision makers. The complete Specific Plan is included as Appendix B to this Draft EIR. This description is provided in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines, which require environmental review of a "project" as defined in Section 15378(a) of the CEQA Guidelines:

"Project," as defined by the CEQA Guidelines, means:

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

This section describes each phase and components of the proposed project, including:

- Any required structure demolition
- Site preparation and grading, including fill of the on-site quarry pits and soil import/export
- On- and off-site infrastructure improvements
- Construction activity, phasing, and equipment
- Operational activities

This section also provides the context in which these activities and ongoing project operations would occur. The project background, environmental setting, and statement of project objectives are described. The project applicant is requesting the following entitlements:

- **General Plan Amendment.** An amendment to the existing General Plan Map, changing the existing land use designation of the subject property from Industrial/Business Park to Specific Plan.

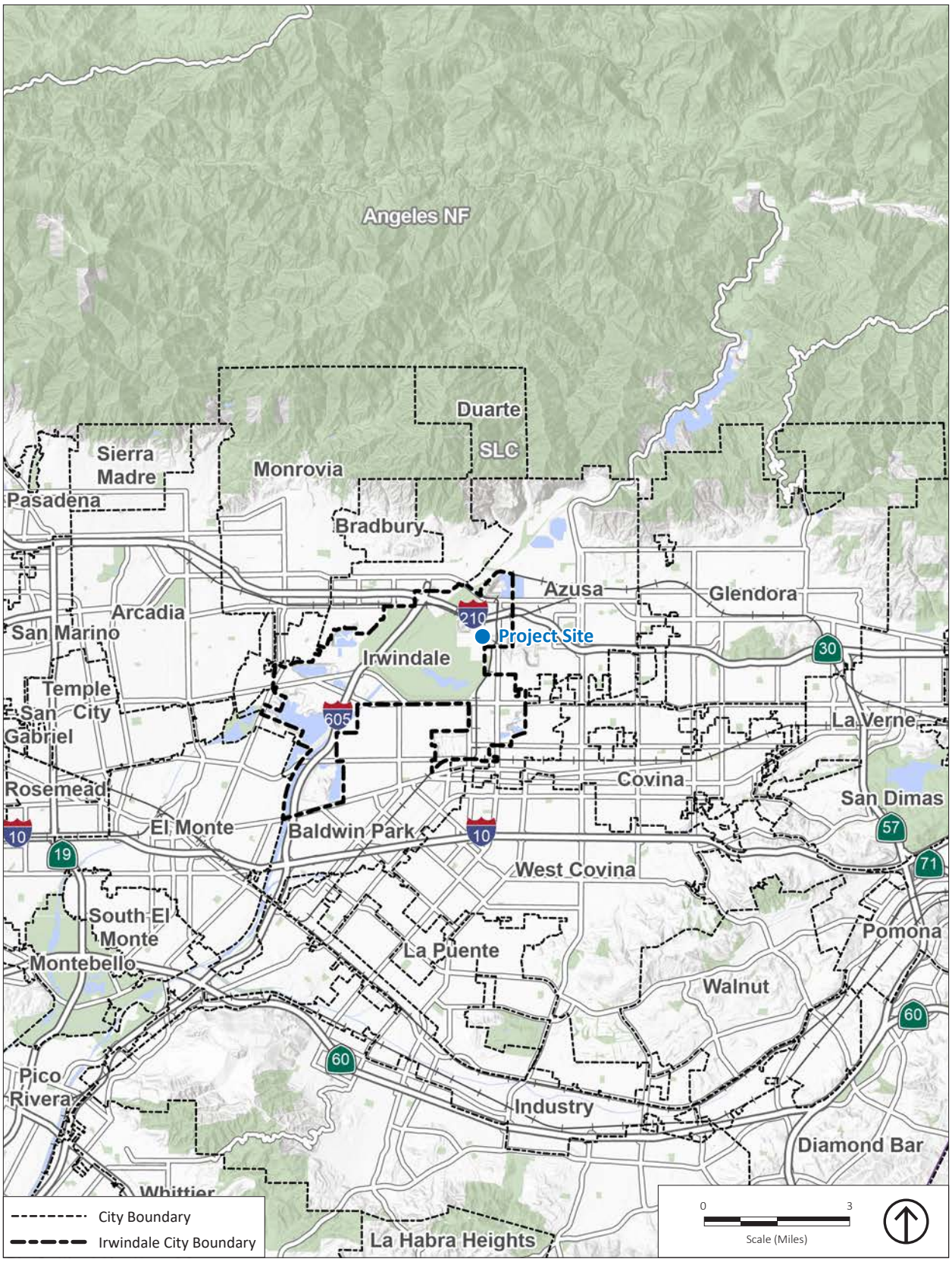
- **Zone Ordinance Amendment.** An amendment to the existing Irwindale Municipal Code (Title 17), adding the Irwindale Brew Yard Specific Plan (IBYSP) to Subsection 17.08.030, "Adopted Specific Plans."
- **Zone Change.** An amendment to the Official Zoning Map of the City of Irwindale, changing the existing zoning designation of the subject property from M-2 (Heavy Industrial) to IBYSP (Irwindale Brew Yard Specific Plan).
- **Tentative Parcel Map.** A subdivision of four existing parcels into five total parcels: four parcels for future development and one parcel for private access purposes.
- **Development Agreement.** A fill and grading operation for two former mining pits that are exempt from the Surface Mining and Reclamation Act (SMARA) of 1975 because they had mining operations prior to January 1, 1976. Once filled, the area will be used for future development.

2.2 PROJECT LOCATION

The 150.1-acre Brew Yard Specific Plan (Specific Plan) area is in the northeast portion of the City of Irwindale, Los Angeles County, California. From a regional standpoint, the City of Irwindale is approximately 14.5 miles northeast of downtown Los Angeles. Interstate 210 (I-210) abuts the project site to the north, Interstate 605 (I-605) is approximately 0.8 mile to the west of the site, and Interstate 10 (I-10) is approximately 3.5 miles to the south of the site. The property does not have a street address but is adjacent to the Brew Yard facility, which is at 15801 First Street. At the local scale, the brewery and Irwindale Avenue form the eastern project site boundary, First Street forms the southern project site boundary, and the Sante Fe Dam Recreation Center forms the western project site boundary. The San Gabriel River Trail is 0.1 mile to the west of the site. The project site and surrounding area are shown in Figure 2-1, *Regional Location,* and Figure 2-2, *Local Vicinity*. Local access to the project site is primarily from First Street, and regional access is provided from Irwindale Avenue.

Figure 2-3, *Project Site Boundary/Aerial*, depicts the site relative to the surrounding land uses. The Specific Plan area is composed of all or portions of the following tax parcels: Tentative Assessor's Parcel Numbers (APNs): 8533-009-026, 8533-009-028, 8533-009-029, and 8533-011-052. The APNs that comprise the project area are subject to change, and the Specific Plan will be updated accordingly prior to adoption.

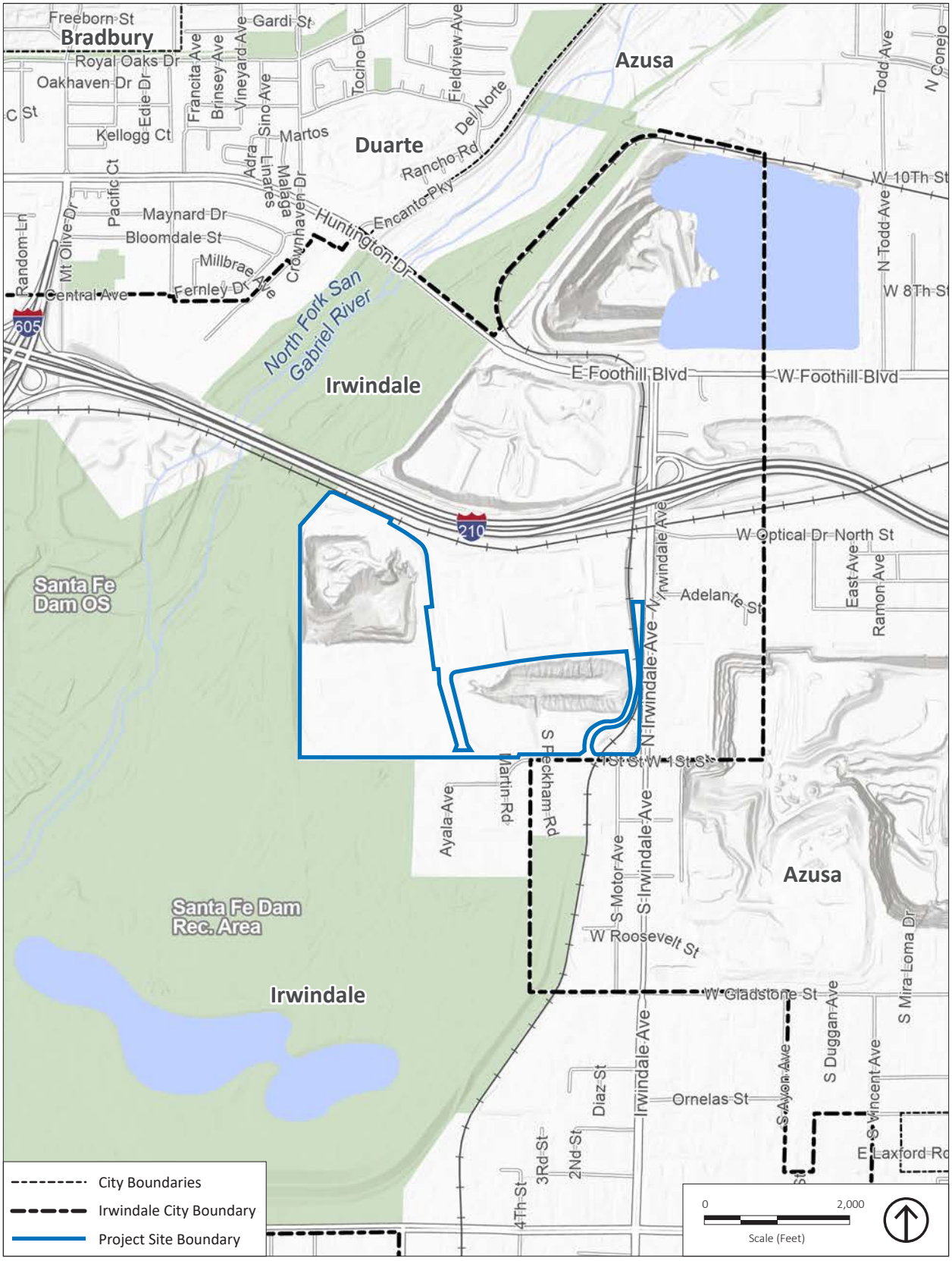
A *Site Topography* map is provided as Figure 2-4.



Source: Generated using GIS Pro 2025.

Figure 2-1
Regional Location

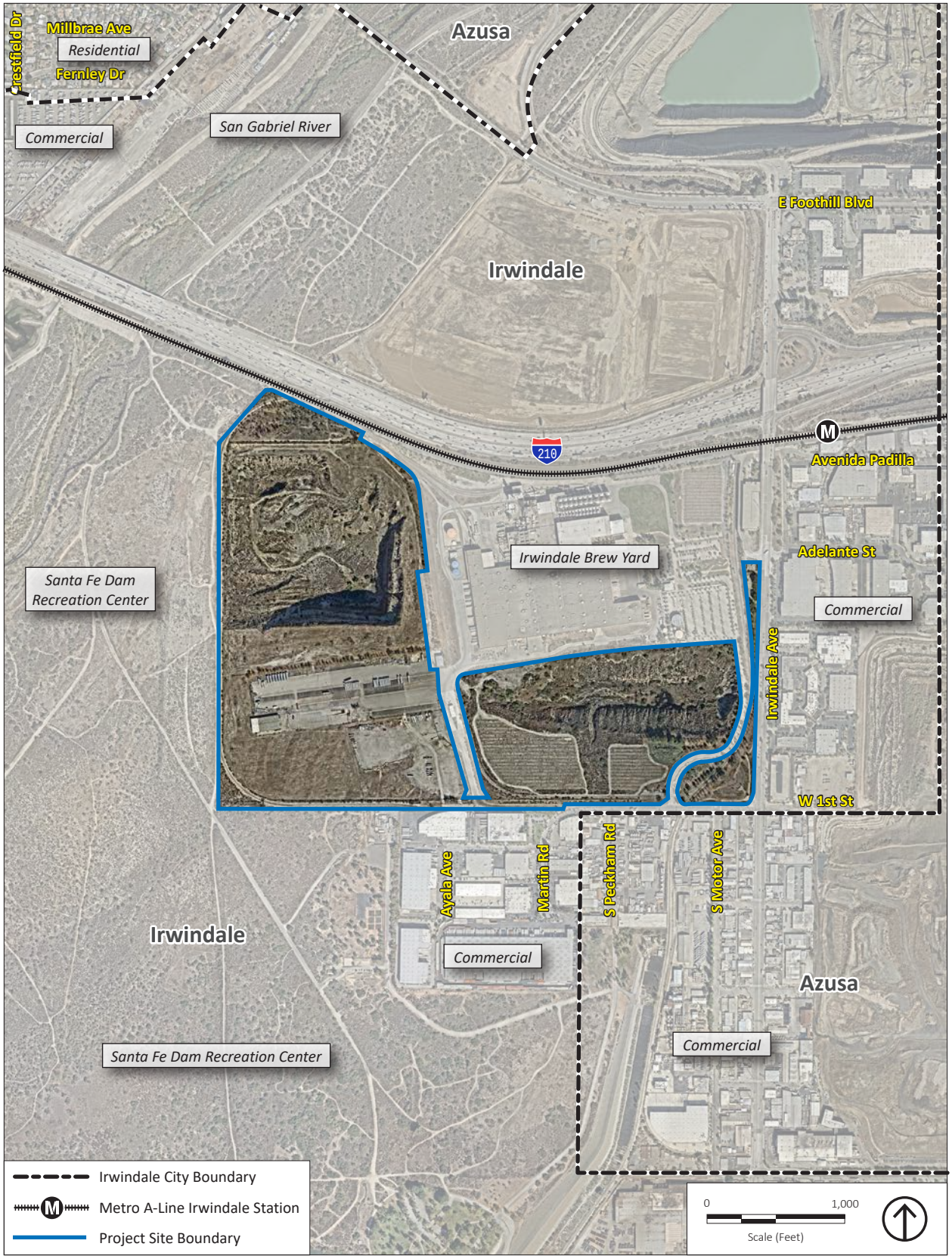
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Source: Generated using GIS Pro 2025.

Figure 2-2
Local Vicinity

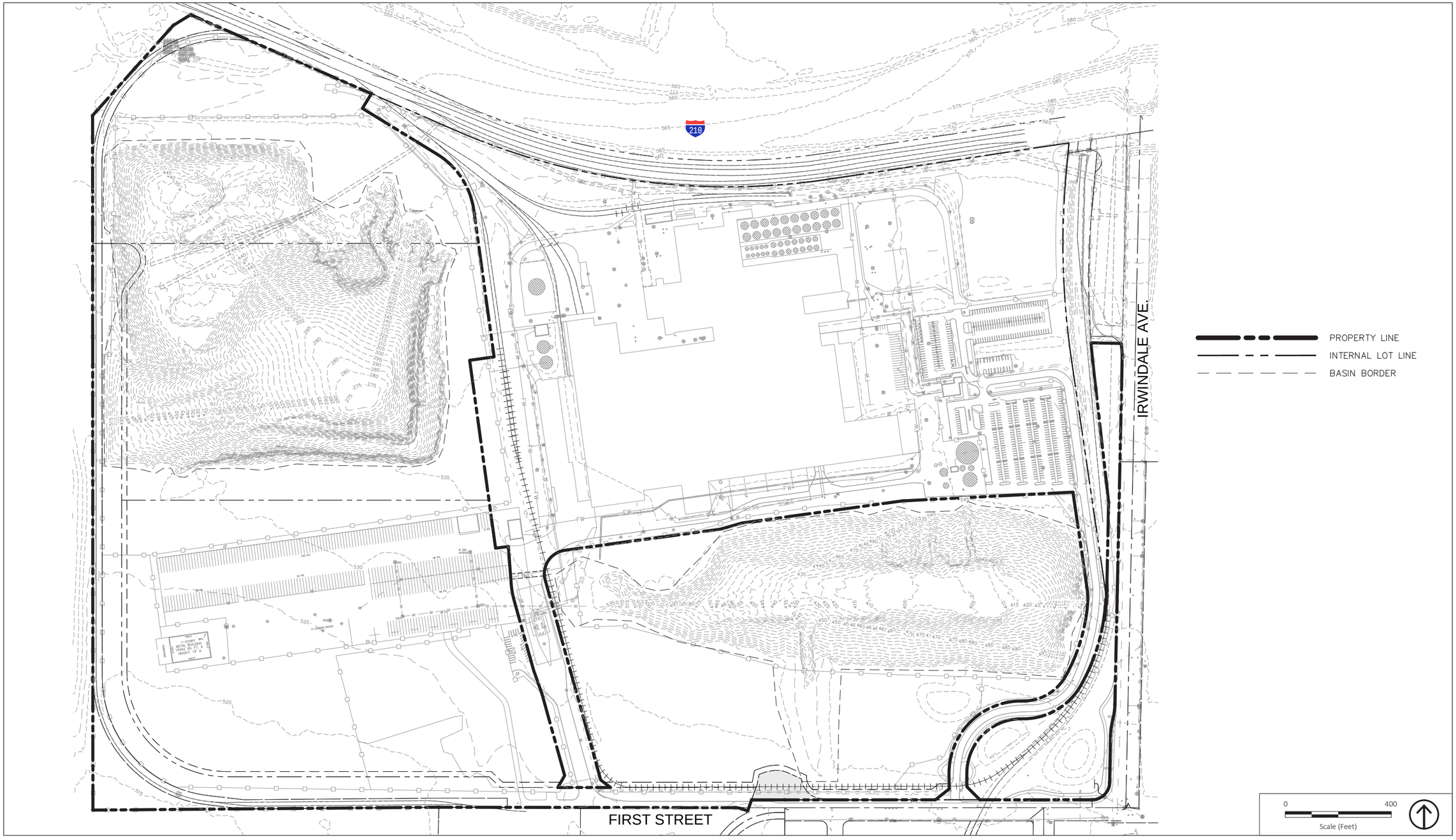
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Source: Nearmap 2025.

Figure 2-3
Project Site Boundary/Aerial Photo

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Source: Kimley-Horn 2026.

Figure 2-4
Site Topography

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2.3 PROJECT BACKGROUND

The project site was historically vacant land used as gravel pits. Aerial photographs show active quarrying as early as 1939 with two areas of installed railroad spurs apparently serving the quarries. Photographs from the 1960s and 1970s indicate a few on-site support buildings and the Irwindale Racetrack passing south of the northwest quarry. The track was gone by 1979. Sand and gravel were excavated from two quarries, which were depleted and ceased operations in the early 1970s.

The adjacent brewery was in place by 1979. In the 2000s a truck parking area was developed in the southwest portion of the site and a solar farm in the southeast corner of the project site.

2.4 ENVIRONMENTAL SETTING

2.4.1 Transportation and Land Use

REGIONAL AND LOCAL ACCESS

Regional highway access is provided by I-210 (Foothill Freeway) and I-605 (San Gabriel River Freeway), as shown in Figure 2-1, *Regional Location.* I-210 is a major east-west freeway north of the project site and connects the foothill communities from the westerly terminus in Sylmar to the easterly terminus in Redlands. Full access interchanges (i.e., eastbound and westbound on- and off-ramps) are provided at Irwindale Avenue, Vernon Avenue, and Azusa Avenue.

I-605 is a north-south freeway located west of the project site. I-605 connects from I-210 at its northerly terminus to I-405 and SR-22 at its southerly terminus. In the project site area, four mixed-flow main-line lanes are provided in each direction.

The project site is accessed from Irwindale Avenue along its eastern boundary and from First Street along the site's southern boundary. Along the project site's frontage, Irwindale Avenue consists of a 15-foot landscaped median with turn lane, two travel lanes in each direction, and a landscaped setback with an unpaved sidewalk. There are no driveways into the project site along Irwindale Avenue. Existing site access is provided at one driveway from First Street, a four-lane local street. Irwindale Avenue is a City-designated truck route between Arrow Highway and Foothill Boulevard, which includes the frontage of the project site.

Public light rail transit is provided by the LA Metro A Line (previously L/Gold Line). Irwindale Station is approximately 0.5 mile north of the Irwindale Avenue/First Street intersection. Light rail transit service is provided approximately every seven to eight minutes during the morning and evening peak commute hours.

EXISTING AND SURROUNDING LAND USE

On-Site Uses

The site's existing land use condition is characterized by two large, inactive sand and gravel quarry pits; vacant and underutilized industrial land; disturbed ground surfaces; and infrastructure associated with former land uses (see Figure 2-3). Following cessation of mining activities, the site has remained largely undeveloped and has been used intermittently for industrial staging, truck parking, and utility-related purposes.

Existing site features include paved areas, internal access routes, rail infrastructure associated with historic quarry operations, and utility improvements. A solar energy facility occupies a portion of the southeastern area of the site, and a trailer storage area is near the northwestern quarry. Aside from a small security facility, the site does not contain permanent buildings or active industrial operations.

Surrounding Land Uses

Overall, surrounding land uses consist primarily of industrial, infrastructure, transportation, and recreational open space uses, with no residential neighborhoods adjacent to the project site. South of the project site, First Street separates the project site from additional industrial and distribution uses, rail easements, and portions of the Santa Fe Dam Recreation Area. Arrow Highway is approximately one mile south of the site and supports a mix of industrial and commercial uses. To the west, the project site abuts the Santa Fe Dam Recreation Area, a large regional open space that includes flood control facilities, trails, water features, and recreational uses, and additional transportation and utility infrastructure are farther to the west (see Figures 2-2 and 2-3). Commercial uses are located east of Irwindale Avenue, and the City of Azusa abuts a portion of the southern project boundary and is beyond the Irwindale boundary to the east and north.

2.4.2 Local Planning Context

CITY OF IRWINDALE GENERAL PLAN

The Irwindale General Plan provides a source of information and a policy framework for future planning and development in the City. Through appropriate goals, policies, and programs it serves as a decision-making tool to guide growth and development. The Irwindale General Plan was adopted in 2020 and has since been updated, including adoption of the 2021–2029 Housing Element update in 2025, updates to the Safety Element, and adoption of a new Environmental Justice Element. The General Plan consists of a series of State-mandated and optional elements to direct the City's physical, social, and economic growth.

Under the General Plan, the project site is designated Industrial/Business Park, which provides for industrial and employment-generating uses, including manufacturing, logistics, warehousing, and related commercial activities. The General Plan supports the continued use and redevelopment of former quarry and industrial lands for productive industrial, manufacturing, logistics, and related commercial activities.

CITY OF IRWINDALE ZONING CODE

The City of Irwindale Zoning Code is in Title 17 of the municipal code. The zoning code is a regulatory document that establishes specific standards for the use and development of all properties in the City by regulating development intensity, including limits on building setbacks, landscaping standards, and building heights. The zoning code also defines the permitted land uses in the various zones.

The project site is currently zoned Heavy Manufacturing (M-2) under the City's municipal code. The M-2 zoning designation allows a range of industrial and manufacturing uses and establishes development standards governing building height, setbacks, and site design.

2.4.3 Environmental Resources and Infrastructure

AESTHETICS AND PHYSICAL CHARACTER

Quarries

The San Gabriel Mountains approximately three miles to the north provide a scenic backdrop to the project site, and the two existing quarries represent dramatic landforms within the project area. Figures 2-5a and 2-5b, *Site Photos*, depict existing conditions at the project site. The northwest quarry is approximately 52 acres at the surface grade with a maximum depth of approximately 270 feet. The southeastern quarry is approximately 25 acres at the surface and approximately 140 feet deep.

Vegetation/Drainage Features

The site consists primarily of previously disturbed sand and gravel mining areas that remain largely undeveloped and support a mix of native and non-native upland vegetation communities. Small areas of sensitive Goodding's willow riparian woodland habitat are in the former mining pits. Other on-site vegetation consists primarily of native scrub habitats dominated by California buckwheat, deerweed, and laurel sumac, interspersed with non-native grasses and forbs.

The project site contains three jurisdictional drainage features. Drainage A is along the northern boundary of the west pit and conveys flows beneath I-210 through existing culverts. Drainage B is an ephemeral drainage in the west pit that seasonally conveys runoff to the pit bottom. The

third drainage feature is in the east pit and supports limited annual flows that discharge through mining talus to a small wetland area supporting Goodding's willow riparian woodland and curvepod yellowcress.

AIR QUALITY AND CLIMATE

Climate

The Specific Plan area is in the South Coast Air Basin (SoCAB) in the jurisdiction of South Coast Air Quality Management District (AQMD). The SoCAB is a 6,745-square-mile subregion of South Coast AQMD's jurisdiction, which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties and all of Orange County.

The SoCAB climate substantially influences regional air quality through factors such as temperature, humidity, precipitation, sunshine, and wind patterns. The SoCAB experiences a semi-arid climate characterized by warm temperatures, limited rainfall concentrated between November and April, abundant sunshine, and the presence of a coastal marine layer that contributes to humidity, fog, and reduced pollutant dispersion. Seasonal temperature inversions are common in the basin and can trap pollutants near the ground surface, particularly during summer and winter. Regional wind patterns are generally characterized by daytime onshore flows and nighttime offshore drainage winds, and periodic Santa Ana wind events and localized eddy circulation patterns also influence pollutant transport and dispersion.

Air Quality

Local air quality in the SoCAB, including the project area in the East San Gabriel Valley, reflects the region's generally poor ozone and particulate matter conditions despite attainment of most other criteria pollutants. Based on State and federal attainment designations, the SoCAB is in nonattainment for ozone (1-hour and 8-hour standards under State; 8-hour under federal), $PM_{2.5}$ (State and federal), and PM_{10} (State only); carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead are in attainment or unclassified at both the State and federal levels.

Monitoring data from nearby stations (East and West San Gabriel Valley) indicate that exceedances of ambient air quality standards are primarily for ozone and particulate matter, consistent with broader regional air quality patterns. Overall, air quality conditions at the project site are typical of the SoCAB, where photochemical smog and fine particulate pollution remain the primary air quality concerns due to persistent atmospheric conditions that limit dispersion and promote pollutant formation.



Photo 1 – View of northwest quarry's south wall.



Photo 2 – View of project site's northernmost boundary looking north.



Photo 3 – View of northwestern quarry pit.



Photo 4 – View of onsite eastern and northern warehouse facade facing southwest.



Photo 5 – View of the northwest quarry's southern boundary facing north.



Photo 6 – View from western boundary of southeast quarry solar panel frame facing north.

Source: Cogstone 2026.

Figure 2-5a
Site Photographs

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Photo 7 – View of southeastern quarry from west end facing east.



Photo 8 – View of southeast quarry facing east from western most end.



Photo 9 – View of Atchison, Topeka and Santa Fe railroad spur looking east.

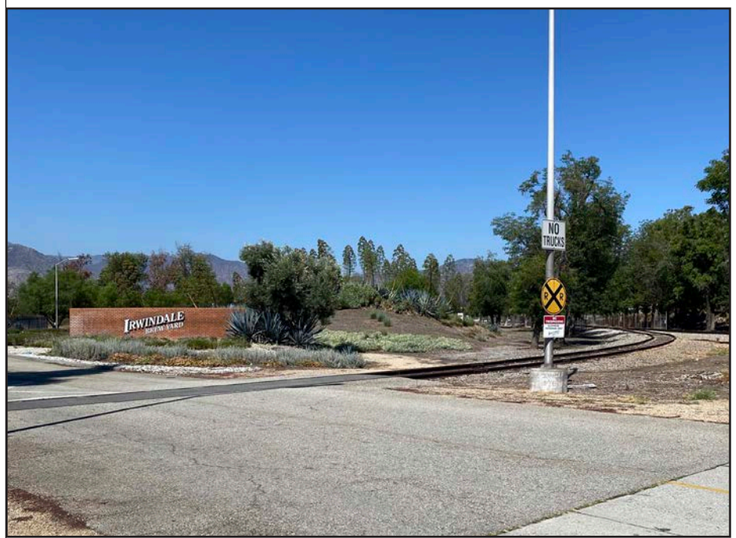


Photo 10 – View of First Street Brewery Sign.



Photo 11 – View of railroad segment facing northeast from 1st Street.



Photo 12 – View of Training Center, south façade (left) and east elevation (right), facing northwest.

Source: Cogstone 2026.

Figure 2-5b
Site Photographs

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HYDROLOGY AND WATER QUALITY

The Specific Plan area is in the Lower San Gabriel watershed, which encompasses approximately 78.5 square miles in Los Angeles County and represents about 11.4 percent of the overall San Gabriel River watershed. Stormwater from the site ultimately drains to the Santa Fe Dam Basin, which discharges to the San Gabriel River, the San Gabriel River estuary, and the Pacific Ocean. Under existing conditions, the two former quarry areas function as self-retaining sump basins, and a small commercial area in the southeast corner drains to adjacent streets. The site generally slopes from north to south and east to west. Runoff from portions of the site is conveyed through three box culverts beneath the railroad to the Santa Fe Dam Basin. The site is currently about 10 percent impervious and 90 percent pervious, and there are no existing low impact development stormwater treatment facilities on-site.

Surface water that receives runoff from the project site is subject to existing water quality impairments. The Santa Fe Dam Basin discharges to the San Gabriel River, including Reaches 1, 2, and 3, and the San Gabriel River estuary, all of which are listed on the 2024 Clean Water Act Section 303(d) list of impaired water bodies. Identified impairments include nickel and low dissolved oxygen in the estuary, pH in Reach 1, cyanide in Reach 2, and chlorine in Reach 3. As a result, stormwater runoff from the Specific Plan area ultimately drains to downstream water bodies with documented water quality limitations.

PUBLIC SERVICES

Fire Services

The City contracts fire and emergency medical services with the Los Angeles County Fire Department (LACoFD). The LACoFD maintains a single fire station in Irwindale, Station No. 48 at 15546 E Arrow Highway near the Civic Center. Fire Station No. 48 is approximately one mile south of the project site. According to LACoFD, the estimated response time to the project site from Station No. 48 is approximately four minutes, which is consistent with the department's five-minute response time goal for the first arriving units.

Police Services

The project site is served by the Irwindale Police Department (IPD), which provides police services throughout the City of Irwindale from its headquarters at 5050 Irwindale Avenue. The IPD police station is approximately 1.2 miles south of the project site. IPD has a reported response time of up to five minutes for most areas in the City (Irwindale 2024).

School Services

The project site is in the Baldwin Park Unified School District and Azusa Unified School District. There is only one public school in the City of Irwindale, Merwin Elementary School, which is approximately two miles south of the project site. However, Merwin Elementary School is in the

Covina-Valley Unified School District. Under existing conditions, the project site places no demand on the public-school system because the project site is vacant except for a storage building and training facility.

Library Services

The Irwindale Public Library, owned and operated by the City of Irwindale, is at 16053 Calle De Paseo. The new Irwindale Public Library is under construction and is anticipated to be completed in Summer 2026. The new library will increase circulation by 10,000 items, totaling approximately 32,000 items. The existing site use places no demand on the City's public library system.

2.5 STATEMENT OF PROJECT OBJECTIVES

Objectives for the Brew Yard Specific Plan will aid decision makers in their review of the proposed project, associated environmental impacts, and potential project alternatives. Pursuant to CEQA Guidelines Section 15124, the following objectives support the proposed project's underlying purpose of expanding industrial/commercial business opportunities in the City and make productive economic use of a reclaimed property that previously operated as a sand and gravel quarry:

- Create a comprehensive master plan for the re-use of a reclaimed sand and gravel quarry project site that complements operations at the adjacent Irwindale Brew Yard.
- Provide economic opportunities and job growth in the City of Irwindale by increasing the City's available range of industrial, commercial, and employment-generating uses.
- Provide a master-planned, job-producing development near the I-210 freeway to accommodate uses that benefit from access to the regional transportation system.
- Provide modern, economically efficient buildings that can accommodate industrial, manufacturing and assembly, warehouse distribution, logistics, and fulfillment center uses.
- Provide neighborhood-serving commercial uses to benefit employees and visitors of the on-site uses and commuters traveling along Irwindale Avenue.
- Ensure that infrastructure plans for water, sewer, drainage, and roads are adequately designed and maintained for the Specific Plan area.
- Provide guidelines and standards for architecture, walls, fencing, signage, lighting, and entry treatments to provide a well-defined identity for the Specific Plan development.

2.6 DEVELOPMENT PLAN

2.6.1 Land Use

The Specific Plan consists of two separate planning areas that would allow for a range of development types. Upon adoption of the Specific Plan, the planning areas depicted in Figure 2-6, *Conceptual Land Use: Planning Areas*, would apply to the project site and replace the previous M-2 (Heavy Industrial) zoning designation.

At buildout, the Specific Plan would permit 3,000,000 building square feet of new industrial/business park uses in Planning Area 1 (Industrial/Business Park) and 12,000 building square feet of commercial uses in Planning Area 2 (Commercial), as summarized in Table 2-1, *Land Use Plan Statistical Summary*. In addition to structures, development would consist of loading docks, truck trailer and automobile parking, vehicular and pedestrian circulation, landscaping, and associated infrastructure improvements. Permitted, conditional, and ancillary uses for Planning Area 1 and Planning Area 2 are detailed in Table 3-1 of the Specific Plan (reproduced as Table 2-5 of this Draft EIR) and are summarized below. In Table 2-5, conditional uses as indicated with a "C" would be conditionally permitted, subject to approval of a Conditional Use Permit in accordance with the requirements of the City of Irwindale Municipal Code. Such uses represent discretionary approvals by the City, and as such, are subject to additional environmental review under the California Environmental Quality Act (CEQA) prior to project approval. As defined in CEQA Section 21080 (a), "…. this division shall apply to discretionary projects proposed to be carried out or approved by public agencies, including, but not limited to, the enactment and amendment of zoning ordinance, the issuance of zoning variances, the issuance of **conditional use permits** [*emphasis added*], and the approval of tentative subdivision maps unless the project is exempt from this division."

Table 2-1 Land Use Plan Statistical Summary

Planning Area	Land Use Designation	Acres		Building Square Footage (SF)
		Industrial Business Park	Commercial	
Planning Area 1	Industrial/Business Park	143.9		3,000,000 (maximum)
Planning Area 2	Commercial		6.2	12,000 (maximum)
Total		**143.9**	**6.2**	**3,012,000**

PLANNING AREA 1: INDUSTRIAL BUSINESS PARK

Planning Area 1 would comprise approximately 143.9 acres and include the primary new development area. This Planning Area would restore the historic mining areas to economically productive uses and include, at build-out, 3,000,000 building square feet in a combination of light industrial buildings, e-commerce and logistics distribution, warehousing, cold storage, light manufacturing, research and development, or showroom space on Irwindale Building Code–compliant "engineered certified fill." Individual buildings would be serviced via an internal private street that would connect with First Street on the Planning Area's southern edge. A full list of permitted, conditionally permitted, and other potentially allowed uses is detailed in Section 2.6.5 of this Project Description.

PLANNING AREA 2: COMMERCIAL USES

The approximately 6.2-acre Commercial/Retail planning area would be the most visible part of the Specific Plan Area to residents and city stakeholders who travel on the local streets (primarily Irwindale Avenue and to a lesser extent First Street) adjacent to the Specific Plan area and would be in close proximity to the Irwindale Metro Station with access to the Metro A-Line.

The parts of the city adjacent to Planning Area 2 are predominantly an urban corridor with a mix of office park, industrial, and other retail uses. This Planning Area is designed to allow commercial and retail uses that can successfully adapt to market conditions over time. Permitted uses include, among other similar uses included in Section 3-1 of the Specific Plan, automobile and truck repair and fueling stations, public self-storage, retail and food sales (including alcoholic beverage sales), commercial services, eating establishments (quick-serve, dine-in, and drive through [with issuance of a Conditional Use Permit]). Uses would activate this frontage in a manner that is supportive of the surrounding community and of the industrial land uses in other planning area. Planning Area 2 would allow phased development of individual retail tenants on separate pads, depending on future development and market needs.

SITE PLAN

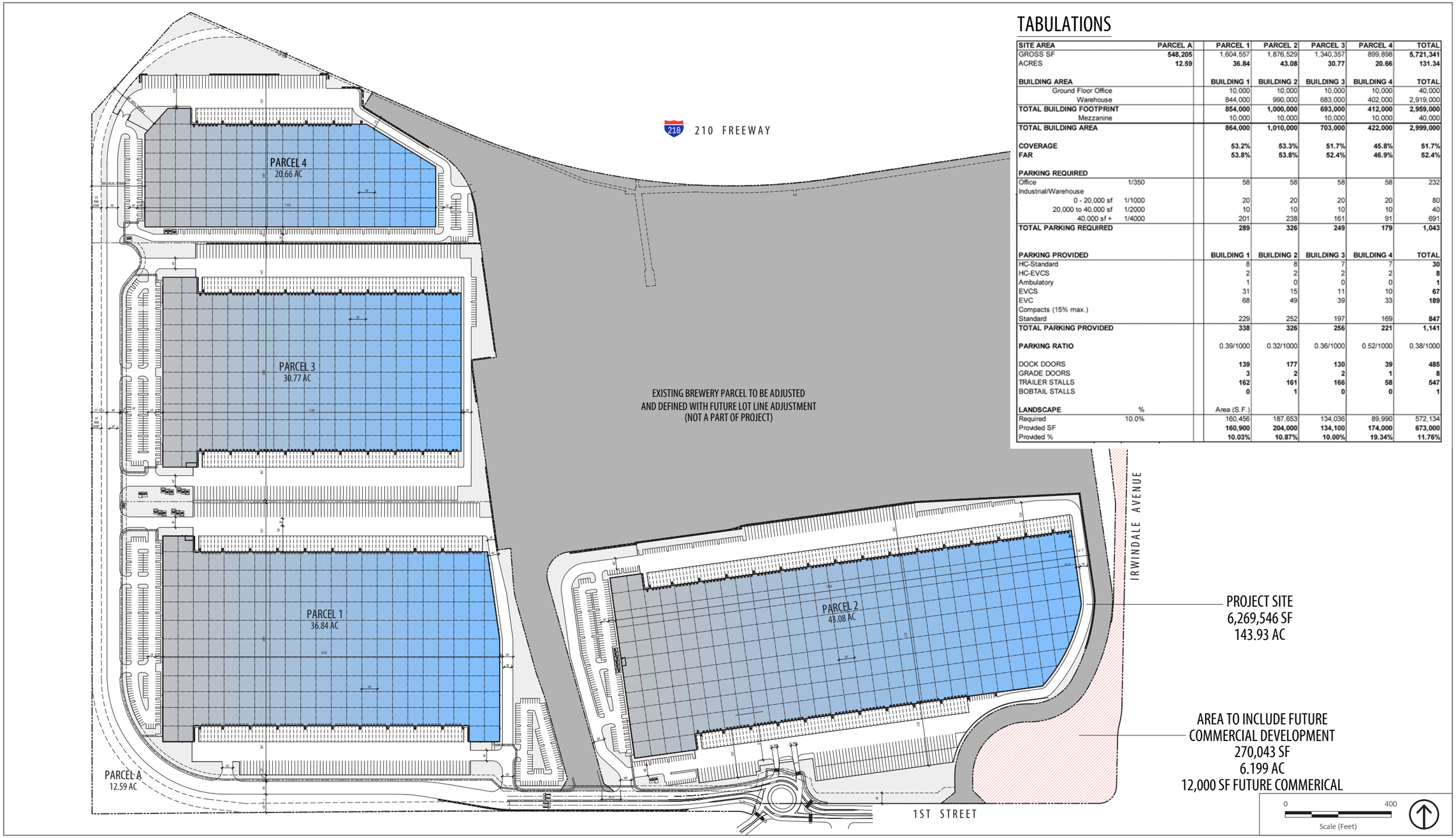
The four proposed developable parcels, building footprints, and parking configuration for the Industrial/Business Park (Planning Area 1) are shown on Figure 2-7, *Site Plan, Planning Area 1.* Precise architectural details for Planning Area 2 would be dependent on the identification of a future commercial tenant. However, Figure 2-8, *Site Plan, Planning Area 2*, depicts the overall development layout and location of driveways for the commercial parcel.



Source: Kimley-Horn 2025.

Figure 2-6
Conceptual Land Use - Planning Areas

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TABULATIONS

SITE AREA	PARCEL A	PARCEL 1	PARCEL 2	PARCEL 3	PARCEL 4	TOTAL
GROSS SF	548,205	1,604,557	1,876,529	1,340,357	899,898	5,721,341
ACRES	12.59	36.84	43.08	30.77	20.66	131.34
BUILDING AREA		**BUILDING 1**	**BUILDING 2**	**BUILDING 3**	**BUILDING 4**	**TOTAL**
Ground Floor Office		10,000	10,000	10,000	10,000	40,000
Warehouse		844,000	990,000	683,000	402,000	2,919,000
TOTAL BUILDING FOOTPRINT		**854,000**	**1,000,000**	**693,000**	**412,000**	**2,959,000**
Mezzanine		10,000	10,000	10,000	10,000	40,000
TOTAL BUILDING AREA		**864,000**	**1,010,000**	**703,000**	**422,000**	**2,999,000**
COVERAGE		**53.2%**	**53.3%**	**51.7%**	**45.8%**	**51.7%**
FAR		**53.8%**	**53.8%**	**52.4%**	**46.9%**	**52.4%**
PARKING REQUIRED						
Office	1/350	58	58	58	58	232
Industrial/Warehouse						
0 - 20,000 sf	1/1000	20	20	20	20	80
20,000 to 40,000 sf	1/2000	10	10	10	10	40
40,000 sf +	1/4000	201	238	161	91	691
TOTAL PARKING REQUIRED		**289**	**326**	**249**	**179**	**1,043**
PARKING PROVIDED		**BUILDING 1**	**BUILDING 2**	**BUILDING 3**	**BUILDING 4**	**TOTAL**
HC-Standard		8	8	7	7	**30**
HC-EVCS		2	2	2	2	**8**
Ambulatory		1	0	0	0	**1**
EVCS		31	15	11	10	**67**
EVC		68	49	39	33	**189**
Compacts (15% max.)						
Standard		229	252	197	169	**847**
TOTAL PARKING PROVIDED		**338**	**326**	**256**	**221**	**1,141**
PARKING RATIO		0.39/1000	0.32/1000	0.36/1000	0.52/1000	0.38/1000
DOCK DOORS		**139**	**177**	**130**	**39**	**485**
GRADE DOORS		**3**	**2**	**2**	**1**	**8**
TRAILER STALLS		**162**	**161**	**166**	**58**	**547**
BOBTAIL STALLS		**0**	**1**	**0**	**0**	**1**
LANDSCAPE	%	Area (S.F.)				
Required	10.0%	160,456	187,653	134,036	89,990	572,134
Provided SF		**160,900**	**204,000**	**134,100**	**174,000**	**673,000**
Provided %		**10.03%**	**10.87%**	**10.00%**	**19.34%**	**11.76%**

Source: GAA Architects 2025.

Figure 2-7
Site Plan - Planning Area 1

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Source: Herdman 2025.

Figure 2-8
Site Plan - Planning Area 2

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Table 2-2, *Site Plan Statistical Summary*, provides the acreages, building square footages, and parking details for the site plan.

Table 2-2 Site-Plan Statistical Summary

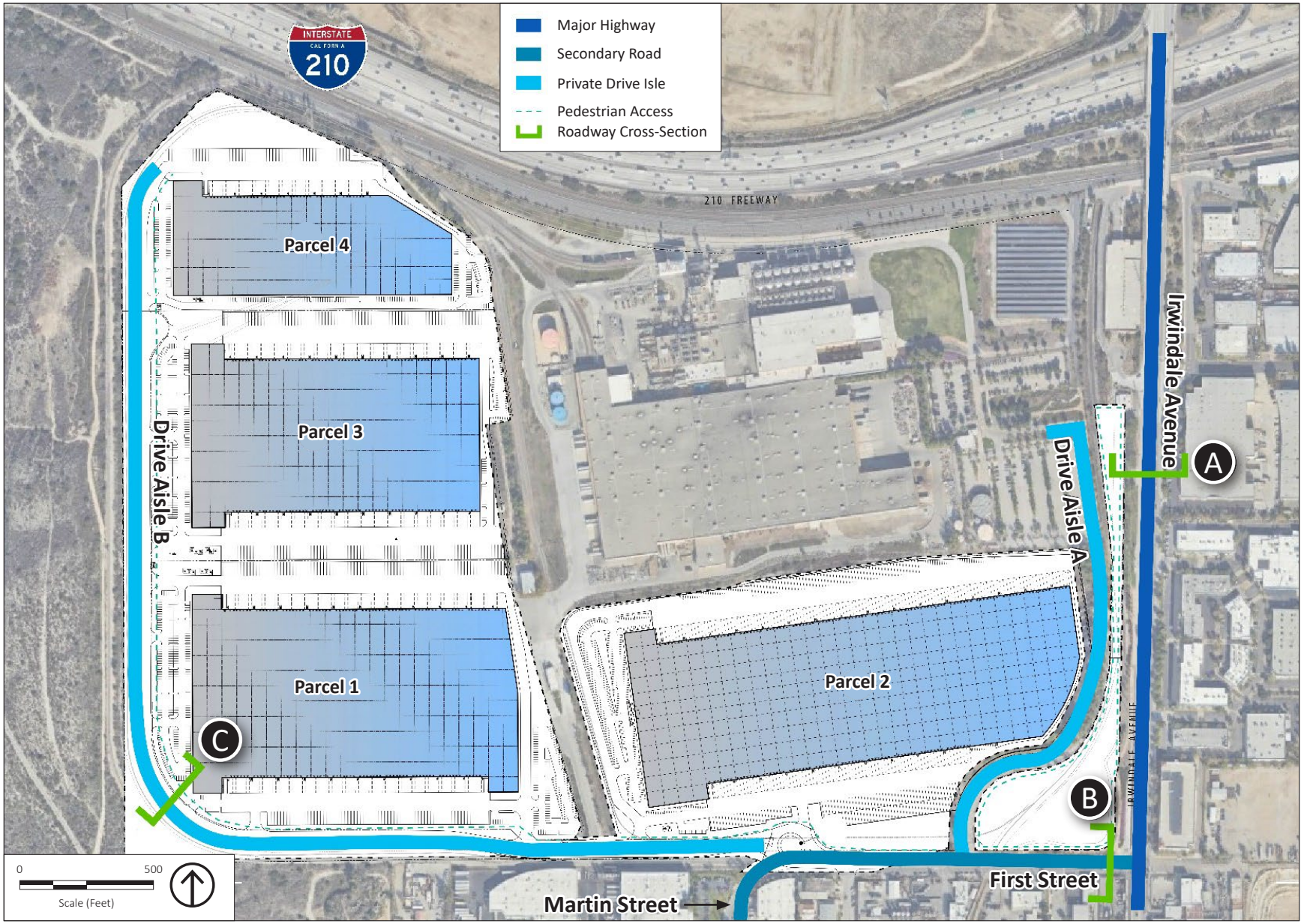
SITE AREA	PARCEL A	PARCEL 1	PARCEL 2	PARCEL 3	PARCEL 4	TOTAL
Gross SF	548,205	1,604,557	1,876,529	1,340,357	899,898	6,269,546
Acres	12.59	36.83	43.07	30.77	20.65	143.92
BUILDING AREA		**BUILDING 1**	**BUILDING 2**	**BUILDING 3**	**BUILDING 4**	**TOTAL**
Ground Floor Office		10,000	10,000	10,000	10,000	40,000
Industrial/Warehouse		844,000	990,000	683,000	402,000	2,919,000
TOTAL BUILDING FOOTPRINT		**854,000**	**1,000,000**	**693,000**	**412,000**	**2,959,000**
Mezzanine		10,000	10,000	10,000	10,000	40,000
TOTAL BUILDING AREA		**864,000**	**1,010,000**	**703,000**	**422,222**	**2,999,000**
COVERAGE		**53.2%**	**53.3%**	**51.7%**	**45.8%**	**47.2%**
Percent coverage		**53.8%**	**53.8%**	**52.4%**	**46.9%**	**47.8%**
PARKING REQUIRED						
Office	1/350	58	58	58	58	232
Industrial/Warehouse						
0 to 20,000 sf	1/1000	20	20	20	20	80
20,000 to 40,000 sf	1/2000	10	10	10	10	40
40,000 sf+	1/4000	201	238	161	91	691
TOTAL PARKING REQUIRED		**289**	**326**	**249**	**179**	**1,043**
PARKING PROVIDED		**BUILDING 1**	**BUILDING 2**	**BUILDING 3**	**BUILDING 4**	**TOTAL**
HC-Standard		8	8	8	7	31
HC-EVCS		2	2	2	2	8
Ambulatory		0	0	0	0	0
EVCS		18	15	15	11	59
EVC		60	51	48	36	195
Standard		310	264	249	187	1,010
TOTAL PARKING PROVIDED		**398**	**340**	**322**	**243**	**1,303**
PARKING RATIO		0.46/1000	0.34/1000	0.46/1000	0.58/1000	
DOCK DOORS		**139**	**177**	**130**	**43**	**489**
GARAGE DOORS		**3**	**2**	**2**	**1**	**8**
TRAILER STALLS		**165**	**161**	**181**	**59**	**566**
BOBTAIL STALLS		**0**	**1**	**0**	**0**	**1**

2.6.2 Circulation

The conceptual circulation plan is shown in Figure 2-9. Vehicular access to the project site is proposed at two access points along First Street. The easternmost access point (Drive Aisle A) would provide direct access to Planning Area 2, accommodated by the existing Irwindale Brew Yard driveway on the north side of First Street, and would service the commercial components of the Specific Plan. The westernmost access point (Drive Aisle C) would provide access to Planning Area 1, accommodated by the existing intersection of First Street and Martin Road, and serve as the ingress/egress point for truck movements from the industrial site. A future roundabout intersection, as shown in Figure 2-10, *Proposed Roundabout,* would replace the current stop-controlled intersection to accommodate access to and from Planning Area 1 via the north and west legs of the intersection. A portion of the existing railroad track would be removed to accommodate the construction of the roundabout (see Figure 2-23, *Brew Yard Railroad* Spurs) The access point leading to Drive Aisle B would be at the western exit off a future roundabout, which would serve as a gateway monument to the Specific Plan area and traffic control measure for freight traffic. Drive Aisle B would also provide off-site access for the existing brewery facility. The brewery and its primary access point of Drive Aisle C are not part of the Specific Plan and would not be modified as part of this plan. Improvements to the existing ingress/egress point from First Street would allow direct site access to Planning Area 2; these improvements would be made with future development through the reciprocal access and parking agreement.

The existing network of public sidewalks in the Specific Plan vicinity would serve the project site. New public sidewalks would be installed as part of the Specific Plan along the west side of Irwindale Avenue and the north side of First Street. The proposed roadway cross-sections (A-A and B-B) for Irwindale Avenue and First Street are depicted in Figure 2-11, *Typical Roadway Cross-Sections.* As shown in Figure 2-11 and in keeping with the City's 2019 Active Transportation Plan, project improvements will also include a Class IV Bicycle Lane along Irwindale Avenue. Proposed improvements along First Street would include the addition of a 12-foot easement on the north side of the street (outside of the right-of-way) to accommodate an 8-foot Class 1 multi-use path and 2 feet of shoulder per the City's ATP. Within the Specific Plan area, sidewalks are planned along the primary private drive aisles for pedestrian access between the proposed buildings and the existing street network (see Figure 2-9).

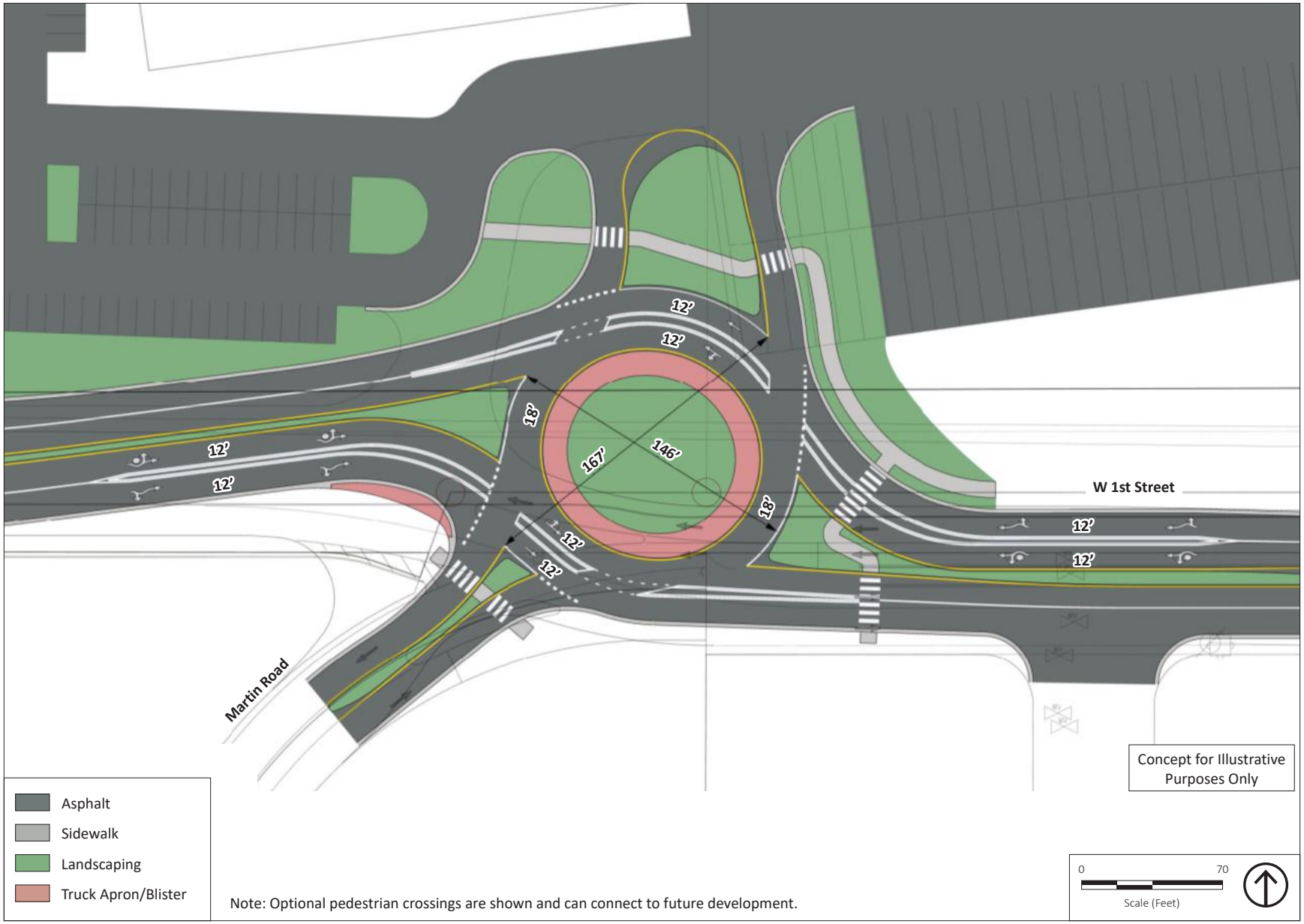
The industrial/business park buildings would accommodate loading docks. The Specific Plan specifies that the loading doors, service docks, and equipment areas are to be oriented or screened so that they are not easily visible from Irwindale Avenue; First Street; I-210; Private Drives A, B, and C; or publicly accessible commercial use locations in the Specific Plan area. The Specific Plan specifies that no direct loading or unloading activity would be permitted from Irwindale Avenue or First Street.



Source: Kimley-Horn 2025.

Figure 2-9
Conceptual Circulation Plan

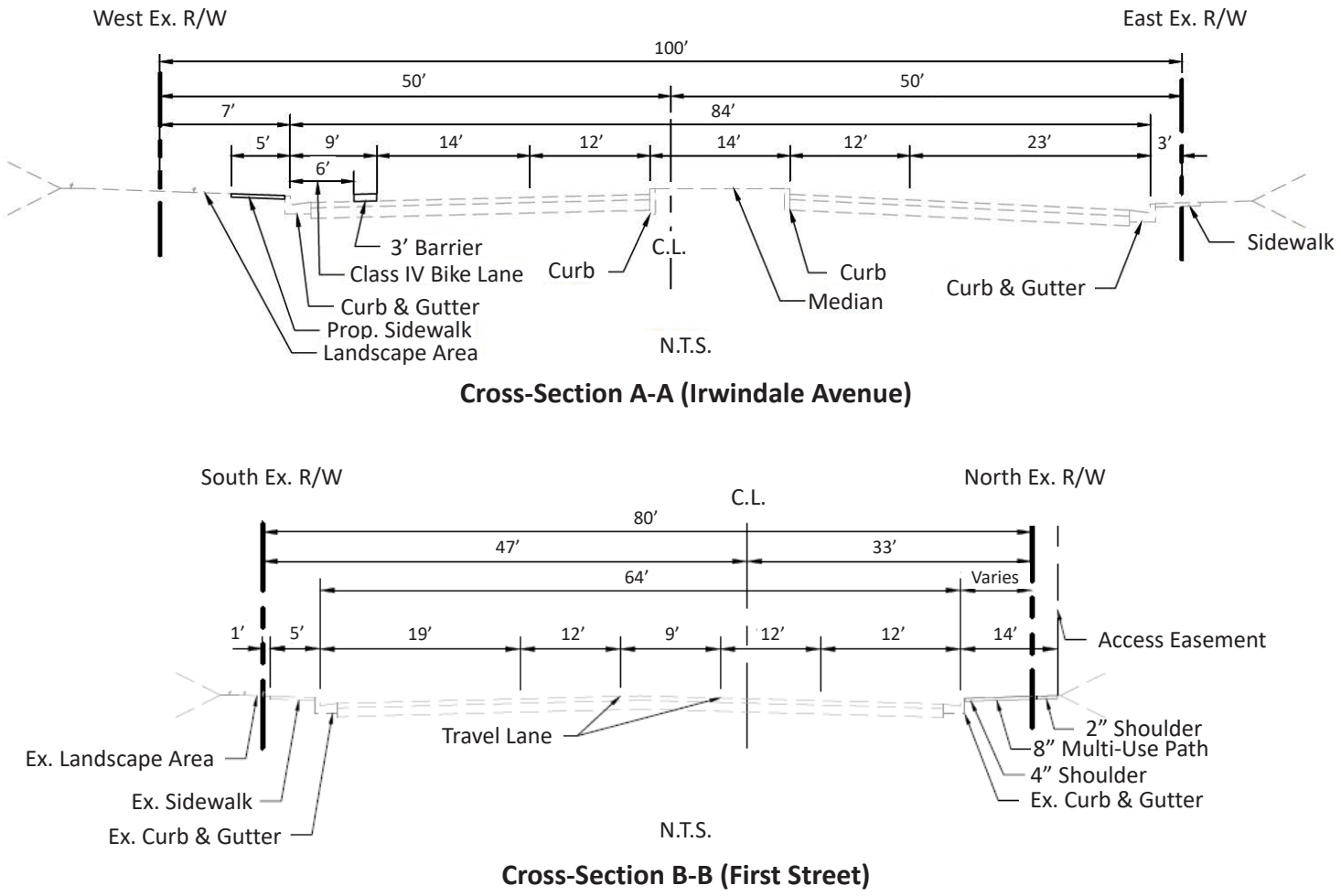
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Source: Kimley-Horn 2024.

Figure 2-10
Proposed Roundabout

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Source: Kimley-Horn 2025.

Figure 2-11
Typical Roadway Cross-Sections

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2.6.3 Infrastructure

WATER

The west half of the Specific Plan Area is currently under the jurisdiction of Cal American Water, who does not have infrastructure in the area. The east half of the Specific Plan is in the Azusa Light and Water (ALW) service area, and ALW currently serves the existing brewery property with a main line that crosses I-210. ALW has existing water lines in Irwindale Avenue and First Street (see Figure 2-12, *Conceptual Water Plan*). The entire Specific Plan Area would be annexed and served by ALW.

The proposed project would include separate domestic water connections to each new industrial parcel. Fire service to the industrial parcels would be provided by a looped fire main across the parcels and designed to Los Angeles County Fire Department standards. The proposed domestic and fire water lines would connect to the existing water main in First Street (see Figure 2-12).

SANITARY SEWER

Sanitary sewer services for the project site would be provided by the Sanitation Districts of Los Angeles County (LACSD). The existing brewery property is served from an existing 18-inch sewer lateral at the northwest corner of the Irwindale Avenue and First Street intersection; however, the Specific Plan Area is not currently served with sewer (see Figure 2-13, *Proposed Sanitary Sewer System*).

LACSD has sewer mains in Irwindale Avenue that flow south to the 12-inch Irwindale Trunk Sewer and the 15-inch Irwindale Relief Trunk Sewer. Both trunk sewers start at the intersection of Irwindale Avenue and First Street. There is no sewer infrastructure in First Street; however, at the intersection of Irwindale Avenue and First Street is a 15-inch private connection that stubs to the southeast corner of the Specific Plan Area.

The proposed project would install a private sewer main in the on-site private drive aisle that runs along the western border of the site. The proposed private sewer would originate from the northwest part of the site and be routed to an on-site lift station north of First Street and west of the proposed commercial parcel. Laterals would extend to each of the proposed buildings. The lift station would discharge to a new gravity main in First Street. This gravity main would extend and terminate at a proposed manhole that would be positioned on the existing 15-inch trunk sewer at the intersection of Irwindale Avenue and First Street. Approximately 6,650 linear feet of sewer line (5,800 feet of private sewer and 850 feet of public sewer) from 8 to 15 inches in diameter are proposed. The existing brewery property would continue to be served from the 18-inch lateral.

The Specific Plan Area would be served by the Joint Water Pollution Control Plant in the City of Carson, which has a capacity of 400 million gallons per day and currently processes an average flow of 249.8 million gallons per day.

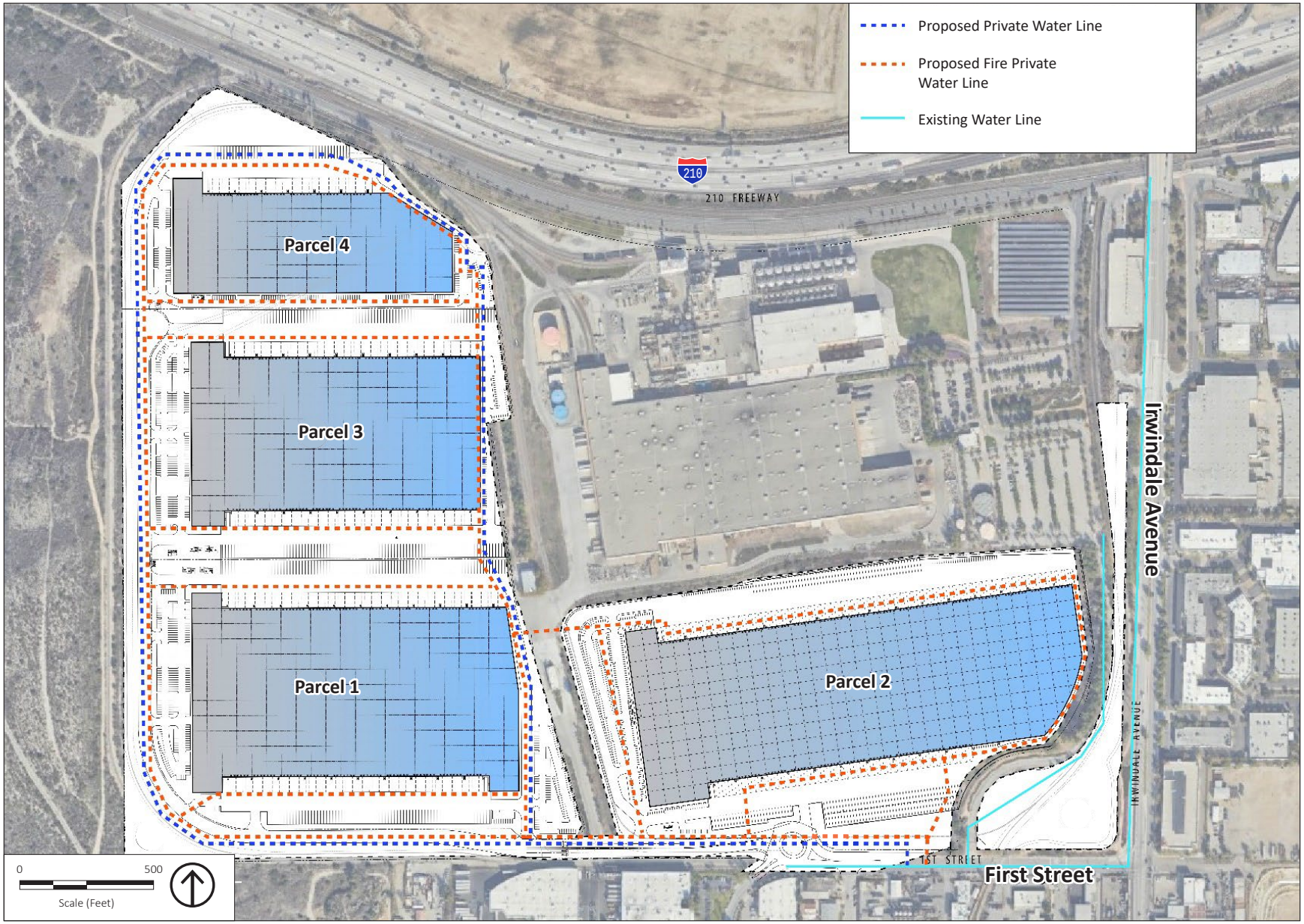
STORMWATER

Under existing conditions, the two depleted quarries self-retain as sump sites, and the brewery discharges stormwater into the southeast quarry basin. The southwest corner of the project site currently discharges via overland sheet flow underneath the railroad through three box culverts that discharge stormwater into the Santa Fe Dam basin. Historically, before the Specific Plan Area was used as a quarry, the site generally surface-drained from the northeast to the southwest.

A culvert near the northwest corner of the site discharges runoff from I-210 and the property immediately north of the freeway into the site. This runoff is conveyed from east to west near the northern property line where it is eventually discharged through a railroad culvert at the northwest corner of the property into the Santa Fe Dam basin.

Under proposed conditions, runoff from the site would primarily flow to on-site catch basins with filter inserts and be conveyed through storm drains to five on-site water quality and detention systems (see Figure 2-14, *Proposed Low Impact Development (LID) Drainage Plan*). The proposed private storm drain system would be installed beneath the planned private road and include backbone storm drain main lines that span the project site east to west and north to south. The storm drain main lines beneath the private road would vary from 36- to 60-inch-diameter lines. These backbone storm drain main lines have been sized to accommodate the expected stormwater peak flow rates for a 25-year storm event. Overflows from the water quality and detention systems would be conveyed through storm drains that converge at a proposed headwall at the southwest corner, adjacent to the existing railroad. This headwall would be a key connection point for the proposed storm drain main lines. From there, the runoff would flow to the existing box culverts and ultimately drain to the Santa Fe Dam basin (see Figure 2-14).

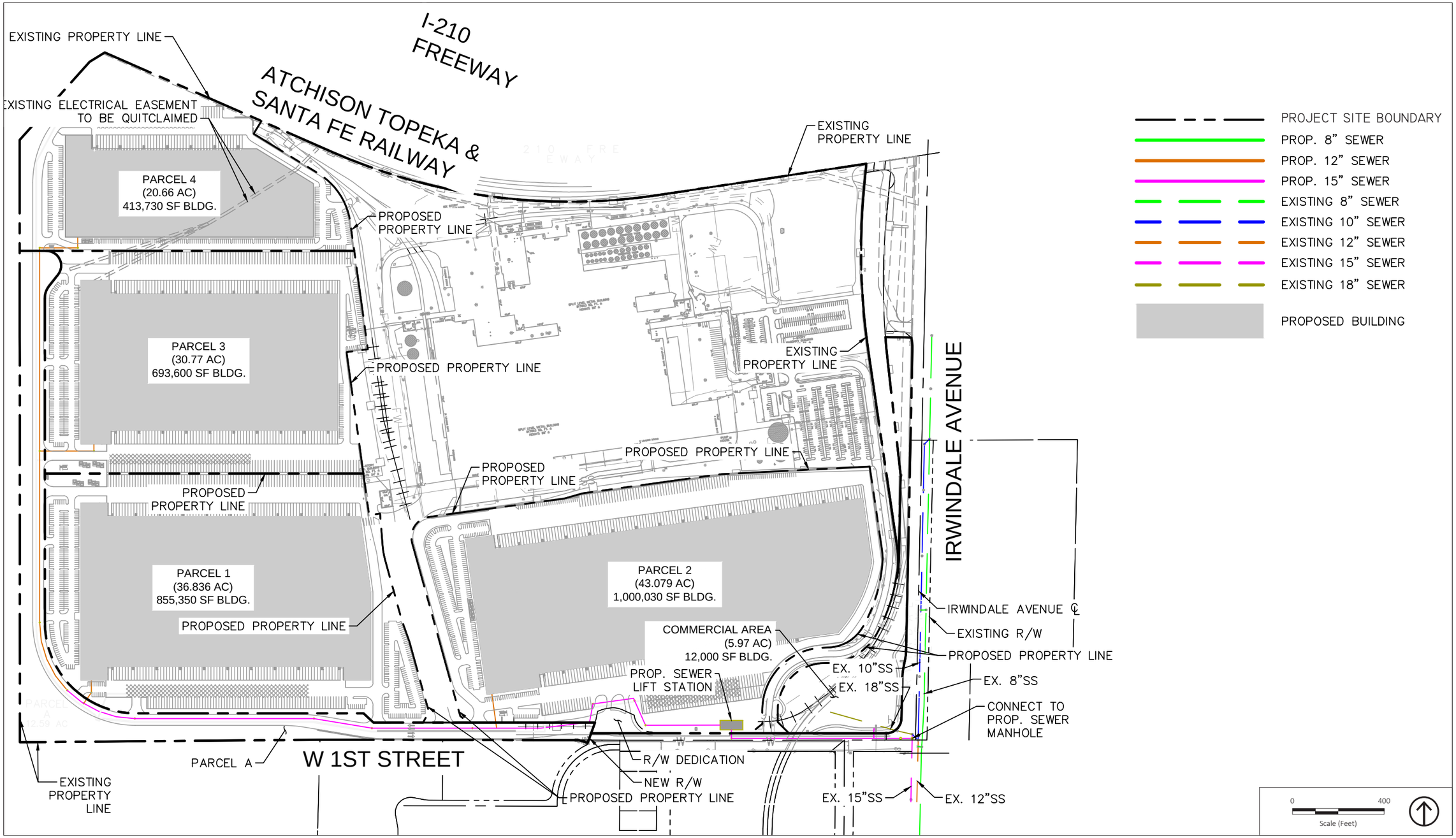
The water quality and detention systems would capture and infiltrate the designated water quality design capture volume while also detaining peak flow rates for the 25-year design storm event, reducing the proposed peak flow to the historical existing condition flow rate. Runoff from the existing brewery parcel would be routed to a proposed underground infiltration basin tank on the brewery parcel. The tank would be designed to capture and treat for water quality and manage peak flows. The overflow structure from this tank would be routed underground to the proposed project's backbone storm drain network.



Source: Kimley-Horn 2025.

Figure 2-12
Conceptual Water Plan

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Source: Kimley-Horn 2025.

Figure 2-**13**
Proposed Sanitary Sewer System

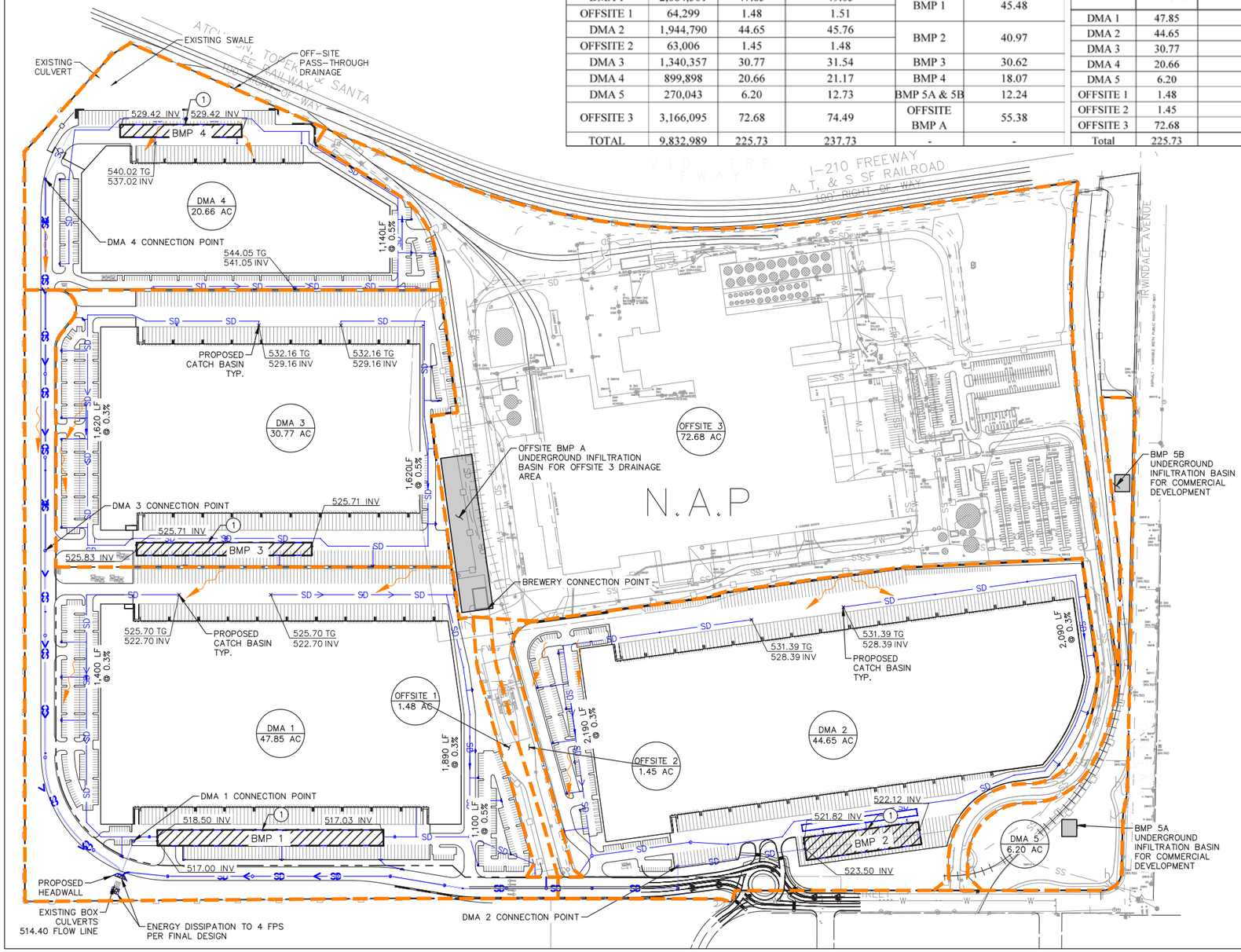
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PROPOSED DETAINED FLOWS VS. ALLOWABLE FLOWS

DMA NO	Area (SF)	Area (AC)	Allowbale Flow (cfs)	BMP NO	Mitigated Flows (cfs)
DMA 1	2,084,501	47.85	49.05	BMP 1	45.48
OFFSITE 1	64,299	1.48	1.51		
DMA 2	1,944,790	44.65	45.76	BMP 2	40.97
OFFSITE 2	63,006	1.45	1.48		
DMA 3	1,340,357	30.77	31.54	BMP 3	30.62
DMA 4	899,898	20.66	21.17	BMP 4	18.07
DMA 5	270,043	6.20	12.73	BMP 5A & 5B	12.24
OFFSITE 3	3,166,095	72.68	74.49	OFFSITE BMP A	55.38
TOTAL	9,832,989	225.73	237.73	-	-

HYDROCALC RESULTS - Q25 PARAMETERS

Subarea	Planning Area (Ac)	Undetained Peak Flow Rates (cfs)
DMA 1	47.85	113.7
DMA 2	44.65	106.08
DMA 3	30.77	80.33
DMA 4	20.66	53.94
DMA 5	6.20	17.11
OFFSITE 1	1.48	3.67
OFFSITE 2	1.45	3.6
OFFSITE 3	72.68	165.75
Total	225.73	



H&H KEYNOTES

1. INSTALL UNDERGROUND CMP INFILTRATION TANK.
2. PROPOSED SITE STORM DRAIN SYSTEM. SEE STORM DRAIN PLAN FOR DESIGN INFORMATION

LEGEND

- RIGHT OF WAY/ PROPERTY LINE
- CENTERLINE
- 147 EXISTING CONTOURS
- 147 PROPOSED CONTOURS
- DMA BOUNDARY
- SD PROPOSED PRIVATE STORM DRAIN LATERAL
- SD PROPOSED PRIVATE MAIN STORM DRAIN LINE
- PROPOSED CATCH BASIN
- PROPOSED INLET
- PROPOSED STORM DRAIN MANHOLE
- DIRECTION OF WATER FLOW
- PROPOSED UNDERGROUND BMP SYSTEM
- PROPOSED UNDERGROUND BMP FOR OFFSITE DRAINAGE AREA
- DMA ID / ACRES DRAINAGE AREA LABEL
- LANDSCAPE

GENERAL NOTES

1. ON-SITE OVERFLOWS ULTIMATELY DISCHARGE TO THE EXISTING BOX CULVERTS LOCATED AT THE SOUTHWEST PORTION OF THE SITE.
2. ANY CHANGES (TYPE, SIZE, LOCATION) TO APPROVED STORMWATER BEST MANAGEMENT PRACTICE(S) (BMPS) MUST OBTAIN WRITTEN APPROVAL FROM LOS ANGELES, DEPARTMENT OF PUBLIC WORKS, BUREAU OF SANITATION PRIOR TO CONSTRUCTION OF BMP(S).
3. HYDROLOGY CALCULATIONS COMPLETED USING LA COUNTY'S HYDROCALC CALCULATOR.
4. DETENTION CALCULATIONS COMPLETED USING PONDPACK SOFTWARE.
5. 50-YEAR RAINFALL DEPTH: 7.3 INCHES
6. SOIL TYPE: 8
7. TOTAL ALLOWABLE FLOW RATE FOR SOUTHWEST OUTFALL: 225 CFS (FOR DMA 1 THROUGH 4 AND THE BREWERY PARCEL)
8. EXISTING FLOW DISCHARGING TO ADJACENT STREET: 12.7 CFS (FOR DMA 5 ONLY)
9. OFFSITE 3 IS NOT A PART OF THIS IMPROVEMENT PLANS AND HYDROLOGY AND HYDRAULICS RESULTS SHOWN AS REFERENCE ONLY. ALTHOUGH THE BREWERY SITE IS NOT PART OF THIS DEVELOPMENT, ITS WATER QUALITY AND DETENTION CALCULATIONS HAVE BEEN INCLUDED IN THIS REPORT FOR REFERENCE PURPOSES. IT SHOULD BE NOTED THAT THE BREWERY SITE WILL BE SUBJECT TO A SEPARATE HYDROLOGY AND DEVELOPMENT PLAN.
10. SINCE IT IS NOT POSSIBLE TO MITIGATE THE RUNOFF FROM OFFSITE 1 AND OFFSITE 2 WITHIN THEIR RESPECTIVE BOUNDARIES, THOSE OFFSITE AREAS WERE INCORPORATED INTO OUR PROJECT SITE TO FULFILL THE REQUIREMENTS FOR BOTH WATER QUALITY IMPROVEMENT AND DETENTION. OFFSITE 1 WILL BE INTEGRATED WITH THE PROPOSED DMA 1, WHILE OFFSITE 2 WILL BE COMBINED WITH DMA 2.

0 400
Scale (Feet)

Source: Kimley-Horn 2026.

Figure 2-14
Proposed Low Impact Development (LID) Drainage Plan
Low Impact Development (LID)

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SOLID WASTE

The City of Irwindale contracts solid waste collection services through Athens Services. Contract services would be expanded to provide solid waste collection services in the Specific Plan area. All solid waste collection would be required to comply with federal, state, and local regulations for waste reduction and recycling.

DRY UTILITIES

Southern California Edison (SCE) provides electricity to the Specific Plan area and maintains aboveground power lines. Existing aboveground electrical lines are on the western side of Irwindale Avenue and along the northern perimeter of the Specific Plan Area. A substation may be required as part of the new development. SCE would provide electricity for the proposed project in accordance with the California Public Utilities Commission and Federal Energy Regulatory Commission tariffs.

All dry utilities would be installed underground. Within the Specific Plan area, the locations of lateral connections, transformers, switches, pull boxes, and dry utility manholes would be determined at the time buildings are positioned in each planning area in conjunction with development implementation.

2.6.4 Buildings and Landscaping

DEVELOPMENT STANDARDS

Chapter 3.0 of the Specific Plan details development standards for the proposed project. The maximum building height, as measured from the finished floor elevation to the highest point of the structure (excluding parapets, rooftop equipment screening and architectural features) would be 70 feet for the industrial/business park area and 50 feet for the commercial area. This height limit and minimum building setbacks, roadway and aisle widths, and parking stall dimension requirements are provided in Tables 2-3 and 2-4, *Industrial Development Standards,* and *Commercial Development Standards,* respectively.

Table 2-3 Industrial Development Standards

Site Requirements	
Minimum Lot Size	n/a
Maximum PA-1 Square Footage	3,000,000
Minimum Setback Requirements	
First Street	25’
Private Roadway	25’
Drive Aisle and Parking	10’
Maximum Building Height Requirements	
Building Height	70’
Minimum Parking and Access Requirements	
Automobile Parking Stall Size	9’ x 19’ (Standard) 8’ x 15’ (Compact)
Drive Aisle Width	26’
Fire Lane Width	28’

Source: Irwindale 2025.

Table 2-4 Commercial Development Standards

Site Requirements	
Minimum Lot Size	n/a
Maximum PA-1 Square Footage	12,000
Minimum Setback Requirements	
First Street Setback	20’
Irwindale Avenue	20’
Private Roadway	20’
Drive Aisle and Parking	10’
Maximum Building Height Requirements	
Building Height	50’
Minimum Parking and Access Requirements	
Automobile Parking Stall Size	9’ x 19’ (Standard) 8’ x 15’ (Compact)
Drive Isle Width	26’
Fire Lane Width	28’

Source: Irwindale 2025.

DESIGN STANDARDS

Chapter 5 of the Specific Plan describes building designs, concepts, landscaping, and features that would promote the quality of the Specific Plan area. The Guidelines address two primary elements: architecture and landscape.

Architecture

The Architectural Design Guidelines define the architectural theme and styles for new buildings with an emphasis on Spanish-style architectural elements. The guidelines also address building mass and scale, materials and exteriors colors, and articulation. Buildings in "high visibility areas," including elevations facing and immediately adjacent to First Street and Irwindale Avenue, would contain extra design elements to enhance the Spanish feel of the proposed project and complement the general architectural character of Irwindale.

Representative imagery for architectural design, aesthetic quality and material/color patterns are shown in Figure 2-15, *Architectural Design.*

Landscaping

The Landscape Guidelines describe general landscaping requirements and recommendations, including streetscape design, entry treatments, signage, quality water features, walls and fencing, and lighting. The guidelines provide direction regarding the use of plant materials that are water wise and complement the desired architectural style.

The Landscape Master Plan includes a preliminary plan palette, as shown on Figure 2-16. Use of plant material not listed in the preliminary plant palette would be permitted subject to approval by the Community Development Director.

Site entries would be designed to provide distinctive visual statements and reinforce the Specific Plan's architectural and landscape themes. A monument sign at the primary entrance to the Specific Plan area is proposed on First Street. Proposed landscaping for First Street, Irwindale Avenue, and drive aisles is depicted in Figures 2-17 and 2-18, *Landscaped Roadway Elevations.*

Parking design is intended to emphasize a clear hierarchy, clear navigation, and safety (see Figure 2-19, *Typical Parking Lot Landscape and Building Entry*).

2.6.5 Operational Activities

Anticipated opening year for the proposed project is 2030. Each Planning Area would depend on market demand, and therefore buildout could occur in one or multiple phases. Because buildout and operation could occur over an extended period of time, the uses permitted would

be flexible enough to respond to changing market demands. A detailed description of the anticipated quarry filling and construction phasing is described in Section 2.7.

The industrial buildings would have the flexibility to support a multitude of uses, including warehousing, distribution, and manufacturing. Table 2-5, *Permitted, Conditional, and Ancillary Uses*, lists the uses that would be allowed in each Planning Area. As noted in Section 2.6.1, *Land Use,* conditional uses as indicated with a "C" would be conditionally permitted, subject to approval of a Conditional Use Permit in accordance with the requirements of the City of Irwindale Municipal Code. Such uses represent discretionary approvals by the City, and as such, are subject to additional environmental review under the California Environmental Quality Act (CEQA) prior to project approval. Daily operations would be dependent on the specific use but would include an operational workforce, maintenance, and security. Warehousing operations are anticipated 24/7, 365 days per year.

At buildout, a total of 2,406 employees is anticipated for the development (DTA 2023).

Table 2-5 Permitted, Conditional, and Ancillary Uses

List of Uses	PA1	PA2	Notes
Industrial and Business Park Uses			
Automobile and truck repair garages, including fueling stations	P	P	
Baked Goods and Other Food Manufacturing Facilities	P	X	
Borrow Pits and Quarries	C	X	
Electric Vehicle Charging	P	P	
Borrowing of Pit Fill Material in Connection with Project Construction, Internal	P	X	
Bottling Plants	P	X	
Brewery with on/off site sales	C	C	
Cold Storage	P	X	
Computer and Electronic Parts Manufacturing	P	X	
Data Processing Centers and Data Storage Services	C	X	
Distilleries, Craft or Other	C	C	
E-Commerce	P	X	
Fabricating, other than snap riveting or any process used in bending or shaping	P	X	

Table 2-5 Permitted, Conditional, and Ancillary Uses

List of Uses	PA1	PA2	Notes
Heavy and Light Logistics, Distribution and Warehousing	P	X	
High-Cube Cold Storage	P	X	
High-Cube Warehouses	P	X	
Industrial Retail Sales	A	X	See Section 3.2.3 for definition.
Joining and Assembly Manufacturing	P	X	
Light Manufacturing and Assembly	P	X	
Logistics Support	P	X	
Machinery Manufacturing	P	X	
Machinery Storage Yards	P	X	
Maintenance Yards and Shops	P	X	
Mass-Produced Bakeries	P	X	
Medicines, Manufacturing	P	X	
Novelties, Manufacturing	P	X	
Outdoor Storage of Materials and Equipment	P	X	Development must be in compliance with nuisance performance standards in IMC 9.28 (Noise Regulation) and IMC 8.24.190 (Fencing and screening).
Overnight Truck and Trailer Parking	P	X	Development must be in compliance with nuisance performance standards in IMC 9.28 (Noise Regulation).
Plastics, Fabrication and Molds	P	X	
Public Self-Storage	C	C	
Quarries, Filling (Non-SMARA)	DA	X	
Rectifying (Mixing of and Blending of Wine and Spirits)	C	X	
Research and Development	P	X	
Robotics Manufacturing and Assembly	P	X	
Shipping/Parcel Delivery Hub and Sorting Center	P	X	

Table 2-5 Permitted, Conditional, and Ancillary Uses

List of Uses	PA1	PA2	Notes
Soft Drinks and Other Non-Alcoholic Beverage, Manufacturing and Bottling	P	X	
Storage Space for Trailers, Transit, and Transportation Equipment	P	X	Development must be in compliance with nuisance performance standards in IMC 9.28 (Noise Regulation) and IMC 8.24.190 (Fencing and screening).
Transfer, Moving, and Storage of Furniture and Household Goods	P	X	
Truck/Trailer Transportation Yards or Terminals	P	X	Development must be in compliance with nuisance performance standards in IMC 9.28 (Noise Regulation).
Truck/Trailer Repairing, Overhauling and Service	P	X	Development must be in compliance with nuisance performance standards in IMC 9.28 (Noise Regulation).
Truck/Trailer Washing and Cleaning	A	X	Development must be in compliance with nuisance performance standards in IMC 9.28 (Noise Regulation).
Vehicle Storage	P	P	
Vehicle Cleaning/Detailing	A	P	
Warehouses (Other than High Cube)	P	X	
Wholesale Businesses and Storage Buildings (No Outside Storage)	P	X	
Wine Storage and Bottling	P	X	
Commercial Uses			
Administration, Medical and Professional Offices	A	P	
Alcoholic Beverage Sales	X	C	
Appliances, Household Sale and Repair	P	X	

Table 2-5 Permitted, Conditional, and Ancillary Uses

List of Uses	PA1	PA2	Notes
Athletic Clubs	P	P	This is intended for gyms or other similar recreational uses that are the primary use.
Athletic Facilities, Ancillary to a primary use	P	P	Minor or ancillary uses are those where the gym is contained within the primary use such as a gym part of a corporate office
Auto Repair (Minor)	P	P	Ancillary to industrial and retail uses which maintain their own fleet of vehicles. Limited to minor repairs such as flat tires, oil changes, and similar repairs and must be completed within a building.
Auto Repair (Major)	C	X	Intended to be a standalone auto repair shop as the primary use
Automobile and Truck Sales	C	X	
Automotive and Truck Equipment Sales/Leasing	P	X	
Bakeries and Shops	P	P	
Blueprinting and Photocopying	P	X	
Brewery production/distribution (no sales)	P	X	
Building Materials Supply and Storage Yards	P	X	Development must be in compliance with nuisance performance standards in IMC 9.28 (Noise Regulation) and IMC 8.24.190 (Fencing and screening).
Cafeterias and Commissaries	P	P	
Commercial Recreation, Indoor	X	X	
Commercial Recreation, Outdoor	X	X	
Contractor Equipment Sale or Rental	C	X	
Convenience Stores	P	P	
Drive-Thru Restaurant	C	C	
Dry Cleaning	A	P	

Table 2-5 Permitted, Conditional, and Ancillary Uses

List of Uses	PA1	PA2	Notes
Electrical Distribution and Generation	P	P	
General Retail	P	P	
Hotel/Motel	X	X	
Jewelry Stores	X	P	
Laundries – self-service	A	P	
Medical and Dental Laboratories	A	X	
Motion Picture Films Processing and Studios	P	X	
Pet and pet supply	X	P	
Quick Serve Restaurant, no Drive Thru	X	P	Consistent with the uses permitted under IMC 17.58.020 for fast food restaurants.
Quick Serve Restaurant, with Drive Thru	C	C	Quick serve with drive thru is the same as a fast-food restaurant but it includes a drive thru.
Bona Fide restaurant	A	P	Consistent with the uses permitted in IMC 17.58.020.
Sporting Goods	X	P	
Thrift and secondhand stores	X	P	
Tobacco products stores	C	C	
Urgent Care	X	P	
Wineries	P	X	
Other Uses			
All Usual and Customary Accessory and Appurtenant Uses to Each of the Uses Listed in Table 3.1, *Permitted, Conditional and Ancillary Uses*	P	P	
Billboards	Subject to IMC	Chapter 17.72	
Childcare	C	P	
Churches/Places of Worship	C	C	
Property Maintenance Facilities	P	P	
Rail Lines	P	P	
Rail Realignment and Unloading of Aggregate	P	P	

Table 2-5 Permitted, Conditional, and Ancillary Uses

List of Uses	PA1	PA2	Notes
Schools (vocational, trade, higher education)	C	C	
Storm Drain Facilities, including recharge basins, water quality facilities	P	P	
Telecommunications facilities	C	C	
Utility Facilities, Public and Private	P	P	Facilities used to carry out the operations of a utility as defined in IMC 13.08.060.

Source: Irwindale 2025.

- "P": means the use is permitted by right without further discretionary approvals, subject to applicable development standards in this Specific Plan. A conditional use permit is not required.
- "C": means the use is conditionally permitted, subject to approval of a conditional use permit in accordance with the requirements of the City of Irwindale Municipal Code. Note as discussed above and in Section 2.6.1, Conditional Uses represent "discretionary" approvals under CEQA and are subject to further environmental review prior to approval by the City.
- "A": means the land is permitted by right, provided the use is ancillary/allowed in conjunction with a primary or conditionally permitted use of the property.
- "X": means the use is not permitted.

2.7 QUARRY FILLING, CONSTRUCTION, AND PHASING

Two general phases for project development are proposed, as shown in Figure 2-20, *Conceptual Phasing Plan*. The following sequence of activities is anticipated:

- Fill the southeast quarry with a combination of on-site material and imported fill.
- Fill the northwest quarry.
- Develop site infrastructure.
- Construct Phase 1.
- Construct Phase 2.

2.7.1 Quarry Filling Operations

A Draft Operations Plan (see Appendix C) has been prepared for Brew Yard Inert Debris Engineered Fill Operation (IDEFO) for the two on-site quarries (Heavy Iron Contracting, LLC, December 2, 2025). The northwestern quarry is approximately 52 acres at the surface grade and

would require approximately six million cubic yards to fill. The southeastern quarry is approximately 25 acres at the surface grade and would require approximately two million cubic yards to fill. The maximum depths of the northwest and southeast quarry pits are approximately 270 feet and 140 feet, respectively. Fill material from the northwestern quarry would be moved and placed in the southeastern quarry, as shown in Figure 2-21, *Overall Rough Grade Phase 1*. Fill of the northwestern quarry would occur as Phase 2 (see Figure 2-22, *Overall Rough Grade Phase 2*). These plans will require approval from the City of Irwindale. All grading will be required to meet the City of Irwindale's building code, and fill must be determined to be "engineered certified fill" to permit the construction of buildings on the material.

The Draft Operations Plan describes the following:

Operation, including site plan provisions for office trailer, temporary movable structures, signage, waste processing, load checking, equipment, hazardous waste inspection of incoming material, salvaging, employee training, and site storage.

Environmental Controls, including noise, odor, litter, dust, rodents and insects, fires, sanitary facilities, and accidental spills.

Sequence of Development includes site development plan and final elevations (rough grading plans Phase I and Phase 2).

Geology and Groundwater describes underlying geology, groundwater and governing Water Quality Control Plan, drainage control, leachate control and groundwater monitoring.

Operating Records describes the records that will be maintained for the lead agency (City of Irwindale) and the Los Angeles County Department of Public Health and Regional Water Quality Control Board.

2.7.2 Construction Activities

DEMOLITION

There are no fixed structures on the project site (Anacapa 2023), and no building demolition activities were assumed in the technical analyses for the proposed project. An existing concrete trailer parking lot and storage area are south of the northwest quarry. On-site concrete would be crushed and used as fill material for the quarries.





Source: Kimley-Horn 2025.

Figure 2-15
Architectural Design

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PLANT PALETTE

Street Trees



Zelkova serrata (Japanese Zelkova)
Tipuana tipu (Tipu Tree)
Platanus racemosa 'Roberts' (California Sycamore 'Roberts')
Quercus engelmannii (Engelmann Oak)
Laurus nobilis (Bay Laurel)



Pinus eldarica (Eldarica Pine)
Lophostemon conferta (Brisbane Box)
Jacaranda mimosifolia (Jacaranda)
Platanus acerifolia 'Bloodgood' (Bloodgood Planetree)

Parking Lot Trees



Umbellularia californica (California Bay)
Pistacia chinensis (Chinese Pistache)
Geijera parviflora (Australian Willow)
Prosopis glandulosa (Honey Mesquite)
Afrocarpis gracilior (Fern Pine)
Rhus lancea (African Sumac)

Accent Trees



Chitalpa x tashkentensis (Chitalpa)
Parkinsonia x 'Desert Museum' (Palo Verde)
Lagerstroemia indica (Crepe Myrtle)
Chilopsis linearis (Desert Willow)
Arbutus marina (Strawberry Tree)

Grasses/Sedges/Rushes



Lomandra longifolia (Lomandra)
Muhlenbergia lindheimeri (Linheimer's Muhly)
Muhlenbergia capillaris (Pink Muhly)
Muhlenbergia rigens (Deer Grass)
Carex tumulicola (Foothill Sedge)
Festuca 'Siskyou Blue' (Siskyou Blue Fescue)

Shrubs



Dietes bicolor (Fornight Lily)
Rhaphiolepis indica (Indian Hawthorn)
Ligustrum japonicum 'Texanum' (Waxleaf Privet)
Leucophyllum frutescens (Texas Sage)
Pittosporum tobira (Japanese Pittosporum)



Phormium tenax (New Zealand Flax)
Salvia spp. (Sage)
Lavandula stoechas 'Silver Anouk' (Spanish Lavender)
Penstemon spp. (Beard Tongue)
Abutilon palmeri (Indian Mallow)



Romneya coulteri (Matilija Poppy)
Rhus integrifolia (Lemonade Berry)
Ceanothus 'Frosty Blue' (Frosty Blue Ceanothus)
Artemisia 'Powis Castle' (Powis Castle Artemisia)
Arctostaphylos 'John Dourley' (John Dourley Manzanita)

Groundcovers



Salvia x 'Bee's Bliss' (Bee's Bliss Sage)
Salvia mellifera 'Jade Carpet' (Jade Carpet Black Sage)
Westringia fruticosa 'Morning Light' (Morning Light Coast Rosemary)
Acacia redolens 'Low Boy' (Prostate Acacia)
Baccharis pilularis (Dwarf Coyote Brush)



Aptenia cordifolia 'Red Apple' (Red Apple Ice Plant)
Euphorbia rigida (Upright Myrtle Spurge)
Drosanthemum speciosum (Royal Dewflower)
Senecio serpens (Blue Chalk Sticks)

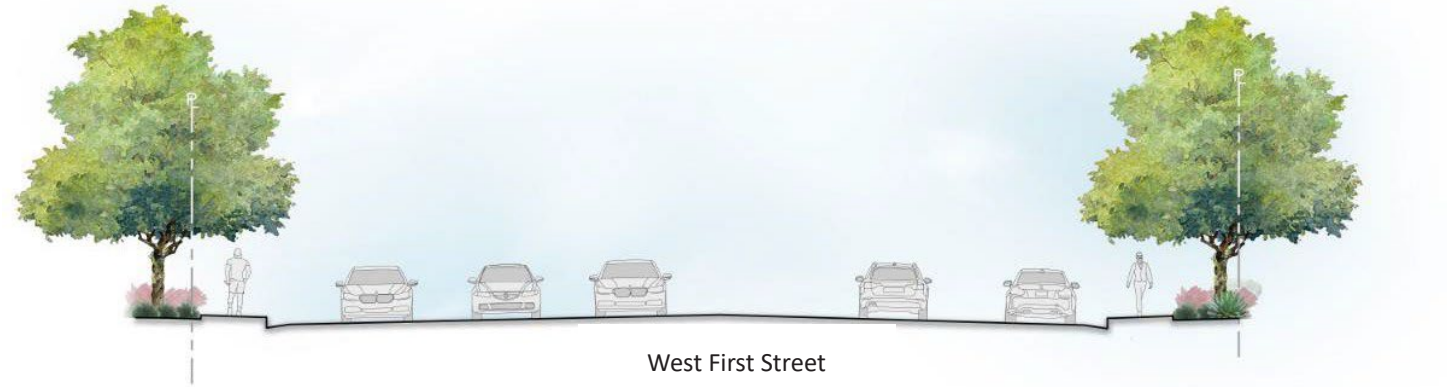
Source: Kimley-Horn 2025.

Figure 2-16
Preliminary Plant Palette

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Irwindale Landscaped Roadway Elevation



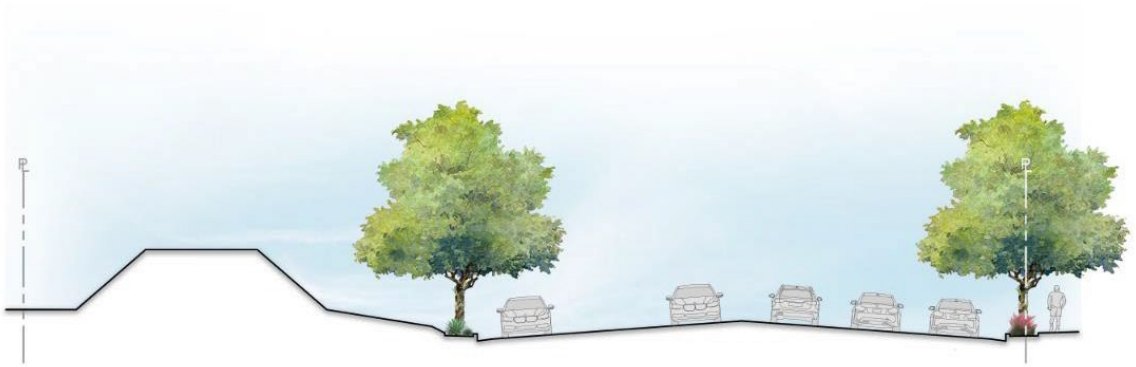
First Street Landscaped Roadway Elevation

Source: Kimley-Horn 2025.

Figure 2-17

Landscaped Roadway Elevations – First Street and Irwindale Avenue

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Drive Aisle Landscaped Roadway Elevation

Source: Kimley-Horn 2025.

Figure 2-18
Landscaped Roadway Elevations – Drive Aisles

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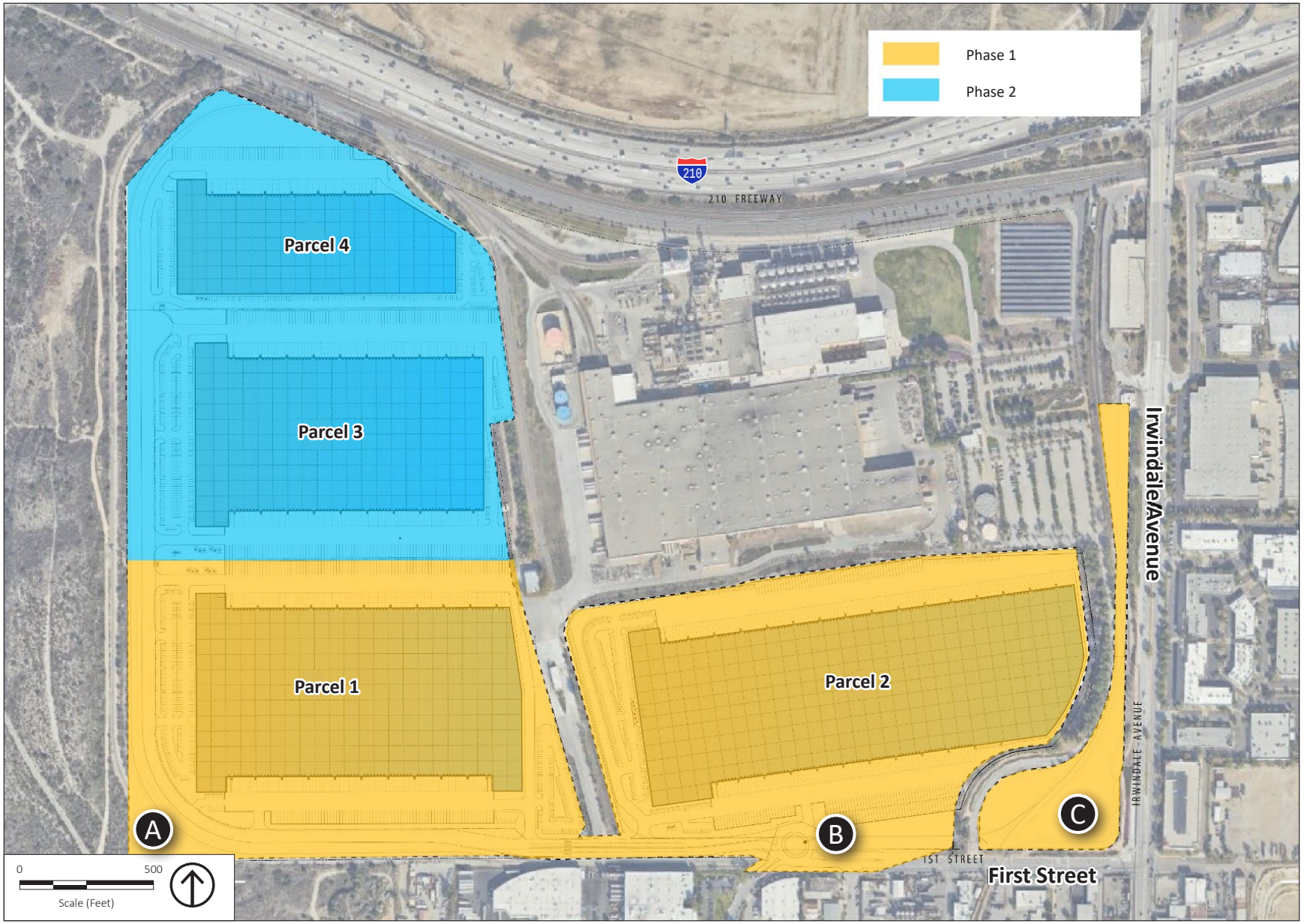


PLANTING LEGEND	
Symbol	Description
	Accent Tree
	Vertical Screening Tree
	Parking Lot Tree
	Screening Shrub
	Accent Shrub Planting
	Background Shrub
	Foreground Shrub

Source: Kimley-Horn 2025.

Figure 2-19
Typical Parking Lot Landscape and Building Entry

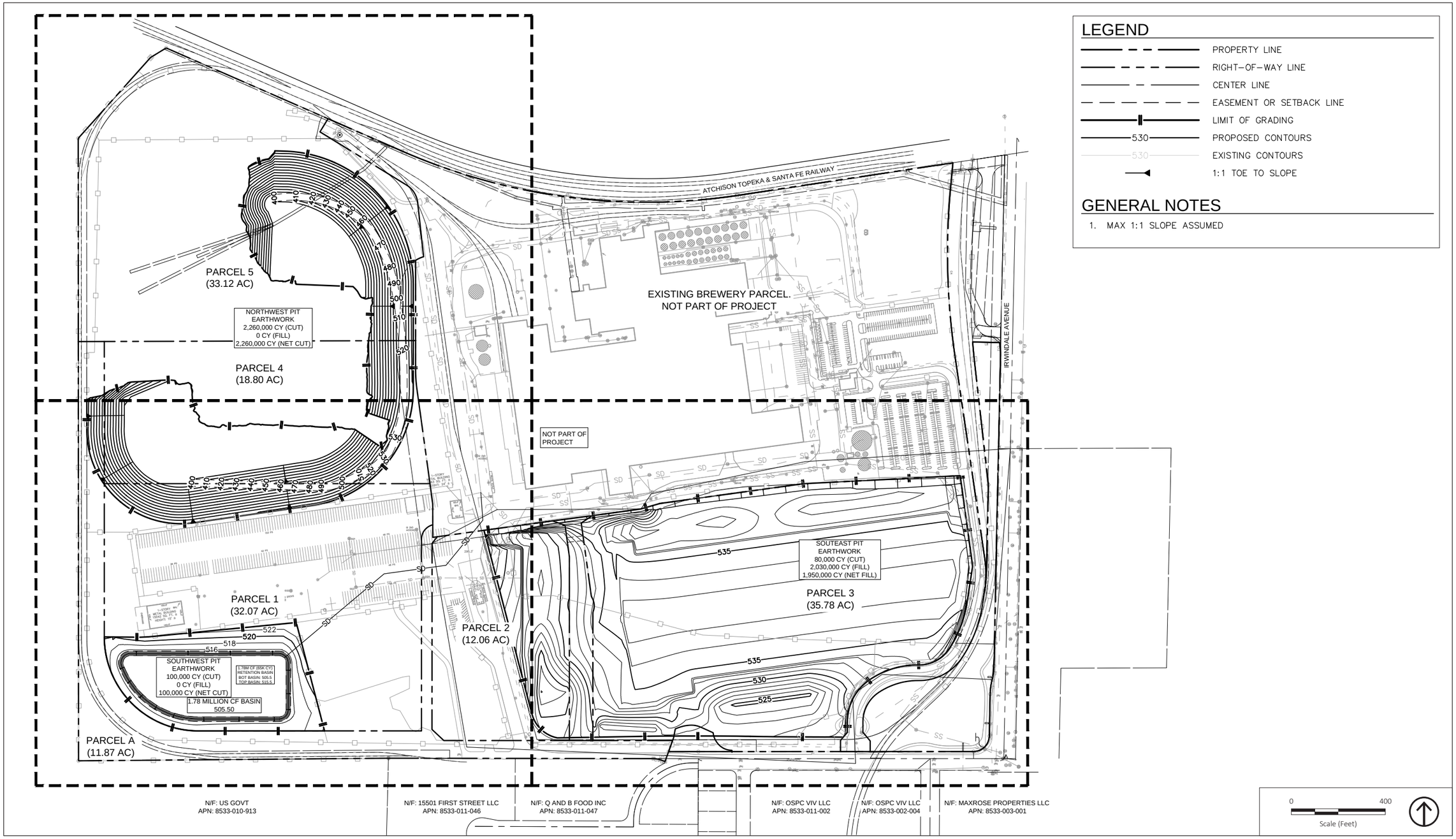
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Source: Kimley-Horn 2025.

Figure 2-20
Conceptual Phasing Plan

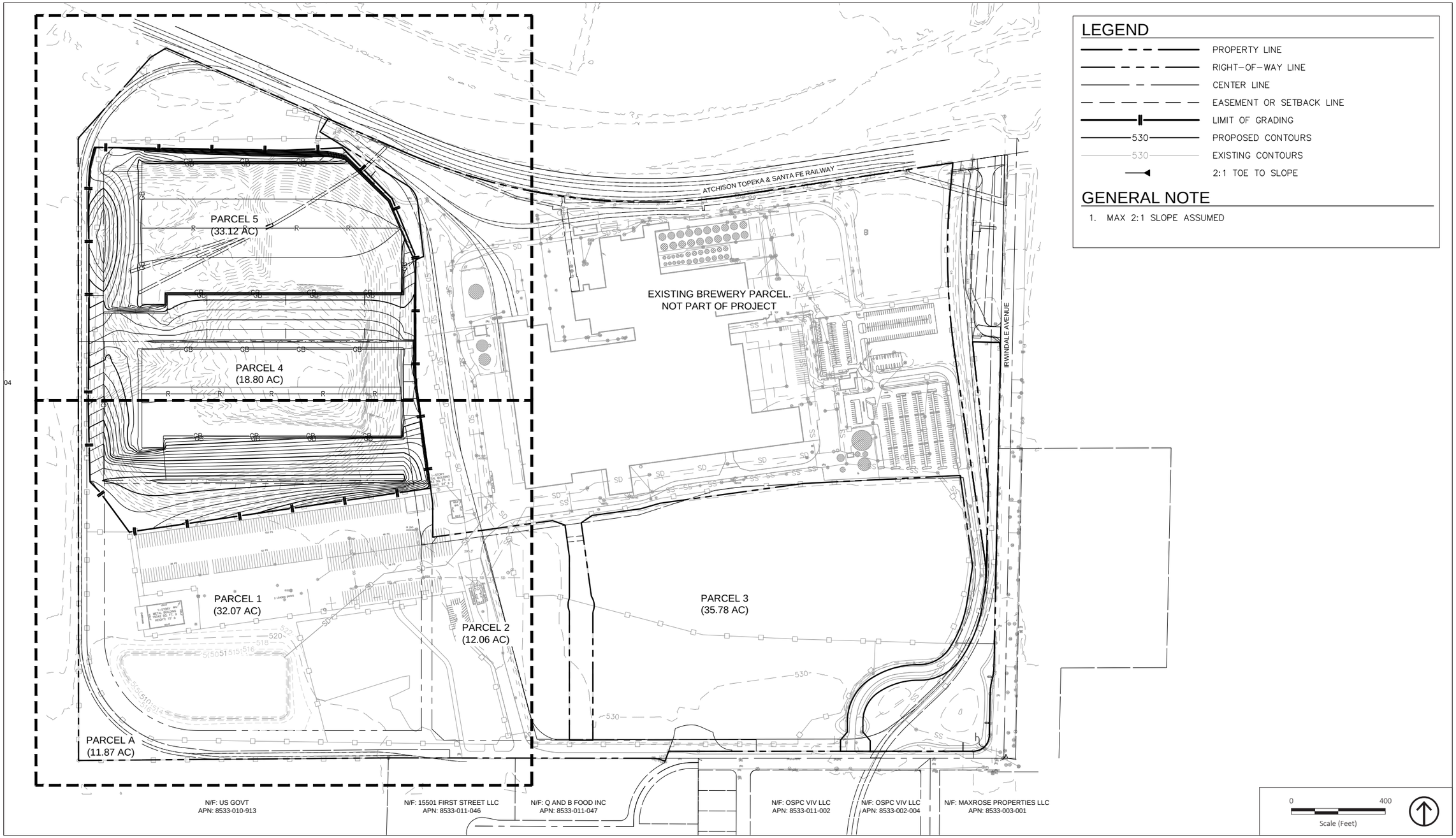
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Source: Kimley-Horn 2025.

Figure 2-21
Overall Rough Grading Plan - Phase 1

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Source: Kimley-Horn 2025.

Figure 2-22
Overall Rough Grading Plan - Phase 2

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RAIL REMOVAL

Railroad Industrial Spur Track

Project implementation would require removal of an existing rail spur. The existing rail spurs are depicted on Figure 2-23, *Brew Yard Railroad Spurs.* As shown, the segment in red would be removed. This segment extends southerly from the "brewery spur" along the western boundary of the brewery facility and continues along the western boundary of the southeastern quarry, then turns east to abut the southern project boundary and First Street. The industrial spur track that is proposed to be removed is a segment of track that extends from the Union Pacific Railroad (UPRR) Azusa Industrial Lead and extends on to property owned and or controlled by Irwindale Brew Yard Property Owner, LLC (IBYPO) and formerly Molson Coors as successor-in-interest to Miller Brewing Company (MC).

According to UPRR Industry Track Maps, this track is covered under an industrial track agreement (ITA) between the UPRR and Miller Brewing Company. The ITA Contract Document is noted as S023869. According to UPRR real estate maps (Val Map 124-16, Sheet 4), the spur is owned and maintained by the UPRR from the initial connection point to a point down the spur where ownership and maintenance changes to the property owner. The point of ownership change is noted as 132 feet from the initial connection point. The balance of the track beyond the 132-foot demarcation point is not owned by the UPRR and is owned by the landowner of record.

The subject spur track beyond the right-of-way of the railroad does not occupy any known easement that would preclude removal of the spur by the landowner. The initial portion of the spur track (132 feet in length) that falls within UPRR's operating easement is not proposed to be removed.

The ITA can be terminated by any party upon 30 days notice. Following termination of the ITA, the spur beyond the 132-foot demarcation line may be physically removed. On March 4, 2024, IBYPO, as successor-in-interest to MC, provided notice of termination of the ITA and intent to remove the spur. The disposition and/or removal of all tracks owned by the UPRR—from the 132-foot demarcation line back to the initial switch connection and falling within the UPRR operating right-of-way—is handled by the UPRR.

Removal of Spur Track Material

Industrial spur track material consists of rail, ties, spikes, tie plates, rail anchors, and aggregate base material (aka ballast). Removal of industrial trackage must be performed by a licensed rail contractor for proper removal of the track. Unless a track assessment shows that the track (steel) is in good or fair condition and suitable for use in other places, the rail is commonly scrapped. In cases where the rail is of decent quality, a local rail contractor may agree to purchase the track. The anchors, spikes, and tie plates, commonly termed "Other Track

Material" are normally scrapped. The railroad ballast is commonly bladed and/or graded into the surrounding area or used as fill material. The railroad ties are regulated in the State of California and must be disposed of at a duly licensed facility. The State of California considers railroad ties to fall under the federal Resource Conservation and Recovery Act (https://www.epa.gov/rcra). The owner of the ties will be required to complete paperwork noting that they (the owner of the ties) are the "generator" of the ties. This paperwork must be supplied to the designated landfill or disposal site for their records.

SOIL IMPORT/EXPORT

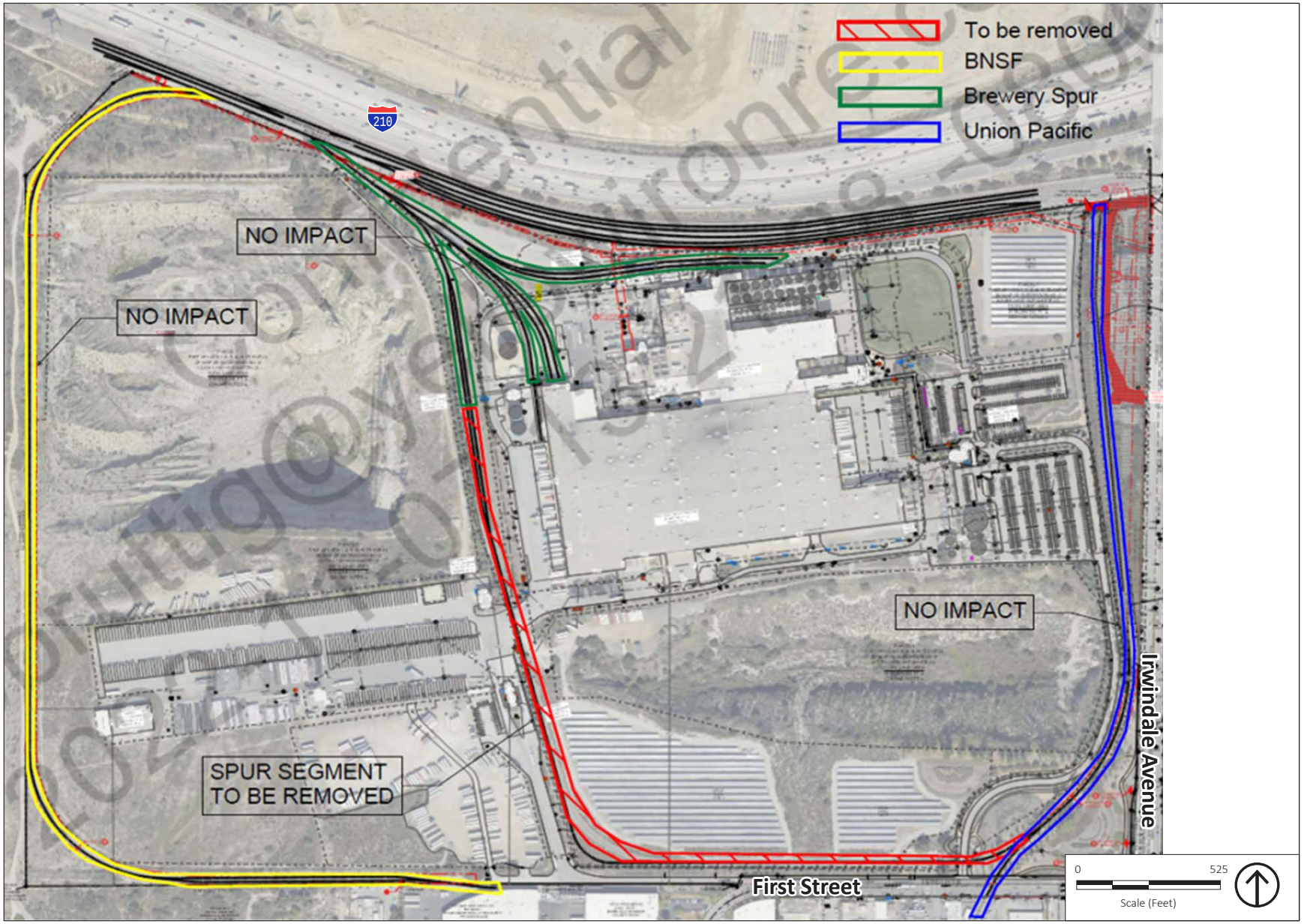
No export of materials is anticipated during the pit-filling process. As noted above, filling activities would begin in the southeast pit with transfer of approximately two million cubic yards of material from the northwest pit to the southeast pit. With the exception of a permitted easement to use the brewery access road, hauling for this phase would be entirely within the Specific Plan site boundaries. Therefore, only nominal increases in construction-related traffic on adjacent public roadways are anticipated.

Filling of the northwest pit would begin concurrently with filling of the southeast pit and require approximately eight million cubic yards of material. Unlike the southeast pit, fill material for the northwest pit would be imported from off-site locations throughout Los Angeles County. Import materials approved by the Regional Water Quality Control Board include:

- Clean dirt
- Brick
- Rock
- Asphaltic material
- Concrete, and
- Other inert materials (e.g., glass)

A total of eight million cubic yards of fill material will be required to fill the northwest pit. Haul trucks with a 15 cubic-yard capacity are planned to be used to import the required fill material. A total of 533,334 truckloads are expected to be required to fill the northwest pit (8,000,000 CY / 15 CY/truckload = 533,334 truckloads). This is an average of 502 truckloads per day (533,334 truckloads / 1,064 days = 502 truckloads/day). Each truckload would generate two trip ends, arriving and departing; therefore, importing activities are expected to generate 1,004 daily truck trips (502 inbound trips and 502 outbound trips).

Haul trucks would access the site using I-210 eastbound and westbound ramps at Irwindale Avenue. Import operations are expected Monday through Friday between 6:00 am and 5:00 pm, allowing approximately 9.5 hours of hauling and other construction activity per day after mandatory rest and meal breaks.



Source: RailPros 2024.

Figure 2-23
Brew Yard Railroad Spurs

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CONSTRUCTION SCHEDULE

Table 2-6, *Project Phasing*, shows the general timelines, including overlap of phases, for the proposed project. The proposed project would commence upon approval by the City of Irwindale and issuance of applicable permits (see Section 2.8). At the time of preparation of this EIR, the proposed project is anticipated to be approved by the end of July 2026. The estimated phasing dates below assume permit issuance completed and project implementation starting August 2026.

Table 2-6 Project Phases and Estimated Schedule

Phase Name	Phase Type	Start Date	End Date	
Filling of NW Pit	Site Preparation	1/5/2027	4/21/2031	4 yrs., 3½ mon.
Filling of SE Pit	Site Preparation	1/5/2027	9/13/2027	8 mon., 9 d
Site Infrastructure	Grading	9/14/2027	2/28/2028	1½ mon.
Phase I Development	Building Construction	10/25/2027	9/25/2028	11 mon.
Phase II Development	Building Construction	6/2/2031	5/14/2032	11½ mon.

The paving and architectural coating timelines would overlap with the site preparation, grading, and building construction activities.

CONSTRUCTION EQUIPMENT

Construction equipment required for each project phase is detailed in Table 2-7, *Construction Equipment*.

Table 2-7 Construction Equipment

Construction Activity	Equipment	Quantity	Hours per Day
Filling of NW Pit (Site Preparation)	Rubber Tired Dozers	4	9.5
	Tractors/Loaders/Backhoes	2	9.5
	Excavators	4	9.5
	Off-Highway Trucks	3	9.5
	Crushing/Processing Equipment	3	9.5
Filling of SE Pit (Site Preparation)	Rubber Tired Dozers	4	9.5
	Tractors/Loaders/Backhoes	2	9.5
	Excavators	4	9.5
	Off-Highway Trucks	3	9.5
	Crushing/Processing Equipment	3	9.5
Site Infrastructure (Grading)	Rubber Tired Dozers	1	9.5
	Graders	1	9.5
	Excavators	2	9.5
	Scrapers	2	9.5
	Tractors/Loaders/Backhoes	2	9.5
Phase I Development (Building Construction)	Cranes	1	9.5
	Forklifts	3	9.5
	Generator Sets	1	9.5
	Tractors/Loaders/Backhoes	3	9.5
	Welders	1	9.5
Phase II Development (Building Construction)	Cranes	1	9.5
	Forklifts	3	9.5
	Generator Sets	1	9.5
	Tractors/Loaders/Backhoes	3	9.5
	Welders	1	9.5
Phase I Development (Paving)	Pavers	2	9.5
	Paving Equipment	2	9.5
	Rollers	2	9.5
Phase I Development (Architectural Coating)	Air Compressors	1	9.5

CONSTRUCTION TRIPS

Table 2-8, *Construction-Related Vehicle Trips*, shows the anticipated number of daily trips for each construction phase.

Table 2-8 Construction-Related Vehicle Trips

Construction Activity	Worker Trips per Day	Vendor Trips per Day	Hauling Trips per Day
Filling of NW Pit (Site Preparation)	40	0	1,004
Filling of SE Pit (Site Preparation)	40	0	0
Site Infrastructure (Grading)	40	0	0
Phase I Development (Building Construction)	1,225	479	0
Phase II Development (Building Construction)	1,225	479	0
Phase I Development (Paving)	15	0	0
Phase I Development (Architectural Coating)	490	0	0

Sources: LLG 2025 for worker and hauling trips for pit filling; CalEEMod defaults for other worker and vendor trips.

2.8 INTENDED USES OF THE EIR

This is a project Draft EIR that examines the environmental impacts of the Brew Yard Specific Plan project. This Draft EIR also addresses various actions by the City and others to adopt and implement the proposed project. It is the intent of this Draft EIR to evaluate the environmental impacts of the proposed project, thereby enabling the City of Irwindale, other responsible agencies, and interested parties to make informed decisions with respect to the requested entitlements. The anticipated discretionary actions required for this proposed project are listed in Table 2-9, *Actions Required*.

Table 2-9 Actions Required

Lead Agency	Action
City of Irwindale	• Certification of the Brew Yard Specific Plan EIR • Approval of City of Irwindale General Plan Amendment • Approval of City of Irwindale Zone Change • Approval of City of Irwindale Zone Ordinance Amendment (adopting the Brew Yard Specific Plan) • Approval of Tentative Parcel Map • Approval of Development Agreement • Issuance of discretionary and ministerial approvals pursuant to the Specific Plan and as otherwise necessary to construct and operate the development on the Project Site consistent with the Specific Plan, including but not limited to final infrastructure phasing plans, condition or temporary use permits, grading permits, building permits, former quarry fill operations, and sewer and other infrastructure permits
Responsible Agencies	**Action**
Los Angeles Regional Water Quality Control Board	• Issuance of National Pollution Discharge Elimination System (NPDES) Permit • Issuance of Construction General Permit Coverage • Issuance of Industrial General Permit Coverage • Permitting and approvals related to the IDEFO
Cal Recycle	• Approval of the project's solid waste collection and disposal. • Approval of an Enforcement Agency (EA) Notification. • Approval of the Inert Debris Fill Operation Plan
Local Agency Formation Commission of Los Angeles County	• Approval of changes in organization with respect to the provision of services, such as water and sewer, to the project site.
Azusa Light and Water District	• Approval of the project site's annexation to ALW's service area. •
South Coast Air Quality Management District	• Issue Construction Permit • Issue Operation Permit

2.9 REFERENCES

Anacapa Geoservices. 2023, October 6. Phase I Environmental Site Assessment. Appendix K.

DTA, April 26, 2023, Summary Memorandum, Fiscal Impacts – Irwindale Brew Yard Project.

Heavy Iron Contracting. 2025, December 1. Draft Operations Plan, Brew Yard Inert Debris Engineered Fill Operation. (Appendix C)

Kimley Horn & Associates. 2026, May. Irwindale Brew Yard Specific Plan. Prepared by Kimley Horn. Appendix B.

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3. ENVIRONMENTAL ANALYSIS

This chapter examines the environmental setting of the proposed project, analyzes the effects of the proposed project and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts. This chapter has a separate section for each environmental topic.

The proposed project is analyzed for potential significant impacts in accordance with Appendix F, "Energy Conservation," and Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines. Environmental topics and their corresponding sections and abbreviations are:

3.1	Aesthetics (AES)	3.11	Land Use and Planning (LUP)
3.2	Agriculture and Forestry Resources (AGF)	3.12	Mineral Resources (MIN)
3.3	Air Quality (AQ)	3.13	Noise (N)
3.4	Biological Resources (BIO)	3.14	Population and Housing (POP)
3.5	Cultural Resources (CUL)	3.15	Public Services (PS)
3.6	Energy (ENE)	3.16	Recreation (REC)
3.7	Geology and Soils (GEO)	3.17	Transportation (TRA)
3.8	Greenhouse Gas Emissions (GHG)	3.18	Tribal Cultural Resources (TCR)
3.9	Hazards and Hazardous Materials (HAZ)	3.19	Utilities and Service Systems (USS)
3.10	Hydrology and Water Quality (HYD)	3.20	Wildfire (W)

ORGANIZATION OF ENVIRONMENTAL ANALYSIS

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

- **Regulatory Framework** offers an overview of applicable laws, regulations, plans, and policies relevant to each environmental topic.
- **Existing Conditions** offers a description of the existing environmental conditions, providing a baseline against which the impacts of the proposed project can be compared.
- **Standards for Analysis** refer to the quantitative or qualitative standards, performance levels, thresholds, or criteria used to evaluate whether an impact is significant. These standards are based primarily on the CEQA Guidelines unless otherwise noted. This section also provides an overview of key methods, assumptions, and considerations that inform the impact analysis.

- **Project Impact Analysis** provides a detailed discussion of the potential direct and indirect impacts of the proposed project. Mitigation measures are included as necessary.
- **Cumulative Impact Analysis** provides an overview of the geographic setting and cumulative projects considered in the cumulative impact assessment. Significant cumulative impacts are identified and mitigation measures are included as necessary.
- **References** are provided for information sources used in the development of the discussion.

LEVELS OF SIGNIFICANCE

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

- **No impact.** The project would result in no adverse effect on the environment.
- **Less than significant.** The project would not exceed the established significance criteria.
- **Significant.** The project would exceed the established significance criteria. For each significant impact, the EIR identifies mitigation measures to reduce, eliminate, or avoid the adverse effect. If one or more mitigation measures would reduce the impact to a less-than-significant level successfully, this is stated in the EIR.
- **Significant and unavoidable.** The project would exceed the established significance criteria, and no feasible mitigation measures are available to reduce the impact to a less-than-significant level.

SCOPING COMMENTS RECEIVED

The City determined that an EIR would be required for this project and issued a Notice of Preparation (NOP) on February 7, 2024 (see Appendix A). A scoping meeting was held on February 22, 2024, to elicit comments on the scope of the DEIR. Table 3-1 summarizes the NOP comments received and identifies the section(s) of this DEIR where the issues are addressed. A brief summary of the NOP comments pertinent to each topical section (e.g., 3.1*, Aesthetics,* 3.2, *Air Quality,* etc.) is also included in the introduction to the respective sections.

Table 3-1 Summary of Comments on the NOP

Commenting Agency/ Person	Letter Dated	Summary of Comments	Issue Addressed In:
Agencies			
Native American Heritage Commission	February 13, 2024	▪ Recommendation to consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. ▪ Recommendation to contact the appropriate regional California historical Research Information System (CHRIS) Center for an archaeological records search. ▪ Recommendation that if an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.	▪ Chapter 3.15, *Tribal Cultural Resources*
Gabrieleno Band of Mission Indians- Kizh Nation	February 26, 2024	▪ Request for consultation of all future projects within this location.	▪ Chapter 3.15, *Tribal Cultural Resources*
Los Angeles County Sanitation District	February 28, 2024	▪ The Project may be required to make a payment on a connection fee before being permitted to discharge to the District's Sewerage System. LACSD provides link to the Connection Fee Information Sheet. ▪ The capacities of the LACSD's wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Expansions of LACSD's facilities must be sized and service phased in a manner that is consistent with the SCAG regional growth forecasts. The available capacity of the LACSD treatment facilities is therefore limited to levels associated with the approved growth identified by SCAG.	▪ Chapter 3.16, *Utilities and Service Systems*

Table 3-1 Summary of Comments on the NOP

Commenting Agency/ Person	Letter Dated	Summary of Comments	Issue Addressed In:
Local Agency Formation Commission for the County of Los Angeles (LAFCO)	February 21, 2024	▪ Request to identify LAFCO as a responsible agency. ▪ Request that the EIR examine whether any potential annexations, Sphere of Influence (SOI) amendments, or other Commission (LAFCO) actions are required, specifically related to providing various municipal services.	▪ Chapter 3.16, *Utilities and Service Systems*
State of California Department of Justice	March 4, 2024	▪ Request to make note that diesel trucks visiting warehouses emit nitrogen oxide (NOx) and diesel particulate matter. ▪ Request to make note that trucks and on-site loading activities can be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure. ▪ Request to make note that daily truck and passenger car trips that warehouses generate can contribute to traffic jams, deterioration of road surfaces, traffic accidents, and unsafe conditions for pedestrians and bicyclists.	▪ Chapter 3.2, *Air Quality* ▪ Chapter 3.12. *Noise* ▪ Chapter 3.14, *Transportation*
California Construction and Industrial Materials Association (CALCIMA)	March 4, 2024	▪ Suggest that the geological maps developed include an outline of both the identified mineral resource zones (MRZs), mineral land classifications of MRZ-3 and MRZ-4 lands adjacent to planned or new existing freight routes, surrounding land use designations, and upcoming projects inclusive of City of Irwindale's planned developments.	▪ Chapter 3.11, *Mineral Resources*
County of Los Angeles Department of Public Works	March 4, 2024	▪ Request for the EIR to discuss the region's need for groundwater recharge areas, and Public Works' offer to fill Miller Pit for free with sediment from Los Angeles County Flood Control District facilities in exchange for the other pit either permanent or a long-term lease. ▪ Request for the EIR to discuss whether the Plan will result in annual increase in flood hazards including, but not limited to, the formation of	▪ Chapter 3.9, *Hydrology and Water Quality* ▪ Chapter 4, *Alternatives*

Table 3-1 Summary of Comments on the NOP

Commenting Agency/ Person	Letter Dated	Summary of Comments	Issue Addressed In:
		any new FEMA Special Flood Hazard Areas (SFHAs).	
Coalition of Responsible Equitable Economic Development	March 8, 2024	▪ Request all efforts are made to minimize air quality effects and likely health consequences to the greatest extent possible. ▪ Request the urgency of the City to adopt quantitative thresholds to determine the significance of the Project's GHG emissions. ▪ Request that the thresholds embody climate change's existential threat to humankind and the analysis to provide discussion on the Applicant's plan to offset the Project's GHG emissions. ▪ Request that if nature of operations information is unavailable, the City should study a reasonable worst-case scenario so that a broad and diverse range of environmental impacts are included.	▪ Chapter 3.2, *Air Quality* ▪ Chapter 3.7, *Greenhouse Gase Emissions* ▪ Chapter 3.10, *Land Use and Planning*
City of Baldwin Park's Planning Division	March 11, 2024	▪ Request to consider which types of commercial activities would be permitted or planned to take place at the project site? ▪ Asking whether the commercial component of the specific plan area would include uses such as the brew yard or other retail/recreational/assembly related uses.	▪ Chapter 3.10, *Land Use and Planning*
Los Angeles County Metropolitan Transportation Authority	March 11, 2024	▪ Request that critical impacts to be studied include: impacts of Project construction and operation on and potential damage to the structural and systems integrity of tracks and related infrastructure; disruption to light rail service; rail crossing safety for pedestrians and vehicles; and temporary changes to customer access and circulation to the station. ▪ Request that the Applicant shall submit engineering drawings and calculations, as well as construction work plans and methods, to evaluate any impacts to the Metro A Line infrastructure in relationship to the Project.	▪ Chapter 3.14, *Transportation*

Table 3-1 Summary of Comments on the NOP

Commenting Agency/ Person	Letter Dated	Summary of Comments	Issue Addressed In:
		▪ Request that all building structures (above ground and below grade) and projections shall be set back at least five (5) feet from the property line shared by the Project property and Metro to allow adequate space for construction and property maintenance activities. ▪ Request that the construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro A Line or the structural and systems integrity of Metro's light rail infrastructure. ▪ Request that the Applicant take all necessary measures to protect the OCS from damage due to Project activities during and after construction, pursuant to applicable California Department of Industrial Relations regulations (Cal. Code of Regulations, Title 8). ▪ Request that any building protrusions facing the ROW (e.g. balconies, awnings and other appurtenances), as well as landscaping shall be set back at least ten (10) feet from the OCS wires. ▪ Recommended to contact Metro Development Review early in the design process to address potential impacts. ▪ Request that the Applicant submit engineering drawings and calculations, as well as construction work plans and methods including any crane placement and radius, to evaluate any impacts to the freight train infrastructure in relationship to the Project. ▪ Note that any access to railroad property is strictly at the discretion of Metro and SCRRA. ▪ Request that the Applicant permit Metro and SCRRA staff to monitor construction activity to ascertain any impact to the ROW.	

Table 3-1 Summary of Comments on the NOP

Commenting Agency/ Person	Letter Dated	Summary of Comments	Issue Addressed In:
		▪ Request that the Applicant analyze traffic and safety impacts and comply with all regulations and requirements of the CPUC with respect to the Project's potential impacts on the at-grade rail crossing at the intersection of W. 1st Street and S. Motor Avenue. ▪ Recommendation for the Applicant to contact SCRRA for Right-of-Entry requirements. Metro provides link to requirements. ▪ Recommend that the Applicant install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. ▪ Request the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. ▪ Request that any wayfinding signage referencing Metro Services or featuring the Metro brand and associated graphics require review and approval by Metro Signage and Environmental Graphic Design. ▪ Request the thoughtful integration of art and culture into public spaces and will need to review any proposals for public art or placemaking facing a Metro ROW.	
South Coast Air Quality Management District	March 12, 2024	▪ Recommendation to use the CalEEMod land use emissions software to estimate pollutant emissions from typical land use development. ▪ Request to identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. ▪ Request that air quality impacts from indirect sources, such as sources that generate or	▪ Chapter 3.2, *Air Quality*

Table 3-1 Summary of Comments on the NOP

Commenting Agency/ Person	Letter Dated	Summary of Comments	Issue Addressed In:
		attract vehicular trips, should be included in the analysis. ▪ Request that emissions from the overlapping construction and operational activities should be combined and compared to South coast AQMD's regional air quality CEQA operational thresholds to determine the level of significance. ▪ Request that South Coast AQMD be identified as a Responsible Agency for the Proposed Project in the Draft EIR. ▪ Request that the South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* use as a tool when making local planning and land use decisions.	
Los Angeles County Department of Parks and Recreation	March 12, 2024	▪ Recommend that potential mitigation measures include applying water sprays to all disturbed active construction areas, scheduling truck trips outside peak traffic hours, and using alternatively fueled vehicles for project operational activities. ▪ Request that the environmental document analyzes the project's potential impact on the wildlife at Santa Fe Dam. ▪ The proposed project could potentially have significant air quality and noise impacts to the two federally protected bird species (least Bell's vireo and coastal California gnatcatcher) in the area during breeding season. ▪ Request that mitigation measures include that the construction period will avoid critical lifecycles such as the breeding season for listed and sensitive species.	▪ Chapter 3.3, *Biological Resources*
County of Los Angeles Department	March 12, 2024	▪ Recommend the use of cinder block walls so that parking lots and structures of the proposed project cannot be seen from the outside.	▪ Chapter 3.1, *Aesthetics* ▪ Chapter 3.12, *Noise*

Table 3-1 Summary of Comments on the NOP

Commenting Agency/ Person	Letter Dated	Summary of Comments	Issue Addressed In:
of Parks and Recreation		▪ Request that mitigation measures should include more landscaping such as ivy-covered walls, green rooftops, and more trees. ▪ Construction of the proposed project would generate increased noise levels adversely affecting wildlife in the area as well as sensitive receptors such as the elderly and children who use the park. ▪ Request that mitigation measures include that the construction period will avoid critical lifecycles such as the breeding season for listed and sensitive species; scheduling construction during off peak use of the recreation facilities; using the most current methods of equipment noise control; and provision of enclosures on motor compartments. ▪ Request to avoid Project construction during events including: o Renaissance Faire Events held in the Sante Fe Dam Recreation Area held in the Park on Saturdays and Sundays from April to June. ▪ Swim Beach held at the Park's Swim Beach from June to September	▪ Chapter 5, *Other CEQA Considerations*
California Department of Transportation	March 13, 2024	▪ Request to incorporate multi-modal and complete streets transportation elements into the Project. ▪ Request to evaluate the Project for potential Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications. ▪ Request to include a VMT analysis in the Transportation section of the DEIR. ▪ Request to evaluate the impact associated with adding Project trips at the off-ramps on Freeway 605 and 210 on the following interchanges:	▪ Chapter 3.14, *Transportation*

Table 3-1 Summary of Comments on the NOP

Commenting Agency/ Person	Letter Dated	Summary of Comments	Issue Addressed In:
		○ Irwindale Ave/I-210 Interchange ○ Vernon Ave/I-210 Interchange ○ Azusa Ave/I-210 Interchange ○ Arrow Hwy/605 Interchange ○ Live Oak Ave/605 Interchange. ▪ Request to ensure that the project traffic does not spill back onto the mainline. ▪ Request to ensure that the traffic queue does not exceed the storage lengths and through traffic would not be impeded. ▪ Request to work with Caltrans to mitigate any traffic impacts.	
Office of the Sheriff County of Los Angeles	March 21, 2024	▪ Request that the EIR identify and provide specific requirements to address ○ Hours of operation ○ Signage ○ Require anti-climb fencing around the perimeter ○ Include a lighting plan ○ Identify security measures ○ Identify whether the sale of alcohol will be included as an outdoor activity ○ Transportation, access, and circulation for vehicles/pedestrians ▪ Implementation of CPTED, Crime prevention through Environmental Design	▪ Chapter 3.13, *Public Services*
Individuals			
Mike Mohajer	March 8, 2024	▪ Request to completely address implementing regulations per solid waste management.	▪ Chapter 3.16, *Utilities and Service Systems*
Fred Barbosa	March 11, 2024	▪ Recommendation to push for electric trucks, clean-idle trucks, with the proper stations to accommodate these types of vehicles. ▪ How many warehouses within the Commercial zone?	▪ Chapter 3.2, *Air Quality* ▪ Chapter 3.10, *Land Use and Planning*

Table 3-1 Summary of Comments on the NOP

Commenting Agency/ Person	Letter Dated	Summary of Comments	Issue Addressed In:
		▪ How many days to construct the Commercial zone? ▪ How many trucks per hour during the construction of the Commercial zone? ▪ Recommendation to establish cooperation between the developer, the Brewery, and the City to answer development questions regarding the Commercial zone. ▪ Recommendation to move the farthest north boundary as close to the freeway frontage as possible. ▪ Question of why the Brewery Property is vacant in the northeast location? Is it the area for future building or empty by mandate? What would it take to use that property legally for this project?	

EVALUATION METHODOLOGY

Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the lead agency, based on substantial evidence in the record as a whole, including views held by members of the public. An ironclad definition of significant effect is not always possible because the significance of an activity may vary based on the setting. Pursuant to CEQA Guidelines Section 15064(b), the analysis in this Draft EIR is based on scientific and factual data that has been reviewed by the lead agency and represents the lead agency's independent judgment and conclusions.

Baseline

This EIR evaluates the impacts of the proposed project relative to existing conditions, as required by CEQA Guidelines Section 15126.2. Unless otherwise noted, the baseline represents the existing conditions on the ground (i.e., physical conditions) at the time that the Notice of Preparation was issued (February 7, 2024).

Potential Effects of the Project on the Environment

The California Supreme Court concluded in *California Building Industry Association vs. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 that "CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents." The *CBIA vs. BAAQMD* ruling provided for several exceptions to the general rule where an analysis of the project on the environment is warranted:

1. If the project would exacerbate existing environmental hazards (such as exposing hazardous waste that is currently buried).
2. If the project qualifies for certain specified exemptions—certain housing projects and transportation priority projects pursuant to Public Resources Code (PRC) Sections 21159.21 (f),(h); 21159.22 (a),(b)(3); 21159.23 (a)(2)(A); 21159.24 (a)(1),(3); or 21155.1 (a)(4),(6).
3. If the project is exposed to potential noise and safety impacts on projects due to proximity to an airport (pursuant to PRC Section 21096).
4. School projects require specific assessment of certain environmental hazards (pursuant to PRC Section 21151.8).

Therefore, the evaluation of the significance of project impacts under CEQA focuses on the potential impacts of the proposed project on the environment, including whether the proposed project may exacerbate any existing environmental hazards. Existing environmental hazards in the project area include, but are not limited to, seismic hazards, hazardous materials and flooding]. Therefore, while the effects of these hazards on the proposed project are generally not subject to CEQA review following the *CBIA vs. BAAQMD* case, a discussion of the project's potential to exacerbate these hazardous conditions is provided in the respective topical sections of this Draft EIR.

CUMULATIVE IMPACTS

A cumulative impact consists of an impact created because of the combination of the project evaluated in the EIR, together with other reasonably foreseeable projects causing related impacts. CEQA Guidelines Section 15130 requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." Cumulative effects could occur when future development under the project is combined with development in the surrounding area or, in some instances, in the entire region.

Pursuant to CEQA Guidelines Section 15130(a)(3), where a cumulative impact is significant when compared to baseline conditions, the analysis must address whether the project's contribution to the significant cumulative impact is "considerable." If the contribution of the project is considerable, then the EIR must identify potentially feasible measures that could avoid

or reduce the magnitude of the project's contribution to a less-than-considerable level. If the project's contribution is not considerable, it is considered less than significant, and no mitigation for the project's contribution is required.

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

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

B. A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

The cumulative impact analyses in this EIR use a combination of both Method A and Method B.

Table 3-2, *Cumulative Projects within Two Miles of the Proposed Project Site* details development projects within various stages of the approval process. At the time of the NOP issuance, none of these projects were occupied, and therefore, would not be represented in baseline conditions. The location of these proposed and approved projects is shown in Figures 3.0-1, *City of Irwindale Cumulative Project within Two Miles of the Proposed Project*, and 3.0-2, *Cumulative Projects within Two Miles of the Proposed Project in Surrounding Jurisdictions.*

Table 3-2 Cumulative Projects within Two Miles of the Proposed Project Site

Project Number	Project Address	Land Use	Size	Status	City
Projects within the City of Irwindale					
1	14005 Live Oak Avenue	Industrial; 102,500 sf speculative concrete tilt-up. Demolition complete.	5.13 AC	Approved Project	Irwindale
2	2200 Arrow Highway	Industrial	17.22 AC	Approved project	Irwindale
3	15715 Arrow Highway	Industrial (Project withdrawn)	4.9 AC	Pending Project	Irwindale
4	5555 Irwindale Avenue	Two speculative industrial buildings. 479,260 sf. (On hold)	± 28.19 AC (gross), 25.82 AC (net) per assessor's map	Pending Project	Irwindale
5	1600 Arrow Highway	40,000 warehouse/office building.	1.88 AC	Pending Project	Irwindale
6	4500 Azusa Canyon Road	189,300 speculative industrial building.	7.92 AC	Pending Project	Irwindale

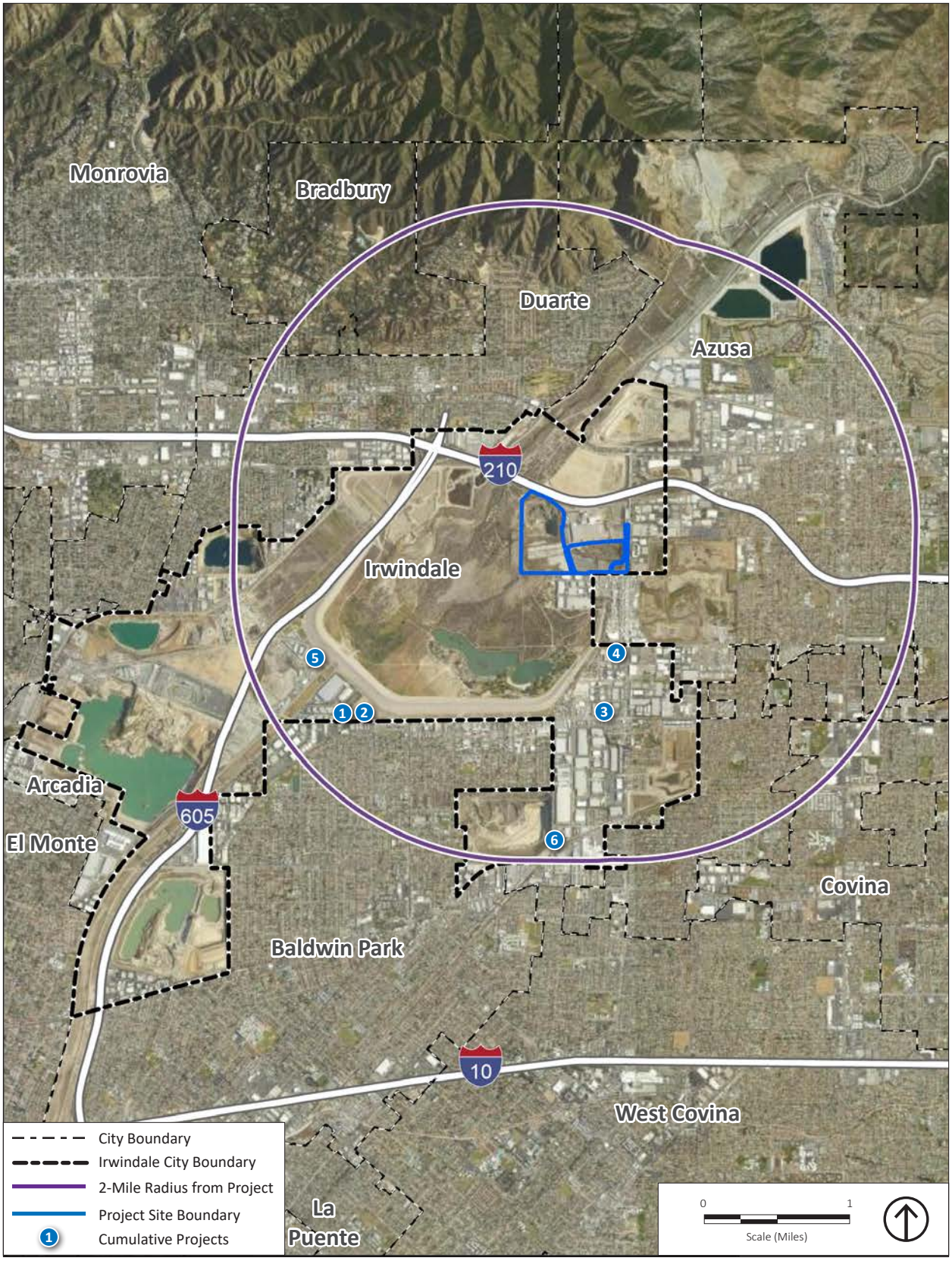
Table 3-2 Cumulative Projects within Two Miles of the Proposed Project Site

Project Number	Project Address	Land Use	Size	Status	City
Projects within Surrounding Jurisdictions					
7	230 S Irwindale	Industrial	6,380 SF Industrial Building	Entitlement Approved	Azusa
8	300 W Foothill Boulevard	Mixed Use	7 Unit Townhome 633 SF Commercial	Plan Check	Azusa
9	333 N Azusa Avenue	Mixed Use	Residential: 4 Units Retail: 1,000 SF	Under Construction	Azusa
10	619 N San Gabriel Avenue	Mixed Use	Retail: 888 SF Residential: 6 Units (8,998SF)	Under Construction	Azusa
11	1041-1043 W Arrow Highway	Commercial	Express Carwash	Under Construction	Azusa
12	243 N. Azusa Ave	Residential	4 Unit Condo	Entitlement Approved	Azusa
13	742 N. Todd Ave	Industrial	16,040 SF Warehouse	Preliminary Plan Review	Azusa
14	120 N. Aspan	Residential	Single family subdivision consisting of 22 lots.	Entitlement Approved	Azusa
15	175 N. Azusa Ave	Residential	4 Unit Condo	Entitlement Approved	Azusa
16	736-740 N Angeleno Ave	Residential	4 Affordable housing units	Under Construction	Azusa
17	163 N. Azusa Ave	Retail	Remodel of restaurant	Under Construction	Azusa
18	635 N. San Gabriel Ave	Mixed-Use	Mixed-Use Building with 16 Residential Units and 3 Live-Work Units	Entitlement Phase	Azusa

Table 3-2 Cumulative Projects within Two Miles of the Proposed Project Site

Project Number	Project Address	Land Use	Size	Status	City
19	710 S. Azusa Ave	Retail	New drive-thru Starbucks Coffee	Under Construction	Azusa
20	820 N Soldano Ave	Residential	6 Unit Townhome	Under Construction	Azusa
21	900 W Foothill Blvd	Light Industrial	138,454 SF Self-storage facility	Under Construction	Azusa
22	628 N Pasadena Ave	Residential	6-unit condos	Entitlement Phase	Azusa
23	1433 Crestfield Dr	Residential	169 townhome units	Project pending final City Council approval.	Duarte
24	1750 Business Center Drive	Duarte Station Specific Plan	292 market-rate apartment units	Project completed and leasing initiated 2025.	Duarte
25	1261 N Azusa Ave	Neighborhood Shopping Center	2,466 square-foot	Approved	Covina

Source: City of Covina 2026; City of Duarte 2025; City of Azusa 2026; City of Irwindale 2026.

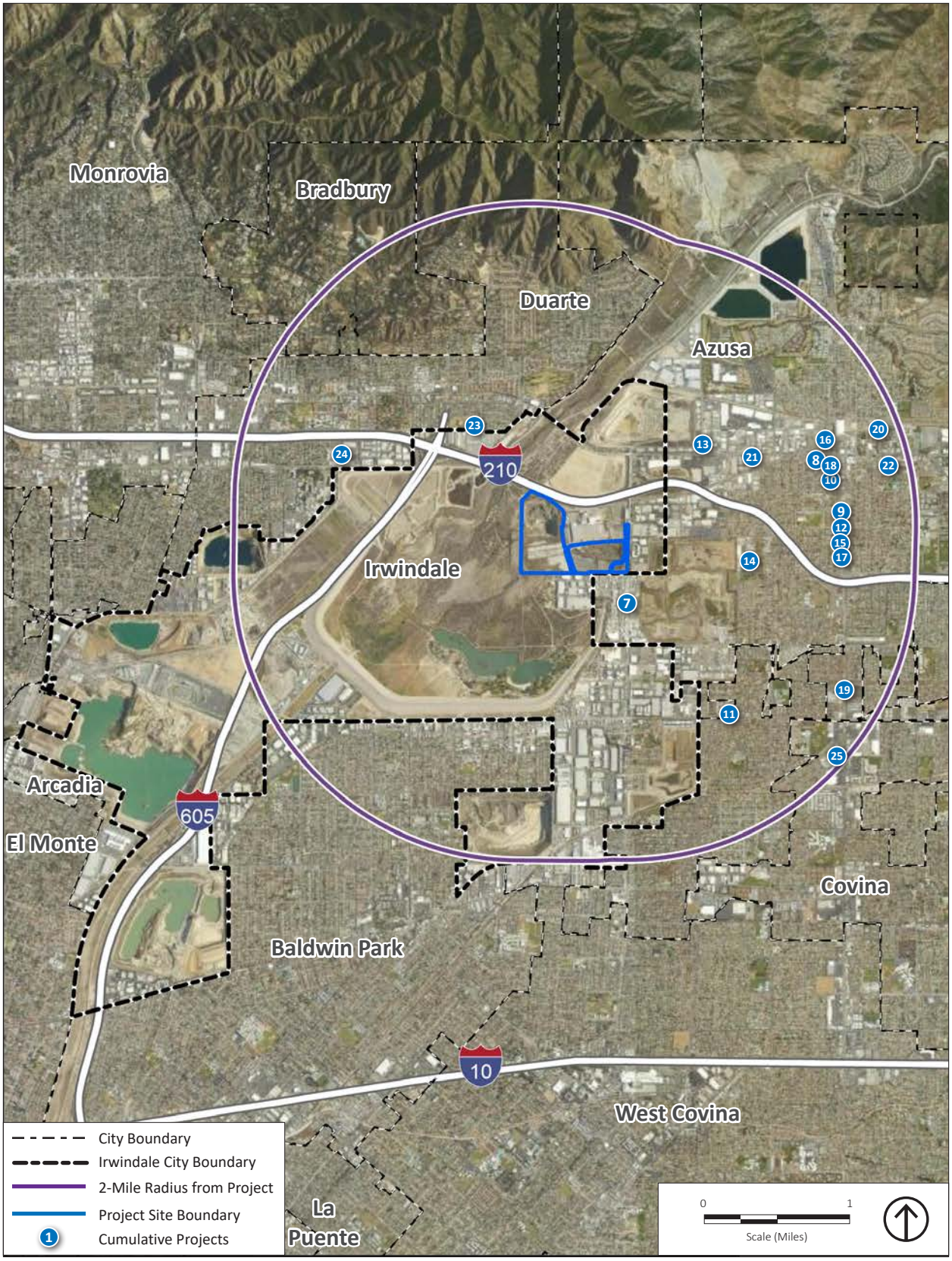


Source: Generated using GIS Pro 2026.

Figure 3.0-1

City of Irwindale Cumulative Projects Within Two Miles of the Proposed Project

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Source: Generated using GIS Pro 2026.

Figure 3.0-2

Cumulative Projects Within Two Miles of the Proposed Project in Surrounding Jurisdictions

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Following is a summary of the approach and extent of cumulative impacts, which are further detailed in each topical environmental section:

- **Aesthetics.** Cumulative impacts consider the potential for the project and related projects to impact scenic vistas, visual character, and light and glare within Irwindale and the surrounding visual environment.
- **Air Quality.** Air quality impacts are both regional impacts and localized impacts. For cumulative impacts, the analysis is based on the regional boundaries of the South Coast Air Basin.
- **Biological Resources.** Cumulative impacts to biological resources are evaluated within the surrounding area where the proposed project and related cumulative projects could affect shared biological resources, including habitat areas and wildlife movement opportunities.
- **Cultural Resources.** Cumulative impacts consider the potential for the proposed project in conjunction with related development projects to result in compounded impacts on cultural resources within the City of Irwindale and surrounding areas where ground-disturbing activities could encounter historical, archaeological, and paleontological resources.
- **Energy.** The scope of cumulative impacts for energy resources is the service area of Southern California Edison and Southern California Gas Company.
- **Geology and Soils.** Geologic and soils impacts are site specific and generally do not combine to result in cumulative impacts, therefore, the geographic context used for the cumulative assessment of geology and soil impacts is the project site.
- **Greenhouse Gas (GHG) Emissions.** Project-related greenhouse gas (GHG) emissions are not confined to a particular air basin but are dispersed worldwide. Therefore, GHG emissions from the proposed project are not a project-specific impact, but are the proposed project's contribution to the worldwide cumulative impact.
- **Hazards and Hazardous Materials.** The cumulative impact for hazards and hazardous materials is based on the Los Angeles County Fire Department Health Hazard Materials Division's (HMMD) service area. The HHMD is the Certified Unified Program Agency (CUPA) for the City of Irwindale.
- **Hydrology and Water Quality.** Cumulative water quality and hydrological impacts are based on the boundaries of the Lower San Gabriel watershed for surface water, and the Main San Gabriel Groundwater Basin for groundwater.
- **Land Use and Planning.** Cumulative impacts are based on the City of Irwindale and surrounding jurisdictions where related projects could affect land use compatibility or

consistency with applicable plans and regulations, ns, including the City of Irwindale General Plan, regional land use plans, such as SCAG's RTP/SCS.

- **Mineral Resources.** Cumulative mineral resources impacts are based on the geographic area of the project site, which is Los Angeles County. The basis for designated mineral resources in the region is the California Geologic Survey.

- **Noise.** Cumulative noise impacts are based on the traffic study, which considers the regional growth based on citywide and regional projections.

- **Public Services. .** Cumulative impacts are based on potential related development within the service areas of applicable public service providers (e.g., Los Angeles County Fire Department and Irwindale Police Department), and consider whether cumulative population or employment growth within those service areas would require new or expanded public service facilities (e.g., fire stations, police facilities, schools, or libraries) to maintain acceptable service levels. Fire protection service planning is guided by the Los Angeles County Fire District Facilities Master Plan, which evaluates future station, apparatus, and staffing needs based on SCAG Connect SoCal regional growth forecasts. Police service needs are evaluated by the City of Irwindale based on growth in the City's employment and daytime population. School facility needs are based on projected housing growth and student generation rates reflected in regional forecasts and the City's adopted Housing Element.

- **Transportation and Traffic.** The vehicle miles traveled (VMT) methodology utilized the San Gabriel Valley Council of Governments (SGVCOG) web-based VMT Evaluation Tool based on VMT data from the SCAG Travel Demand Model. SGVCOG worked with member agencies, including the City of Irwindale, to analyze traffic conditions in the region to develop the baseline standard for this tool. Multimodal transportation related cumulative impacts are reviewed in accordance with the City's General Plan and consistency with the RTP/SCS.

- **Tribal Cultural Resources.** Cumulative impacts related to tribal cultural resources are based on the local Native American tribes' culturally significant areas and include, but are not limited to, cultural landscapes and regions, specific heritage sites, and other tribal cultural places.

- **Utilities and Service Systems.** Cumulative impacts are based on a combination of service provider long-range plans and quantifying impacts for related projects within the respective service boundary:

    - **Water Supply:** cumulative demand based on Azusa Light and Water's (ALW) boundary and 2020 Urban Water Management Plan.

- **Water distribution:** related projects that will connect to the same ALW water mains as the proposed project.
- **Wastewater treatment:** A.K. Warren Water Resource Facility cumulative demand based on related projects.
- **Wastewater conveyance:** related projects that will connect to the same sewer mains as the proposed project
- **Stormwater drainage:** based on the Lower San Gabriel watershed boundary and hydrology report per the requirements of Los Angeles County Hydrology Manual and future project compliance with the NPDES MS4 permit
- **Solid Waste:** Cumulative analysis based on remaining and projected landfill capacity for the El Sobrante and Olinda Alpha landfills that would serve the project.
- **Natural gas and electricity:** respective service boundaries for the Southern California Gas Company and southern California Edison and the demand projects for these providers.

Please refer to Chapter 5, *Environmental Analysis*, of this DEIR for a discussion of the cumulative impacts for each environmental resource area.

REFERENCES

City of Azusa, 2026 (accessed), Development Projects, https://www.azusaca.gov/1969/Development-Projects.

City of Covina, 2026 (accessed), City of Covina Planning Projects, https://experience.arcgis.com/experience/cc095818a73842d39a01cc6b8ef0cc76/?draft=true, accessed January 8, 2026.

City of Duarte, September 2025, Current & Planned Major Development Project List, https://www.cityofduarte.ca.gov/home/showpublisheddocument/1754/638888852294470000

City of Irwindale, January 2026, Emai Correspondence with Brandi Jones.

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3.1 AESTHETICS

This section of the Draft Environmental Impact Report (DEIR) describes the existing landform and aesthetic character of the project site and surrounding area and describes views of the project site from surrounding areas. It also analyzes the potential aesthetic and visual impacts resulting from implementation of the Irwindale Brew Yard Specific Plan (proposed project).

During the NOP comment period (March 6, 2024, through April 12, 2024), one commenter raised concerns related to aesthetics, which were considered during preparation of this analysis. The County of Los Angeles Department of Parks and Recreation, in a letter dated March 12, 2024, requested that the project include cinder-block walls and landscaping such as ivy-covered walls, green rooftops, and more trees. NOP and scoping meeting comments are included as Appendix A to this DEIR.

3.1.1 Regulatory Framework

STATE

California Scenic Highway Program

California's Scenic Highway Program was created by the Legislature in 1963 to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to highways. The State laws governing the Scenic Highway Program are found in the Streets and Highways Code Section 260 et seq. The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been so designated. These highways are identified in Section 263 of the Streets and Highways Code. A list of California's scenic highways and a map showing their locations may be obtained from the California Department of Transportation's Scenic Highway Coordinators website (Caltrans 2025).

California Building Code

The State of California provides a minimum standard for building design through Title 24, Part 2, of the California Code of Regulations, commonly referred to as the California Building Code (CBC). The CBC is updated every three years. It applies to the design, construction, use, occupancy, location, and maintenance of all buildings and structures, as well as certain equipment, to safeguard life, health, property, and public welfare. It sets minimum standards for fire/life safety, structural safety, energy efficiency, and accessibility, covering everything from new construction to existing premises and their facilities. Once adopted, it automatically applies throughout the state. Local jurisdictions may adopt ordinances with building standards that are more restrictive than the CBC based on local climatic, geological, or topographical conditions. The CBC includes standards for outdoor lighting that are intended to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.

The California Building Standards Commission adopted the California Green Building Standards Code, also known as CALGreen. CALGreen is part of the Building Standards Code, Part 11 of Title 24 of the California Code of Regulations. CALGreen establishes building standards aimed at enhancing the design and construction of buildings using building concepts that reduce negative impacts and increase positive environmental impacts by encouraging sustainable construction practices. Specifically, Section 5.106.8, Light Pollution Reduction, establishes backlight, uplight, and glare ratings to minimize the effects of light pollution for nonresidential development. The local building permit process enforces the mandatory provisions of CALGreen.

Assembly Bill 98 – Planning and Zoning: logistics use: truck routes

California's AB 98 (as amended by SB 415) sets statewide design standards for new/expanded logistics warehouses (>= 250k sq ft or near sensitive receptors) starting January 1, 2026, focusing on community and environment, requiring arterial road access, truck routing, significant buffers (50-ft to 500-ft setback for loading bays from receptors), separate truck entrances, EV infrastructure, air quality monitoring, and zero-emission equipment mandates to reduce impacts from truck traffic, noise, and pollution near homes/schools. Although the design standards became effective January 1, 2026, projects for which local entitlement applications were filed before September 30, 2024, are exempt from these requirements. The proposed Specific Plan is exempt from these requirements.

LOCAL

City of Irwindale General Plan

The City of Irwindale General Plan Community Development Element policies are applicable to the proposed project:

- **Community Development Element Policy 3**. The City of Irwindale will continue to ensure that the type, location, and intensity of all new development and intensified developments adhere to the requirements that are specified for their particular land use category in the General Plan.
- **Community Development Element 12**. The City of Irwindale will continue to promote quality design in the review and approval of commercial and industrial development through the application of the commercial and industrial design guidelines.
- **Community Development Element Policy 13**. The City of Irwindale will continue to employ a design theme in the review of future commercial and industrial development and in the rehabilitation of existing commercial and industrial uses. (City of Irwindale 2020)

City of Irwindale Municipal Code

The City of Irwindale Municipal Code sections applicable to the proposed project site and pertaining to the topic of aesthetics include, but are not limited to the following:

Site Plan and Design Review: Municipal Code Section 17.27.010 establishes:

> that new development supports the goals and objectives of the General Plan and other adopted plans and guidelines. The specific purposes of the Site Plan and Design Review process are to:
>
> A. Promote excellence in site planning and design and the harmonious appearance of buildings and sites;
>
> B. Ensure that new and modified uses and development will be compatible with the existing and potential development of the surrounding area; and
>
> C. Supplement other City regulations and standards to ensure control of aspects of site planning and design that are not otherwise addressed.

Municipal Code Section 17.20.050 establishes development and operational standards for billboards, including digital billboards. Applicable standards address billboard location, height, design, illumination, landscaping, maintenance, and compliance with applicable federal, state, and local laws. Digital billboards must comply with California Department of Transportation (Caltrans) Outdoor Advertising Division requirements including applicable approvals, and the Highway Beautification Act, the Outdoor Advertising Act, and implementing regulations, as applicable. Additional project-specific requirements for future digital billboards may also be established through the Development Agreement required for each new or replacement digital billboard.

City of Irwindale Commercial and Industrial Design Guidelines

The purpose of the City of Irwindale Commercial and Industrial Design Guidelines is to ensure the successful integration of commercial and industrial projects with the goal of contributing to an aesthetically and functionally cohesive community. These guidelines form the basis and criteria for the evaluation of plans and specifications submitted for review and approval to the City of Irwindale. Developers are required to follow all provisions of these guidelines as applicable to their specific project. In addition to the provisions of these guidelines, all regulations, requirements, standards, and specifications of the City of Irwindale also apply and take precedence over the guidelines (Irwindale 2009).

3.1.2 Existing Conditions

EXISTING VISUAL SETTING AND CHARACTER

The project site encompasses approximately 150.1 acres in the northern portion of Irwindale in the central San Gabriel Valley. The site is in a generally flat, urbanized portion of the City of Irwindale, south of the San Gabriel Mountains and north of the Puente Hills. The San Gabriel

River traverses the city northeast to southwest and contributes to the broader regional visual context. The project site is bounded by Interstate 210 (I-210) to the north, Irwindale Avenue to the east, First Street to the south, and the Santa Fe Dam Recreation Area to the west and is immediately adjacent to the Irwindale Brew Yard facility at 15801 First Street. The site itself is characterized by large expanses of disturbed and paved land, rail corridors, utility infrastructure associated with historic industrial and logistics-related uses, and two former quarry pits in the northwest and southeast portions of the project site. Figures 2-5a and 2-5b, *Site Photos*, depict many of these on-site features.

As shown in Figure 3.1-1, *Proposed Project Rendering Locations, Vantage Points, and Surrounding Land Uses*, and Figure 3.1-2, *Views from Vantage Points*, the surrounding visual environment is dominated by industrial development, transportation infrastructure, and utility features, with recreational open space to the west. To the north, the project site is bordered by multiple rail lines, electrical transmission facilities, and the I-210 freeway corridor; industrial and vacant lands associated with mining and aggregate processing are beyond the freeway; and the San Gabriel Mountains are visible in the distance and provide a regional backdrop. To the east, Irwindale Avenue functions as a major arterial roadway and is characterized by bus stops, rail-related facilities, transmission lines, and parking associated with the Irwindale A Line station, with heavy and light manufacturing uses and rail infrastructure across the roadway and extending farther east into Azusa. South of the site, First Street separates the project site from additional industrial uses, rail easements, and portions of the Santa Fe Dam Recreation Area, including trail facilities such as the San Gabriel River Trail; the Santa Fe Reservoir is about half a mile south, and Arrow Highway is about a mile south. To the west, the site abuts the Santa Fe Dam Recreation Area, a large regional open-space area that includes trails, water features, and naturalized landscape areas, with I-605, electrical transmission towers, and the RC Airplane Airport at Santa Fe Dam Irwindale visible farther west.

Overall, the existing visual character of the project vicinity is defined by large-scale industrial uses, freeway and rail infrastructure, utility corridors, and adjacent recreational open space, with distant mountain views serving as a secondary visual backdrop rather than a dominant scenic feature.

EXISTING PHYSICAL SITE CONDITIONS

As shown on Figure 3.1-1, the 150-acre project site is dominated by two large, excavated fallow sand and gravel quarries in the northwestern and southeastern areas of the project site and a surface parking lot.



Source: Nearmap 2025.

Figure 3.1-1

Proposed Project Rendering Locations, Vantage Points, and Surrounding Land Uses

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Photo 1 – View from the south end of the proposed project site facing north, overlooking the project site and the San Gabriel Mountains in the distance.



Photo 2 – View from within the proposed project site, facing west, overlooking a parking lot and the truck parking area.



Photo 3 – View from the east end of the proposed project site facing north, overlooking the existing brewery facility to the north of the proposed project site, with the San Gabriel Mountains in the distance.



Photo 4 – View from the east end of the proposed project site facing west, overlooking a quarry and the existing brewery facility, with the San Gabriel Mountains in the distance.



Photo 5 – View from the south end of the proposed project site end looking north, overlooking the solar panels within the project site, with the San Gabriel Mountains in the distance.



Photo 6 – View from the south end of the project site looking east, showing the existing railroad track and foliage within the proposed project site.

Source: PlaceWorks 2025.

Figure 3.1-2
Views from Vantage Points

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The project site is bounded by railroad tracks to the north and Irwindale Avenue, an adjacent property, and First Street to the south. A trailer storage lot and a decommissioned solar generation facility sit alongside the two former quarries in the northwest and southeast, respectively. The project site's topography slopes gently from north to south. The decommissioned solar panel array covers approximately eight acres in Planning Area 1 of the Specific Plan and was constructed circa 2014. There are no fixed structures on the project site aside from the security facility.

The project site is bounded by the I-210 freeway and existing railroad tracks to the north, the Irwindale Light Rail Station to the northeast, and light industrial/distribution uses across Irwindale Avenue to the east. To the south, it is bounded by First Street and existing light industrial uses (see Figure 3.1-1). The project site is in the San Gabriel River Watershed, with an existing culvert near the northwest corner discharging runoff into the project site from the freeway and from the property immediately north of the freeway.

Landform

The San Gabriel Mountains are roughly three miles north of the project site and rise to an elevation of approximately 10,000 feet above mean sea level. Views of the San Gabriel Mountains are visible from the project site and from the parts of Irwindale Avenue, First Street, and I-210 that abut the project site. As illustrated in Figure 3.1-2, views of the San Gabriel Mountains from the project site and adjacent public viewpoints are distant and partially obstructed by existing infrastructure, industrial buildings, vegetation, and freeway facilities. Also, the Puente Hills are approximately eight miles south of the project site. Partial, distant views of the Puente Hills are available looking south from various viewpoints on the project site.

Scenic Vistas and Corridors

According to the Irwindale General Plan, there are no designated scenic corridors or vistas in the city (Irwindale 2020).

Light and Glare

Under existing conditions, the project site contains flood lights over the parking lot in Planning Area 1. The rest of the project site contains no lighting. During the daytime, parked cars in the parking lot and the now-decommissioned solar panels in Planning Area 1 could be sources of glare. In addition, vehicles traveling through the project site to access the existing Brew Yard facility generate temporary nighttime light from vehicle headlights that may be locally visible.

3.1.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that, "except as provided in Public Resources Code Section 21099," the proposed project would result in a significant aesthetic impact if it 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, would the project conflict with applicable zoning and other regulations governing scenic quality.

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

3.1.4 Applicable Specific Plan Development Standards and Design Guidelines

DEVELOPMENT STANDARDS

Development standards are detailed in Chapter 3 of the Brew Yard Specific Plan, included as Appendix B to this DEIR. The Specific Plan would govern buildout and operation of the proposed project. Table 3-2, Industrial Uses Development Standards, and Table 3-3, Commercial Uses Development Standards, describe site requirements, including lot size, setbacks, building heights, and parking and height requirements. Sections 3.6 through 3.9 of the Specific Plan detail additional standards that would inform the aesthetic character of the proposed project, such as for parking, walls and fences, signage, and lighting.

DESIGN GUIDELINES

Design guidelines are detailed in Chapter 4 of the Specific Plan and are aimed at promoting the quality of development envisioned for the project area. That chapter addresses both architectural and landscape design guidelines and provides design guidelines that establish functional and visual quality for future development in the plan area. The Specific Plan also provides recommendations to achieve a cohesive and uniform quality, character, and design;

encourage sustainable practices; and create simple building designs that result in efficient use of space.

The following Design Guidelines in the Specific Plan are applicable to aesthetics.

Lighting and Security

Lighting within the public right-of-way shall adhere to applicable City of Irwindale requirements. Lighting within the Specific Plan area provides aesthetic appeal, enhances safe pedestrian and vehicular circulation, and adds to plan area security.

Digital billboards shall comply with applicable Caltrans Outdoor Advertising Division requirements, including applicable approvals, and the Highway Beautification Act, the California Outdoor Advertising Act, and implementing regulations, as applicable. All other lighting on private property in the Specific Plan shall adhere to the following guidelines.

- Minimize glare and "spill over" light onto public streets and adjacent properties by using downward-directed lights and/or cutoff devises on outdoor lighting fixtures, including spotlights, floodlights, electrical reflectors, and other means of illumination for signs, structures, parking, loading, unloading and similar areas. Where desired, illuminate trees and other landscape features by concealed up light fixtures. Limit light spillover or trespass to one-quarter foot-candle or less, measured from within five feet of any adjacent property line.
- Select all lighting fixtures used in the Specific Plan area from the same—or complementary—family of fixtures with respect to design, materials, fixture color and light color.
- Lights should be unbreakable plastic, recessed or otherwise designed to reduce the problems associated with damage and replacement of fixtures.
- Neon and similar type of lighting are prohibited in all areas within the Specific Plan area. The only exception is Planning Area 2 developed with commercial uses where lighting may be located in storefront windows or in signs consistent with the intended signage design or corporate or brand logos.
- Locate all electrical meter pedestals and light switch/control equipment in areas with minimum public visibility or screen them with appropriate plant materials.
- Illuminate parking lots, loading dock areas, pedestrian walkways, building entrances, and public sidewalks to the level necessary for building operation and security reasons. Dimmers and motion detectors are permitted.
- Along sidewalks and walkways, the use of low mounted fixtures (ground or bollard height), which reinforce the pedestrian scale, are encouraged.
- Use exterior lights to accent entrances, plazas, activity areas, and special features.
- Provide for illumination intensity during hours of darkness as follows:

- To illuminate parking lots or parking structures and their pedestrian links that provide more than five parking spaces for use by the general public, provide a minimum coverage of one foot-candle of light with a maximum of eight foot-candles on the parking or walkway surface, unless otherwise approved by the City of Irwindale for visibility and security.
- To illuminate aisles and passageways within a building complex, provide a maximum of one-half to one foot-candle of maintained lighting.
- High Pressure Sodium (HPS) light fixtures are prohibited for site lighting.
- Street lighting on Private Drives shall be designed in accordance with the City of Irwindale requirements and Los Angeles County Department of Public Works Street Lighting Design Guidelines.

3.1.5 Project Impact Analysis

a) Would the project have a substantial adverse effect on a scenic vista?

CONSTRUCTION

Construction activities would be within the hours permitted by the City of Irwindale (7:00 am to 7:00 pm Monday through Saturday) and in accordance with applicable municipal regulations, per Irwindale Municipal Code (IMC) Subsection 9.28.110(B). Construction would be primarily within the project site, with limited off-site improvements, such as roadway and utility infrastructure improvements, in adjacent public rights-of-way as needed to serve the proposed project, and would involve the intermittent use of construction equipment depending on construction phase and activity. Prior to commencement of construction activities, temporary fencing would be installed around active construction areas.

As described in detail in Chapter 2, *Project Description*, the proposed project would be constructed over an extended period, with multiple phases, including quarry filling, site infrastructure installation, and vertical construction. Quarry filling activities alone are anticipated to take about four years, and subsequent infrastructure and building construction phases would extend construction activities over multiple years. Construction would involve the use of numerous pieces of heavy equipment on-site and, where applicable, within adjacent public rights-of-way for off-site improvement work, including dozers, excavators, loaders, off-highway trucks, scrapers, cranes, and paving equipment.

Screening of construction activities would be required to comply with the Irwindale Municipal Code, including Chapter 9.28, Noise Regulation; Chapter 8.24, Fences, Walls, and Hedges; and Chapter 15.04, Grading Code, as well as conditions of approval imposed through the City's grading and building permit processes.

Construction activities for large-scale grading and quarry fill operations would import approximately 8 million cubic yards of material to fill the depleted quarry pits. These activities would substantially modify on-site landforms. However, the quarry pits are in a previously disturbed industrial landscape and are not identified as scenic landforms or scenic vistas. The fill operations would take place within the confines of the existing quarry footprints—fully within the project site—and would restore the site to a grade consistent with surrounding development.

Construction-related visual effects would be temporary over the duration of construction described above. Construction activities would be partially screened from off-site viewpoints by temporary fencing, existing vegetation, topography, and intervening development. Construction activities would not require permanent nighttime lighting.

Screening of construction activities would be required to comply with applicable provisions of the Irwindale Municipal Code, including requirements for temporary construction fencing, screening, and site security, as well as any conditions of approval imposed by the City to minimize visual exposure of construction activities from adjacent public rights-of-way.

Though construction would modify the landform, these changes would not obstruct or degrade views of any designated scenic vista available to the public. Construction would be temporary and would not result in long-term obstruction of public views of a scenic vista. Accordingly, construction-related impacts to scenic vistas would be **less than significant**.

OPERATION

Operation of the proposed project would introduce new industrial and commercial development, including buildings, circulation features, landscaping, and associated infrastructure consistent with the Specific Plan. The assessment below considers whether the proposed project would substantially obstruct or degrade public views of scenic vistas from publicly accessible vantage points.

Recreational Trails and Open Space Areas

Publicly accessible recreational areas in the project vicinity include the Santa Fe Dam Recreation Area and its associated bicycle and pedestrian trail system. Views from the San Gabriel River Trail adjacent to the project site would be altered by project implementation because existing open or sparsely developed quarry areas would be replaced with industrial buildings and landscaped setbacks. As shown in Figure 3.1-3a through Figure 3.1-3e, *Proposed Project Renderings*, the proposed project would be visible from portions of the San Gabriel River Trail.

While these views would change, the affected viewpoints do not currently provide views of designated scenic vistas or unique scenic resources that may be considered a scenic vista. Existing views from the San Gabriel River Trail include distant views of the San Gabriel

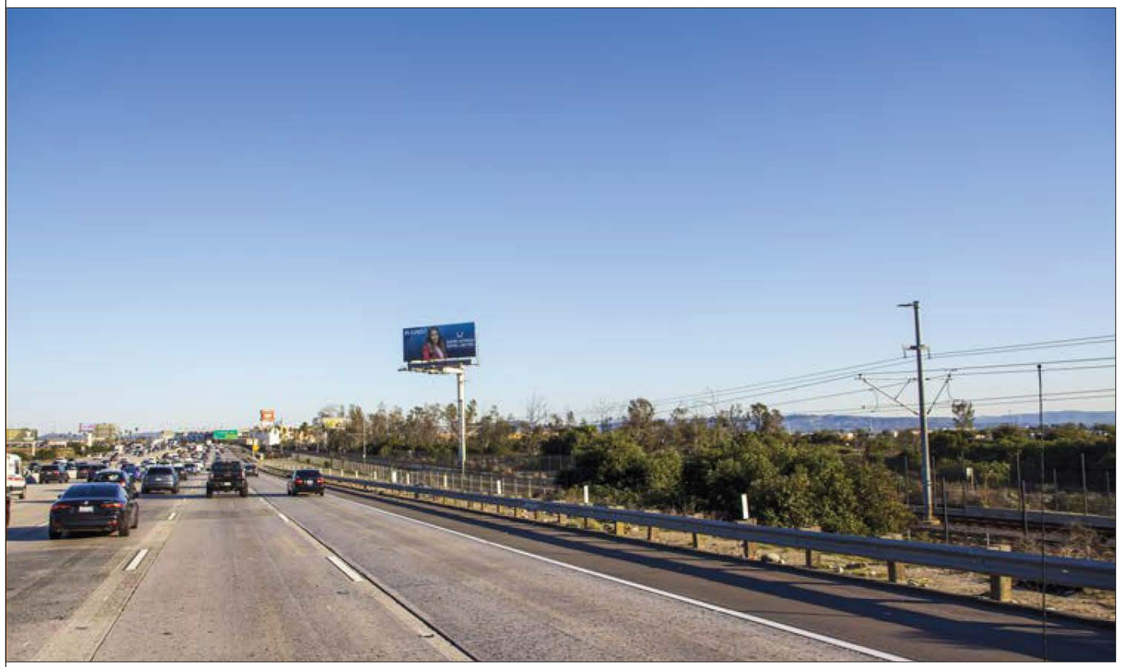
Mountains, quarry pits, industrial facilities, freeway infrastructure, and utility features. The visual character of the area is already influenced by large-scale industrial development. As reflected in Figure 3.1-3b, *Proposed Project Renderings*, bike trails within the Santa Fe Dam Recreation Area provide distant views of the San Gabriel Mountains.

As used in this analysis, the term "scenic vista" generally refers to visual access to or the visibility of a particular sight from a given vantage point or corridor. The subjects of valued or recognized views may be focal (meaning specific individual resources) or panoramic (meaning broad geographic area). The nature of a view may be unique, such as a view from an elevated vantage point or particular angle. Existing views may be focused on a single feature, such as a building or garden, or encompass a broad field of view, such as ocean/coastal views, distant mountain range, or hilltop ridgelines.

The background view of the San Gabriel Mountains represents scenic resources and thus is conservatively treated as a scenic vista. As illustrated in Figure 3.1-3b, the corner of Building 1 would be intermittently visible from the bike trail and would partially block individual background views of the San Gabriel Mountains from select viewing angles. However, in the few instances where the proposed buildings would be visible, this view is already partially blocked by vegetation and industrial development (including the existing Irwindale Brew Yard and related signage). While the proposed buildings would be visible and would partially block background views of the San Gabriel Mountains, the vast majority of the distant panoramic view would remain visible from the bike trails and other public vantage points. Therefore, when viewed as a whole, the proposed buildings would not obstruct overall views of surrounding mountain ranges or other prominent scenic landforms and would include landscaping along the project perimeter that would, over time, soften views from the San Gabriel River Trail.

Roadway and Regional Views

Views of the project site from surrounding roadways, including First Street, Irwindale Avenue, and I-210, are already dominated by transportation infrastructure, industrial uses, and commercial uses. As shown in the site renderings in Figure 3.1-3a through Figure 3.1-3e, and the rendering locations identified on Figure 3.1-1, the proposed project would replace existing disturbed conditions and quarries with cohesive building forms and landscaped frontage. The proposed project would not occupy a ridgeline or elevated landform and would not substantially alter regional viewsheds or block views of scenic vistas.



A Existing View



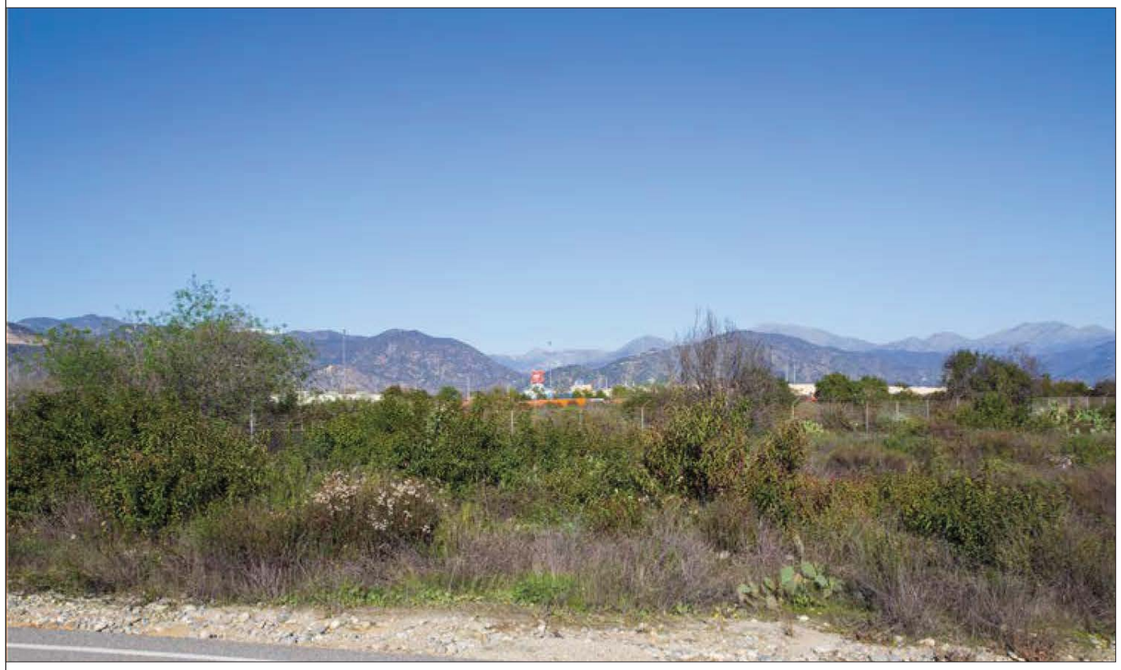
A Proposed View

I-210 East Foothill Freeway: This vehicular view travels eastbound in the second land from the shoulder, capturing the entire site, which includes Buildings 1, 4, and 5. These structures stand at a **height of 70 feet** and feature **mature landscaping**. The photograph was taken at approximately 3:00 PM under clear skies, using a 17mm focal length to frame the view.

Source: Ripple Creative 2025.

Figure 3.1-3a
Proposed Project Renderings

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B Existing View



B Proposed View

Santa Fe Recreation Area: This pedestrian view looks northeastern from the shoulder of a bike trail within the Santa Fe Dam Recreational Area, capturing the corner of Building 1, which stands at a **height of 70 feet** and feature **mature landscaping**. The photograph was taken at approximately 2:00 PM under clear skies, using a 20mm focal length to frame the view.

Source: Ripple Creative 2025.

Figure 3.1-3b
Proposed Project Renderings

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C Existing View



C Proposed View

West 1st Street: This pedestrian view looks west on 1st Street from the sidewalk on the south side near the intersection of Irwindale Avenue and 1st Street, capturing Buildings 1, 2, and 3, which stand at a **height of 70 feet** and feature **mature landscaping**. The photograph was taken at approximately 2:00 PM under clear skies, using a 17mm focal length to frame the view.

Source: Ripple Creative 2025.

Figure 3.1-3c
Proposed Project Renderings

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D Existing View



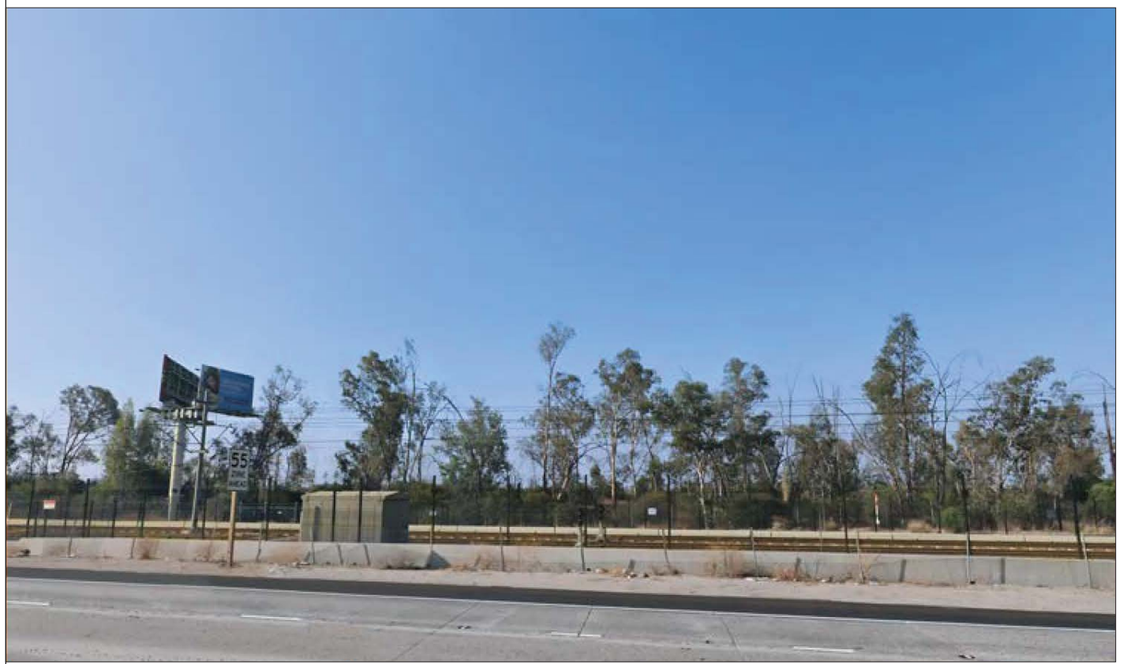
D Proposed View

Irwindale Avenue: This view faces northwest from the pedestrian sidewalk on Irwindale Avenue, capturing Building 3, which stands at a **height of 70 feet** and feature **mature landscaping**. The photograph was taken at approximately 1:30 PM under clear skies, using a 17mm focal length to frame the view.

Source: Ripple Creative 2025.

Figure 3.1-3d
Proposed Project Renderings

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E Existing View



E Proposed View

I-210 East Foothill Freeway: This vehicular view captures a perpendicular perspective of Building 5 from the eastbound inside lane of the I-210 Foothill Freeway. The building stands at a **height of 70 feet** and feature **mature landscaping**. The photograph was taken at approximately 11:00 AM under clear skies, using a 25mm focal length to frame the view.

Source: Ripple Creative 2025.

Figure 3.1-3e
Proposed Project Renderings

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The San Gabriel Mountains form a prominent regional visual resource and scenic backdrop for the project area and surrounding communities. The mountains are north of the project site, beyond the I-210 freeway, and rise to elevations exceeding 6,000 feet above mean sea level, substantially taller than the proposed project's maximum building height of up to 70 feet. Because the proposed buildings would be constructed on a previously excavated quarry site and would not extend above surrounding developed areas, they would remain visually subordinate to the mountain backdrop when viewed from public roadways and other publicly accessible vantage points.

Although the proposed project would introduce new built form and result in noticeable visual change from certain recreational viewpoints, it would not eliminate public views of designated scenic vistas, physically alter scenic landforms, or substantially degrade the quality of public views from publicly accessible vantage points. Although the City of Irwindale General Plan does not identify designated scenic vistas in the project area, this analysis considers publicly accessible views of regional visual features, including the San Gabriel Mountains, from nearby roadways, trails, and recreational areas. Views of the San Gabriel Mountains above and beyond the proposed development would—with the exception of intermittent viewing angles as described above and shown in Figure 3.1-3b—remain available for motorists, pedestrians, and trail users along nearby roadways and regional circulation routes. Therefore, the proposed project would result in a **less than significant** impact regarding effects on a scenic vista.

Significance without Mitigation: Less than significant.

b) Would the project substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

According to the California Department of Transportation Scenic Highway System Map, there are no state scenic highways in or near the City of Irwindale (Caltrans 2025). The closest officially designated state scenic highway to the project site is the segment of State Route 2 (SR-2) between SR-138 and I-210, about 11.5 miles north of the project site. The nearest eligible state scenic highway to the project site is the segment of SR-39 between I-210 and SR-2 approximately 3.6 miles east of the project site. Additionally, according to the Irwindale General Plan, there are no scenic corridors near the project site. Due to the distance as well as the intervening development, landscaping, and topography, the proposed project's development features would not be visible from the segments of SR-2 and SR-39 that are designated/eligible state scenic highways. Further, the proposed project would not affect any trees, rock outcroppings, or historic buildings visible within a state scenic highway. Therefore, **no impact** would occur to scenic resources within a state scenic highway.

Significance without Mitigation: No Impact.

c) In nonurbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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 in an urbanized area characterized by existing development, paved roadways, and established infrastructure. The project site lies within a U.S. Census urbanized area of the Southern California Association of Governments (SCAG) region (SCAG 2023). Because the project site is not in a nonurbanized area, the first part of this threshold (substantial degradation of public views in nonurbanized settings) does not apply.

Approval of the proposed Zone Change No. 01-2023 would replace the existing M-2 (Heavy Manufacturing) zoning designation with the Brew Yard Specific Plan zoning framework. The Specific Plan defines design and development standards that would regulate building form, height, massing, landscaping, lighting, and overall visual character. The proposed project would be subject to Site Plan and Design Review pursuant to Subsection 5.3.2, and the design guidelines in the Brew Yard Specific Plan, which establish standards for scale, architectural character, materials, site layout, landscaping, and visual compatibility with surrounding development (Irwindale 2020).

The proposed project would also be consistent with applicable City of Irwindale General Plan Community Development Element policies related to visual quality and design. Specifically, the proposed project would be consistent with Community Development Element Policy 3 because development within the project site would be in accordance with the land use framework and development standards established through the approved zoning and Specific Plan. The project would also be consistent with Community Development Element Policies 12 and 13, which promote quality commercial and industrial design and application of a consistent design theme, because the Specific Plan incorporates project-specific architectural and landscape design guidelines that would govern future development review and implementation.

The proposed improvements would not introduce features that conflict with these regulations or that would otherwise diminish the visual quality of publicly accessible viewpoints. Although the proposed project would transition the site from a largely undeveloped condition—trailer storage lot, decommissioned solar generation facility, and former quarry areas—to a developed industrial/business park and commercial use site, this change would occur within an established industrial and infrastructure-oriented urban context. Instead, the proposed project would maintain and enhance the established visual character of the surrounding urban environment through coordinated site planning, architectural design, and landscaping.

Compliance with the municipal code, and the Specific Plan's development standards and design guidelines would ensure that the proposed project does not conflict with regulations governing scenic quality.

Because the proposed project is in an urbanized area and complies with all zoning and design regulations governing scenic quality, it would not result in a conflict with applicable scenic-quality standards or degrade public views. Therefore, this impact would be **less than significant**.

Significance without Mitigation: Less than significant.

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

CONSTRUCTION

As described in Chapter 2, *Project Description*, overall project development would occur over an extended period in multiple phases. Quarry filling, infrastructure installation, and building construction would be sequential and are estimated to take approximately 65 months in total. Construction activities would be limited to the hours permitted by the City (7:00 am to 7:00 pm Monday through Saturday) and in accordance with applicable municipal regulations governing construction activities. Thus, the extensive use of portable temporary construction lighting would not be required. All construction and utility improvements would be entirely within the project site or within adjacent public rights-of-way and would not require new off-site utility corridors or construction areas beyond those already developed.

During construction, equipment such as backhoes, forklifts, skip loaders, and compaction rollers would be used intermittently, depending on construction phase and activity. Prior to commencement of construction activities, temporary fencing would be installed around active construction areas. Construction activities would primarily take place during daylight hours, and the use of extensive temporary nighttime lighting would be permitted only with prior authorization from the City of Irwindale. IMC Section 17.13.090 allows for exceptions to the outdoor lighting provisions of that section, such as IMC Subsection 17.13.090(d), Construction and Emergency Lighting, which states: "All construction or emergency lighting fixtures provided they are temporary and are discontinued immediately upon completion of the construction work or abatement of the emergency."

Construction activities at ground level would be largely obscured from off-site viewpoints by intervening fencing, existing development, vegetation, and topographic features. Visual effects associated with construction lighting, where needed for safety, would be temporary and short term. Accordingly, construction-related light and glare impacts would be **less than significant**.

OPERATION

Operation of the proposed project would introduce new exterior lighting to support building operations, internal circulation, parking areas, pedestrian pathways, and site security. Lighting would be typical of industrial and commercial development and would increase illumination on the project site compared to existing conditions; however, lighting levels would be consistent with the surrounding urban industrial context.

All exterior lighting would be subject to the City of Irwindale's exterior lighting requirements in the Specific Plan and IMC Chapter 17.20, Billboards, as applicable. The Specific Plan identifies billboards as a permitted use subject to compliance with IMC Chapter 17.20 and requires site development to undergo Site Plan Review. As part of Site Plan Review, a photometric study would be required to demonstrate compliance with applicable lighting standards. The City's Commercial and Industrial Design Guidelines further regulate fixture height, placement, and shielding to reduce off-site light impacts. The Specific Plan establishes performance-based lighting criteria intended to minimize glare, light trespass, and skyglow and emphasizes downward-directed and fully shielded fixtures, appropriate mounting heights, and site-specific illumination levels. The Specific Plan further requires outdoor lighting to minimize glare and spillover onto public streets and adjacent properties through the use of downward-directed fixtures and cutoff devices and limits light trespass to 0.25 foot-candle or less measured within five feet of an adjacent property line. Digital billboard lighting is required to conform to the Caltrans Outdoor Advertising Division requirements, including applicable approvals, and the Highway Beautification Act, the California Outdoor Advertising Act, and implementing regulations, as applicable. These standards are intended to reduce off-site visibility of lighting sources while maintaining safe and functional lighting conditions for industrial and commercial operations.

The project site is not adjacent to residential uses; however, the Santa Fe Dam Recreation Area is immediately west of the project site and includes open space and recreational uses that could be sensitive to off-site light spill. Surrounding land uses consist primarily of industrial, manufacturing, infrastructure, and recreational uses that already experience ambient nighttime lighting and regional skyglow typical of the San Gabriel Valley.

Potential light spill toward the Santa Fe Dam Recreation Area would be minimized through compliance with applicable City lighting requirements and Specific Plan lighting standards that require shielding, directional control, and performance-based lighting design to reduce glare, light trespass, and off-site visibility of lighting sources. Future development proposals would also be subject to Site Plan Review and preparation of a photometric study demonstrating compliance with applicable lighting standards. The Specific Plan limits light trespass to adjacent properties and requires digital billboard lighting to comply with applicable industry and Caltrans standards. In addition, the proposed lighting would be typical of industrial and commercial development in an already urbanized setting with existing ambient nighttime lighting

conditions. With compliance with applicable IMC requirements and design guidelines, operation of the proposed project would not introduce substantial light or glare that would adversely affect day or nighttime views in the project vicinity. Therefore, operational light and glare impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.1.6 Cumulative Impact Analysis

Would the project have a cumulative effect related to aesthetics?

SCENIC VISTA

The cumulative setting for scenic vista impacts includes the surrounding areas in Irwindale and adjacent portions of the San Gabriel Valley that are visible from shared public viewpoints, including First Street, Irwindale Avenue, Live Oak Avenue, Arrow Highway, and the I-210. The surrounding visual environment is characterized by industrial development, transportation infrastructure, utility corridors, rail lines, and disturbed lands associated with former quarry and extraction activities.

Several past, present, and reasonably foreseeable development projects are approved, under construction, or proposed in the vicinity of the project site, as identified in Table 4-1, *City of Irwindale Approved and Pending Projects Within Two Miles of the Proposed Project.* These include, but are not limited to, the Irwindale Gateway Specific Plan at 13620 Live Oak Lane; Speedway Commerce Center Specific Plan at 500 Speedway Drive; Reliance II Specific Plan; The Park at Live Oak industrial development along 16203 to 16233 Arrow Highway; and other industrial and commercial projects along Live Oak Avenue, First Street, and Azusa Canyon Road (Irwindale 2026). Collectively, these projects reflect continued redevelopment and intensification of industrial and employment-generating uses in an established urban-industrial context.

Although the San Gabriel Mountains form a prominent regional scenic backdrop, existing public views of the mountains are already intermittently obscured by freeway infrastructure, industrial buildings, rail facilities, utility features, and topography. None of the proposed or cumulative projects would introduce building heights or massing that exceed the scale typical of existing or planned industrial development in Irwindale, nor would they substantially obstruct long-range views of regional landforms from publicly accessible vantage points.

Accordingly, the proposed project, when considered in combination with other past, present, and reasonably foreseeable development projects in the surrounding area, would not result in the loss of a designated scenic vista or a substantial degradation of public views. Cumulative

scenic vista impacts would be less than significant, and the proposed project's contribution would not be cumulatively considerable.

SCENIC HIGHWAY

There are no State-designated scenic highways within or adjacent to the Specific Plan area. Development of the proposed project would not impact a designated scenic highway, and therefore, could not contribute to other projects to result in a cumulative impact related to scenic highways.

LIGHT AND GLARE

The cumulative setting for light and glare includes existing industrial facilities; roadway lighting along Irwindale Avenue, First Street, Live Oak Avenue, and Arrow Highway; freeway lighting along the I-210; rail-related lighting; and vehicle headlights. Portions of the Santa Fe Dam Recreation Area west of the project site are darker; however, existing lighting from nearby infrastructure, industrial uses, and transportation corridors are already present along the eastern edge of the recreation area.

Cumulative development in the surrounding area includes approved, under-construction, and proposed industrial and commercial projects. These projects would introduce additional exterior lighting typical of industrial and commercial uses; however, all such development is subject to municipal lighting regulations and project-specific development standards that require lighting to be designed, shielded, and oriented to minimize glare, light trespass, and skyglow.

With respect to daytime glare, cumulative development would consist primarily of buildings constructed with concrete, stucco, tilt-up panels, and other non-reflective materials, with limited glazing and metal accents used in accordance with the Specific Plan Development Standards and Design Guidelines, which regulate building materials, finishes, and reflectivity to minimize glare.

Given the urban-industrial character of the surrounding area, cumulative development would not result in a substantial increase in light or glare beyond existing conditions. These requirements prevent incremental increases in light spillover, glare, or skyglow as multiple projects are developed over time. Accordingly, cumulative light and glare impacts would be less than significant, and the proposed project's contribution would not be cumulatively considerable.

3.1.7 References

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3.2 AIR QUALITY

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for the Irwindale Brew Yard Specific Plan (proposed project) to impact air quality in a local and regional context. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (South Coast AQMD). The analysis focuses on air pollution from regional emissions and localized pollutant concentrations. In this section, "emissions" refers to the actual quantity of pollutant, measured in pounds per day (lbs./day), and "concentrations" refers to the amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million, parts per billion, or micrograms per cubic meter.

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

- *Irwindale Brew Yard Specific Plan Air Quality Analysis*, Urban Crossroads, June 1, 2026
- *Irwindale Brew Yard Specific Plan Construction and Operational Health Risk Assessment,* Urban Crossroads, June 1, 2026.

Complete copies of these studies are in the Technical Appendices to this Draft EIR as Appendices D and E, respectively.

During the Notice of Preparation public review period (March 6, 2024, through April 5, 2024) and the scoping meeting held on February 23, 2024, comments regarding health risk and air quality were received from the Coalition of Responsible Equitable Economic Development, the California Department of Justice, South Coast AQMD, and Fred Barbosa. The comments regarded minimizing air quality and health risks to the greatest extent possible, providing on-site infrastructure to support electric trucks, recommendations to use the South Coast AQMD's guidelines and the California Emissions Estimator Model (CalEEMod) to prepare the air quality analysis, and a request to identify potential air quality impacts from all phases of the proposed project (including overlapping construction and operational activities) and from indirect sources. These comments have been addressed below in Impacts 3.2 (a), (b), and (c).

TERMINOLOGY

The following are definitions for terms used throughout this section.

- **AAQS**: Ambient Air Quality Standards that define clean air, established to protect the health of sensitive communities.
- **CES**: CalEnviroScreen, a mapping tool that helps identify the California communities most affected by many sources of pollution, and where people are often especially vulnerable to pollution's effects.

- **Concentrations**: The amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter ($\mu g/m^3$).
- **Criteria Air Pollutants**: Those air pollutants specifically identified for control under the Federal Clean Air Act (currently six: carbon monoxide, nitrogen oxides, lead, sulfur oxides, ozone, and particulates).
- **DPM**: Diesel particulate matter, exhaust from trucks, buses, trains, ships, and other equipment with diesel engines, containing a mixture of gases and solid particles.
- **Emissions**: The actual quantity of pollutant, measured in pounds per day or tons per year.
- **ppm**: Parts per million.
- **Sensitive receptor**: Land uses that are considered more sensitive to air pollution compared to others due to the types of population groups or activities involved. These land uses include residential, retirement facilities, hospitals, and schools.
- **TAC**: Toxic air contaminant.
- **$\mu g/m^3$**: Micrograms per cubic meter.
- **VMT**: Vehicle miles traveled.

CRITERIA AIR POLLUTANTS

The pollutants emitted into the ambient air by stationary and mobile sources are categorized as primary and/or secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_X), sulfur dioxide (SO_2), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), and lead (Pb) are primary air pollutants. Of these, CO, SO_2, nitrogen dioxide (NO_2), PM_{10}, and $PM_{2.5}$ are "criteria air pollutants," which means that ambient air quality standards (AAQS) have been established for them. VOC and NO_X are criteria pollutant precursors that form secondary criteria air pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O_3) and NO_2 are the principal secondary pollutants.

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

- **Carbon Monoxide (CO)** is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. Carbon Monoxide is a primary criteria air pollutant. Carbon Monoxide concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion, engines and motor vehicles operating at slow speeds are the primary source of CO in the South Coast Air Basin (SoCAB). The highest ambient CO concentrations are generally found near traffic-congested corridors and intersections. The primary adverse health effect associated

with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation (South Coast AQMD 2005; USEPA 2025a). The SoCAB is designated as being in attainment under the California AAQS and attainment (serious maintenance) under the National AAQS (CARB 2023a).

- **Volatile Organic Compounds (VOC)** are composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of VOCs. Other sources include evaporative emissions from paints and solvents, asphalt paving, and household consumer products such as aerosols (South Coast AQMD 2005). There are no AAQS for VOCs. However, because they contribute to the formation of O_3, South Coast AQMD has established a significance threshold. The health effects for ozone are described later in this section.

- **Nitrogen Oxides (NO_X)** are a by-product of fuel combustion and contribute to the formation of ground-level O_3, PM_{10}, and $PM_{2.5}$. The two major forms of NO_X are nitric oxide (NO) and nitrogen dioxide (NO_2). Nitric oxide is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. The principal form of NO_X produced by combustion is NO, but NO reacts quickly with oxygen to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. Nitrogen dioxide is an acute irritant and more injurious than NO in equal concentrations. At atmospheric concentrations, however, NO_2 is only potentially irritating. Nitrogen dioxide absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. Nitrogen dioxide exposure concentrations near roadways are of particular concern for susceptible individuals, including asthmatics, children, and the elderly. Current scientific evidence links short-term NO_2 exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects, including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Also, studies show a connection between elevated short-term NO_2 concentrations and increased visits to emergency departments and hospital admissions for respiratory issues, especially asthma (South Coast AQMD 2005; USEPA 2025b). The SoCAB is designated in attainment (maintenance) under the National AAQS and attainment under the California AAQS (CARB 2023a).

- **Sulfur Dioxide (SO_2)** is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of burning high-sulfur-content fuel oils and coal and chemical processes at plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of SO_2. When sulfur dioxide forms sulfates (SO_4) in the atmosphere, together these pollutants are referred to as sulfur oxides (SO_X). Thus, SO_2 is both a primary and secondary criteria air pollutant. At sufficiently high concentrations, SO_2 may irritate the upper respiratory tract. Current scientific evidence links short-term exposures to SO_2, ranging from 5 minutes to 24 hours, with an array of adverse respiratory effects, including bronchoconstriction and increased asthma symptoms. These effects are particularly adverse for asthmatics at elevated ventilation rates (e.g., while

exercising or playing) at lower concentrations and when combined with particulates, SO_2 may do greater harm by injuring lung tissue. Studies also show a connection between short-term exposure and increased visits to emergency facilities and hospital admissions for respiratory illnesses, particularly in at-risk populations such as children, the elderly, and asthmatics (South Coast AQMD 2005; USEPA 2026). The SoCAB is designated as attainment under the California and National AAQS (CARB 2023a).

- **Suspended Particulate Matter (PM_{10} and $PM_{2.5}$)** consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized and regulated. Inhalable coarse particles, or PM_{10}, include particulate matter with an aerodynamic diameter of 10 microns or less (i.e., ≤0.01 millimeter). Inhalable fine particles, or $PM_{2.5}$, have an aerodynamic diameter of 2.5 microns or less (i.e., ≤0.002.5 millimeter). Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Both PM_{10} and $PM_{2.5}$ may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems. The US Environmental Protection Agency's (EPA) scientific review concluded that $PM_{2.5}$, which penetrates deeply into the lungs, is more likely than PM_{10} to contribute to health effects and at far lower concentrations. These health effects include premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms (e.g., irritation of the airways, coughing, or difficulty breathing) (South Coast AQMD 2005). There has been emerging evidence that ultrafine particulates, which are even smaller particulates with an aerodynamic diameter of <0.1 microns or less (i.e., ≤0.0001 millimeter) have human health implications because their toxic components may initiate or facilitate biological processes that may lead to adverse effects to the heart, lungs, and other organs (South Coast AQMD 2022). However, the EPA and the California Air Resources Board (CARB) have not adopted AAQS to regulate these particulates. Diesel particulate matter is classified by CARB as a carcinogen. Particulate matter can also cause environmental effects such as visibility impairment,[1] environmental damage,[2] and aesthetic damage[3] (South Coast AQMD 2005). The SoCAB is a nonattainment area for $PM_{2.5}$ under California and National AAQS and a nonattainment area for PM_{10} under the California AAQS (CARB 2023a).[4]

1 $PM_{2.5}$ is the main cause of reduced visibility (haze) in parts of the United States.
2 Particulate matter can be carried over long distances by wind and then settle on ground or water, making lakes and streams acidic; changing the nutrient balance in coastal waters and large river basins; depleting the nutrients in soil; damaging sensitive forests and farm crops; and affecting the diversity of ecosystems.
3 Particulate matter can stain and damage stone and other materials, including culturally important objects such as statues and monuments.
4 CARB approved the South Coast AQMD's request to redesignate the SoCAB from serious nonattainment for PM_{10} to attainment for PM_{10} under the National AAQS on March 25, 2010, because the SoCAB did not violate federal

- **Ozone (O_3)** is a key ingredient of "smog" and is a gas that is formed when VOCs and NO_X, both by-products of internal combustion engine exhaust, undergo photochemical reactions in sunlight. Ozone is a secondary criteria air pollutant. Ozone concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for its formation. Ozone poses a health threat to those who already suffer from respiratory diseases as well as to healthy people. Breathing O_3 can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level O_3 also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. Ozone also affects sensitive vegetation and ecosystems, including forests, parks, wildlife refuges, and wilderness areas. In particular, O_3 harms sensitive vegetation during the growing season (South Coast AQMD 2005; US EPA 2025c). The SoCAB is designated nonattainment under the California AAQS (1-hour and 8-hour) and National AAQS (8-hour) (CARB 2023a).

- **Lead (Pb)** is a metal found naturally in the environment as well as in manufactured products. Once taken into the body, lead distributes throughout the body in the blood and accumulates in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The effects of lead most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ (South Coast AQMD 2005; USEPA 2025d). The major sources of lead emissions have historically been mobile and industrial sources. As a result of the EPA's regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector dramatically declined by 95 percent between 1980 and 1999, and levels of lead in the air decreased by 94 percent between 1980 and 1999. Today, the highest levels of lead in air are usually found near lead smelters. The major sources of lead emissions today are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. However, in 2008 the EPA and CARB adopted more strict lead standards, and special monitoring sites immediately downwind of lead sources recorded very localized violations of the new State and federal standards.[5]

24-hour PM_{10} standards from 2004 to 2007. The EPA approved the State of California's request to redesignate the South Coast PM_{10} nonattainment area to attainment of the PM_{10} National AAQS, effective on July 26, 2013.

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

Table 3.2-1, *Criteria Air Pollutant Health Effects Summary*, summarizes the potential health effects associated with the criteria air pollutants.

Table 3.2-1 Criteria Air Pollutant Health Effects Summary

Pollutant	Health Effects	Examples of Sources
Carbon Monoxide (CO)	▪ Chest pain in heart patients ▪ Headaches, nausea ▪ Reduced mental alertness ▪ Death at very high levels	Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves
Ozone (O_3)	▪ Cough, chest tightness ▪ Difficulty taking a deep breath ▪ Worsened asthma symptoms ▪ Lung inflammation	Atmospheric reaction of organic gases with nitrogen oxides in sunlight
Nitrogen Dioxide (NO_2)	▪ Increased response to allergens ▪ Aggravation of respiratory illness	Same as carbon monoxide sources
Particulate Matter (PM_{10} and $PM_{2.5}$)	▪ Hospitalizations for worsened heart diseases ▪ Emergency room visits for asthma ▪ Premature death	Cars and trucks (particularly diesels) Fireplaces and woodstoves Windblown dust from overlays, agriculture, and construction
Sulfur Dioxide (SO_2)	▪ Aggravation of respiratory disease (e.g., asthma and emphysema) ▪ Reduced lung function	Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, and industrial processes
Lead (Pb)	▪ Behavioral and learning disabilities in children ▪ Nervous system impairment	Mobile and industrial source emissions

Source: CARB 2026.

ADDITIONAL POLLUTANTS

The South Coast AQMD's primary focus is to achieve the National and California AAQS for criteria pollutants. However, it also has a broader mandate to control emissions of air contaminants and safeguard public health. As a result, South Coast AQMD regulates additional pollutants beyond criteria pollutants, including reactive organic gases (ROGs), VOCs, and odors. These additional pollutants are further described below.

- Exceptions to the VOC designation include CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The terms VOC and ROG (see below) interchangeably.

- **Reactive Organic Compounds (ROG).** Similar to VOC, ROGs are also precursors in forming O_3 and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and NO_X react in the presence of sunlight. ROGs are criteria pollutants since they are a precursor to O_3, which is a criteria pollutant. The terms ROG and VOC are interchangeable.

- **Odor**. Odor means the perception experienced by a person when one or more chemical substances in the air come into contact with the human olfactory nerves.

TOXIC AIR CONTAMINANTS

CARB has identified other air pollutants as toxic air contaminants (TAC), which are pollutants that may cause serious, long-term effects. Main sources of outdoor TACs include emissions from stationary sources (e.g., factories, refineries, powerplants) and mobile sources e.g., cars, trucks, buses) (USEPA 2018). For indoor TACs, the main sources include building materials (e.g., asbestos) and chemicals like solvents. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2021b). By the last update to the TAC list in December 1999, CARB had designated 244 compounds as TACs (CARB 1999). Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. There are no air quality standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most relevant to the proposed project being particulate matter from diesel-fueled engines.

Diesel Particulate Matter

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

3.2.1 Regulatory Framework

Ambient air quality standards have been adopted at the State and federal levels for criteria air pollutants. In addition, both the State and federal government regulate the release of TACs. The proposed project is in the SoCAB and is subject to the rules and regulations imposed by the South Coast AQMD as well as the California AAQS adopted by CARB and National AAQS adopted by the EPA. Federal, State, and regional laws, regulations, plans, or guidelines that are potentially applicable to the proposed project are summarized in this section.

FEDERAL AND STATE

Ambient Air Quality Standards

The Clean Air Act was passed in 1963 by the US Congress and has been amended several times. The 1970 Clean Air Act amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National AAQS and the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States. The Clean Air Act allows states to adopt more stringent standards or to include other pollution species. The California Clean Air Act, signed into law in 1988, requires all areas of the state to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS.

These National and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect "sensitive receptors" most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both California and the federal government have established health-based AAQS for seven air pollutants. As shown in Table 3.2-2, *Ambient Air Quality Standards for Criteria Pollutants*, these pollutants are O_3, NO_2, CO, SO_2, PM_{10}, $PM_{2.5}$, and Pb. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

Table 3.2-2 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard[1]	Federal Primary Standard[2]	Major Pollutant Sources
Ozone (O_3)[3]	1 hour	0.09 ppm	*	Motor vehicles, paints, coatings, and solvents.
	8 hours	0.070 ppm	0.070 ppm	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm	
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm	0.100 ppm	
Sulfur Dioxide (SO_2)[4]	Annual Arithmetic Mean	*	0.010 ppm	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	0.075 ppm	
	24 hours	0.04 ppm	*	
Respirable Coarse Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 µg/m^3	*	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	50 µg/m^3	150 µg/m^3	
Respirable Fine Particulate Matter ($PM_{2.5}$)[5,6]	Annual Arithmetic Mean	12 µg/m^3	9 µg/m^3	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	*	35 µg/m^3	

Table 3.2-2 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard[1]	Federal Primary Standard[2]	Major Pollutant Sources
Lead (Pb)	30-Day Average	1.5 µg/m^3	*	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarter	*	1.5 µg/m^3	
	Rolling 3-Month Average	*	0.15 µg/m^3	
Sulfates (SO_4)[7]	24 hours	25 µg/m^3	*	Industrial processes.
Visibility Reducing Particles	8 hours	ExCo =0.23/km visibility of 10≥ miles	No Federal Standard	Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt.
Hydrogen Sulfide	1 hour	0.03 ppm	No Federal Standard	Hydrogen sulfide (H_2S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation.
Vinyl Chloride	24 hours	0.01 ppm	No Federal Standard	Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl

Table 3.2-2 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard[1]	Federal Primary Standard[2]	Major Pollutant Sources
				chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.

Source: CARB 2023b.

Notes: ppm: parts per million; µg/m^3: micrograms per cubic meter

* Standard has not been established for this pollutant/duration by this entity.

1. California standards for O_3, CO (except 8-hour Lake Tahoe), SO2 (1 and 24 hour), NO_2, and particulate matter (PM10, PM2.5, and visibility-reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California AAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than O_3, PM, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

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

4. On December 27, 2024, the secondary annual SO2 standard was revised to an annual average, averaged over three consecutive years, with a level of 10 parts per billion (ppb).

5. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15 µg/m^3. The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

6. On February 7, 2024, the national annual PM2.5 standard was lowered from 12 µg/m^3 to 9 µg/m^3. The existing national 24-hour PM2.5 standards (primary and secondary), secondary annual PM2.5 standard, and PM10 standards (primary and secondary) were retained.

7. On June 2, 2010, a new 1-hour SO2 standard was established and the existing 24-hour and annual primary standards were revoked. The 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

FEDERAL

United States Environmental Protection Agency

The EPA is responsible for setting and enforcing the National AAQS for O_3, CO, NO_X, SO_2, PM_{10}, $PM_{2.5}$, and Pb. The EPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside state waters (outer continental shelf). The EPA also establishes emission standards for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission requirements of CARB.

The CAA was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes the federal air quality standards, the National AAQS, and specifies future dates for achieving compliance. The CAA also mandates that states submit and implement a State Implementation Plan for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the National AAQS require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones.

The sections of the CAA most directly applicable to the development of the proposed project include Title I, Non-attainment Provisions, and Title II, Mobile Source Provisions. Title I provisions were established with the goal of attaining the National AAQS for the following criteria pollutants O_3, NO_2, SO_2, PM_{10}, CO, $PM_{2.5}$, and Pb. The National AAQS were amended in July 1997 to include an additional standard for O_3 and to adopt a National AAQS for $PM_{2.5}$. Mobile-source emissions are regulated in accordance with Title II provisions. These provisions require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and NO_X. NO_X is a collective term that includes all forms of NO_X that are emitted as by-products of the combustion process.

STATE

California Air Resources Board

CARB, which became part of the California Environmental Protection Agency (CalEPA) in 1991, is responsible for ensuring implementation of the California Clean Air Act (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. AB 2595 mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the State AAQS by the earliest practical date.

CARB established the California AAQS for all pollutants for which the federal government has National AAQS and also for SO_4, visibility, hydrogen sulfide (H_2S), and vinyl chloride (C_2H_3Cl). However, at this time, H_2S and C_2H_3Cl are not measured at any monitoring stations in the SoCAB because they are not considered to be a regional air quality problem. Generally, the California AAQS are more stringent than the National AAQS. Local air quality management districts, such as the South Coast AQMD, regulate air emissions from stationary sources such as commercial and industrial facilities. All air pollution control districts have been formally designated as attainment or nonattainment for each California AAQS. Serious nonattainment areas are required to prepare air quality management plans (AQMP) that include specified emission reduction strategies in an effort to meet clean air goals. These plans are required to include:

- Application of best available retrofit control technology to existing sources.
- Development of control programs for area sources (e.g., architectural coatings and solvents) and indirect sources (e.g., motor vehicle use generated by residential and commercial development).
- An air district permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions.
- Implementation of reasonably available transportation control measures and evidence of a substantial reduction in growth rate of vehicle trips and miles traveled.
- Significant use of low emissions vehicles by fleet operators.
- Sufficient control strategies to achieve a 5 percent or more annual reduction in emissions or 15 percent or more in a period of three years for ROGs, NO_X, CO, and PM_{10}. However, air basins may use an alternate emission reduction strategy that achieves a reduction of less than 5 percent per year under certain circumstances.

California has also adopted a host of other regulations that reduce criteria pollutant emissions.

- **Assembly Bill (AB) 1493: Pavley Fuel Efficiency Standards.** Pavley I is a clean-car standard that reduces greenhouse gas (GHG) emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016. In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025.
- **Heavy-Duty (Tractor-Trailer) GHG Regulation.** The tractors and trailers subject to this regulation must either use EPA SmartWay-certified tractors and trailers or retrofit their existing fleet with SmartWay-verified technologies. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. These

owners are responsible for replacing or retrofitting their affected vehicles with compliant aerodynamic technologies and low-rolling-resistance tires. Sleeper cab tractors model year 2011 and later must be SmartWay certified. All other tractors must use SmartWay-verified low-rolling-resistance tires. There are also requirements for trailers to have low-rolling-resistance tires and aerodynamic devices.

- **SB 1078 and SB 107.** Renewables Portfolio Standards. A major component of California's Renewable Energy Program is the renewables portfolio standard (RPS) established under Senate Bills 1078 (Sher) and 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010.

- **California Code of Regulations (CCR) Title 20: Appliance Energy Efficiency Standards.** The 2006 Appliance Efficiency Regulations (20 CCR sections 1601–1608) were adopted by the California Energy Commission on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances.

Tanner Air Toxics Act and Air Toxics Hot Spot Information and Assessment Act

Public exposure to TACs is a significant environmental health issue in California. In 1983, the California legislature enacted a program to identify the health effects of TACs and reduce exposure to them. The California Health and Safety Code defines a 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" (17 CCR sec. 93000). A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal Clean Air Act (42 US Code sec. 7412[b]) is a TAC. Under State law, CalEPA, acting through CARB, is authorized to identify a substance as a TAC if it is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). The Tanner Air Toxics Act set up a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an "airborne toxics control measure" for sources that emit that TAC. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate "toxics best available control technology" to minimize emissions. To date, CARB has established formal control measures for 11 TACs that are identified as having no safe threshold.

Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High-priority facilities are required

to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public through notices and public meetings.

CARB has promulgated the following specific rules to limit TAC emissions:

- **13 CCR Chapter 10 Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.** Generally restricts on-road diesel-powered commercial motor vehicles with a gross vehicle weight rating of greater than 10,000 pounds from idling more than five minutes.
- **13 CCR Chapter 10 Section 2480: Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools.** Generally restricts a school bus or transit bus from idling for more than five minutes when within 100 feet of a school.
- **13 CCR Section 2477 and Article 8: Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate.** Regulations established to control emissions associated with diesel-powered TRUs.

Title 24 Energy Efficiency Standards and California Green Building Standards

CCR Title 24, Part 6, The California Energy Code, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption.

The standards are updated periodically to allow consideration and possible incorporation of new energy-efficient technologies and methods. CCR Title 24, Part 11, California Green Building Standards Code (CALGreen), is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission.

The 2025 California Title 24 Energy Standards became effective on January 1, 2026. Because the proposed project is expected to be completed in 2032, it will need to comply with the Title 24 Energy Standards in effect at that time, which may include further updates beyond the 2025 version. CALGreen is updated on a regular basis; the most recent approved update is the 2025 California Green Building Code Standards that went into effect on January 1, 2026. The proposed project would be required to comply with the applicable standards in place at the time plan check submittals are made.

REGIONAL

Air Quality Management Planning

The South Coast AQMD is the agency responsible for improving air quality in the SoCAB and ensuring that the National and California AAQS are attained and maintained. South Coast AQMD

is responsible for preparing the AQMP for the SoCAB in coordination with the Southern California Association of Governments (SCAG). The AQMP is a regional strategy plan to achieve air quality standards by examining emissions, looking at regional growth projections, and the impact of existing and proposed control measures to provide healthful air in the long-term. Since 1979, a number of AQMPs have been prepared.

The Clean Air Act requires CARB to develop a State Implementation Plan that describes how an area will attain National AAQS. The AQMP provides the framework for air quality basins to achieve attainment of the State and federal AAQS through the SIP. Areas are classified as attainment or nonattainment areas for a particular pollutant depending on whether they meet the AAQS. Severity classifications for ozone nonattainment range in magnitude from marginal, moderate, and serious to severe and extreme.

- ***Unclassified.*** A pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.
- ***Attainment.*** A pollutant is in attainment if the AAQS for that pollutant was not violated at any site in the area during a three-year period.
- ***Nonattainment.*** A pollutant is in nonattainment if there was at least one violation of an AAQS for that pollutant in the area.
- ***Nonattainment/Transitional.*** A subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the AAQS for that pollutant.

2022 AQMP

South Coast AQMD adopted the 2022 AQMP on December 2, 2022, as an update to the 2017 AQMP. On October 1, 2015, the EPA strengthened the National AAQS for ground-level ozone, lowering the primary and secondary ozone standard levels to 70 parts per billion (ppb) (2015 Ozone National AAQS). The SoCAB is currently classified as nonattainment for the 2015 Ozone National AAQS. Meeting the 2015 federal ozone standard requires reducing NO_x emissions, the key pollutant that creates ozone, by 67 percent more than is required by adopted rules and regulations in 2037. The only way to achieve the required NO_x reductions is through extensive use of zero-emission (ZE) technologies across all stationary and mobile sources. South Coast AQMD's primary authority is over stationary sources, which account for approximately 20 percent of NO_x emissions. 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 South Coast AQMD's control. The region will not meet the 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 standard. The control strategy for the 2022 AQMP includes aggressive new regulations and the development of incentive programs to

support early deployment of advanced technologies. The two key areas for incentive programs are (1) promoting widespread deployment of available ZE and low NO_x technologies and (2) developing new ZE and ultra-low NO_x technologies for use in cases where the technology is not currently available. South Coast AQMD is prioritizing distribution of incentive funding in environmental justice areas and seeking opportunities to focus benefits on the most disadvantaged communities (South Coast AQMD 2022).

South Coast AQMD $PM_{2.5}$ Redesignation Request and Maintenance Plan

In 1997, the EPA adopted the 24-hour fine $PM_{2.5}$ standard of 65 micrograms per cubic meter ($\mu g/m^3$). In 2006, this standard was lowered to a more health-protective level of 35 $\mu g/m^3$. The SoCAB is designated nonattainment for both the 65 and 35 $\mu g/m^3$ 24-hour $PM_{2.5}$ standards. In 2020, monitored data demonstrated that the SoCAB attained both 24-hour $PM_{2.5}$ standards. The South Coast AQMD has developed the "2021 Redesignation Request and Maintenance Plan" for the 1997 and 2006 24-hour $PM_{2.5}$ Standards for the SoCAB $PM_{2.5}$ Redesignation Request and Maintenance Plan, demonstrating that the SoCAB has met the requirements to be redesignated to attainment for the 24-hour $PM_{2.5}$ standards (South Coast AQMD 2021a).

Assembly Bill 617, Community Air Protection Program

AB 617 (C. Garcia, Chapter 136, Statutes of 2017) requires local air districts to monitor and implement air pollution control strategies that reduce localized air pollution in communities that bear the greatest burdens. In response to AB 617, CARB has established the Community Air Protection Program.

Air districts are required to host workshops to help identify disadvantaged communities that are disproportionately affected by poor air quality. Once the criteria for identifying the highest priority locations have been identified and the communities have been selected, new community monitoring systems would be installed to track and monitor community-specific air pollution goals. In 2018 CARB prepared an air monitoring plan, the Community Air Protection Blueprint that evaluates the availability and effectiveness of air monitoring technologies and existing community air monitoring networks. Under AB 617, the Blueprint is required to be updated every five years.

Under AB 617, CARB is also required to prepare a statewide strategy to reduce TACs and criteria pollutants in impacted communities; provide a statewide clearinghouse for best available retrofit control technology; adopt new rules requiring the latest best available retrofit control technology for all criteria pollutants for which an area has not achieved attainment of California AAQS; and provide uniform, statewide reporting of emissions inventories. Air districts are required to adopt a community emissions reduction program to achieve reductions for the communities impacted by air pollution that CARB identifies.

Lead Implementation Plan

In 2008, the EPA designated the Los Angeles County portion of the SoCAB as a nonattainment area under the federal lead (Pb) classification because of the addition of source-specific monitoring under the new federal regulation. This designation was based on two source-specific monitors in the City of Vernon and the City of Industry that exceeded the new standard in the 2007 to 2009 period. The remainder of the SoCAB, outside the Los Angeles County nonattainment area, remains in attainment of the new 2008 lead standard. On May 24, 2012, CARB approved the SIP revision for the federal lead standard, which the EPA revised in 2008. Lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011. The SIP revision was submitted to the EPA for approval.

South Coast AQMD Rules and Regulations

All projects within the SoCAB are subject to South Coast AQMD rules and regulations in effect at the time of activity.

- **Rule 401, Visible Emissions.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in visible emissions. Specifically, the rule prohibits the discharge of any air contaminant into the atmosphere by a person from any single source of emission for a period or periods aggregating more than three minutes in any one hour that is as dark as or darker than designated No. 1 on the Ringelmann Chart, as published by the US Bureau of Mines.

- **Rule 402, Nuisance.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in a public nuisance. Specifically, this rule prohibits any person from discharging quantities of air contaminants or other material from any source such that it would result in an injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Additionally, the discharge of air contaminants would also be prohibited where it would endanger the comfort, repose, health, or safety of any number of persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

- **Rule 403, Fugitive Dust.** This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earth-moving and grading activities.

- **Rule 1113, Architectural Coatings.** This rule serves to limit the VOCs content of architectural coatings used on projects in the South Coast AQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the South Coast AQMD must comply with the current VOC standards set in this rule.

- **Rule 1301**. This rule is intended to provide that pre-construction review requirements to ensure that new or relocated facilities do not interfere with progress in attainment of the National AAQS, while future economic growth within the South Coast AQMD is not unnecessarily restricted. The specific air quality goal is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors. Rule 1301 also limits emissions increases of ammonia, and ozone depleting compounds from new, modified, or relocated facilities by requiring the use of best available control technology.

- **Rule 1403, Asbestos Emissions from Demolition/Renovation Activities.** The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (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. All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

- **Rule 2202**. This rule would apply to tenants who employ 250 or more employees on a full- or part-time basis. The purpose of this rule is to provide employers with a menu of options to reduce employee commute vehicle emissions. Tenants with less than 250 employees or tenants with 250 or more employees who are exempt from South Coast AQMD Rule 2202 (as stated in the rule) shall either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to the City. The tenant-implemented program could include, but not be limited to the following:
  - Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees.
  - Create and maintain a “commuter club” to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work.
  - Inform employees of public transit and commuting services available to them (e.g., social media, signage).
  - Provide on-site transit pass sales and discounted transit passes.
  - Guarantee a ride home.

- Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted.
- Coordinate with the Foothill Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program."

- **Rule 2305, Warehouse Indirect Source Rule: Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program.** The South Coast AQMD adopted Rule 2305, the Warehouse Indirect Source Rule, on May 7, 2021. Owners and operators associated with warehouses 100,000 square feet (sf) or larger are required to directly reduce nitrogen oxides (NO_X) and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. The rule imposes a "Warehouse Points Compliance Obligation" (WPCO) on warehouse operators. Operators satisfy the WPCO by accumulating "Warehouse Actions and Investments to Reduce Emissions Points" (WAIRE Points) in a given 12-month period. WAIRE Points are awarded by implementing measures to reduce emissions listed on the WAIRE Menu, or by implementing a custom WAIRE Plan approved by the South Coast AQMD.

  Although the proposed project would comply with Rule 2305, it should be noted that there is no way to quantify these reductions in CalEEMod. The two most pertinent regulatory requirements that could be modeled, are Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). Credit for Rule 403 and Rule 1113 have been taken into account in the analysis.

3.2.2 Existing Conditions

Unless otherwise noted, all information in this section is from Appendix D. Additional sources and information regarding air quality can be found in Appendix E.

SOUTH COAST AIR BASIN

The Specific Plan area is in the SoCAB, within the jurisdiction of South Coast AQMD. The South Coast AQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under this act, South Coast AQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and State air quality standards. The SoCAB is a 6,745-square-mile subregion in South Coast AQMD's jurisdiction and includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties and all of Orange County. The SoCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the San Diego Air Basin to the south.

METEOROLOGY

Regional Climate

The regional climate has a substantial influence on air quality in the SoCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality. The annual average temperatures throughout the SoCAB vary from the low to mid-60s (degrees Fahrenheit °[F]). Due to a decreased marine influence, the eastern portion of the SoCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SoCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SoCAB have recorded maximum temperatures above 100°F.

Although the climate of the SoCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SoCAB climate. Humidity restricts visibility in the SoCAB, and the conversion of SO_2 to SO_4 is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity in the SoCAB is 71 percent along the coast and 59 percent inland. Since the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast.

More than 90 percent of the SoCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately 9 inches in Riverside to 14 inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SoCAB, with frequency higher near the coast. Due to its generally clear weather, about three-quarters of available sunshine is received in the SoCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year, there are approximately 10 hours of possible sunshine, and on the longest day of the year, there are approximately 14.5 hours of possible sunshine.

In the SoCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing, which effectively acts as an impervious lid to pollutants over the entire SoCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level. A second inversion type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp

boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as NO_X and CO from vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline.

Wind Patterns

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

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

REGIONAL AIR QUALITY

Air pollution contributes to a wide variety of adverse health effects. The South Coast monitors levels of various criteria pollutants at 35 permanent monitoring stations and 2 single-pollutant source Pb air monitoring sites throughout the air district. On January 25, 2024, CARB adopted the proposed 2023 amendments to the State and national area designations. The attainment status for the SoCAB is shown in Table 3.2-3, *Attainment Status of Criteria Air Pollutants in the South Coast Air Basin*.

Table 3.2-3 Attainment Status of Criteria Air Pollutants in the SoCAB

Pollutant	State	Federal
Ozone – 1 hour	Nonattainment	--
Ozone – 8 hour	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassified/Attainment
NO_2	Attainment	Unclassified/Attainment
SO_2	Attainment	Unclassified/Attainment
Lead	Attainment	Unclassified/Attainment

Source: Urban Crossroads 2026 (Appendix D).
Notes: "-" = no standard.

LOCAL AIR QUALITY

The South Coast has designated general forecast areas and air monitoring areas (referred to as Source Receptor Areas [SRA]) throughout the district to inform Southern California residents about the air quality conditions. The Specific Plan area is in the East San Gabriel Valley area (SRA 9). The East San Gabriel Valley monitoring station is 4.89 miles northeast of the Specific Plan area and reports air quality statistics for O_3, CO, NO_2, and PM_{10}. The West San Gabriel Valley monitoring station is 4.96 miles northwest of the Specific Plan area and reports air quality statistics for $PM_{2.5}$.

The most recent three years of data available are shown in Table 3.2-4, *Air Quality Monitoring Summary 2022-2024,* which identifies the number of days AAQS were exceeded for the study area and is considered representative of the local air quality at the Specific Plan area. Data for SO_2 has been omitted because attainment is regularly met in the SoCAB and few monitoring stations measure SO_2 concentrations.

Table 3.2-4 Ambient Air Quality Monitoring Summary

Pollutant	Standard	Year		
		2022	2023	2024
Ozone (O_3)				
Max. Federal 1-Hour Conc. (ppm)		0.143	0.155	0.145
Max. Federal 8-Hour Conc. (ppm)		0.101	0.110	0.114
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	46	57	82
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	61	72	96
Nitrogen Dioxide (NO_2)				

Table 3.2-4 Ambient Air Quality Monitoring Summary

Pollutant	Standard	Year		
		2022	2023	2024
Maximum Federal 1-Hour Concentration	> 35 ppm	0.9	0.8	1.4
Maximum Federal 8-Hour Concentration	> 20 ppm	0.6	0.6	1.1
Coarse Particulates (PM_{10})				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 150 µg/m^3	83	126	82
Annual Federal Arithmetic Mean (µg/m^3)		24.6	22.4	27.5
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m^3	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m^3	6	3	10
Fine Particulates ($PM_{2.5}$)				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 35 µg/m^3	18.4	22.2	51.3
Annual Federal Arithmetic Mean (µg/m^3)	> 12 µg/m^3	9.98	8.74	10.89
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m^3	0	0	2

Source: Urban Crossroads 2026 (Appendix D).

Notes: ppm = parts per million; µg/m^3 = microgram per cubic meter.

MULTIPLE AIR TOXICS EXPOSURE STUDY V

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

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

The MATES V study showed that cancer risk in the SoCAB decreased to 454 in a million from 997 in a million in the MATES IV study. Overall, air toxics cancer risk in the SoCAB decreased by 54 percent since 2012 when MATES IV was conducted. MATES V showed the highest risk locations near the Los Angeles International Airport and the Ports of Long Beach and Los Angeles. DPM

continues to be the major contributor to air toxics cancer risk (approximately 72 percent of the total cancer risk). Goods movement and transportation corridors have the highest cancer risk. Transportation sources account for 88 percent of carcinogenic air toxics emissions, and the remainder is from stationary sources, which include large industrial operations such as refineries and power plants as well as smaller businesses such as gas stations and chrome-plating facilities. (South Coast AQMD 2021b).

SENSITIVE RECEPTORS

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

Residential areas are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to pollutants. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent because the majority of workers tend to stay indoors most of the time. In addition, the workforce is generally the healthiest segment of the population. Receptors in the vicinity of the Specific Plan area are described below and shown in Figure 3.2-1, *Locations of Sensitive Receptors*. All distances are measured from the Specific Plan area boundary to the outdoor living areas (e.g., backyards) or at the building façade, whichever is closer to the Specific Plan area.

- **R1**: Represents the existing residence at 1343 Starhaven Street, approximately 8,722 feet west of the Specific Plan area.
- **R2**: Represents the City of Hope Helford Hospital located at 1500 E. Duarte Road, approximately 6,801 feet west of the Specific Plan area.
- **R3**: Represents the existing residential apartment complex at 1750 Fasana Road, approximately 6,612 feet west of the Specific Plan area.
- **R4**: Represents the Duarte Preschool located at 1433 Crestfield Drive, approximately 2,992 feet northwest of the Specific Plan area.
- **R5**: Represents the existing residence at 2604 Fernley Drive, approximately 2,394 feet northwest of the Specific Plan area.
- **R6**: Represents the Avila Gardens Residence for Seniors at 1171 Encanto Parkway, approximately 3,346 feet north of the Specific Plan area.

- **R7**: Represents the existing residence at 226 Zachary Padilla Avenue, approximately 3,447 feet east of the Specific Plan area.
- **R8**: Represents the existing residence at 1020 Parkside Avenue, approximately 3,920 feet southeast of the Specific Plan area.
- **R9**: Represents the potential worker receptor at 15547 E. 1st Street, approximately 47 feet south of the Specific Plan area.
- **R10**: Represents the existing residence at 15847 Hidalgo Street, approximately 5,518 feet south of the Specific Plan area.
- **R11**: Represents the potential worker receptor at 6000 S Irwindale Avenue, approximately 165 feet east of the Specific Plan area.

Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that, "Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations." The proposed project would result in a significant air quality impact if it would:

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

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

c) Expose sensitive receptors to substantial pollutant concentrations.

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



Source: Urban Crossroads 2026.

Figure 3.2-1
Location of Sensitive Receptors

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South Coast Air Quality Management District Thresholds

Regional Significance Thresholds

Air quality throughout the United States has seen substantial improvements since 1970 (USEPA 2023b). And despite the significant population and economic growth in the region, the SoCAB has also experienced vast improvements to air quality (South Coast AQMD 2022). However, as new information comes to light regarding the effects of these criteria pollutants, standards must be continually updated to curb these effects. South Coast AQMD has established regional thresholds of significance for air quality for construction activities and project operation in the SoCAB, as shown in Table 3.2-5, *South Coast AQMD Regional Significance Thresholds.* The table lists thresholds that are applicable for all projects uniformly, regardless of size or scope. As discussed above, there is growing evidence that although ultrafine particulate matter contributes a very small portion of the overall atmospheric mass concentration, it represents a greater proportion of the health risk from PM. However, because the EPA and CARB have not adopted AAQS to regulate ultrafine particulate matter, South Coast AQMD has not developed thresholds for it.

Table 3.2-5 South Coast AQMD Regional Significance Thresholds

Air Pollutant	Construction Phase	Operational Phase
Nitrogen Oxides (NO_X)	100 lbs/day	55 lbs/day
Volatile Organic Compound (VOC)	75 lbs/day	55 lbs/day
Particulates (PM_{10})	150 lbs/day	150 lbs/day
Particulates ($PM_{2.5}$)	55 lbs/day	55 lbs/day
Sulfur Oxides (SO_X)	150 lbs/day	150 lbs/day
Carbon Monoxide (CO)	550 lbs/day	550 lbs/day
Lead (Pb)	3 lbs/day	3 lbs/day

Source: Urban Crossroads 2026 (Appendix D).
Notes: lbs/day = pounds per day

Localized Significance Thresholds

Criteria Air Pollutants

South Coast AQMD identifies localized significance thresholds (LST), shown in Table 3.2-6, *South Coast AQMD Localized Significance Thresholds*. Emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at a project site could expose sensitive receptors to substantial concentrations of

criteria air pollutants. Off-site mobile-source emissions are not included in the LST analysis. A project would generate a significant impact if it generates emissions that, when added to the local background concentrations, violate the AAQS.

Table 3.2-6 South Coast AQMD Localized Significance Thresholds

Air Pollutant (Relevant AAQS)	Construction	Operations
NOX	0.18 ppm	0.18 ppm
CO (1-hour average)	20 ppm	20 ppm
CO (8-hour average)	9 ppm	9 ppm
PM10	10.4 µg/m^3	2.5 µg/m^3
PM2.5	10.4 µg/m^3	2.5 µg/m^3

Source: Urban Crossroads 2026 (Appendix D).

Notes: ppm = parts per million; µg/m^3 = micrograms per cubic meter

The South Coast AQMD established LSTs in response to the South Coast AQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest residence or sensitive receptor.

CO Hotspots

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

In 2007, the SoCAB was designated in attainment for CO under both the California AAQS and National AAQS. The CO hotspot analysis conducted for attainment by South Coast AQMD did not predict a violation of CO standards at the busiest intersections in Los Angeles during the peak morning and afternoon periods.[6] As identified in South Coast AQMD's 2003 AQMP and the

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

1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SoCAB in years before the 2007 redesignation were a result of unusual meteorological and topographical conditions and not of congestion at a particular intersection. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—to generate a significant CO impact (BAAQMD 2017).[7]

Health Outcomes Associated with the AQMD Regional Significance Thresholds

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

- Increases cancer risk ($PM_{2.5}$, TACs)
- Aggravates respiratory disease (O_3, $PM_{2.5}$)
- Increases bronchitis (O_3, $PM_{2.5}$)
- Causes chest discomfort, throat irritation, and increased effort to take a deep breath (O_3)
- Reduces resistance to infections and increases fatigue (O_3)
- Reduces lung growth in children ($PM_{2.5}$)
- Contributes to heart disease and heart attacks ($PM_{2.5}$)
- Contributes to premature death (O_3, $PM_{2.5}$)
- Contributes to lower birth weight in newborns ($PM_{2.5}$) (South Coast AQMD 2015a)

Exposure to fine particulates and ozone aggravates asthma attacks and can amplify other lung ailments such as emphysema and chronic obstructive pulmonary disease. Exposure to current levels of $PM_{2.5}$ is responsible for an estimated 4,300 cardiopulmonary-related deaths per year in the SoCAB. In addition, University of Southern California scientists, in a landmark children's

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

health study, found that lung growth improved as air pollution declined for children aged 11 to 15 in five communities in the SoCAB (South Coast AQMD 2015b).

South Coast AQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals exposed to elevated concentrations of air pollutants in the SoCAB and has established thresholds that would be protective of these individuals. To achieve the health-based standards established by the EPA, South Coast AQMD prepares an AQMP that details regional programs to attain the AAQS. Mass emissions thresholds shown in Table 3.2-5 are not correlated with concentrations of air pollutants, but emissions exceeding the thresholds contribute to the cumulative air quality impacts in the SoCAB. These thresholds are based on the trigger levels for the federal New Source Review Program, which was created to ensure projects are consistent with attainment of health-based federal AAQS. Regional emissions from a single project do not trigger a regional health impact, and it is speculative to identify how many more individuals in the air basin would be affected by the health effects listed previously. Projects that do not exceed the South Coast AQMD's regional significance thresholds in Table 3.2-5 would not violate any air quality standards or contribute substantially to an existing or projected air quality violation.

If projects exceed the emission levels in Table 3.2-5, those emissions would cumulatively contribute to the nonattainment status of the air basin and would contribute to worsening health effects associated with these criteria air pollutants. Known health effects related to ozone include exacerbating bronchitis, asthma, and emphysema and a decrease in lung function. Health effects associated with particulate matter include premature death of people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Reducing emissions would contribute to reducing possible health effects related to criteria air pollutants. However, for projects that exceed the emissions in Table 3.2-5, it is speculative to determine this would affect the number of days the region is in nonattainment, because mass emissions are not correlated with concentrations of emissions, or how many additional individuals in the air basin would be affected by the health effects cited previously.

South Coast AQMD has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health to address the issue raised in *Sierra Club v. County of Fresno* (*Friant Ranch*) (2018) 6 Cal.5th 502, Case No. S21978. South Coast AQMD currently does not have methodologies that would provide the City with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a proposed project's mass emissions.[8] Ozone concentrations are dependent on a variety of complex factors,

8 In April 2019, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published an Interim Recommendation on implementing *Friant Ranch* in the review and analysis of proposed projects under CEQA in Sacramento County. Consistent with the expert opinions submitted to the court in *Friant Ranch* by the San

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

Health Risk

Whenever a project would require use of chemical compounds that have been identified in South Coast AQMD Rule 1401, placed on CARB's air toxics list pursuant to AB 1807, or placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, a health risk assessment (HRA) is required by the South Coast AQMD. Table 3.2-7, *South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds*, lists the TAC incremental risk thresholds for operation of the proposed project. The type of land uses whose operations typically generate substantial quantities of criteria air pollutants and TACs include industrial (stationary sources) and warehousing (truck idling) land uses (CARB 2005). These thresholds are applied to the proposed project's construction due to the scope and nature of the proposed project.

Table 3.2-7 South Coast AQMD TAC Incremental Risk Thresholds

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

Source: South Coast AQMD 2023.

South Coast AQMD has also established non-carcinogenic risk parameters for use in HRAs. Non-carcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). A REL is a concentration at or below which health effects are not likely to occur. A hazard index of less than one means that adverse health effects are not expected. In this HRA, non-carcinogenic

Joaquin Valley Air Pollution Control District and South Coast AQMD, the SMAQMD guidance confirms the absence of an acceptable or reliable quantitative methodology that would correlate the expected criteria air pollutant emissions of projects to likely health consequences for people from project-generated criteria air pollutant emissions. The SMAQMD guidance explains that while it is in the process of developing a methodology to assess these impacts, lead agencies should follow the court's advice to explain in meaningful detail why this analysis is not yet feasible. Since this interim memorandum, SMAQMD has provided methodology to address health impacts. However, a similar analysis is not available for projects in the SoCAB.

exposures of less than 1.0 are considered less than significant. Both the cancer risk and non-carcinogenic risk thresholds are applied to the nearest sensitive receptors below.

The analysis considers a conservative scenario in which a child at a nearby residence is exposed to construction-related DPM emissions from the third trimester for the expected 5.6 years of construction and is then exposed to operational emissions for the remaining 24.4 years of the 30-year residential exposure scenario.

The HRA is based on applicable guidelines to produce conservative estimates of human health risk posed by exposure to DPM. The conservative nature of this analysis is due primarily to the following factors:

- The CARB-adopted diesel exhaust Unit Risk Factor (URF) of 300 in one million per $\mu g/m^3$ is based upon the upper 95 percentile of estimated risk for each of the epidemiological studies utilized to develop the URF. Using the 95th percentile URF represents a very conservative (health-protective) risk posed by DPM because it represents breathing rates that are high for the human body.

- The emissions derived conservatively assume that every truck accessing the Specific Plan area would idle for 15 minutes, and this is an overestimation of actual idling times and thus conservative. CARB's anti-idling requirements impose a 5-minute maximum idling time, so the analysis conservatively overestimates DPM emissions from idling by a factor of 3.

Additionally, the purpose of this environmental evaluation is to identify the significant effects of the proposed project on the environment, not the significant effects of the environment on the proposed project (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (Case No. S213478)).

Cumulative Health Risk

South Coast AQMD has published a report on how to address cumulative impacts from air pollution: White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. In this report the Air Quality Management District (AQMD) states:

> …the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden,

both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (South Coast AQMD 2003).

METHODOLOGY

Air Quality Modeling

Land uses such as the proposed project affect air quality through construction-source and operational-source emissions. The California Air Pollution Control Officers Association in conjunction with other California air districts, including South Coast AQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, and the latest version available at the time of this report was utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for the proposed project to determine construction and operational air quality emissions.

Criteria Air Pollutant Emissions

Criteria air pollutant emissions modeling is in Appendix D of this DEIR. The calculated emissions of the proposed project are compared to thresholds of significance in Table 3.2-5 and using the South Coast AQMD Handbook and updates. The following is a summary of the assumptions used for the proposed project's analysis.

Construction Phase

The following project-specific assumptions were used to inform the inputs of the air quality modeling for the construction activities under the proposed project. CalEEMod defaults were used in place of unknown inputs.

- **Demolition.** Demolition of existing structures located at the Specific Plan area would occur at the start of construction. It is estimated that approximately 20,000 square feet of building space would be demolished and removed from the Specific Plan area.
- **Filling of Northwest and Southeast Pits.** The Specific Plan area is located at an abandoned quarry with two pits that would be filled as part of project construction. It is assumed that the filling of the northwest pit would require the import of approximately 8,000,000 cubic

yards of soil. No soil import would be required for the southeast pit; rather, material would be hauled from the northwest pit to fill the southeast pit. The analysis utilized the CalEEMod default haul distance of 20 miles for soil import activities because it is not known at this time where soil would be imported from. Additionally, the analysis assumed that on-site truck travel haul distances of 0.53 mile during the filling of the northwest pit and 0.85 mile during filling of the southeast pit. CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity.

The construction schedule utilized in the analysis, shown in Table 3-3 of Appendix D, represents a conservative analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases, due to emission regulations becoming more stringent. The associated equipment and vehicle represent a reasonable approximation of the expected construction fleet, as required per CEQA Guidelines and are shown in Tables 2-7, *Construction Equipment*, and 2.8, *Construction-Related Vehicle Trips*.

Construction equipment is based on applicant-provided information, and each piece of equipment is assumed to operate up to eight hours per day. Construction worker and hauling trips from the demolition, site preparation, and grading phases were pulled from the Transportation Impact Analysis (Appendix P1). Construction worker trips for the building construction phase and vendor trips are based on CalEEMod defaults.

Operation Assumptions

The following assumptions were used to inform the operational air quality modeling under the proposed project:

- **Mobile-Source Emissions**. For purposes of analysis, CalEEMod default parameters for trip length, trip purposes, and fleet mix were used to determine mobile-source emissions from the office land uses of the project. CalEEMod defaults for trip length and trip purpose were also used for passenger vehicles under the industrial land uses with a fleet mix based on the CalEEMod default percentages for passenger vehicles (see Table 3-8 of Appendix D). Truck trip lengths were based on a length of 39.90 miles for 4+-axle (HHDT) trucks and conservatively applied to all truck trips. This trip length assumption is higher than the CalEEMod default trip length. The truck fleet mix is based on assumptions for the project truck traffic modeling (see Table 3-9 of Appendix D).
  - **Fugitive Dust Related to Vehicular Travel:** Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of brake and tire wear particulates. The emissions estimate for travel on paved roads was calculated using CalEEMod.
  - **On-Road Mobile-Source Emissions Modeling Methodology:** On-road mobile-source emissions for the proposed project were estimated using the CARB's Emissions Factor

Model version 2021 (EMFAC2021). EMFAC 2021 is the most recent version of EMFAC approved by the EPA for use in State Implementation Plans and federal transportation conformity determinations, and it remains the standard analytical platform for regional air quality planning in California.

On November 21, 2025, the EPA approved the use of EMFAC 2021 off-model adjustment factors. These adjustment factors remove from EMFAC 2021 the estimated emission benefits that were attributed to California's Advanced Clean Trucks, ZE Airport Shuttle, Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions, and Heavy Duty Omnibus regulations. Because the preemption waivers for these regulations no longer have effect, these regulations are no longer enforceable. These adjustment factors are multipliers provided by CARB that adjust VOC, NO_X, PM_{10}, and $PM_{2.5}$ emission factors by year, region, and vehicle category to account for the removal of these regulations, which are already accounted for in EMFAC 2021. Due to fleet turnover, the adjustment factors result in greater emission increases over the base EMFAC 2021 model outputs in later analysis years.

Although these adjustment factors were approved by EPA primarily for SIP and conformity analysis purposes, they have been incorporated into this analysis in order to provide a conservative estimation of emissions in an evolving regulatory environment.

- **Architectural Coatings**. Buildings under the proposed project would require occasional reapplication of architectural coatings which would produce emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings. The emissions associated with architectural coatings were calculated using CalEEMod and incorporate South Coast AQMD Rule 1113.

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

- **Landscape Maintenance**. Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the proposed project. It should be noted that on October 9, 2021, Governor Gavin Newsom signed AB 1346, which bans the sale of new gasoline-powered equipment under 25 gross horsepower by January 1, 2024, which is now in effect. However, for purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod and do not incorporate the emissions reductions that would be realized from implementation of AB 1346. Therefore, the analysis is conservative in nature.

- **Energy Source Emissions.** Electricity and natural gas are used in almost every project. Criteria pollutant emissions are emitted through the generation of electricity. However, because electrical generating facilities for the Specific Plan area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SoCAB, criteria pollutant emissions from off-site generation of electricity are excluded from the evaluation of significance. Natural gas usage was estimated based on CalEEMod defaults.

- **Stationary Source Emissions:** The proposed project was conservatively assumed to include a total of five emergency fire pumps and one emergency generator. Each emergency fire pump was assumed to be diesel-fueled and rated at 350 brake horsepower. The emergency generator was assumed to be diesel-fueled and rated at 2,000 brake horsepower. Each fire pump and emergency generator was assumed to operate for up to one hour per day, one day per week for up to 50 hours per year for maintenance and testing purposes. Emissions associated with the stationary diesel-powered emergency engines were calculated using CalEEMod.

- **On-Site Cargo Handling Equipment Emissions**: It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. The analysis assumed the operation of 11 pieces of equipment. Each piece of equipment was modeled as a 175-horsepower natural gas-powered port tractor and assumed to operate four hours a day for 365 days of the year.

- **TRU Source Emissions**: In order to account for the refrigerated uses, trucks associated with the cold-storage land use are assumed to also have TRUs. Therefore, for modeling purposes 201 trucks (401 two-way truck trips per day) have the potential to include TRUs. TRUs are accounted for during on-site and off-site travel. The TRU calculations are based on EMFAC2021, developed by CARB. EMFAC2021 does not provide emission rates per hour or mile as with the on-road emission model and only provides emission inventories. Emission results are produced in tons per day while all activity, fuel consumption and horsepower hours were reported at annual levels. The emission inventory is based on specific assumptions including the average horsepower rating of specific types of equipment and the hours of operation annually. These assumptions are not always consistent with assumptions used in the modeling of project-level emissions. Therefore, the emissions inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with project-level details. This was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each criteria pollutant by equipment type and the average daily hours of operation. In order to account for CARB's withdrawal of its request for an EPA waiver for the ZE TRU portions of its TRU Regulation, the analysis conservatively utilized 2029 emission factors for truck-mounted TRUs in EMFAC.

Localized Air Quality Impacts

The analysis for the proposed project makes use of methodology in the South Coast AQMD Final Localized Significance Threshold Methodology (LST Methodology). South Coast AQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses. LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, South Coast AQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects.

Emissions Considered

Based on South Coast AQMD's LST Methodology, emissions for concern during construction activities are on-site NO_X, CO, $PM_{2.5}$, and PM_{10}. The LST Methodology clearly states that off-site mobile emissions from the project should not be included in the emissions compared to LSTs. As such, for purposes of the construction LST analysis, only emissions included in the CalEEMod on-site emissions outputs were considered.

Dispersion Modeling

In order to estimate localized pollutant concentrations resulting from project construction, the South Coast AQMD-approved American Meteorological Society/EPA Regulatory Model (AERMOD) dispersion model was utilized.

- **Sources.** To model worst-case conditions, the highest daily peak on-site emissions resulting from overlapping construction activity were modeled. A ground-level release height and a one-meter (approximately 3.28 feet) initial vertical dimension (sigma z) were utilized for fugitive dust emissions of PM_{10} and $PM_{2.5}$ consistent with South Coast AQMD's LST guidance. To account for equipment exhaust emissions from NO_2, CO, PM_{10}, and $PM_{2.5}$ a release height of five meters was utilized consistent with South Coast AQMD's LST guidance.

- **Meteorological Data.** To account for meteorological conditions at the Specific Plan area, meteorological data from the South Coast AQMD's Azusa monitoring station was utilized, as this is the nearest station to the Specific Plan area for which meteorological data is available. Additionally, a receptor height of two meters and regulatory default options were utilized consistent with South Coast AQMD's LST guidance.

- **Receptors.** Consistent with the LST Methodology, the nearest land use to the Specific Plan area where an individual could remain for 24 hours is used to determine localized construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$ (since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time). Per the LST Methodology, commercial and industrial facilities are not included in the definition of sensitive receptor

because employees and patrons do not typically remain on-site for a full 24 hours but are typically on-site for 8 hours or less. However, LST Methodology explicitly states that LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours. Therefore, any adjacent land use where an individual could remain for one to eight hours and is closer to the Specific Plan area than the receptor used for PM_{10} and $PM_{2.5}$ analysis must be considered to determine construction and operational LST air impacts for emissions of NO_2 and CO since these pollutants have an averaging time of one and eight hours.

Construction Health Risk Assessment

The sources evaluated in the construction health risk assessment include off-road construction equipment and heavy-duty diesel trucks along the truck haul route, as shown in Appendix E. Modeling is based on the EPA's AERMOD v13.0 air dispersion modeling program and the latest HRA guidance from the Office of Environmental Health Hazard Assessment to estimate excess lifetime cancer risks and chronic non-cancer hazard indices at the nearest maximum exposed off-site sensitive receptors.

The emissions calculations for the construction HRA component are based on an assumed mix of construction equipment, and hauling activity as presented Tables 2-7, and 2.8. DPM emissions were based on the CalEEMod construction model runs using annual exhaust PM_{10} construction emissions in pounds (lbs.) per day. Construction would occur over 5.6 years.

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

Operational Health Risk Assessment

Vehicle DPM emissions were calculated using emission factors for particulate matter less than 10 µm in diameter (PM_{10}) generated with the 2021 EMFAC. The most recent version of this model, EMFAC 2021, incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled (VMT) by speed, and number of starts per day.

Several distinct emission processes are included in EMFAC 2021. Emission factors calculated using EMFAC 2021 are expressed in units of grams per vehicle miles traveled (g/VMT) or grams per idle-hour (g/idle-hr), depending on the emission process. The emission processes and

corresponding emission factor units associated with diesel particulate exhaust for the proposed project are presented below.

Annual average PM_{10} emission factors were generated by running EMFAC 2021 in EMFAC Mode for vehicles in the Los Angeles County jurisdiction. The EMFAC Mode generates emission factors in terms of grams of pollutant emitted per vehicle activity and can calculate a matrix of emission factors at specific values of temperature, relative humidity, and vehicle speed. The model was run for speeds traveled in the vicinity of the proposed project. The vehicle travel speeds for each segment modeled are summarized below:

- Idling: on-site loading/unloading and truck trailer parking areas.
- 5 miles per hour: on-site vehicle movement including driving and maneuvering.
- 25 miles per hour: off-site vehicle movement including driving and maneuvering.

It is expected that minimal idling would occur at nearby intersections during truck travel on study area roadways (e.g., at an intersection during a red light, or yielding to make a turn). Notwithstanding, the analysis conservatively utilizes a reduced off-site average speed of 25 miles per hour (below the posted speed limit) for travel on study area roadways. Use of a lower average speed for off-site travel results in a higher emission factor, and therefore any negligible idling during truck travel along the study area is accounted for.

The analysis incorporated the use of EMFAC 2021 off-model adjustment factors in accordance with CARB guidance. The adjustment factors modify the emission rates utilized in this analysis to reflect the incremental effects of specific adopted regulations and programs relevant to the SoCAB and are consistent with CARB- and EPA-approved planning methodologies to reflect regulatory programs applicable to heavy-duty vehicles that may not be fully captured in the base EMFAC 2021 model. As such, these adjustments conservatively result in an approximate 5.6 percent increase in DPM emissions compared to the base EMFAC 2021 model outputs.

The proposed project was conservatively assumed to include a total of five emergency fire pumps and one emergency generator. Each fire pump and emergency generator was assumed to operate for up to one hour per day, one day per week for up to 50 hours per year for maintenance and testing purposes.

In order to account for the possibility of refrigerated uses, trucks associated with the high-cube cold-storage land use are assumed to also have TRUs. TRUs are accounted for during on-site and off-site travel. The TRU calculations are based on CARB's OFFROAD Model version 2021. OFFROAD2021 does not provide emission rates per hour or mile as with the on-road emission model and only provides emission inventories. Emission results are produced in tons per day while all activity, fuel consumption and horsepower hours were reported at annual levels. The emission inventory is based on specific assumptions including the average horsepower rating of specific types of equipment and the hours of operation annually. These assumptions are not

always consistent with assumptions used in the modeling of project-level emissions. Therefore, the emissions inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with project-level details. This was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each criteria pollutant by equipment type and the average daily hours of operation. It was estimated that each TRU would spend approximately 3.3 hours per load at the facility, and that the TRU engine would operate 62.5 percent of the time.

3.2.3 Applicable Specific Plan Development Standards and Design Guidelines

DEVELOPMENT STANDARDS

The Specific Plan has an overall objective of providing standards for landscaping and building systems that are aimed at reducing unnecessary water use, energy use, and fossil fuel consumption in the Irwindale Brew Yard Specific Plan area.

Section 3.6, Parking, specifies the minimum parking requirements for projects within the Irwindale Brew Yard Specific Plan, including compliance with applicable provisions of the California Green Building Standards Code (CALGreen) for bicycle parking and EV charging stalls.

DESIGN GUIDELINES

The Specific Plan guidelines have overall objectives to encourage sustainable design solutions that reduce energy consumption, use water efficiently, and minimize waste and to create simple building designs that result in efficient use of space, materials, and resources while maintaining a high level of design integrity.

Section 4.4.2, Site Design, notes that the site should include wayfinding measures to promote efficient paths of travel for pedestrians, cyclists, and all vehicles, including large truck traffic, and that the site should be organized in a way that reduces conflicts between pedestrian and vehicular paths of travel.

Section 4.4, Landscape Design, of the Specific Plan includes general landscaping requirements and recommendations, including water quality features and the use of plant materials that are water wise, such as native and drought-tolerant plants. This section encourages sustainable design solutions that use water efficiently. Section 4.4 also includes a preliminary plant palette; use of plant material that is not listed in the palette is permitted subject to approval by the Community Development Director.

Section 4.4.6, Service Areas and Utility Placement and Screening, notes that truck and service vehicle entries should be designed to provide clear and convenient access to truck courts and loading areas such that passenger vehicle, pedestrian, and bicycle circulation are not adversely affected.

3.2.4 Project Impact Analysis

Impact AQ-1 Impacts associated with regional construction emissions could result in inconsistency with the 2022 AQMP. [question a]

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

The 2022 AQMP evaluates current integrated strategies and control measures to meet the National AAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. The 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements. The proposed project's consistency with the AQMP was determined using the 2022 AQMP.[9]

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook and are based on two criteria:

- **Consistency Criterion No. 1.** Potential to result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. The violations that Consistency Criterion No. 1 refers to are the California and National AAQS. California and National AAQS violations would occur if regional or LST were exceeded.

- **Consistency Criterion No. 2.** The 2022 AQMP demonstrates that the applicable AAQS can be achieved within the timeframes required under federal law. Growth projections from local

9 It should be noted that although SCAG has released an updated 2024-2050 RTP, the 2022 AQMP is based on the 2020-2045 RTP.

general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in City of Irwindale General Plan is consistent with the AQMP.

Construction

Consistency Criterion No.1

Emissions during the peak construction activity would not exceed South Coast AQMD's LST at the maximally exposed receptor location, as illustrated in Table 3.2-8, *Construction Localized Significance Summary*. Detailed construction model outputs are presented in Appendix D. All other modeled locations in the study area would experience lower concentrations, resulting in a reduced impact.

Table 3.2-8 Construction Localized Significance Summary

	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
Peak Construction	**1-Hour**	**8-Hours**	**1-Hour**	**24-Hours**	**24-Hours**
Peak Day Localized Emissions	0.04	0.01	2.97E-02	1.02	0.26
Background Concentration[1]	1.4	1.1	0.09	-	-
Total Concentration	1.44	1.11	0.12	1.02	0.26
South Coast AQMD Localized Significance Threshold	20	9	0.18	10.4	10.4
Threshold Exceeded?	NO	NO	NO	NO	NO

Source: Urban Crossroads 2026 (Appendix D).

Notes: PM_{10} and $PM_{2.5}$ concentrations are expressed in µg/m^3. All others are expressed in ppm.

Based on South Coast AQMD's LST Methodology, background concentrations are considered only for CO and NO_2.

The points of maximum impact are Location R9 for CO and NO_2 and Location R7 for PM_{10} and $PM_{2.5}$.

1. Highest concentration from the last three years of available data.

CalEEMod calculates maximum daily emissions for summer and winter periods. As such, the estimated maximum daily regional construction emissions for both summer and winter periods are summarized in Table 3.2-9, *Maximum Daily Regional Construction Emissions*. Detailed construction model outputs are presented in Appendix D. Under the assumed scenarios, project construction would exceed the applicable South Coast AQMD regional pollutant thresholds for emissions of VOC and NO_X.

Table 3.2-9 Maximum Daily Regional Construction Emissions

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
2025	17.66	239.87	181.96	0.77	85.40	24.77
2026	76.56	214.20	212.36	0.78	62.15	20.61
2027	76.14	181.62	193.89	0.73	59.17	18.50
2028	8.65	142.11	99.89	0.61	42.93	13.89
2029	8.50	136.02	98.82	0.61	42.79	13.77
2030[1]	40.70	26.24	61.53	0.09	9.85	2.83
Winter						
2025	17.51	244.10	181.87	0.77	85.40	24.77
2026	76.43	231.13	204.71	0.78	84.93	24.33
2027	75.93	186.60	185.28	0.73	59.17	18.50
2028	8.52	145.39	100.00	0.61	42.93	13.89
2029	8.37	139.34	98.50	0.61	42.79	13.77
2030[1]	40.66	26.75	57.05	0.09	9.85	2.83
Maximum Daily Emissions	76.56	244.10	212.36	0.78	85.40	24.77
South Coast AQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**YES**	**YES**	NO	NO	NO	NO

Source: Urban Crossroads 2026 (Appendix D).

1. Buildout of the proposed project is anticipated to occur in 2032. However, it should be noted that for analytical purposes, this analysis assumes that project buildout would occur in 2030, consistent with the project Transportation Impact Analysis (Appendix P1). This assumption of an earlier buildout year is conservative, as it is a base assumption of emission factors utilized in the modeling that vehicles and equipment become cleaner each year as fleet turnover occurs and new emission standards take effect.

The proposed project's localized construction-source emissions would not exceed applicable LSTs. However, project construction-source emissions would exceed regional thresholds for emissions of VOC and NO_X. Accordingly, project construction-source emission exceedances would increase the frequency or severity of existing air quality violations and would cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No.2

Consistency Criterion 2 is applicable to the operational emissions associated with the proposed project and whether these have been accounted for in the applicable AQMP rather than construction emissions, as these are short-term in nature. Peak day emissions generated by construction activities are largely independent of land use assignments but are a function of

development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. Therefore, construction of the proposed project does not conflict with Criterion No. 2 of the AQMP.

AQMP Consistency Summary

The proposed project has the potential to result in or cause National or California AAQS violations. Construction-source emissions would exceed the applicable regional significance threshold for VOC and NO_X. As such, the proposed project is considered to have the potential to conflict with the AQMP, and impacts are **potentially significant.**

Mitigation Measures

Mitigation Measure AQ-1: The construction contractor(s) shall specify in the construction bid that the construction contractor(s) shall:

- Provide electrical hook ups to the power grid rather than use diesel-fueled generators for electric construction tools such as saws, drills, and compressors, and shall use such electric tools.
- Keep all equipment maintenance records and data sheets, including design specifications and emission control tier classifications, on-site or at the contractor's office and furnish documents to the Lead Agency or other regulators upon request.
- Place legible, durable, weather-proof signs at construction staging areas within the project site. At a minimum, each sign shall include: 1) instructions for construction workers to shut off engines when not in use; 2) instructions for operators of heavy-duty diesel construction equipment to restrict idling to no more than three (3) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager to report violations.
- Require that all diesel-fueled off-road equipment of 25 horsepower or greater to comply with Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 4 Final off-road emissions standards or equivalent and ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications.

Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the City of Irwindale Public Works/Engineering and Community Development Departments clearly show these requirements. The City of Irwindale shall conduct an on-site inspection to verify compliance.

Mitigation Measure AQ-2: The project applicant/developer shall include a note on grading plans that prohibit grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone in the Project area. Daily Air Quality Index forecasts for the next day of grading shall be checked via the airnow.gov system the day prior by the project contractor(s). Prior to grading, the project applicant/developer shall ensure that all grading plans submitted to the City of Irwindale Public Works/Engineering and Community Development Departments clearly show this requirement.

Mitigation Measure AQ-3: The project designer and contractor(s) shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g., bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor(s) shall be required to utilize "Super-Compliant" VOC paints, which are defined in South Coast AQMD's Rule 1113. The construction contractor shall be required to utilize "Super-Compliant" VOC paints, which are defined in South Coast AQMD's Rule 1113. Prior to construction, building specifications submitted to the City of Irwindale Public Works/Engineering and Community Development Departments should clearly show these construction requirements. The City of Irwindale shall conduct an on-site inspection to verify compliance.

Mitigation Measure AQ-4: The project applicant/developer shall identify a person to act as a community liaison concerning on-site construction activities and provide contact information for the community liaison to the surrounding community. The contact of the community liaison shall be provided to the City Planning Division and be posted on the construction site prior to issuance of a demolition permit. The City of Irwindale shall conduct an on-site inspection to verify compliance.

Mitigation Measure AQ-5: Prior to construction, the project applicant/developer shall provide documentation to the City demonstrating that information on transit and ridesharing programs and services shall be provided to construction employees. The City of Irwindale shall conduct an on-site inspection to verify compliance.

Regional construction emissions from the proposed project were calculated with mitigation measures incorporated.[10] After implementation of these mitigation measures, Construction-source VOC emissions would be reduced to less than significant levels. However, NO_X emissions would still exceed the South Coast AQMD regional significance threshold and result in a

[10] Under MM AQ-1, the modeling assumed that all construction equipment would meet or exceed CARB Tier 4 Final emission standards.

significant and unavoidable impact. Mitigated regional construction emissions are presented in Table 3.2-10, *Construction Regional Significance Summary (With Mitigation)*.

Table 3.2-10 Construction Regional Significance Summary (With Mitigation)

Year	Emissions (lbs/day)					
	VOC	NOX	CO	SO2	PM10	PM2.5
Summer						
2025	4.91	124.33	200.87	0.77	80.03	19.87
2026	68.67	121.71	235.42	0.78	57.82	16.67
2027	68.53	116.42	209.47	0.73	56.21	15.80
2028	2.88	93.62	112.37	0.61	40.76	11.92
2029	2.87	90.66	111.81	0.61	40.76	11.92
2030[1]	39.21	13.55	64.76	0.09	9.36	2.39
Winter						
2025	4.76	128.56	200.78	0.77	80.03	19.87
2026	68.53	126.29	227.77	0.78	80.03	19.87
2027	68.33	121.40	200.86	0.73	56.21	15.80
2028	2.75	96.91	112.48	0.61	40.76	11.92
2029	2.74	93.98	111.48	0.61	40.76	11.92
2030[1]	39.17	14.07	60.29	0.09	9.36	2.39
Maximum Daily Emissions	68.67	128.56	235.42	0.78	80.03	19.87
South Coast AQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	NO	**YES**	NO	NO	NO	NO

Source: Urban Crossroads 2026 (Appendix D).

1. Buildout of the proposed project is anticipated to occur in 2032. However, it should be noted that for analytical purposes, this analysis assumes that project buildout would occur in 2030, consistent with the project Transportation Impact Analysis (Appendix P1). This assumption of an earlier buildout year is conservative, as it is a base assumption of emission factors utilized in the modeling that vehicles and equipment become cleaner each year as fleet turnover occurs and new emission standards take effect.

Impact AQ-2: Impacts associated with regional operation emissions could result in inconsistency with the 2022 AQMP.

Operations

Consistency Criterion No.1

The LST analysis generally includes on-site sources (area, energy, mobile, and on-site cargo handling equipment are previously discussed in Section 3.5 of this report). However, it should be

noted that the CalEEMod outputs do not separate on-site and off-site emissions from mobile sources. As such, to establish a maximum potential impact scenario for analytic purposes, the modeled emissions include all on-site project-related stationary (area) sources and on-site project-related mobile emissions. To account for on-site mobile emissions, a passenger car and truck trip length of 0.5 miles was utilized.

As shown in Table 3.2-11, *Operation Localized Significance Summary*, emissions would not exceed South Coast AQMD's LST at the maximally exposed on-site receptors because of operational activities.

Table 3.2-11 Operation Localized Significance Summary Peak Construction CO

			NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	**8-Hours**	**1-Hour**	**24-Hours**	**24-Hours**
Peak Day Localized Emissions	6.47E-02	4.18E-02	1.20E-02	0.14	0.08
Background Concentration[1]	1.4	1.1	0.090		
Total Concentration	1.46	1.14	0.10	0.14	0.08
South Coast AQMD Localized Significance Threshold	20	9	0.18	2.50	2.50
Threshold Exceeded?	NO	NO	NO	NO	NO

Source: Urban Crossroads 2026 (Appendix D).

Notes: PM_{10} and $PM_{2.5}$ concentrations are expressed in $\mu g/m^3$. All others are expressed in ppm.

Based on South Coast AQMD's LST Methodology, background concentrations are considered only for CO and NO_2.

The points of maximum impact are Location R9 for CO and NO_2 and Location R7 for PM_{10} and $PM_{2.5}$.

1. Highest concentration from the last three years of available data.

Operational activities for summer and winter scenarios are presented in Table 3.2-12, *Maximum Daily Regional Operation Emissions*. Detailed operational model outputs are presented in Appendix D. At buildout, the proposed project's operational emissions would exceed the applicable South Coast AQMD significance thresholds for emissions of VOC, NO_X, CO, and PM_{10}.

Table 3.2-12 Maximum Daily Regional Operation Emissions

Source	Emissions (lbs/day)					
	VOC	NOX	CO	SO2	PM10	PM2.5
Summer						
Mobile	39.89	125.99	442.48	1.98	146.43	38.98
Area	94.04	1.10	131.00	0.01	0.23	0.18
Energy	0.90	16.38	13.76	0.10	1.25	1.25
Stationary	6.15	22.70	15.69	0.03	0.91	0.91
Cargo Handling Equipment	1.23	3.98	170.92	0.00	0.32	0.30
TRU	63.82	65.30	6.35	0.00	1.72	1.58
Maximum Daily Emissions	206.03	235.47	780.20	2.12	150.86	43.18
South Coast AQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**YES**	**YES**	**YES**	NO	**YES**	NO
Winter						
Mobile	39.66	132.74	403.66	1.93	146.44	38.98
Area	72.51	0.00	0.00	0.00	0.00	0.00
Energy	0.90	16.38	13.76	0.10	1.25	1.25
Stationary	6.15	22.70	15.69	0.03	0.91	0.91
Cargo Handling Equipment	1.23	3.98	170.92	0.00	0.32	0.30
TRU	63.82	65.30	6.35	0.00	1.72	1.58
Maximum Daily Emissions	184.28	241.11	610.39	2.06	150.63	43.01
South Coast AQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**YES**	**YES**	**YES**	NO	**YES**	NO

Source: Urban Crossroads 2026 (Appendix D).

The proposed project's localized operational-source emissions would not exceed applicable LSTs. However operational-source emissions would exceed applicable regional thresholds for emissions of VOC, NO_X, CO, and PM_{10} at buildout. Accordingly, operational-source emission exceedances would increase the frequency or severity of existing air quality violations and would cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No.2

Section 15206(b) of the CEQA Guidelines states that a proposed project is of statewide, regional, or area-wide significance if the project would involve a net increase of over 500,000 square feet of business establishment. The proposed project would introduce 3,000,000 square feet of new industrial/business park uses, and 12,000 square feet of commercial uses.

Therefore, it is a project of statewide, regional, or area-wide significance. As discussed in Section 5.4.2, *Population and Housing*, at buildout, a total of 2,406 employees is anticipated for the proposed project. SCAG forecast that the City of Irwindale would have 18,900 jobs in 2019 increasing to 19,600 jobs by 2035 (SCAG 2024). However, as of 2023, the City has only 15,128 jobs (US Census Bureau 2025). The new jobs generated by the proposed project would provide additional employment opportunities for residents in the area and, with an anticipated opening year of 2032, would be accommodated within SCAG's 2035 projection.[11]

Additionally, population growth typically occurs when there is an expansion of residential development, and therefore an increase of new residents. Because the Regional Housing Needs Assessment (RHNA) calculated for 2021-2029 has accounted for the housing need in Irwindale and the surrounding cities based on SCAG's population and job forecasts, any new growth in population associated with the job's generated by the proposed project would not exceed housing assumptions from the RHNA. The proposed project would not increase the number of residential units available or designate new land uses that may generate an increased population. Therefore, the proposed project is consistent with Criterion No. 2 of the AQMP.

AQMP Consistency Summary

The proposed project has the potential to result in or cause National or California AAQS violations. Operational-source emissions would exceed the applicable South Coast AQMD regional thresholds for VOC, NO_X, CO, and PM_{10}. As such, the proposed project is considered to have the potential to conflict with the AQMP and impacts are **potentially significant.**

Mitigation Measures

Mitigation Measure AQ-6: Prior to the shell building permit approval, the project applicant shall provide documentation to the City demonstrating that an electrical room(s) and/or exterior area(s) of the site shall be designated where future electrical panels would be located for the purpose of supplying power to on-site charging facilities for electric-powered trucks. Conduits shall be installed from this designated area where the panel would be located to the on-site location where the charging facilities would be located and where electric-powered trucks would park and connect to charging facilities to charge the batteries that power the motors of the electric-powered trucks.

Mitigation Measure AQ-7: Prior to issuance of an Occupancy Permit for a new tenant/business entity, the Project Developer/Successor-in-interest shall provide documentation to the City demonstrating that building occupants shall be provided with

[11] Considering the US Census Bureau 2023 jobs of 15,128 and SCAG's 20235 projection of 19,600 the net increase is 4,472.

information related to South Coast AQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles. Information shall also include, but not be limited to, the health effect of diesel particulates, benefits of reduced idling time, and CARB regulations. Tenants shall be notified about the availability of:

- Alternatively fueled cargo handling equipment.
- Grant programs for diesel-fueled vehicle engine retrofit and/or replacement.
- Access to alternative fueling stations proximate to the site that supply compressed natural gas.
- The EPA's SmartWay program.

Mitigation Measure AQ-8: Prior to issuance of a Certificate of Occupancy, legible, durable, weather-proof signs shall be installed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations. At a minimum, each sign shall include the following instructions for truck drivers to shut off engines when not in use:

- Instructions for drivers of diesel trucks to restrict idling to no more than five minutes once the vehicle is stopped, the transmission is set to "neutral" or "park" and the parking brake is engaged.
- Telephone numbers of the building facilities manager and CARB to report violations.

The project applicant/developer shall ensure that building design plans submitted to the City of Irwindale Public Works/Engineering and Community Development Departments clearly show these requirements.

Mitigation Measure AQ-9: Prior to issuance of an Occupancy Permit for a new tenant/business entity, the project developer/facility owner and tenant/business entity shall provide to the City of Irwindale Community Development Department a signed document (verification document) noting that the project developer/facility owner has disclosed to the tenant/business entity the requirement to implement the following measures:

- Sites shall clearly mark entry and exit points for trucks and service vehicles.
- Facility operators shall maintain records of their fleet equipment owned by the facility and ensure that all diesel-fueled Medium-Heavy Duty Trucks (MHDT) and Heavy-Heavy Duty Trucks (HHD) use year CARB 2010 or newer engines. The records should be maintained on-site and be made available for inspection by the City.

- Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Signs should be posted in the appropriate locations and/or handouts should be provided that show the locations of the nearest food options, fueling, truck maintenance services, and other similar convenience services.
- Each facility shall designate a Compliance Officer responsible for implementing the measures described herein. Contact information shall be provided to the City and updated annually, and signs shall be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community. The Compliance Officer shall also coordinate with CARB and South Coast AQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.
- Signs shall be posted in the appropriate locations noting that heavy truck shall park and perform any self-maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets.
- Project plans and specifications shall include signs at every truck exit driveway providing directional information to the truck route.

Mitigation Measure AQ-10: Prior to issuance of building permits, the following features shall be demonstrated on the project's building plans to the extent feasible over minimum California Code of Regulations Title 24 requirements. Installation shall be verified by the City prior to issuance of a Certificate of Occupancy.

- For use by employees and visitors conducting business at the building, install automobile electric vehicle (EV) charging stations shall be installed at the minimum number required by the California Code of Regulations Title 24. All charging stations shall be equipped with Level 2 or faster chargers. Signs shall be posted indicating that the charging stations are for exclusive use by the building's employees and by visitors conducting business at the building.
- Install appropriate electrical infrastructure sufficiently sized to accommodate the potential installation of additional auto and truck EV charging stations in the future.
- Install raceways for conduit to tractor-trailer parking areas in logical, gated locations determined by the project applicant during construction document plan check, for the purpose of accommodating the future installation of EV truck charging stations at such time this technology becomes commercially available. The charging station location(s) are to be located inside the gated and secured truck courts.

Mitigation Measure AQ-11: Prior to issuance of building permits, the following features shall be demonstrated on the project's building and landscape plans to the extent

feasible. Installation shall be verified by the City prior to issuance of a Certificate of Occupancy.

- Install Energy Star-rated heating, cooling, lighting, and appliances.
- Structures shall be equipped with outdoor electric outlets in the front and rear to facilitate use of electrical lawn and garden equipment.
- Design buildings that exceed the 2019 Title 24 building envelope energy efficiency standards by at least 50 percent.

Mitigation Measure AQ-12: Prior to issuance of a Certificate of Occupancy, the following language shall be included within tenant lease agreements to reduce operational air pollutant emissions to the extent feasible:

- Information about energy efficiency, energy-efficient lighting and lighting control systems, energy management, and existing energy incentive programs.
- Information about funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.
- Requirements to use the cleanest technologies available and to provide the necessary infrastructure to support zero-emission vehicles, equipment, and appliances that would be operating on-site at such time this technology becomes commercially available. This requirement shall apply to equipment such as forklifts, handheld landscaping equipment, yard trucks, office appliances, etc.
- Requirements to operate in compliance with and to monitor compliance with all current and applicable air quality regulations for on-road trucks, including the CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation.
- Requirements and identification of the responsible party to maintain, replace, and upgrade rooftop solar panels per the manufacturer's recommendations for the life of the lease. The proposed project would comply with existing solar requirements per the California Energy Code in effect during permitting of the project (at the time of construction drawing plan check submittal). In the case that the tenant requires additional solar capacity, this shall be addressed during the tenant improvement process. The proposed project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed project.
- Requirements and identification of the responsible party to maintain, replace, and repair the legible, durable, weather-proof signs that were installed at initial building occupancy placed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations.

- The tenant agreement shall include notification that the tenant shall comply with CARB Truck and Bus regulation, including requirements that only haul trucks meeting model year 2010 engine emission standards shall be used for the on-road transport of materials to and from the project site.
- Requirements for the building owner to provide a green cleaning products and paint education program available to the building tenant, to keep at the building's office, break room, leasing space, or on an accessible website.

Mitigation Measure AQ-13: The City Occupancy Permit shall require that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2014 model year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators that own vehicles subject to Section 2025 shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and State upon request.

As indicated in Table 3.2-12, without mitigation, VOC, NO_X, CO, and PM_{10} emissions are anticipated to exceed South Coast AQMD regional thresholds. The estimated maximum daily operational emissions with mitigation are summarized in Table 3.2-13, *Peak Operation Regional Significance Summary (With Mitigation)*. Mitigation measures AQ-6 through MM AQ-13 are recommended to reduce these impacts.[12]

Despite the mitigation measures provided and the anticipated regulations implemented by the EPA and CARB to improve truck efficiency, the estimated long-term emissions generated under full buildout of the proposed project would exceed the South Coast AQMD's regional operational significance thresholds and would cumulatively contribute to the nonattainment designations in the SoCAB (see Table 3.2-13). On this basis, it is concluded that operational-source VOC, NO_X, CO, and PM_{10} emissions cannot be reduced below applicable South Coast AQMD thresholds and therefore are considered **significant and unavoidable**.

[12] Under MM AQ-11, the modeling assumed that all landscape maintenance equipment would be electric, and that the proposed project would exceed 2019 Title 24 building envelope energy efficiency standards by 50 percent.

Table 3.2-13 Peak Operation Regional Significance Summary (With Mitigation)

Year	Emissions (lbs/day)					
	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
Mobile	39.89	125.99	442.48	1.98	146.43	38.98
Area	72.51	0.00	0.00	0.00	0.00	0.00
Energy	0.90	16.37	13.75	0.10	1.24	1.24
Stationary	6.15	22.70	15.69	0.03	0.91	0.91
Cargo Handling Equipment	1.23	3.98	170.92	0.00	0.32	0.30
TRU	63.82	65.30	6.35	0.00	1.72	1.58
Maximum Daily Emissions	184.51	234.35	649.19	2.11	150.62	43.01
South Coast AQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**YES**	**YES**	**YES**	NO	**YES**	NO
Winter						
Mobile	39.66	132.74	403.66	1.93	146.44	38.98
Area	72.51	0.00	0.00	0.00	0.00	0.00
Energy	0.90	16.37	13.75	0.10	1.24	1.24
Stationary	6.15	22.70	15.69	0.03	0.91	0.91
Cargo Handling Equipment	1.23	3.98	170.92	0.00	0.32	0.30
TRU	63.82	65.30	6.35	0.00	1.72	1.58
Maximum Daily Emissions	184.28	241.10	610.38	2.06	150.62	43.01
South Coast AQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**YES**	**YES**	**YES**	NO	**YES**	NO

Source: Urban Crossroads 2026 (Appendix D).

Impact AQ-3: Impacts associated with regional operation emissions due to the overlap of Phase I operations and Phase II construction could result in inconsistency with the 2022 AQMP.

Overlap of Phase I Operation and Phase II Construction

The Draft Operations Plan includes a site development plan that would proceed in two phases. Table 2-6, *Project Phasing*, shows the general timelines, including overlap of phases, for the proposed project. It is anticipated that Phase I would be completed and operational during Phase II construction activities, and as such Phase I operational emissions may overlap with Phase II construction emissions. As shown in Table 3.2-14, *Phase I Operations and Phase II Construction Overlap Emissions,* the maximum overlap emissions from the overlap of these two phases would be less than the peak emissions shown in Table 3.2-13 for full operation of Phase I

and Phase II, but would still exceed applicable regional emission thresholds for VOC, NOx, and CO.

Table 3.2-14 Phase I Operations and Phase II Construction Overlap Emissions

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
Phase 1 Operational Emissions	95.25	128.48	535.06	1.44	95.77	27.01
Phase 2 Construction Emissions	40.70	26.24	61.53	0.09	9.85	2.83
Maximum Daily Emissions	135.94	154.72	596.59	1.53	105.62	29.84
South Coast AQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**YES**	**YES**	**YES**	NO	NO	NO
Winter						
Phase 1 Operational Emissions	81.60	132.84	424.98	1.40	95.63	26.90
Phase 2 Construction Emissions	40.66	26.75	57.05	0.09	9.85	2.83
Maximum Daily Emissions	122.26	159.59	482.03	1.50	105.48	29.73
South Coast AQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**YES**	**YES**	NO	NO	NO	NO

Mitigation measures AQ-1 through AQ-13 would apply.

As indicated in Table 3.2-14, without mitigation, VOC, NO_X, and CO anticipated to exceed South Coast AQMD regional thresholds. The estimated maximum daily emissions with mitigation are summarized in Table 3.2-15, *Phase I Operations and Phase II Construction Overlap Emissions (With Mitigation)*. Mitigation measures AQ-1 through MM AQ-13 are recommended to reduce these impacts.

Table 3.2-15 Phase I Operations and Phase II Construction Overlap Emissions (With Mitigation)

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
Phase 1 Operational Emissions	81.77	127.79	453.01	1.44	95.63	26.90
Phase 2 Construction Emissions	39.21	13.55	64.76	0.09	9.36	2.39
Maximum Daily Emissions	120.98	141.34	517.77	1.53	104.99	29.29
South Coast AQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**YES**	**YES**	NO	NO	NO	NO
Winter						
Phase 1 Operational Emissions	81.55	126.69	424.97	1.40	94.21	26.51
Phase 2 Construction Emissions	39.17	14.07	60.29	0.09	9.36	2.39
Maximum Daily Emissions	120.72	140.75	485.26	1.50	103.58	28.90
South Coast AQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**YES**	**YES**	NO	NO	NO	NO

Despite the mitigation measures provided and the anticipated regulations implemented by the EPA and CARB to improve truck efficiency, the estimated long-term emissions would exceed the South Coast AQMD's regional significance thresholds and would cumulatively contribute to the nonattainment designations in the SoCAB. On this basis, it is concluded that emissions cannot be definitively reduced below applicable South Coast AQMD thresholds and therefore are considered significant and unavoidable.

Significance with Mitigation: Implementation of Mitigation Measures AQ-1 through AQ-13 would not ensure that impacts associated with construction and operational regional emissions and consistency with the AQMP would be mitigated and impacts remain **significant and unavoidable**.

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

As shown in Table 3.2-3, the California AAQS designate the Specific Plan area as nonattainment for O_3 PM_{10}, and $PM_{2.5}$ while the National AAQS designates the Specific Plan area as nonattainment for O_3 and $PM_{2.5}$. South Coast AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. Projects that exceed the project-specific significance

thresholds are considered by the SCAQMD to be cumulatively considerable (south Coast AQMD 2003).

Therefore, the analysis for the proposed project assumed that individual projects that do not generate operational or construction emissions that exceed South Coast AQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which SoCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Conversely, project-level construction and operational emissions that exceed South Coast AQMD thresholds would be considered cumulatively considerable.

Construction

Construction activities produce combustion emissions from various sources, such as on-site heavy-duty construction vehicles, vehicles hauling materials to and from the site, and motor vehicles transporting the construction crew. Construction of the proposed project would generate criteria air pollutants associated with construction equipment exhaust and fugitive dust from site preparation, rough grading, fine grading, utilities trenching, building construction, paving, architectural coating, and finishing and landscaping; off-site improvements; and sewer and storm drain construction. Air pollutant emissions from construction activities on-site would vary daily as construction activity levels change.

An estimate of maximum daily construction emissions are provided in Table 3.2-9. The tables show the highest daily emissions that would be generated by the overlapping construction activities over the anticipated development period. As shown in Table 3.2-9, project construction emissions would exceed the applicable South Coast AQMD regional pollutant thresholds for emissions of VOC and NO_X. Per South Coast AQMD protocols, project construction-source VOC and NO_X emissions would also be cumulatively significant. Emissions of VOC and NOx that exceed the South Coast AQMD regional threshold would cumulatively contribute to the O_3 nonattainment designation of the SoCAB. Emissions of NOx that exceed the South Coast AQMD regional significance thresholds would also cumulatively contribute to the particulate matter (PM_{10} and $PM_{2.5}$) nonattainment designations of the SoCAB. Therefore, this impact is **potentially significant**.

Impact AQ-4: Impacts associated with regional construction emissions could result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment.

Regional construction emissions from the proposed project were calculated with mitigation measures incorporated. After implementation of mitigation measures AQ-1 through AQ-5, construction-source VOC emissions would be reduced to less than significant levels. However, NO_X emissions would still exceed the South Coast AQMD regional significance threshold (see Table 3-9). Therefore, this impact would remain **significant and unavoidable**.

Operations

Following full buildout, operation of the proposed project would generate criteria air pollutant emissions from mobile sources (e.g., passenger vehicles, trucks, and fugitive dust related to vehicular travel), area sources (e.g., consumer products, landscaping equipment, architectural coating), energy sources (e.g., natural gas used for heating), and stationary sources (e.g. emergency fire pumps, emergency generator).

As shown in Table 3.2-12, project-level operational-source VOC, CO, NO_X, and PM_{10} emissions would exceed the applicable South Coast AQMD regional pollutant thresholds. Per South Coast AQMD protocols, project operational-source VOC, NO_X, CO, and PM_{10} emissions impacts would also be cumulatively significant. The primary sources of long-term criteria air pollutant emissions would be project-generated passenger vehicle and truck trips as well as use of off-road equipment on-site such as yard trucks and forklifts. Emissions of VOC and NOx that exceed the South Coast AQMD regional threshold would cumulatively contribute to the O_3 nonattainment designation of the SoCAB. Emissions of NOx that exceed the South Coast AQMD regional significance thresholds would also cumulatively contribute to the particulate matter (PM_{10} and $PM_{2.5}$) nonattainment designations of the SoCAB. Therefore, this impact is **potentially significant**.

Impact AQ-5: Impacts associated with regional operational emissions could result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment.

Regional operational emissions from the proposed project were calculated with mitigation measures incorporated. After implementation of mitigation measures AQ-6 through AQ-13, operational-source VOC, NO_X, CO, and PM_{10} would still exceed the South Coast AQMD regional significance threshold (see Table 3-12). Therefore, this impact would remain **significant and unavoidable**.

Significance without Mitigation: Significant and Unavoidable.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

This impact analysis describes changes in localized impacts from short-term construction and long-term activities. The proposed project could expose sensitive receptors to elevated pollutant concentrations during construction activities if it would cause or contribute significantly to the elevated levels. Unlike the mass of emissions shown in the regional emissions analysis in Tables 3.2-9, which are described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or $\mu g/m^3$) and can be correlated to potential health effects.

This impact analysis also describes changes in localized impacts from long-term operational activities. The proposed project could expose sensitive receptors to elevated pollutant concentrations during operation of the proposed project if it would cause or contribute significantly to the elevated levels.

Construction

Construction Phase LSTs

Screening-level LSTs (pounds per day) are the amount of project-related mass emissions at which localized concentrations (ppm or $\mu g/m^3$) could exceed the AAQS for criteria air pollutants for which the SoCAB is designated nonattainment. They are based on the acreage disturbed and distance to the nearest sensitive receptor. Screening-level LSTs are based on the proposed project site size and distance to the nearest sensitive receptor. Thresholds are based on the California AAQS, which are the most stringent, established to provide a margin of safety in the protection of the public's health and welfare. They are designed to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise.

The nearest off-site sensitive receptor is the residence to the northwest of the project site along at 2604 Fernley Drive (see Figure 3.2-1, marked R5). Tables 3.2-8 shows the maximum daily construction emissions (pounds per day) generated during on-site overlapping construction activities compared with the South Coast AQMD's screening-level LSTs. These two distances represent the residence at 3,447 feet, which are assumed to be exposed to construction emissions 24 hours a day (R7), and employees of the nearby business (R9) at 47 feet, who are not anticipated to be on-site 24 hours a day.

The on-site PM_{10} and $PM_{2.5}$ emissions shown represent the total on-site particulate matter emissions from vehicle exhaust and fugitive dust. As shown in Table 3.2-8, construction of the proposed project under either would not generate construction-related on-site emissions that would exceed the screening-level LSTs, and impacts would be **less than significant**.

Construction Health Risk

The proposed project would elevate concentrations of TACs (i.e., DPM) in the vicinity of sensitive land uses during temporary construction activities that would use off-road equipment operating on-site, and at different levels depending on the type of activity (e.g., few to none during installation of utilities, and more during grading activities).

A site-specific construction HRA of TACs was prepared to quantify potential health risk emissions during construction (see Appendix E). The results of the analysis are shown in Table

3.2-16, *Construction Cancer Risks,* and in Table 3.2-17, *Construction Non-cancer Risks*. As shown in these tables, there would be no exceedance of identified thresholds.

Table 3.2-16 Construction Cancer Risks

Maximum Exposed Location		Time Period (Year)	Maximum Lifetime Cancer Risk[1]	Cancer Risk Significance Threshold[1]	Exceeds Significance Threshold?
Type	**Receptor Location**				
Cancer Risk					
Resident	R7	5.5	2.15	10	No
Worker	R11	5.5	0.11	10	No
School Child	R4	5.5	1.58	10	No

Source: Urban Crossroads 2026 (Appendix E).

1. Risk per million.

Table 3.2-17 Construction Non-cancer Risks

Maximum Exposed Location		Time Period (Year)	Maximum Hazard Index	Significance Threshold	Exceeds Significance Threshold?
Type	**Receptor Location**				
Non-Cancer Risk					
Resident	R7	Annual Average	<0.01	1	No
Worker	R11	Annual Average	<0.01	1	No
School Child	R4	Annual Average	<0.01	1	No

Source: Urban Crossroads 2026 (Appendix E).

Residential Exposure Scenario

The land use with the greatest potential exposure to construction-source DPM emissions is Location R7 (see Figure 3.2-1), which is 3,447 feet east of the Specific Plan area at an existing residence at 226 Zachary Padilla Avenue. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to project construction-source DPM emissions is estimated at 1.58 in one million which is less than the South Coast AQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable threshold of 1.0. Although Location R7 is not the nearest receptor to the Specific Plan area, it would experience the highest concentrations of DPM during project construction due to its location, meteorological conditions at the site, and wind direction. Because all other modeled receptors would experience lower concentrations of DPM during project construction, all other receptors in the

vicinity of the Specific Plan would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the proposed project would not cause a significant human health or cancer risk to adjacent land uses because of project construction activity.

Worker Exposure Scenario

The worker receptor land use with the greatest potential exposure to project construction-source DPM emissions is Location R11 (see Figure 3.2-1), which represents the potential worker receptor approximately 165 feet east of the Specific Plan area. The maximally exposed individual worker (MEIW) is the worker receptor location that would experience the highest modeled concentrations of DPM and thus the highest risk. At the MEIW, the maximum incremental cancer risk impact is calculated to be 2.34 in one million, which is less than the South Coast AQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors would be exposed to lower concentrations of DPM, all other worker receptors in the vicinity of the Specific Plan would be exposed to less emissions and therefore less risk than the MEIW. As such, project construction would not cause a significant human health or cancer risk to adjacent workers.

School Child Exposure Scenario

The nearest school and location of the maximally exposed individual school child (MEISC) is the Duarte Preschool, approximately 2,992 feet northwest of the Specific Plan area and represented by Receptor R4 (see Figure 3.2-1). At the MEISC, the maximum incremental cancer risk impact attributable to project construction is calculated to be 0.2 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the proposed project was calculated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled school receptors would be exposed to lower concentrations of DPM, all other school receptors in the vicinity of the Specific Plan area would be exposed to less emissions and therefore less risk than the MEISC.

Operation

Operation Phase LSTs

The screening-level LSTs are the amount of project-related stationary and area sources of emissions at which localized concentrations (ppm or µg/m^3) would exceed the AAQS for criteria air pollutants for which the SoCAB is designated a nonattainment area. Land uses that have the potential to generate substantial stationary sources of emissions or would require a permit from South Coast AQMD include industrial land uses, such as chemical processing, and warehousing operations where substantial truck idling could occur on-site. On-site emissions include truck maneuvering and idling, TRUs, and diesel-powered forklifts and yard trucks. Table 3.2-10 shows localized maximum daily operational emissions. As shown in the tables, on-site project-related

operational emissions would not exceed the screening-level LSTs. Therefore, localized criteria air pollutant emissions impacts from project-related operations would be **less than significant**.

Operational Health Risk

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

An operational HRA was prepared for the proposed project and is provided in Appendix E. The analysis included DPM emissions from on-site and off-site truck activity, stationary sources, and TRUs. For off-site truck activity, each roadway was modeled as a line volume source.[13] The DPM emission rate for each line volume source was calculated by multiplying the emission factor (based on the average travel speed along the roadway) by the number of trips and the distance traveled along each roadway segment, as illustrated in Table 2-4, *DPM Emissions from Project Trucks*, of Appendix E. In order to model idling emissions, line sources were modeled at the building loading docks. The modeled emission sources are illustrated on Figure 3.2-2, *Modeled On-Site Emission Sources*, for on-site sources and Figure 3.2-3, *Modeled Of-Site Emission Sources*, for off-site sources. The modeling domain is limited to the proposed project's primary truck route and includes off-site sources within a ¾ mile radius.

A site-specific construction HRA of TACs was prepared to quantify potential health risk emissions during operations (see Appendix E). The results of the analysis are shown in Table 3.2-18, *Operation Cancer Risks,* and in Table 3.2-19, *Operation Non-cancer Risks*. As shown in these tables, there would be no exceedance of identified thresholds.

[13] A line volume source is a method used to represent emissions that occur along a linear path (such as a roadway or conveyor belt) by simulating them as a series of adjacent or separated 3D volume sources.

Table 3.2-18 Operation Cancer Risks

Maximum Exposed Location		Time Period (Year)[1]	Maximum Lifetime Cancer Risk[2]	Significance Threshold[1]	Exceeds Significance Threshold?
Type	Receptor Location				
Cancer Risk					
Resident	R7	30	2.30	10	No
Worker	R9	25	2.34	10	No
School Child	R4	9	0.20	10	No

Source: Urban Crossroads 2026 (Appendix E).

1. Exposure durations of 30 years for residents, 25 years for workers, and 9 years for school children are based on the Office of Environmental Health Hazard Assessment Risk Assessment Guidelines.

2. Risk per million.

Table 3.2-19 Operation Non-cancer Risks

Maximum Exposed Location		Time Period (Year)	Maximum Hazard Index	Significance Threshold	Exceeds Significance Threshold?
Type	Receptor Location				
Non-Cancer Risk					
Resident	R7	Annual Average	<0.01	1	No
Worker	R9	Annual Average	<0.01	1	No
School Child	R4	Annual Average	<0.01	1	No

Source: Urban Crossroads 2026 (Appendix E).

Residential Exposure Scenario

The residential land use with the greatest potential exposure to project operational-source DPM emissions is Location R7 (see Figure 3.2-1), which is approximately 3,447 feet east of the Specific Plan area at an existing residence at 226 Zachary Padilla Avenue. At this location, the maximum incremental cancer risk attributable to project operational-source DPM emissions is estimated at 2.30 in one million, which would not exceed the South Coast AQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0.

Although Location R7 is not the nearest receptor to the Specific Plan area, it would experience the highest concentrations of DPM from project operation due to its location and meteorological conditions at the project site. Because all other modeled receptors would be exposed to lower concentrations of DPM, all other receptors in the vicinity of the Specific Plan

would be exposed to less emissions and therefore less risk than the MEIR. As such, the proposed project would not cause a significant human health or cancer risk to nearby residences.

Worker Exposure Scenario

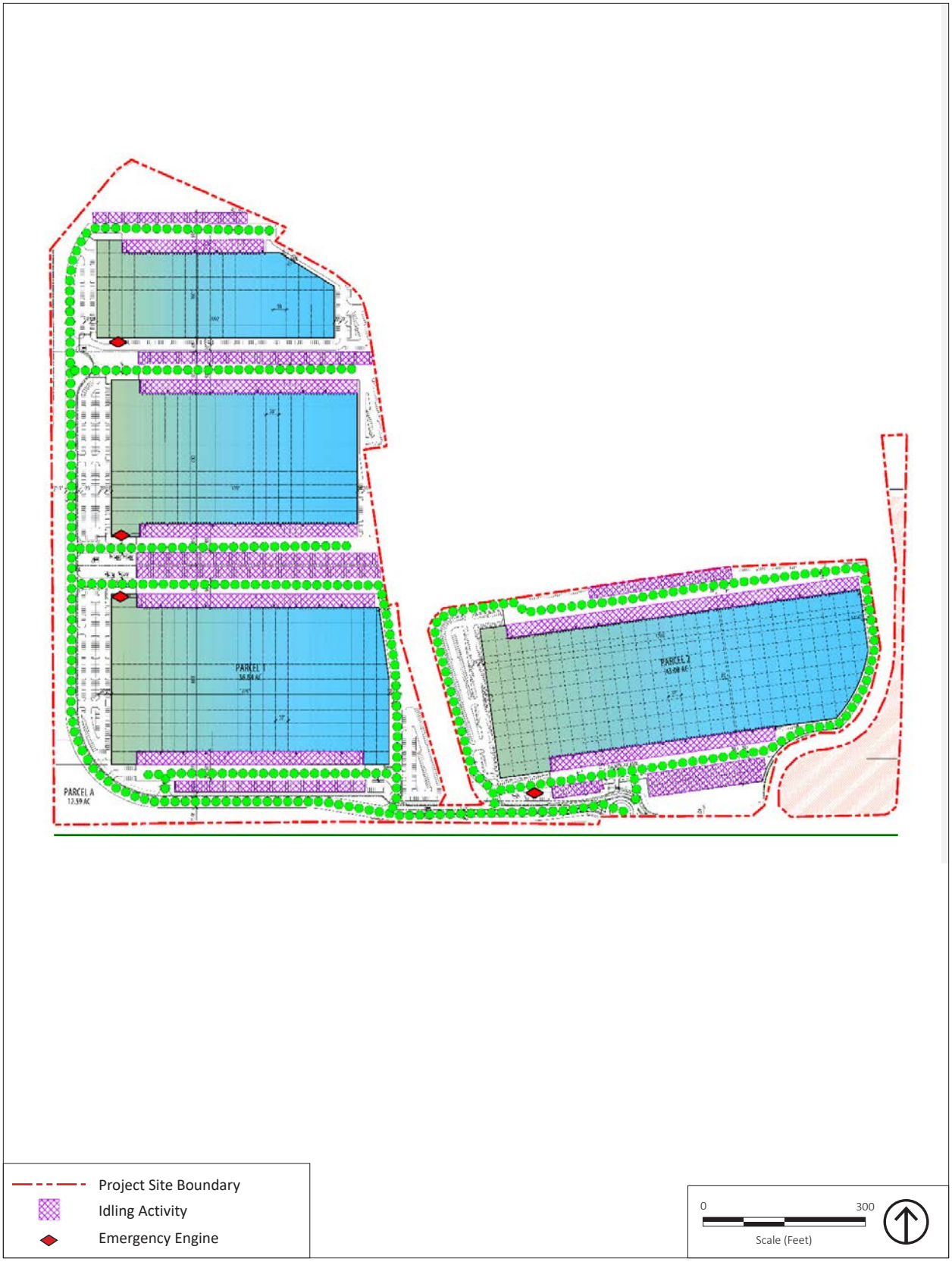
The worker receptor land use with the greatest potential exposure to project operational-source DPM emissions is Location R9 (see Figure 3.2-1), which represents the potential worker receptor approximately 47 feet south of the Specific Plan area. The MEIW is the worker receptor location that would experience the highest modeled concentrations of DPM and thus the highest risk. At the MEIW, the maximum incremental cancer risk impact is calculated to be 2.34 in one million, which is less than the South Coast AQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors would be exposed to lower concentrations of DPM, all other worker receptors in the vicinity of the Specific Plan would be exposed to less emissions and therefore less risk than the MEIW. As such, the proposed project's operation would not cause a significant human health or cancer risk to adjacent workers.

School Exposure Scenario

Proximity to sources of toxics is critical to determining impacts. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70 percent drop-off in particulate pollution levels at 500 feet. Based on CARB and South Coast AQMD emissions and modeling analyses, an 80 percent drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center.

The 1,000-foot evaluation distance is supported by research-based findings concerning TAC emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources.

A one-quarter-mile radius, or 1,320 feet, is commonly utilized for identifying sensitive receptors, such as schools, that may be impacted by a proposed project. This radius is more robust and therefore provides a more health-protective scenario for evaluation than the 1,000-foot impact radius identified above. Notwithstanding, for full disclosure purposes, the nearest school was also evaluated.



Source: Urban Crossroads 2025.

Figure 3.2-2
Modeled On-Site Emission Sources

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Source: Urban Crossroads 2025.

Figure 3.2-3
Modeled Off-Site Emission Sources

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The nearest school and location of the MEISC is the Duarte Preschool, approximately 2,992 feet northwest of the Specific Plan area and represented by Receptor R4 (see Figure 3.2-1). At the MEISC, the maximum incremental cancer risk impact attributable to project operation is calculated to be 0.20 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the proposed project were calculated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled school receptors would be exposed to lower concentrations of DPM, all other school receptors in the vicinity of the Specific Plan would be exposed to less emissions and therefore less risk than the MEISC.

Combined Construction Phase and Operational Phase TACs

The HRA analysis considered a conservative scenario in which a child at a nearby residence is exposed to project construction-related DPM emissions from birth for the expected 5.6 years of project construction and is then exposed to project operational emissions for the remaining 24.4 years of the 30-year residential exposure scenario.

The land use with the greatest potential exposure to project construction-source and operational-source DPM emissions is Location R7 (see Figure 3.2-1). As shown in Table 3.2-20, *Construction and Operation Cancer Risk,* at the MEIR, the maximum incremental cancer risk attributable to project construction-source and operational-source DPM emissions is estimated at 2.51 in one million, which is less than the threshold of 10 in one million.

Table 3.2-20 Construction and Operation Cancer Risks

Maximum Exposed Location		Time Period (Year)	Maximum Lifetime Cancer Risk[1]	Significance Threshold[1]	Exceeds Significance Threshold?
Type	Receptor Location				
Cancer Risk					
Sensitive Receptor	R7	30	2.51	10	No

Source: Urban Crossroads 2026 (Appendix E).

1. Risk per million.

As shown in Table 3.2-21, *Construction and Operation Non-cancer Risk,* at the same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable threshold of 1.0. As such, the proposed project would not cause a significant human health or cancer risk to adjacent land uses as a result of project construction and operational activity. All other receptors during construction and operational activity would experience less risk than what is identified for this location.

Table 3.2-21 Construction and Operation Non-cancer Risks

Maximum Exposed Location		Time Period (Year)	Maximum Hazard Index	Significance Threshold	Exceeds Significance Threshold?
Type	Receptor Location				
Non-cancer Risk					
Sensitive Receptor	R7	Annual Average	<0.01	1	No

Source: Urban Crossroads 2026 (Appendix E).

Carbon Monoxide Hotspots

A CO hotspot is defined as a localized concentration of CO exceeding the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. At the time the most recent CEQA Air Quality Handbook (1993) was published by South Coast AQMD, the air basin was designated as nonattainment, requiring projects to perform hotspot analyses to ensure they did not worsen the existing conditions. Over the last two decades, background CO concentrations have been significantly reduced due to regulatory controls on tailpipe emissions, which have culminated in the air basin achieving attainment status for CO.

The 2003 AQMP's findings underscore that CO hotspots are highly unlikely due to the reduced background concentrations and the effectiveness of California's air quality management strategies. The substantial reduction in CO levels from the vehicle fleet and the State's attainment status for CO further diminish the need for detailed microscale hotspot analyses, reinforcing that existing monitoring and regulatory frameworks adequately address potential air quality concerns.

In 2003, South Coast AQMD, as part of its AQMP development process, prepared modeling to determine the potential for CO hotspots at the four busiest intersections in the air basin. As summarized in the 2003 AQMP, even at one of the busiest intersections at that time, only 0.7 ppm of CO is attributable to vehicular traffic, and the remaining 7.7 ppm were due to ambient background conditions. As shown on Table 3.2-4, the background 1-hour and 8-hour concentrations are well below the applicable AAQS.

Project-related traffic at any intersections within the vicinity of the proposed project would not cause or contribute to a CO hotspot since the background concentrations are low and any contribution from project traffic would be negligible. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

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

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

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

Land uses generally associated with odor complaints include:

- Agricultural uses (livestock and farming)
- Wastewater treatment plants
- Rendering plants
- Chemical plants
- Composting operations
- Refineries
- Landfills
- Dairies
- Fiberglass molding facilities

The proposed project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction. It is expected refuse generated during the operational phase would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed project would also be required to comply with South Coast AQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors and other emissions (such as those leading to odors) associated with construction and operations activities of the proposed project would be **less than significant**.

Significance without Mitigation: Less than significant.

3.2.5 Cumulative Impact Analysis

For the purpose of this analysis, the geographic context used for the cumulative assessment of air quality impacts is the SoCAB.

Would the project have a cumulative effect related to air quality?

In accordance with South Coast AQMD's methodology, any project that produces a significant project-level regional air quality impact in an area that is in nonattainment contributes to the cumulative impact. The greatest source of emissions in the SoCAB is mobile sources. Due to the extent of the area potentially impacted from cumulative project emissions (i.e., the SoCAB), South Coast AQMD considers a project cumulatively significant when project-related emissions exceed the South Coast AQMD regional emissions thresholds shown in Table 3.2-3. No significant cumulative impacts were identified regarding CO hotspots.

Construction

The SoCAB is designated nonattainment for O_3 and $PM_{2.5}$ under the California and National AAQS and nonattainment for PM_{10} under the California AAQS. Regional construction emissions from the proposed project were calculated with mitigation measures incorporated. After implementation of mitigation measures AQ-1 through AQ-5, construction-source VOC emissions would be reduced to less than significant levels. However, NO_X emissions would still exceed the South Coast AQMD regional significance threshold (see Table 3-9). Therefore, this impact would remain **significant and unavoidable**.

Operation

For operational air quality emissions, any project that does not exceed or can be mitigated to less than the daily regional threshold values is not considered by South Coast AQMD to be a substantial source of air pollution and does not make a cumulatively considerable contribution to a cumulative air quality impact. While operational activities would not exceed their LSTs and would not substantially increase CO hotspots at intersections in the vicinity of the project area, they would result in emissions in excess of the South Coast AQMD regional emissions thresholds for VOC, NO^X, CO, and PM_{10}. Therefore, this impact would remain **significant and unavoidable**.

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3.3 BIOLOGICAL RESOURCES

Biological resources include plant and animal species, habitat types, habitat linkages, and sensitive natural communities. This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for the proposed Irwindale Brew Yard Specific Plan to result in significant impacts to biological resources, including special-status species, sensitive natural communities, and jurisdictional waters. The analysis in this section is based in part on the following technical report, which is included as an appendix to this DEIR.

- *Irwindale Brew Yard Project: Biological Technical Report*, Helix Environmental Planning, Inc., March 2026

Complete copies of these studies are included in the Technical Appendices to this Draft EIR as Appendix F. Unless otherwise noted, information in this section is derived from Appendix F. The Biological Technical Report includes supporting focused surveys and technical memoranda addressing burrowing owl, Crotch's bumble bee, coastal California gnatcatcher, and jurisdictional waters, which are incorporated by reference.

During the Notice of Preparation (NOP) public review period (February 7, 2024, through March 11, 2024) and the scoping meeting (held on February 22, 2024), comments related to biological resources were submitted by the Los Angeles County Department of Parks and Recreation. The comments raised concerns regarding potential impacts to adjacent biological resources in the Santa Fe Dam Recreation Area, including potential effects of construction noise and lighting on wildlife, particularly during sensitive breeding seasons, and requested that mitigation measures include avoidance of critical life stages for listed and sensitive species. These comments have been addressed below in the biological resources analysis.

3.3.1 Regulatory Framework

FEDERAL

The Federal Endangered Species Act

The Federal Endangered Species Act (ESA) protects plants and animals that are listed as endangered or threatened by the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service. Section 9 of the ESA prohibits the taking of endangered wildlife, where taking is defined as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct" (50 Code of Federal Regulations [CFR] 17.3). For plants, this statute governs removing, possessing, maliciously damaging, or destroying any endangered plant on federal land and removing, cutting, digging up, damaging, or destroying any endangered plant on non-federal land in knowing violation of state law (16 U.S. Code 1538).

Under Section 7 of the ESA, federal agencies are required to consult with the USFWS if their actions, including permit approvals or funding, could adversely affect a listed (or proposed) species (including plants) or its critical habitat. Through consultation and the issuance of a biological opinion, the USFWS may issue an incidental take statement allowing take of the species that is incidental to an otherwise authorized activity provided the activity will not jeopardize the continued existence of the species. Section 10 of the ESA provides for issuance of incidental take permits where no other federal actions are necessary provided a habitat conservation plan is developed.

On April 17, 2025, USFWS and the National Marine Fisheries Service (NMFS) published a notice of proposed rulemaking that would rescind the existing definition of "harm," which includes habitat modification. Specifically, the NMFS asserts that the current definition of harm, which includes "significant habitat modification or degradation," contradicts the best meaning of "take." The proposed rulemaking states that a proposed action that alters habitat for listed species is not equivalent to an act that directly injures or kills fish or wildlife. As of May 2026, the proposed rule has not been finalized.

Migratory Bird Treaty Act

The MBTA implements international treaties between the U.S. and other nations devised to protect migratory birds, any of their parts, eggs, and nests from activities including hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit. As authorized by the MBTA, the USFWS issues permits to qualified applicants for the following types of activities: falconry, raptor propagation, scientific collecting, special purposes (rehabilitation, education, migratory game bird propagation, and salvage), take of depredating birds, taxidermy, and waterfowl sale and disposal. The regulations governing migratory bird permits can be found in 50 CFR Part 13, General Permit Procedures, and 50 CFR Part 21, Migratory Bird Permits.

Federal Clean Water Act

Under Section 404 of the Federal Clean Water Act (CWA), potential waters of the U.S., including wetlands, may be regulated by the U.S. Army Corps of Engineers (USACE). Jurisdictional waters of the U.S. (WOTUS) are delineated in accordance with the "Revised Definition of 'Waters of the United States'" rule, published in the Federal Register in 2022, which became final on January 18, 2023, as further amended in the manner described below following the U.S. Supreme Court ruling in *Sackett v. Environmental Protection Agency*. The January 2023 rule, set forth by the U.S. Environmental Protection Agency (EPA) and USACE, was consistent with the pre-2015 regulatory definition as all waters that are currently used, or were used in the past, or may be susceptible to use in interstate commerce, including all waters subject to the ebb and flow of the tide. This definition also includes all interstate waters, including interstate wetlands, interstate lakes, rivers, streams (including all intermittent and ephemeral streams), mudflats, sand flats, sloughs, and prairie potholes, wet meadows, playa lakes, or natural ponds where the use, degradation,

or destruction of which could affect interstate or foreign commerce. Under this rule, WOTUS do not include prior converted cropland.

The definition of WOTUS is codified in 33 CFR 328.3 and 40 CFR 120.2 and generally includes:

1. All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
2. All interstate waters including interstate wetlands;
3. All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters: (i) Which are or could be used by interstate or foreign travelers for recreational or other purposes; or (ii) From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or (iii) Which are used or could be used for industrial purpose by industries in interstate commerce;
4. All impoundments of waters otherwise defined as waters of the U.S. under the definition;
5. Tributaries of waters identified in paragraphs (s)(1)–(4);
6. The territorial sea; and
7. Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (s)(1) through (6); waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 CFR 423.11(m) which also meet the criteria of this definition) are not WOTUS.

On May 25, 2023, the U.S. Supreme Court adopted a narrower definition of WOTUS in *Sackett v. Environmental Protection Agency*. Under the majority opinion, WOTUS refers to "geographical features that are described in ordinary parlance as 'streams, oceans, rivers, and lakes' and to adjacent wetlands that are 'indistinguishable' from those bodies of water due to a continuous surface connection." On August 29, 2023, the agencies issued a final rule to amend the final "Revised Definition of 'Waters of the United States'" rule to conform the definition of "waters of the United States" to the U.S. Supreme Court's May 25, 2023, decision in *Sackett v. Environmental Protection Agency*.

Parts of the January 2023 Rule are invalid under the U.S. Supreme Court's interpretation of the CWA in the *Sackett* decision. Therefore, the agencies have amended key aspects of the regulatory text to conform to the court's decision. Key changes under the amendment include:

- Definition of "adjacent" is now "having a continuous surface connection."
- Only tributaries that are relatively permanent, standing, or continuously flowing bodies of water (or tributaries with a continuous surface connection to those) are considered jurisdictional.
- Interstate wetlands are no longer jurisdictional just by virtue of being interstate.
- Significant nexus test is eliminated.

Where areas jurisdictional to the USACE will be impacted by a project, the project proponent must usually apply for permitting with the agency, which generally consists of submittal of a Pre-construction Notification under Section 404 of the CWA.

STATE

California Endangered Species Act

The California ESA (CESA or state ESA) generally parallels the main provisions of the federal ESA but, unlike its federal counterpart, the CESA applies the take prohibitions to species proposed for listing (called "candidates" by the state). Section 2080 of the California Fish and Game Code prohibits the taking, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or in the regulations. Take is defined in Section 86 of the California Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." The CESA allows for take incidental to otherwise lawful development projects. State lead agencies are required to consult with California Department of Fish and Wildlife (CDFW) to ensure that any action they undertake is not likely to jeopardize the continued existence of any endangered or threatened species or result in destruction or adverse modification of essential habitat.

Fully Protected Species

The State of California first began to designate species as "fully protected" prior to the creation of the federal and California ESAs. Lists of fully protected species were initially developed to provide protection to animals that were rare or faced possible extinction, and included fish, amphibians, reptiles, birds, and mammals. Most fully protected species have since been listed as threatened or endangered under the federal and/or California ESA. Previously, the regulations that implement the Fully Protected Species Statute (California Fish and Game Code Section 4700) provide that fully protected species may not be taken or possessed at any time. However, as of July 10, 2023, Senate Bill 147 (SB 147) authorized CDFW to issue take permits under the CESA for fully protected species for qualifying projects through 2033. As stated in section 2081.15 of SB 147, qualifying projects include:

- A maintenance, repair, or improvement project to the State Water Project, including existing infrastructure, undertaken by the Department of Water Resources.

- A maintenance, repair, or improvement project to critical regional or local water agency infrastructure.
- A transportation project, including any associated habitat connectivity and wildlife crossing project, undertaken by a state, regional, or local agency, that does not increase highway or street capacity for automobile or truck travel.
- A wind project and any appurtenant infrastructure improvement, and any associated electric transmission project carrying electric power from a facility that is located in the state to a point of junction with any California based balancing authority.
- A solar photovoltaic project and any appurtenant infrastructure improvement, and any associated electric transmission project carrying electric power from a facility that is located in the state to a point of junction with any California-based balancing authority.

California Fish and Game Code

Native Plant Protection Act

The Native Plant Protection Act (NPPA) of 1977 (California Fish and Game Code Sections 1900–1913) was created with the intent to "preserve, protect and enhance rare and endangered plants in this State." The NPPA is administered by CDFW. The California Fish and Game Commission has the authority to designate native plants as "endangered" or "rare" and to protect endangered and rare plants from take. The CESA of 1984 (California Fish and Game Code Sections 2050–2116) provided further protection for rare and endangered plant species, but the NPPA remains part of the California Fish and Game Code.

Streambed Alteration Agreement

Pursuant to Section 1602 of the California Fish and Game Code, a Streambed Alteration Agreement (SAA) application must be submitted for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake". In Title 14 of the California Code of Regulations (CCR), Section 1.72, the CDFW defines a stream (including creeks and rivers) as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation."

In Chapter 9, Section 2785, of the Fish and Game Code, riparian habitat is defined as "lands which contain habitat which grows close to, and which depends upon, soil moisture from a nearby freshwater source."

The CDFW's jurisdiction includes drainages with a definable bed, bank, or channel and areas associated with a drainage channel that support intermittent, perennial, or subsurface flows; support fish or other aquatic life; or support riparian or hydrophytic vegetation. It also includes areas that have a hydrologic source.

The CDFW will determine if the proposed actions will result in diversion, obstruction, or change of the natural flow, bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. If warranted, the CDFW will issue an SAA that includes measures to protect affected fish and wildlife resources; this SAA is the final proposal agreed upon by the CDFW and the applicant.

Migratory Birds

The CDFW enforces the protection of nongame native birds in Sections 3503, 3503.5, and 3800 of the California Fish and Game Code. Section 3513 of the California Fish and Game Code prohibits the possession or take of birds listed under the MBTA. These sections mandate the protection of California nongame native birds' nests and also make it unlawful to take these birds. All raptor species are also protected from "take" pursuant to California Fish and Game Code Section 3503.5 and are protected at the federal level by the MBTA of 1918.

Bats and Bat Roosts

Bats in California are currently protected directly and indirectly by the California Fish and Game Code, Sections 86, 1600, 2000, 2014, 3007, and 4150; California Public Resources Code, Division 14, Section 21000 et seq.; and 14 CCR, including but not limited to Section 251.1, California Environmental Quality Act (CEQA) regulations (Section 15000 et seq.), and Section 15382, Significant Effect on the Environment.

Regulations of particular relevance to the protection of bats and bat roosts include 14 CCR Section 251.1, which prohibits harassment (defined in that section as an intentional act that disrupts an animal's normal behavior patterns, including breeding, feeding, or sheltering) of nongame mammals (e.g., bats), and California Fish and Game Code Section 4150, which prohibits take or possession of all nongame mammals or parts thereof. Any activities resulting in bat mortality (e.g., the destruction of an occupied bat roost that results in the death of bats), disturbance that causes the loss of a maternity colony of bats (resulting in the death of young), or various modes of nonlethal pursuit or capture may be considered take as defined in Section 86 of the California Fish and Game Code. In addition, impacts to bat maternity colonies, which are considered native wildlife nursery sites, could be considered significant under CEQA.

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Control Act requires "any person discharging waste, or proposing to discharge waste, within any region that could affect the waters of the State to file a

report of discharge" with the Regional Water Quality Control Board (RWQCB) through State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (23 CCR Section 3855).

Waters of the State are defined as any surface water or groundwater, including saline waters, within the boundaries of the state (California Water Code Section 13050[e]). Pollution is defined as an alteration of the quality of the waters of the State by waste to a degree that unreasonably affects its beneficial uses (California Water Code Section 13050) and includes filling in waters of the State. Note that 23 CCR Section 3855 applies only to individual water quality certifications, but the new State Wetland Definition and Procedures extend the application of Section 3855 to individual waste discharge requirements for discharges of dredged or fill material to waters of the State and waivers thereof. To determine whether a project should be regulated pursuant to the Porter-Cologne Water Quality Control Act, the RWQCB considers whether project activities could impact the quality of waters of the State.

On September 27, 2023, the EPA published its final 2023 Clean Water Act Section 401 Quarter Quality Certification Improvement Rule. The final 2023 Rule revises and replaces the 2020 Rule's regulatory requirements for water quality certification that were adopted by the prior federal administration. The updates realign the scope of the Section 401 certification process with established practices while also restoring the roles of states, territories, and authorized tribes as certifying agencies.

Jurisdictional Waters and Wetland Delineation

The RWQCB generally shares the USACE jurisdictional methodology for identifying non-wetland waters unless the water body is not jurisdictional to the USACE. Non-wetland waters of the State do not require connectivity to downstream trade-navigable waters and can include isolated and/or ephemeral aquatic features not subject to federal jurisdiction. In the case where the water body is not a water of the US, the RWQCB considers such water bodies to be jurisdictional waters of the State.

The State Water Resources Control Board adopted the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* (Procedures) for inclusion in the Water Quality Control Plan for Inland Surface Waters and Enclosed Bays and Estuaries and Ocean Waters of California. The Procedures consist of four major elements:

1. A wetland definition.
2. A framework for determining if a feature that meets the wetland definition is a water of the State.
3. Wetland delineation procedures.

4. Procedures for the submittal, review, and approval of applications for Water Quality Certification and Waste Discharge Requirements for dredge or fill activities.

The State wetland definition and delineation procedures are largely consistent with USACE's three-parameter approach involving indicators of hydrophytic vegetation, hydric soil, and wetland hydrology. However, one exception is that an area can naturally lack vegetation and still qualify as a wetland water of the State if it satisfies both the hydric soil and wetland hydrology parameters.

Keene-Nejedly Wetlands Preservation Act

Pursuant to the Keene-Nejedly Wetlands Preservation Act, the California state legislature recognizes that the remaining wetlands of the state are of increasingly critical economic, aesthetic, and scientific value to the people of California, and that the need exists for an affirmative and sustained public policy and program directed at their preservation, restoration, and enhancement so that wetlands will continue in perpetuity to meet the needs of the people. The Keene-Nejedly Act allows both CDFW and the California Department of Parks and Recreation to acquire interests in real property to protect, preserve, and restore wetlands. Additionally, both departments can enter into operating agreements with cities, counties, and districts for the management and control of wetlands.

LOCAL

City of Irwindale General Plan

The Irwindale General Plan provides a policy framework for future planning and development. The General Plan was adopted in 2020; the 2021–2029 Housing Element and Safety Element were updated in 2025 and a new Environmental Justice Element was adopted.

Resource Management Element

The Resource Management Element (RME) includes policies and programs intended to prevent the unnecessary loss or degradation of ecological resources. It also includes a Resource Management Plan that guides preservation of important natural and man-made resources in the City. As discussed throughout this DEIR, mining operations at the project site have been completed, and reclamation of the site is intended to facilitate future development consistent with applicable City policies and regulations.

Safety Element

The Safety Element addresses natural and human-caused hazards that may affect public safety and community well-being. Relevant to biological resources, the Safety Element provides a policy framework for reducing risks associated with hazards that may affect natural systems and

adjacent open space areas, including flood-related hazards associated with the San Gabriel River and Santa Fe Dam.

Tree Protection

The City's tree ordinance pertains specifically to vegetation on public rights-of way and does not specify tree species for special types of avoidance or preservation.

3.3.2 Existing Conditions

Unless otherwise noted, all information in this section is from Appendix F. Additional sources and information regarding biological resources can be found in Appendix F.

HELIX conducted a general biological survey (including vegetation mapping and a general habitat assessment) on December 24, 2024, and a jurisdictional delineation on July 9, 2025. HELIX completed focused surveys for rare plant species in April and July 2025, for burrowing owl (BUOW) between April and July 2025, and for California gnatcatcher (CAGN) between April and May 2025. Focused surveys for Crotch's bumble bee were conducted between April and July 2025.

PROJECT SITE

The project site is in the City of Irwindale in central Los Angeles County, near the western edge of the San Gabriel Valley. It is immediately east of the Santa Fe Dam Recreation Area and south of Interstate 210 (I-210), with regional access provided by adjacent arterial roadways. As shown on Figure 2-1, *Regional Location*, and Figure 2-2, *Vicinity Map*, the project site is in a largely industrial and infrastructure-oriented setting, with open space and flood control facilities associated with the Santa Fe Dam to the west and north.

The project site is directly adjacent to the Santa Fe Dam Recreation Area and was historically used for sand and gravel mining. The project site contains two former mining excavation pits, one on the west side and one on the east side (see Figure 2-3, *Project Site Boundary/Aerial Photo*). Based on historic aerials, the east pit was explored for mined resources prior to 1948 and has not been active for over 77 years. The west pit remained active through the mid- to late 1960s. It has been fallow for at least 60 years. Both former pits are surrounded by a terrace of upland vegetation. The west pit terrace historically supported a scrub and chaparral community but was ripped and grubbed for fire fuel modification in February 2025. The interior of the west pit predominantly supports coastal sage scrub and chaparral scrub species, including California buckwheat (*Eriogonum fasciculatum*), deerweed (*Acmispon glaber*), and laurel sumac (*Malosma laurina*). The eastern pit comprises similar vegetation communities but also includes Peruvian pepper trees (*Schinus molle*), fountain grass (*Pennisetum* sp.), and a small community of Goodding's willow (*Salix gooddingii*) trees in the bottom of the eastern pit. Between the excavations is a developed space used for commercial vehicle parking, materials storage, and

materials staging. To the southwest of the east pit is infrastructure that supported a series of dismantled solar arrays.

Elevations on the project site range from approximately 285 feet (87 meters) above mean sea level (amsl) inside the west pit to approximately 540 feet (165 meters) amsl on the mine terraces. Three soil types are mapped on the project site: Pits and Quarries; urban land–Soboba complex (0 to 5 percent slopes); and urban land, commercial–Soboba complex (0 to 5 percent slopes). The project site is bounded by a large brewery to the northeast, urban and commercial complexes to the south, the Santa Fe Dam Recreation Area to the west, and I-210 to the north.

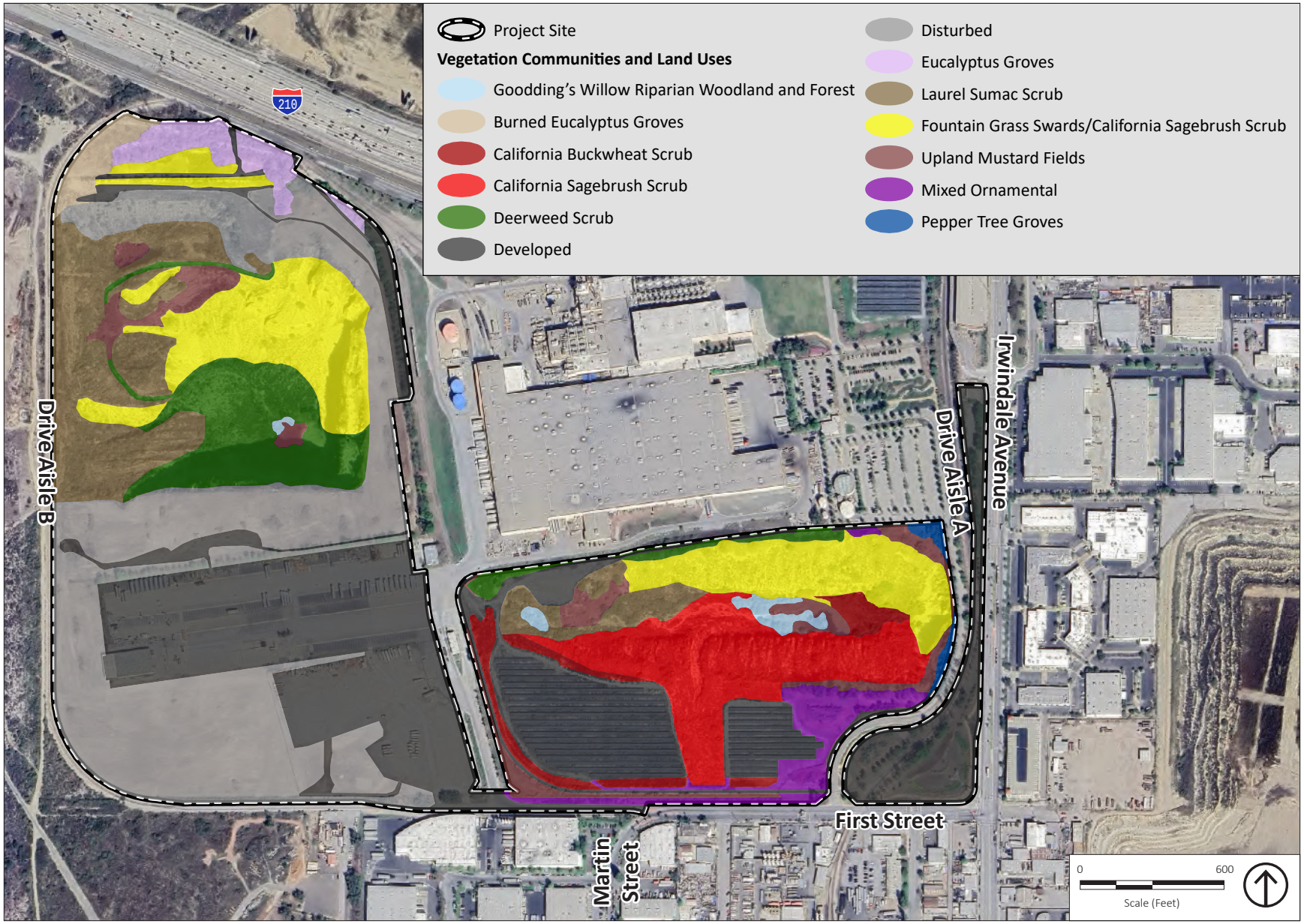
Vegetation Communities

Thirteen vegetation communities and land use types were mapped within the project site based on field surveys and review of existing biological resources data. These communities range from disturbed and developed areas to native- and nonnative-dominated vegetation types. The extent and distribution of each vegetation community and land use are summarized in Table 3.3-1, *Vegetation and Land Uses*, and depicted on Figure 3.3-1, *Vegetation Communities and Land Uses*. Sensitive vegetation communities identified pursuant to the CDFW's Natural Communities List are included among the mapped habitats and noted in the table. Brief descriptions of each vegetation community and land use on the project site are provided after the table.

Table 3.3-1 Vegetation and Land Uses

Habitat Type	Project Site (Acres)	Off-Site Areas (Acres)
California Buckwheat Scrub	2.78	-
California Sagebrush Scrub	10.56	-
Deerweed Scrub	10.17	-
Developed	48.29	1.26
Disturbed	32.01	-
Eucalyptus Groves	2.94	-
Burned Eucalyptus Groves	1.41	-
Fountain Grass Swards/California Sagebrush Scrub	17.66	-
Goodding's Willow Riparian Woodland and Forest	0.94	-
Laurel Sumac Scrub	14.16	-
Mixed Ornamental	3.59	-
Pepper Tree Groves	0.43	-
Upland Mustard Fields	5.17	-
TOTAL	**150.11**	**1.26**

Source: Helix 2026.



Source: Helix 2025.

Figure 3.3-1
Vegetation Communities and Land Uses

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California Buckwheat Scrub

California buckwheat scrub occupies xeric[1] sites such as steep slopes, severely drained soils, or clays that slowly release stored soil moisture. It is dominated by subshrubs with leaves that are deciduous during drought, an adaptation that allows the habitat to withstand the prolonged drought period in the summer and fall. Composition varies substantially depending on physical circumstances and the successional status of the vegetation community; however, characteristic species include California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), brittlebush (*Encelia farinosa*), and several species of sage (*Salvia* spp.).

California buckwheat scrub totaling 2.78 acres was observed in clusters within and around the eastern pit.

California Sagebrush Scrub

California sagebrush scrub is found primarily in dry, low elevation areas in coastal regions of California. The community typically consists of open mosaics of shrub species and grasses, with shrubs growing in two tiers, the lower of which is less than two meters in height and the upper is less than five meters in height. Composition varies substantially depending on weather conditions and the successional status of the vegetation community; however, characteristic species include California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), bush sunflower (*Encelia californica*), several species of sage (*Salvia* spp.) and species of chaparral shrubs (*Rhus* sp).

California buckwheat scrub was observed in clusters within and around the eastern pit, totaling 10.56 acres. Predominant plant species in this community include California buckwheat, deerweed, California sagebrush and laurel sumac. The community is on the upper terrace surrounding the eastern pit, especially in areas to the south and west of the former solar array on the south side of the east pit.

Deerweed Scrub

Deerweed (*Acmispon glaber*) is a perennial herb that is native to California. As a community, deerweed scrub is composed of at least 50 percent deerweed in the shrub canopy. It occurs on lower to upper slopes and ridges, typically exposed in somewhat steep open settings. It often emerges following recent disturbances such as fire, brush removal, or intermittent flooding.

[1] A xeric habitat is a dry environment characterized by limited water, well-drained, nutrient-poor soils, and often intense sun, supporting specialized plants and animals adapted to drought, like deserts, arid shrublands, or dry rocky outcrops, defined by low rainfall and high evaporation, featuring fire-adapted vegetation and unique biodiversity.

A narrow band of deerweed scrub is along the north terrace of the eastern pit. On the western pit it is in the bottom and the southern face of the former pit. Deerweed scrub in the project site totaled 10.17 acres.

Developed

Developed land is where existing permanent structures and/or pavement are present, which prevents the growth of vegetation, or where landscaping is clearly tended and maintained.

Existing developed areas include the trailer parking and equipment staging yard south of the western pit. Other developed areas include the large industrial facility north of the east pit and the former solar arrays south of the eastern pit. Developed areas on the project site totaled 48.29 acres.

Disturbed

Disturbed habitat includes land cleared of vegetation (e.g., dirt roads) or actively maintained or frequently traversed areas that are mostly unvegetated but may support scattered non-native plant species, such as ornamentals or ruderal exotic species that take advantage of disturbance.

Disturbed habitat was observed throughout the project site but was concentrated on the terraces of the west mining pit and surrounding the parking and staging area south of the west pit. Disturbed areas within the project site totaled 32.01 acres.

Eucalyptus Groves

Eucalyptus was planted as trees, groves, and windbreaks and has become naturalized in uplands and lowlands as well as adjacent to stream courses, lakes, and levees. Groves are composed of 80 percent relative cover in the tree layer. Understories in groves of fast-growing eucalyptus trees are usually lacking in variety due to a build-up of chemicals in the soil and deep leaf litter that inhibit the establishment of other plants. Stands in this alliance occur in agricultural and urban land uses, typically in disturbed areas including roadsides and the terraces of floodplains.

Eucalyptus groves within the project site are north of the west mining pit terrace adjacent to I-210 and total 2.94 acres.

Burned Eucalyptus Groves

Burned habitat has been affected by fire. The northwestern portion of the project site exhibits indicators of a relatively recent burn, likely the result of a roadside car fire from the adjacent southbound lanes of I-210.

Mapped burned habitat within the project site totaled 1.41 acres. Due to the extent of damage from the fire, other vegetation communities in these areas were not identifiable.

Fountain Grass Swards/California Sagebrush Scrub

Fountain grass swards is an herbaceous vegetation community composed of at least 50 percent cover by *Pennisetum* species. This association occurs on steep coastal cliffs, bluffs, road cuts, and coastal dunes, with coastal and desert scrub in areas with mild frost-free winters. At this location, the history of mining disturbance mimics the bluffs and road cuts favored by the species. Fountain grass swards have replaced native plants in the California sagebrush scrub community through competitive advantage. The fountain grass swards community is composed of dense stands of the tufted perennial grass among native species, including California buckwheat, California sagebrush, brittlebush, various species of sages, and California sunflower.

Coupled with the California sagebrush scrub described above, this blended community totaled 17.66 acres within the project site.

Goodding's Willow Riparian Woodland and Forest

Goodding's willow (*Salix gooddingii*) riparian woodland and forest consists of over 50 percent relative cover in the tree canopy. The community typically occurs on terraces along large rivers, canyons, floodplains of streams, seeps, springs, ditches, and other water courses. Other alliances and community groupings associated with Goodding's willow riparian woodland include desert riparian, fresh emergent wetlands, and valley foothill riparian. The species is a moderate-sized, fast-growing willow that reaches approximately 30 meters in height. Established plants tolerate seasonal inundation, and plants sprout from a root crown under conditions of adequate sunlight. Germination is best on fine-grained, moist bare soil.

Approximately 0.94 acre of Goodding's willow riparian woodland and forest is on the project site.

Laurel Sumac Scrub

Laurel sumac scrub is typically found in shallow and coarse soils on steep slopes. This plant community typically consists of laurel sumac as the sole, dominant, or important shrub, with black sage, hollyleaf cherry (*Prunus ilicifolia*), or toyon in the canopy. Other typical species in this plant community include monkey-flower (*Mimulus* sp.), California brittle bush (*Encelia farinosa*), California sagebrush, poison oak (*Toxicodendron diversilobum*), sugar bush (*Rhus ovata*), and yellow bush penstemon (*Keckiella antirrhinoides*). Emergent California black walnut (*Juglans californica*) may be present.

Laurel sumac is the predominant shrub on the western slopes of the west pit. Laurel sumac scrub areas within the project site totaled 14.16 acres.

Mixed Ornamental

Mixed ornamental vegetation is characterized as stands of naturalized trees and shrubs, many of which are also used in landscaping.

Several large patches of ornamental vegetation were observed throughout the project site, totaling 3.59 acres. Most of the ornamental vegetation was associated with existing development, such as access roads and landscaped spaces around the perimeter of the property. Ornamental species observed included Peruvian pepper tree (*Schinus molle*), Eucalyptus (*Eucalyptus* sp.), and acacia (*Acacia* sp.).

Pepper Tree Groves

Pepper tree groves are characterized as stands of pepper trees (*Schinus* spp.) and other nonnative trees (e.g., acacias), many of which are used in landscaping.

Pepper tree groves were observed on the east terrace of the east mining pit, totaling 0.43 acre. This area consisted mostly of Peruvian pepper trees, with other ornamental trees and shrubs, including acacia.

Upland Mustard Fields

Upland mustard fields, a non-native vegetation community, is typically associated with land that has been heavily influenced by human activities, including areas adjacent to roads, manufactured slopes, and abandoned lots. Upland mustard fields are dominated by non-native mustard species (e.g., black mustard [*Brassica nigra*] and short-pod mustard [*Hirschfeldia incana*]) or similar forb species that take advantage of previously cleared or abandoned landscaping, or land showing signs of past or present animal usage, which reduces the capacity for providing viable habitat.

Upland mustard fields were observed on the northern slopes of both mining pits totaling 5.17 acres. These areas were dominated by short-pod mustard.

Plants

The Biological Technical Report prepared for the proposed project identified 96 plant species on the project site during biological surveys, of which 33 (34 percent) were non-native species (see Appendix A of Appendix E).

Animals

The Biological Technical Report prepared for the proposed project identified 53 animal species on the project site during biological surveys, including 1 insect, 1 reptile species, 47 bird species, and 4 mammal species (see Appendix B of Appendix E).

Sensitive Biological Resources

Rare Plant Species

Rare plant species are uncommon or limited in that they: (1) are only found in the Irwindale/Azusa region; (2) are a local representative of a species or association of species not otherwise found in the region; or (3) are severely depleted within their ranges or within the region. Rare plant species include those species listed by CNPS with a CRPR of 1, 2, or 3 or federally and state listed endangered and threatened species. Species with CRPR of 4 may be considered rare if a population is locally uncommon, at the periphery of the species' range, sustained heavy losses, shows unusual morphology, or occurs on unusual substrates. Since none of these exceptional circumstances pertaining to CRPR 4 species occurred on the project site, focused surveys concentrated on the identification of CRPR 1, 2, and 3 species.

Forty-four rare plant species were recorded within the nine-quadrangle database search conducted on CNDDB and CNPS. These species are included in Appendix G of Appendix F, *Rare Plant Species' Potential to Occur.* Of the 44 rare plant species recorded within the general vicinity of the project site, 37 species were considered to have no potential to occur on the project site based on elevation and/or lack of suitable habitat. The remaining seven species were considered to have potential to occur on the project site, primarily based on the presence of microtopography, gravelly soils, and proper elevation range (see Appendix G of Appendix E). These species include alkali mariposa lily (*Calochortus striatus*), slender mariposa lily (*Calochortus clavatus* var. *gracilis*), Parry's spineflower (*Chorizanthe parryi* var. *parryi*), slender-horned spineflower (*Dodecahema leptoceras*), many-stemmed dudleya (*Dudleya multicaulis*), mesa horkelia (*Horkelia cuneata* var. *puberula*), and white rabbit-tobacco (*Pseudognaphalium leucocephalum*).

Spring and summer rare plant surveys were conducted on April 9 and July 9, 2025. The 2025 water year was an average year for rainfall in the region, which provided suitable conditions for detecting rare plant species if present. None of the seven rare species with the potential to occur (Slender mariposa lily, alkali mariposa lily, Parry's spineflower, slender-horned spineflower, many-stemmed dudleya, mesa horkelia, and white rabbit-tobacco) were observed during the rare plant surveys and are therefore presumed to be absent from the project site.

Sensitive Animal Species

Sensitive animal species include Federally and State listed endangered and threatened species, candidate species for listing by USFWS or CDFW, and/or are species of special concern (SSC) pursuant to CDFW.

Thirty-eight sensitive animal species were recorded within the nine-quadrangle database search conducted on CNDDB (see Appendix H, Sensitive Animal Species Potential to Occur, of DEIR

Appendix F). An evaluation of each sensitive animal species' potential to occur on the project site is described in Table 3.3-2, *Sensitive Animal Species Potential to Occur*, and provided in Appendix H to Appendix F.

Table 3.3-2 Sensitive Animal Species Potential to Occur

Species Name	Status	Potential to Occur
Invertebrates		
Bombus crotchii (Crotch's bumble bee)	SCE	**Not Observed**. The project site supports suitable nectar sources, including Eriogonum fasciculatum and Salvia spp. No foraging or nesting individuals were detected during focused surveys conducted in 2025.
Euphydryas editha quino (Quino checkerspot butterfly)	FE	**None**. This species has been extirpated from Los Angeles County. The project site does not support suitable host species.
Fish		
Catostomus santaanae (Santa Ana sucker)	FT; SSC	**None**. The project site does not support perennial water.
Gila orcuttii (arroyo chub)	SSC	**None**. The project site does not support perennial water.
Rhinichthys osculus ssp. 8 (Santa Ana speckled dace)	Federal Proposed Threatened ; SSC	**None**. The project site does not support perennial water.
Amphibians		
Anaxyrus californicus (arroyo toad)	FE; SSC	**None**. The water source and flow characteristics lack suitability for residence or breeding of the species.
Rana boylii (foothill yellow-legged frog)	FE; SE	**None**. The water source and flow characteristics lack suitability for residence or breeding of the species.
Rana muscosa (southern mountain yellow-legged frog)	FE; SE	**None**. The water source and flow characteristics lack suitability for residence or breeding of the species.
Spea hammondii (western spadefoot)	State Proposed Threatened	**None**. The project site does not support suitable temporary pools for breeding.
Taricha torosa (coast range newt)	SSC	**None**. The project site does not support suitable temporary pools for breeding.
Reptiles		
Actinemys pallida (southwestern pond turtle)	State Proposed Threatened	**None**. The water source and flow characteristics lack suitability for residence or breeding of the species.

Table 3.3-2 Sensitive Animal Species Potential to Occur

Species Name	Status	Potential to Occur
Anniella stebbinsi (San Deigo legless lizard)	SSC	**Low**. Soils tend toward rocky and cobbly than sandy. Preferred vegetation occurs on site. Commercial activity and proximity to state highway may deter movement.
Arizona elegans occidentalis (California glossy snake)	SSC	**Low**. Soils tend toward rocky and cobbly than sandy. Preferred vegetation occurs on site. Commercial activity and proximity to state highway may deter movement.
Aspidoscelis tigris stejnegeri (coast whiptail)	SSC	**Low**. Exposed cobble and rocky mining talus could support the occurrence of the species, though none were observed during habitat assessments and surveys.
Crotalus ruber (red-diamond rattlesnake)	SSC	**Low**. Soils tend toward rocky and cobbly than sandy. Preferred vegetation occurs on site. Commercial activity and proximity to state highway may deter movement.
Phrynosoma blainvillii (coast horned lizard)	SSC	**Low**. Soils tend toward rocky and cobbly than sandy. Preferred vegetation occurs on site. Commercial activity and proximity to state highway may deter movement.
Thamnophis hammondii (two-striped gartersnake)	SSC	**None**. The project site does not support suitable aquatic foraging habitat.
Thamnophis sirtalis (south coast gartersnake)	SSC	**None**. The project site does not support suitable aquatic foraging habitat.
Birds		
Athene cunicularia (western burrowing owl)	State Candidate	**Not Observed**. Due to recent disturbance to heavily vegetated mine upper terrace, suitable habitat is present. However, the species is presumed absent due to lack of detection during the 2025 focused surveys.
Buteo swainsoni (Swainson's hawk)	ST	**Low (Foraging Only).** This species is not known to nest in Southern California except for populations in the Antelope Valley and Mojave Desert (Battistone et al. 2019, Bechard et al. 2020). The project site may provide low-quality foraging habitat.
Coccyzus americanus occidentalis (yellow-billed cuckoo)	FT; SE	**None**. Although the project site supports one small patch of willow woodland, heavy development of the area and size of habitat excludes this species from the project site.
Cypseloides niger (black swift)	SSC	**None**. The project site does not support nesting habitat for the species and is not located within the known range of the species.
Empidonax traillii extimus (southwestern willow flycatcher)	FE; SE	**None**. Although the project site supports small, isolated patches of riparian habitat, willows (Salix spp.) are not a large component of this habitat.

Table 3.3-2 Sensitive Animal Species Potential to Occur

Species Name	Status	Potential to Occur
Icteria virens (yellow-breasted chat)	SSC	**None**. Although the project site supports small, isolated patches of riparian habitat, willows (Salix spp.) are not a large component of this habitat.
Laterallus jamaicensis coturniculus (California black rail)	ST	**None**. The project site is not within tidal areas.
Polioptila californica californica (coastal California gnatcatcher)	FT; SSC	**Not Observed**. Although the project site supports small, isolated patches of coastal sage scrub (CSS), CSS is not a dominant element of this habitat. The nearest eBird occurrence was recorded in 2023, less than 1 mile south of the project site. This species was not detected during the 2025 focused surveys.
Riparia riparia (bank swallow)	ST	**None**. The project site does not support suitable breeding or foraging habitat.
Setophaga petechia (yellow warbler)	SSC	**None**. Although the project site supports small, isolated patches of riparian habitat, willows (Salix spp.) are not a large component of this habitat and there are no cottonwoods or alder trees.
Vireo bellii pusillus (least Bell's vireo)	FE; SE	**None**. Although the project site supports three small isolated patches of riparian habitat, the willow stands are small (0.09 acre, 0.18 acre and 0.67 acre [sparse canopy]) and fragmented and are located at the base of two very deep (between 100 and 200 feet) mining pits. The willow stands lack understory species, which is a necessary component for breeding individuals. There is no adjacent suitable habitat, with the nearest suitable habitat being approximately 1.5 miles to the southwest of the project site. This species would not use the project site for foraging or breeding given the habitat is small and fragmented, it lacks a shrubby understory, and there is no adjacent suitable habitat.
Mammals		
Antrozous pallidus (pallid bat)	SSC	**Low**. The project site supports suitable foraging habitat. The nearest CNDDB occurrence was recorded in 1936, approximately 2.0 miles southwest of the project site.
Corynorhinus townsendii (Townsend's big-eared bat)	SSC	**None**. The project site does not support suitable foraging habitat. A high level of human disturbance likely excludes this species from the project site. No CNDDB records of the species occur in the vicinity of the project site.

Table 3.3-2 Sensitive Animal Species Potential to Occur

Species Name	Status	Potential to Occur
Eumops perotis californicus (western mastiff bat)	SSC	**Low (Foraging Only).** The project site does not support suitable roosting habitat but does support suitable foraging habitat. The nearest CNDDB occurrence was recorded in 1964, approximately 2.5 miles east of the project site.
Lasiurus frantzii (western red bat)	SSC	**Low**. The project site supports suitable roosting habitat, including black willow trees, and a water source (streambed), though the aquatic resource is limited and seasonally intermittent.
Lasiurus xanthinus (western yellow bat)	SSC	**None**. Habitat suitable for survival of the species does not occur on the project site. The nearest CNDDB occurrence was recorded in 1987, approximately 2 miles east of the project site.
Nyctinomops femorosaccus (pocketed free-tailed bat)	SSC	**None**. Habitat suitable for survival of the species does not occur on the project site. The nearest CNDDB occurrence was recorded in 1985, approximately 3.5 miles southeast of the project site.
Nyctinomops macrotis (big free-tailed bat)	SSC	**None**. Habitat suitable for survival of the species does not occur on the project site. The nearest CNDDB occurrence was recorded in 1997, approximately 2 miles east of the project site.
Ovis canadensis nelsoni (desert big horn sheep)	CDFW Fully Protected	**None**. The project site does not support suitable habitat.
Taxidea taxus (American badger)	SSC	**None**. The project site does not support prairies and farmland habitat.

Source: Helix 2025.
Listing is as follows: F = Federal; S = State of California; E = Endangered; T = Threatened; CE = Candidate Endangered; CT = Candidate Threatened; FP = Fully Protected; SSC = State Species of Special Concern.

No Potential to Occur

Of the 38 sensitive animal species recorded within the vicinity of the project site, 26 species were considered to have no potential to occur on the project site due to lack of suitable habitat and/or the inability to disperse into the project site. These species are listed in Table 3.3-2.

Low Potential to Occur

Nine species were determined to have a low potential to occur on the project site based on the presence of low-quality habitat, limited acreage of habitat, and lack of recent observations within the immediate vicinity of the project site. The species are listed in Table 3.3-2.

Not Observed

CAGN, Crotch's bumble bee, and BUOW were determined to have a moderate potential to occur on the project site based on the presence of moderate quality habitat and/or recent observations within the immediate vicinity. These species, however, were not observed during focused surveys that were conducted in 2025 and are therefore presumed to not be present at the time of the survey.

Crotch's Bumble Bee (*Bombus crotchii*)

Crotch's bumble bee is a State candidate endangered species. The project site supports potentially suitable foraging and nesting habitat, and focused surveys were conducted between April and July 2025. This species was not observed during the focused surveys or incidentally during other field surveys conducted in 2025 (see Appendix D of DEIR Appendix F).

Burrowing Owl (*Athene cunicularia*)

Burrowing Owl (BUOW) is a State SSC and is a candidate for State listing under CESA, which affords the species protected status until a final determination is published by CDFW. Potentially suitable habitat was identified during the 2024 habitat assessment, including sparsely vegetated, disturbed habitat mapped throughout portions of the project site. Several earthen burrows that could potentially be used by BUOW were observed within the project site; therefore, focused surveys were completed between April and July 2025. This species was not observed during focused surveys or incidentally during other field surveys conducted in 2025 (see Appendix E of DEIR Appendix F).

Coastal California Gnatcatcher (*Polioptila californica californica*)

Coastal California Gnatcatcher (CAGN) is a federal threatened and State SSC. Potentially suitable habitat on site consists of approximately 53.71 acres of coastal sage-chaparral scrub. A focused survey for CAGN was conducted between April and May 2025. This species was not observed during focused surveys or incidentally during other field surveys and is therefore presumed absent from the project site (see Appendix F of DEIR Appendix F) during the 2025 breeding bird season.

Sensitive Vegetation Communities/Habitats

Sensitive vegetation communities/habitats are considered either rare within the region or sensitive by CDFW (Helix 2026). Communities are given a Global and State (S) ranking on a scale of 1 to 5. Communities afforded a rank of 5 are most common, and communities with a rank of 1 are considered highly imperiled. CDFW considers sensitive communities as those with a rank between S1 and S3.

The project site supports one sensitive plant community, Goodding's willow riparian woodland and forest (State rarity ranking: S3), which is mapped to approximately 0.94 acre of the site.

Jurisdictional Waters and Wetlands

Based on the results of the jurisdictional delineation, the project site supports four jurisdictional drainages. Two drainages are in the west pit, a single longer drainage feature is in the east pit, and the final drainage feature is located in the southwest corner of the project site in the avoidance zone.

Drainage A traverses the northern boundary of the west pit, along the northern boundary of the project site, adjacent to I-210. This drainage feature is connected to culverts on the eastern and western extents. Drainage A enters the site via a culvert system that conveys flows from the north side of I-210 as well as draining road sheet flows associated with the I-210 road drainage system. Flows enter the site and trend southwesterly for approximately 125 feet before reaching a berm system on the project site that helps direct flows to the west. Drainage A continues west for approximately 300 feet before reaching a second culvert that conveys flows under the railroad tracks and off-site. This second culvert conveys flows directly west to the adjacent property, where it appears to dissipate in course, cobbly soils. Characteristics of moderate flow are visible at both ends, but clear flow indicators are absent or diminished in the center of the feature. Drainage A supports approximately 0.03 acre of waters of the State under the jurisdiction of RWQCB, and 0.07 acre of streambed and associated vegetation under CDFW jurisdiction.

Drainage B is in the bottom of the west pit within the project site. The feature is the result of sheet flows collected from surface runoff and direct rainfall in the pit. The periodic rainfall supports moderate- to low-quality riparian vegetation. Flow and sedimentation signs are minimal in the cobbly mining talus and eroded soils of the pit. The isolated feature extends approximately 80 feet into the pit's low point, where water pools briefly before dissipating into the course sandy and rocky soils. Drainage B supports approximately 0.03 acre of waters of the State under the jurisdiction of RWQCB, and 0.19 acre of streambed and associated vegetation under CDFW jurisdiction.

Drainage C is in the east pit within the project site. This intermittent feature is fed by a culvert of unknown source and origin on the west side of the pit approximately 30 feet from the edge of the pit terrace. The culvert and dissipation structure convey flows perennially from an unknown urban source. Due to the porous composition of the soils in the pit, surface flows dissipate quickly during the dry season. Therefore, Drainage C exhibits ephemeral flow characteristics beginning in the west and passing approximately 1,500 feet eastward, culminating in a vegetated depression that exhibits wetland characteristics. The feature tends to meander throughout its course through the large cobbles and boulders in the pit bottom depending on the force and duration of flows during the wet season. Based on surrounding vegetation at the

east end of the pit, short-duration ponding likely occurs during seasons of above-average rainfall. Drainage C supports approximately 0.30 acre of waters of the State under the jurisdiction of RWQCB, and 0.99 acre of streambed and associated vegetation under the jurisdiction of CDFW. A small area in the downstream portion of Drainage C was identified as three-parameter wetlands (0.17 acre).

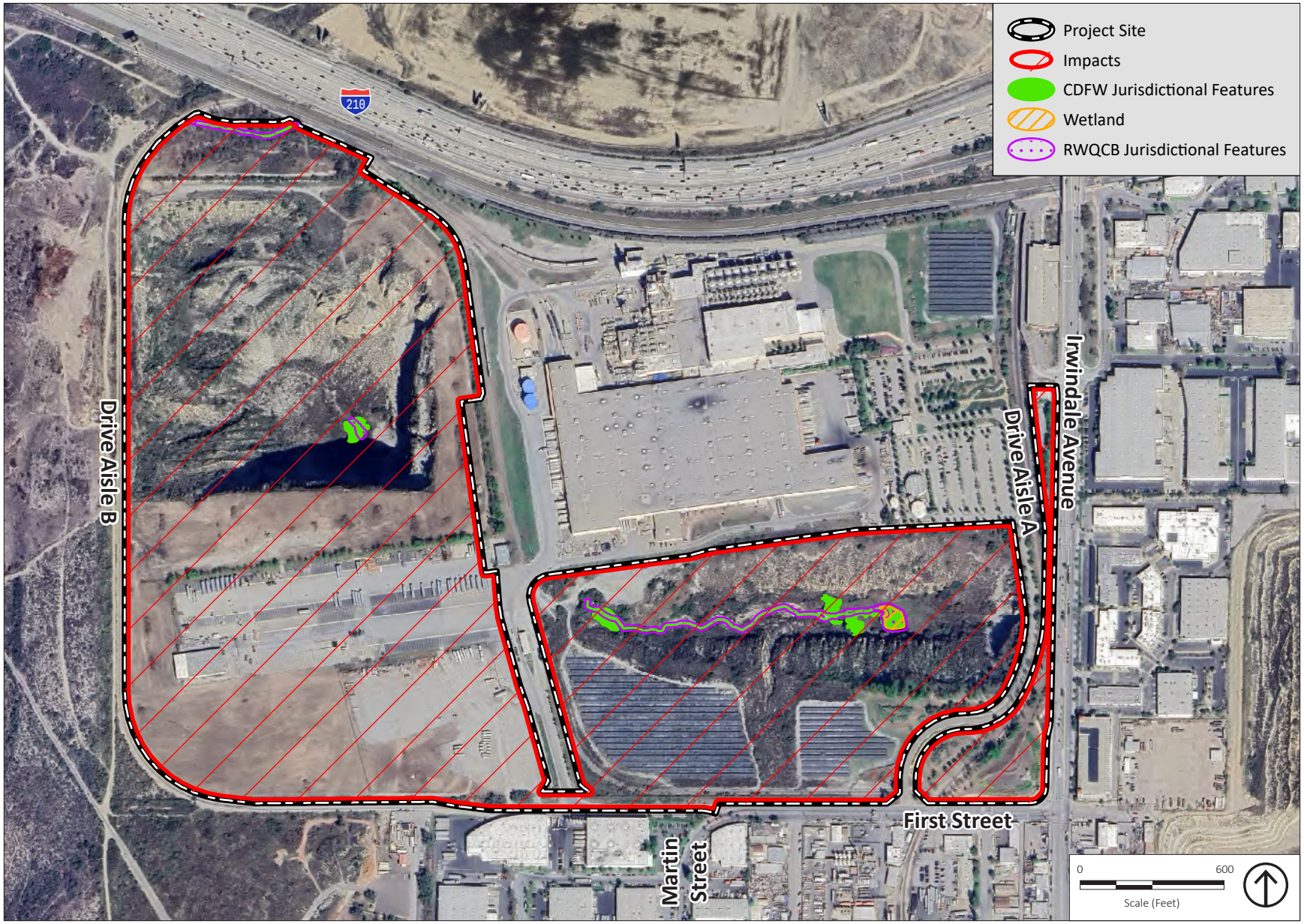
Drainage D is located in the southwest corner of the project site. The ephemeral feature conveys sheet flows collected north and east of the railroad tracks under a trestle and continues to the west approximately 275 feet where flows stop at a perimeter berm. The feature is surrounded by upland vegetation classified as Deerweed Scrub, which is composed predominantly of deerweed, with occurrences of coast prickly pear (*Opuntia littoralis*), California sage scrub, and laurel sumac. Drainage D supports approximately 0.01 acre of Waters of the State under the jurisdiction of RWQCB and 0.06 acre of streambed under the jurisdiction of CDFW.

In total, the project site supports approximately 0.37 acre of waters of the State under RWQCB jurisdiction, including approximately 0.17 acre of wetlands and approximately 1.25 acres of streambed and associated vegetation under CDFW jurisdiction. The location and extent of jurisdictional features are summarized in Table 3.3-3, *Existing Jurisdictional Features*, and illustrated in Figure 3.3-2, *Jurisdictional Features and Impact Area*.

Table 3.3-3 Existing Jurisdictional Features

Drainage	RWQCB (acres) [1]	CDFW (acres)[1,3]
Drainage A	0.03	0.07
Drainage B	0.03	0.19
Drainage C	0.30 (0.17)[2]	0.99
Drainage D	0.01	0.00
TOTAL	**0.37**	**1.25**

Source: Helix 2026.
NOTE: Jurisdictional acreages overlap and are not additive (e.g., RWQCB acreages are included in the CDFW acreages).
1. Acreages are rounded to the nearest hundredths of an acre.
2. Acreages in parentheses indicate jurisdictional acreages that were identified as a three-parameter wetland. Wetland acreages are a subset of the total acreage and are not additive.
3. Acreages include streambed and associated riparian vegetation.



Source: Helix 2025.

Figure 3.3-2
Jurisdictional Features and Impact Area

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Habitat and Wildlife Corridor Evaluation

Habitat linkage is the general concept of creating broad landscape-level connections between large habitat areas or ecosystems to allow wildlife movement. Wildlife corridor is a type of habitat linkage that consists of a narrow connection between habitat areas that would otherwise be isolated. Corridors can be local or regional in scale, and their functions may vary temporally and spatially based on conditions and species presence.

Wildlife corridors connect otherwise isolated pieces of habitat and allow movement or dispersal of plants and animals. Corridors can be local or regional in scale; their functions may vary based on conditions and species. Local wildlife corridors allow access to resources such as food, water, and shelter within the framework of their daily routine. Animals use these corridors, which are often hillsides or tributary drainages, to move between different habitats. Regional corridors provide these functions over a larger scale and link two or more large habitat areas, allowing the dispersal of organisms and the consequent mixing of genes between populations.

Regionally, the project site is situated adjacent to the upper reaches of the San Gabriel River, northeast of the Santa Fe Dam Recreation Area. The project site is roughly 3.5 miles southwest of Azusa Wilderness Park, which is within the Angeles National Forest. The segment of the San Gabriel River provides connectivity between the Angeles National Forest and the protected wilderness areas in the Santa Fe Dam Recreation Area, a final refugia for plant and wildlife before opening to extensive urban development in Irwindale and North El Monte.

The project site is bounded by industrial development to the east with a former mine excavation pit less than 0.25 mile east. The project site is bounded by I-210 to the north and further north includes relict mine operations and disturbed, not-yet-developed land uses.

To the west, southwest, and northwest are the Santa Fe Dam Recreation Area and San Gabriel River corridor. Native habitat within the project site is patchy and is mostly relict habitats from prior to mining operations. The project site is not in a Significant Ecological Area (SEA), though it is adjacent to the San Gabriel Canyon SEA, which includes the Santa Fe Dam Recreation Area and the upstream portions of the San Gabriel River.

The project site is not considered a regional corridor because it does not directly connect two or more large blocks of habitat that would otherwise be fragmented or isolated from one another. The areas immediately adjacent to the project site to the south and east are highly urbanized or exhibit significant disturbance due to former mining operations, and movement from the south is constrained by existing development, including urban and industrial land uses. Wildlife may access the project site from the west and southwest via the Santa Fe Dam Recreation Area.

Though the project site is not considered a regional wildlife movement corridor, the Santa Fe Dam Recreation Area and the associated San Gabriel River to the north are regional wildlife movement corridors. The project site may provide adjacent habitat for wildlife moving through

the San Gabriel River corridor to the Angeles National Forest. The project site also provides habitat for local wildlife that are moving shorter distances throughout the area, such as common mammals that are adapted to human disturbance (e.g., raccoon [*Procyon lotor*], skunk [*Mephitis* sp.], cottontail rabbits [*Sylvilagus* spp.], and coyote [*Canis latrans*]). Bird species may fly over surrounding development to nest and/or forage on project site.

3.3.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact on biological resources if it would:

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

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

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

d) 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.

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

3.3.4 Applicable Specific Plan Development Standards and Design Guidelines

Development Standards

Development standards are detailed in Chapter 3 of the Specific Plan and include standards governing site requirements such as building height, setbacks, circulation, parking, and other development parameters applicable within the Specific Plan area. While the Specific Plan does not include development standards that specifically address biological resources, it does include lighting standards intended to minimize glare and off-site light spillover. These standards require exterior lighting to be shielded and directed downward, designed to confine illumination to the project site, and arranged to minimize glare and visibility of light sources from off-site locations. Compliance with these standards would help minimize potential indirect effects of nighttime lighting on adjacent open space areas, including the Santa Fe Dam Recreation Area.

Design Guidelines

The following Design Guidelines in the Specific Plan are applicable to biological resources.

Biology: Fuel Modification Zone

The proposed project includes a site-specific Fuel Modification Plan delineating the fuel modification zone (FMZ) where combustible vegetation has been removed and/or modified and partially or completely replaced with more adequately spaced, drought-tolerant, low-fuel-volume plants to provide a reasonable level of protection to structures from wildland fire. Year-round maintenance shall be performed for all native brush, weeds, grass, trees, and hazardous vegetation within the FMZ surrounding any structures and buildings within the project site, and within 10 feet of any combustible fence or roadway/driveway used for vehicular travel. To ensure long-term identification and maintenance, all FMZs will be identified by a permanent zone marker meeting the approval of LACFD. An example of a permanent zone marker is a 1-1/2-inch diameter galvanized post with a concrete footing and a post cap indicating the fuel modification zone. For the majority of the project site, areas within 200 feet of structures will be considered within the FMZ. However, because of reduced accessibility in the southwest corner of the project site (southwest of the existing Union Pacific Railroad easement), the FMZ in this area shall be provided as follows, which shall apply in lieu of the 200-foot FMZ applied in other portions of the project site:

Zone 1: Clear all hazardous vegetation and other combustible growth within the first 100 feet surrounding structures.

- Remove from the property all dead trees and maintain all weeds and other vegetation at a height of no more than three inches if such weeds or other vegetation are within 100 feet of

a building or structure located on such property or on adjacent property. This requirement does not apply to the maintenance of trees, ornamental shrubbery or plants which are used as ground cover, provided such do not provide a ready fuel supply to augment the spread or intensity of a fire; nor does it apply to a native shrub, provided such shrub is trimmed up from the ground to one third of its height; does not exceed 216 cubic feet in volume; is spaced at a distance of not less than three times its maximum diameter, and not less than 18 feet from the edge of any other native shrub, building or structure; and all dead wood and other combustible material within 18 feet of such shrub is removed except as provided above.

- The horizontal distance between crowns of new trees and crowns of adjacent trees shall in all cases not be less than 10 feet.
- New trees not classified as fire-resistant vegetation, such as conifers, palms, pepper trees and eucalyptus species, shall be prohibited.
- Shrub groupings shall be separated from structures a minimum of 30 feet.
- Shrubs shall not exceed 6 feet in height.
- Groupings of shrubs are limited to a maximum aggregate diameter of 10 feet.
- Shrub groupings shall be separated from other groupings a minimum of 15 feet.
- Where shrubs are located below or within a tree's drip line, the lowest tree branch shall be a minimum of three times the height of the understory shrubs or 10 feet, whichever is greater.
- In addition, the FMZ shall include an enhanced Ember Resistant Zone for all vegetation within 5 feet of the structure through each of the following measures:
  - The use of hardscaping like gravel, pavers, concrete, and other non-combustible materials is required. Combustible bark or mulch are prohibited.
  - Remove any portion of a tree which extends within 10 feet of the outlet of a chimney or stovepipe.
  - Relocating all pallets, firewood, and lumber to be a minimum 30 feet or more from the structure.
  - Utilize only non-combustible materials for fencing, gates, and other structures within this zone.
  - Relocate all garbage and recycling containers outside this zone.
  - Maintain the roofs of all buildings or structures free of leaves, needles, twigs and other combustible matter.
  - Keep all trees, shrubs, and other growing vegetation or portions thereof adjacent to or overhanging any building or structure free of dead limbs, branches and other combustible matter. Maintain 5 feet of vertical clearance between roof surfaces and portions of trees overhanging any building or structure.

Zone 2: Vegetation within 100 to 165 feet of the structure

- Reduce the amount and/or modify the arrangement of hazardous vegetation within the area comprising the second 65 feet for a total distance of 160 feet from the applicable structure.

3.3.5 Project Impact Analysis

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

Construction

Direct Impacts to Candidate, Special-Status, and Sensitive Species

Rare Plant Species

Focused rare plant surveys were conducted during appropriate blooming periods in April and July 2025 (Appendix E). Of the 44 rare plant species identified within the regional database search area, 37 were determined to have no potential to occur within the project site due to elevation constraints and lack of suitable habitat. The remaining seven species were initially considered to have potential to occur based on soil characteristics; however, none were observed during focused surveys. Therefore, rare plant species are presumed absent from the project site.

Because no rare plant species occur within the project site, construction of the proposed project would not result in direct impacts to rare plant species, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

Sensitive Animal Species

Low Potential to Occur

Nine sensitive animal species were determined to have a low potential to occur within the project site due to the limited extent and low quality of suitable habitat, lack of recent observations in the immediate vicinity, and the disturbed condition of the site. These species are California glossy snake, coast horned lizard, coast whiptail, red-diamond rattlesnake,

southern California legless lizard, Swainson's hawk (foraging only), pallid bat, western mastiff bat (foraging only), and western red bat.

These species are either highly mobile, use the project site only incidentally for foraging, or lack suitable nesting or roosting habitat within the project site. Although temporary displacement of individuals could occur if present, such displacement would not affect regional populations, and suitable habitat would remain available in nearby open space areas, including the Santa Fe Dam Recreation Area and San Gabriel River corridor.

Therefore, direct impacts to the low-potential sensitive animal species discussed above during construction would be **less than significant**.

Not Observed (Presumed Absent During Focused Surveys)

Focused surveys in 2025 did not detect Crotch's bumble bee, burrowing owl, or coastal California gnatcatcher on the project site. Although marginal habitat for some of these species may be present, survey results support a conclusion that these species are not currently present on the project site.

Despite the absence of detections, construction activities could result in direct impacts if any of these species were to colonize the project site prior to ground disturbance. Sensitive animal species evaluated for the project and their listing status are summarized in Table 3.3-2. Given the regulatory status of these species and the potential for site conditions to change between the time of survey and the initiation of construction, direct impacts to presumed absent sensitive animal species are **potentially significant**.

Impact BIO-1: Construction-related activities could result in direct impacts to candidate, sensitive, or special-status species within the project site if such species are present on the project site prior to ground-disturbing activities.

> **Mitigation Measure BIO-1: San Diego Legless Lizard.** Due to the presence of suitable habitat for San Diego legless lizard (*Anniella stebbinsi*), a pre-construction survey shall be conducted by a qualified biologist within suitable habitat (leaf litter with high soil moisture) no more than 14 days prior to soil disturbance. The survey shall be conducted when soil temperatures are between 60 and 70 degrees Fahrenheit, as feasible with timing of construction. A hand rake shall be used to gently search for individuals in loose litter and soil. If California or Southern California legless lizards are encountered, a qualified biologist with an appropriate Scientific Collecting Permit shall relocate individuals to suitable habitat outside of the project footprint. For purposes of this and Mitigation Measure BIO-1 through Mitigation Measure BIO-5, the Biological Monitor shall: (1) have a bachelor's degree in biology or a closely related field; (2) be knowledgeable and experienced in the biology and natural history of local plant and

wildlife resources; (3) be able to identify resources that are or have the potential to be present on the project site; and (4) have previous biological monitoring experience on construction projects.

Mitigation Measure BIO-2: Sensitive Bat Species. Due to the presence of potentially suitable habitat (i.e., trees) for sensitive bat species, the following avoidance and minimization measures shall be implemented to avoid potential impacts to these species.

Pre-construction Survey: A qualified biologist experienced with bats shall conduct a pre-construction survey within all suitable habitat on the project site to determine whether occupied hibernacula, night roosts, and/or maternity roosts occur within the project site. The pre-construction survey shall be conducted no more than 30 days prior to commencing construction activities (i.e., earthwork, clearing, grubbing, and fuel modification [including off-site fuel modification on private property]) and shall consist of two separate surveys conducted no more than a week apart. The second and final survey shall be conducted no more than seven days prior to commencing construction activities. The pre-construction surveys shall be conducted using a detector for echolocation calls, such as an Anabat bat detector system. The results of the pre-construction survey shall be documented by the qualified biologist. If the qualified biologist determines that no sensitive bat roosts are present, the activities shall be allowed to proceed without any further requirements.

If the qualified biologist determines that big free-tailed bat, pallid bat, and/or western yellow bat roosts are present, the following avoidance and minimization measures shall be implemented:

Maternity Roosts: If occupied maternity roost(s) are identified during the pre-construction survey, no construction activities shall occur within 500 feet during the maternity roosting season (March 1 through September 30) or until a qualified bat biologist determines the roost is no longer active. A qualified biologist shall clearly delineate the 500-foot no-work buffer(s), which shall be clearly marked with flags and/or fencing prior to the initiation of construction activities.

Night Roosts and Hibernacula: To the extent feasible, no construction activities shall occur within 500 feet of active night roosts and/or hibernacula. The 500-foot no-work buffer shall be left in place until project construction is completed or until a qualified bat biologist determines the roost/hibernaculum is no longer active. No project construction shall occur between 1.5 hours before sunset and 1.5 hours after sunrise.

If avoidance of active night roosts and/or hibernacula is not feasible, the qualified biologist shall prepare a Bat Roost Relocation Plan to remove active night roosts/hibernacula and construct alternative bat roost outside of the work area. The Relocation Plan shall be submitted to CDFW for review prior to construction activities.

The qualified biologist shall implement the Relocation Plan, and new roost sites shall be constructed before the commencement of any project construction (i.e., earthwork, clearing, grubbing, and fuel modification [including off-site fuel modification on private property]). Removal of roosts will be guided by accepted exclusion and deterrent techniques.

Mitigation Measure BIO-3: Crotch's Bumble Bee. Due to the presence of suitable habitat for Crotch's bumble bee (*Bombus crotchii*) within the project site, the following measures shall be implemented to reduce potential impacts to this species.

Pre-construction Survey: If construction activities occur during the flight season (February 1 through October 31), a qualified biologist with expertise in surveying for bumble bees shall conduct a pre-construction survey for Crotch's bumble bee queens, gynes, and colonies. The survey shall be conducted no more than 14 days prior to construction during optimal weather conditions (e.g., warm, sunny days between 65- and 90-degrees Fahrenheit). The pre-construction survey shall be based on recommendations described in the Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, released by the CDFW on June 6, 2023, or the most current version at the time of construction. If the pre-construction survey is negative, no further assessment shall be required, and construction activities shall be allowed to proceed without any further requirements.

If habitat occupied by Crotch's bumble bee is detected during the pre-construction survey, the measures below shall be implemented. The measures below shall only be required if Crotch's bumble bee remains as a candidate State endangered species or is listed as a state endangered species at the time of project construction. If Crotch's bumble bee is delisted, the measures below shall not be required.

CESA Compliance: Prior to issuance of a grading permit, it shall be demonstrated that CESA-required consultation with CDFW regarding the project's effects to occupied Crotch's bumble bee habitat has occurred, and, if take of Crotch's bumble bee is expected, that CDFW has authorized such take through an incidental take permit, as applicable. In addition, if an incidental take permit is issued for the project that covers Crotch's bumble bee, that document shall supersede any inconsistent measures provided in this report.

Compensatory Mitigation: Compensatory mitigation for permanent direct impacts to occupied Crotch's bumble bee habitat shall be offset through compensatory mitigation, which may include, but is not limited to, on-site or off-site habitat preservation, enhancement, restoration, and/or creation at a ratio of no less than 1:1. However, if an incidental take permit is issued for the project that covers Crotch's bumble bee, that document shall supersede any measures and mitigation ratios provided in this report.

Mitigation Measure BIO-4: Burrowing Owl. Due to the presence of potentially suitable habitat within the project site, the following measures shall be implemented to reduce potential impacts to this species.

Take Avoidance Surveys: Take avoidance surveys shall be conducted 14 days or more prior to construction activities (i.e., demolition, earthwork, clearing, and grubbing) to determine presence of BUOW (*Athene cunicularia*). If ground-disturbing activities occur, but the project site is left undisturbed for more than 14 days, a pre-construction survey must be conducted again to confirm BUOW has not colonized the project site since it was last disturbed. If take avoidance surveys are negative and BUOW is confirmed absent, then ground-disturbing activities shall be allowed to commence, and no further measures shall be required.

Protection and Relocation Plan: If BUOW(s) is observed during the take avoidance surveys, CDFW will be immediately informed of the observation location(s) and status(es). Active burrows shall be avoided by the project in accordance with the CDFW's Staff Report. If avoidance of direct and/or indirect impacts to active burrows is not feasible, a BUOW Protection and Relocation Plan (Plan) shall be prepared by a qualified biologist. The plan must be approved by CDFW prior to construction activities (i.e., demolition, earthwork, clearing, and grubbing). The plan shall include measures to minimize direct and/or indirect impacts to BUOWs during construction, and if direct impacts are unavoidable, the plan shall provide measures to conserve all nesting, occupied, and satellite burrows and/or BUOW habitat such that the habitat acreage and number of burrows and BUOW individuals impacted are maintained and/or replaced.

Further coordination with CDFW shall occur to mitigate for direct loss of habitat through the acquisition, conservation, and management of in-kind habitat. Lands conserved to mitigation for direct impacts shall include: (1) sufficiently large acreage with fossorial mammals present; (2) permanent protection through a conservation easement for the purpose of conserving BUOW habitat and prohibiting activities incompatible with BUOW use; (3) development and implementation of a Mitigation Land Management Plan to address long-term ecological sustainability and maintenance of the site for BUOWs; and (4) funding for the maintenance and management of mitigation land through the establishment of a long-term funding mechanism, such as an endowment.

Mitigation Measure BIO-5: Nesting Birds: To the extent feasible, construction activities (i.e., earthwork, clearing, and grubbing) shall occur outside of the general bird nesting season for migratory birds, which is February 15 through August 31 for songbirds and January 1 to August 31 for raptors.

When construction activities (i.e., earthwork, clearing, and grubbing) occur during the general bird nesting season for migratory birds and raptors, a qualified biologist shall perform a pre-construction survey of potential nesting habitat within 300 feet of disturbance areas (500 feet for raptors and special-status species) to confirm the

absence of active nests belonging to migratory birds and raptors afforded protection under the Migratory Bird Treaty Code and California Fish and Game Code. The pre-construction survey shall be performed no more than seven days prior to the commencement of construction activities. The qualified biologist shall document the results of the pre-construction survey. If construction is inactive for more than seven days, an additional nesting bird survey shall be conducted. If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements.

If the qualified biologist determines that an active migratory bird or raptor nest is present, no construction activities within 300 feet (500 feet for raptors) of the active nest shall occur until the young have fledged the nest and the nest is confirmed to no longer be active. The biological monitor may modify the buffer or propose other recommendations to minimize disturbance to nesting birds. The results of the surveys, including graphics showing the locations of any active nests detected and documentation of any avoidance measures taken, shall be submitted to the City of Irwindale within 14 days of completion of the pre-construction surveys or construction monitoring to document compliance with applicable State and federal laws pertaining to the protection of native birds.

In addition to the requirements for qualified biologists set forth in Mitigation Measure BIO-1, the qualified biologist implementing this measure shall have at least three years of experience of conducting nesting bird surveys in the project region.

Significance with Mitigation: Implementation of Mitigation Measures BIO-1 through BIO-5 would ensure that any special-status species present prior to construction are identified and avoided or appropriately addressed. With these measures in place, potential direct impacts to presumed absent sensitive animal species would **less than significant**.

Indirect Impacts to Candidate, Special-Status, and Sensitive Species

Construction activities associated with the proposed project have the potential to result in indirect impacts to biological resources in the surrounding area through the generation of dust and erosion, increases in construction-related noise and lighting, and increased human activity. If not properly managed, these indirect effects could temporarily disturb wildlife behavior in nearby open space areas, including the Santa Fe Dam Recreation Area, which may support candidate, sensitive, or special-status species.

Noise

As discussed in Section 3.12, *Noise*, wildlife within the Santa Fe Dam Recreation Area west of the study area already experiences a moderate-level of persistent human-generated noise including but not limited to, human visitation in the recreation area and along existing trails, unhoused individual activities, existing industrial noise, air traffic, and traffic noise from I-210.

Long-term noise measurements were collected at four locations situated approximately 225 to 900 feet west of the project boundary. These 24-hour measurements represent the sustained acoustic conditions relevant to wildlife. Short term readings are not discussed in this section given they capture only momentary noise levels (15-minute snapshots) and are not representative of the continuous ambient environment. Existing ambient sound levels at the four long-term monitoring locations ranged from 51.0 to 62.8 A-weighted decibels (dBA), primarily influenced by noise from I-210, aircraft overflights, cyclists, and other recreational activity (See Figure 9 in Appendix E, *SoundPLAN Modeled Project Construction Noise Contours*).

Modeled construction noise levels at these same long-term monitoring locations are expected to temporarily generate noise levels between 64.8 dBA to 73.7 dBA, depending on the construction phase and distance from active equipment (See Figure 9 in Appendix E). These temporary increases could result in short term, indirect effects to wildlife moving through or foraging within adjacent open space, particularly roosting bats and nesting birds that are sensitive species sensitive to human disturbance. Therefore, this impact is potentially significant.

Significance without Mitigation: Potentially significant.

Impact BIO-2: Construction and operation of the proposed project could result in indirect noise-related impacts to wildlife utilizing adjacent open space habitats.

> **Mitigation Measure BIO-6 Noise**: The construction contractor shall stage equipment in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receptors nearest the project during all construction. The contractor's activities shall be confined to the hours between 7:00 a.m. and 7:00 p.m. Monday through Friday, excluding holidays.

Significance with Mitigation: Construction noise would be temporary and would occur during limited daytime hours. Implementation of Mitigation Measure BIO-6 would increase the separation between construction-related noise sources and adjacent open space habitats and would limit construction activities to daytime hours when wildlife species are less sensitive to disturbance. With implementation of Mitigation Measure BIO-6, indirect noise-related impacts to wildlife would be **less than significant**.

Lighting

Construction activities could require temporary nighttime lighting if work occurs during early morning or evening hours. Artificial lighting has the potential to affect wildlife behavior if light spills into adjacent open space areas, including the Santa Fe Dam Recreation Area.

Due to the proximity of the project site to undeveloped open space areas, temporary construction lighting could result in indirect impacts to wildlife occupying nearby habitat if light

trespass occurs along the western and southwestern project boundaries. Artificial lighting can disrupt wildlife movement, foraging behavior, and other nocturnal activity patterns for species utilizing adjacent open space areas.

Although construction lighting would be selectively placed, directed, and shielded to minimize spillover and would be designed to provide only the necessary level of illumination for worker safety and construction visibility, the potential for light trespass into nearby habitat could still occur in the absence of specific lighting controls.

Therefore, indirect lighting-related impacts during construction are **potentially significant**.

Significance without Mitigation: Potentially Significant.

Impact BIO-3: Construction and operation of the proposed project could result in indirect lighting-related impacts to wildlife utilizing adjacent open space habitats.

> **Mitigation Measure BIO-7 Lighting**: Perimeter night lighting shall be directed away from adjacent undeveloped open space areas to protect species occupying native habitats from direct night lighting. Shielding shall be incorporated in project designs to ensure ambient lighting in the adjacent open space is not increased.

Significance with Mitigation: Implementation of Mitigation Measure BIO-7 would ensure that construction and operational lighting is directed away from adjacent undeveloped habitat areas and appropriately shielded to prevent light trespass into the Santa Fe Dam Recreation Area and other nearby open space habitats. By minimizing artificial nighttime illumination within adjacent habitat areas, potential effects on wildlife movement, foraging behavior, and other nocturnal activities would be reduced. With implementation of Mitigation Measure BIO-7, indirect lighting-related impacts to wildlife would be **less than significant**.

Traffic

Construction of the proposed project would result in temporary increases in vehicle trips associated with construction worker commuting, equipment deliveries, and haul trucks transporting materials to and from the project site. These trips would occur on existing roadways that currently serve industrial and recreational uses in the project vicinity, including access routes near the Santa Fe Dam Recreation Area.

Although construction traffic would temporarily increase vehicle activity in the area, construction vehicles would utilize existing roadways and access points and would not create new barriers to wildlife movement. Construction activities would also be temporary and confined to the project site. As a result, construction traffic could result in minor, short-term increases in noise and human activity along nearby roadways; however, these conditions would

be similar to existing traffic disturbances associated with surrounding transportation infrastructure and recreational uses.

Therefore, construction traffic would not result in substantial indirect impacts to candidate, sensitive, or special-status species. This impact would be **less than significant**.

Significance without Mitigation: Less than significant.

Fugitive Dust

Construction activities associated with grading, excavation, and soil handling could generate fugitive dust that may disperse beyond the project site. If not properly controlled, fugitive dust could temporarily affect nearby vegetation communities, jurisdictional waters, or wildlife habitat in adjacent open space areas.

However, construction activities would be required to comply with applicable air quality and water quality regulations that control dust generation and sediment transport. Preparation and implementation of a Stormwater Pollution Prevention Plan would require erosion and sediment control measures to prevent sediment-laden runoff from leaving the project site during construction. In addition, compliance with applicable South Coast Air Quality Management District requirements would require implementation of dust control measures such as watering disturbed areas, stabilizing exposed soils, and minimizing windborne dust from construction activities.

These regulatory requirements would minimize the potential for fugitive dust and sedimentation to affect nearby vegetation communities, jurisdictional waters, or wildlife habitat. Therefore, indirect impacts related to fugitive dust during construction would be **less than significant**.

Significance without Mitigation: Less than significant.

Pesticide Use

Vegetation management and pest control during construction of the proposed project could involve the use of herbicides or other pesticides. If not properly managed, pesticide applications have the potential to indirectly affect wildlife occupying adjacent open space areas through drift, runoff, or ingestion of contaminated prey. Wildlife species that utilize habitat edges near the project perimeter, including small mammals, raptors, pollinators, and other foraging species, could be exposed to pesticides used for vegetation management during construction activities.

To reduce the potential for indirect impacts, vegetation management along the project perimeter and exterior spaces during construction would prioritize mechanical methods, such as mowing, trimming, or manual removal of vegetation, to control the encroachment of native and non-native plant species. If chemical control is necessary, treatments would be limited to

targeted spot applications using aquatic-safe herbicides. In addition, rodenticides would be avoided along the project perimeter and facility exteriors during construction to reduce the potential for secondary poisoning of non-target wildlife.

However, despite these management practices, the potential for indirect exposure of wildlife to pesticides could still occur if chemical treatments are used in areas adjacent to open space habitat during construction activities. Therefore, this impact is **potentially significant**.

Significance without Mitigation: Potentially significant.

Invasive Plant Species

Construction activities associated with grading, excavation, and movement of soils and equipment could introduce or facilitate the spread of invasive plant species. Seeds or plant fragments may be transported on construction equipment, vehicles, or imported fill material and could establish in disturbed areas of the project site. Once established, invasive plant species could spread into adjacent open space areas to the west and compete with native vegetation, potentially altering habitat conditions for wildlife that utilize these areas.

Although the proposed project would commit to avoiding the use of landscape plant species identified on the California Invasive Plant Council Species Inventory, the potential for invasive plant species to be introduced during construction activities could still occur through soil disturbance and equipment movement. Therefore, impacts related to the introduction or spread of invasive plant species during construction are **potentially significant**.

Significance without Mitigation: Potentially significant.

Although construction activities would be confined to the project site, indirect effects could occur in adjacent areas as a result of construction-generated noise, lighting spillover, pesticide use, and the introduction or spread of invasive plant species associated with construction activities at the project site. Additionally, given the proximity of the project site to the Santa Fe Dam Recreation Area and associated open space, these factors could indirectly affect candidate, sensitive, or special-status species occurring in nearby habitats. Therefore, indirect impacts related to construction noise, lighting, pesticide use, and invasive plant species would be **potentially significant**.

Impact BIO-4: Construction-related activities associated with construction noise, lighting, pesticide use, and the introduction or spread of invasive plant species could result in indirect impacts to nearby open space areas, including the Santa Fe Dam Recreation Area, which may support candidate, sensitive, or special-status species.

> Implement Mitigation Measures BIO-2, BIO-3, BIO-5, BIO-6 and Mitigation Measure BIO-7.

Mitigation Measure BIO-8: **Pesticide Use**. During construction and in the post-construction condition, the use of rodenticides along the project perimeter and facility exteriors should be avoided. To further reduce the risk of indirect impacts to native small mammals, raptors, pollinators or other foraging animals, weed removals along the project perimeter and exterior spaces will be first done through mechanical means, then followed by spot treatments with aquatic-safe herbicides.

Mitigation Measure BIO-9: **Invasive Plant Species**. The project will not use landscape plant species on the California Invasive Plant Species Inventory (https://www.cal-ipc.org/plants/inventory/).

Significance with Mitigation: Implementation of Mitigation Measure BIO-2 would reduce the potential for indirect impacts to sensitive bat species through pre-construction surveys, establishment of avoidance buffers around active roosts, seasonal work restrictions, and relocation procedures if avoidance is not feasible.

Implementation of Mitigation Measure BIO-3 would reduce the potential for impacts to Crotch's bumble bee through pre-construction surveys, compliance with applicable California Endangered Species Act requirements, and compensatory mitigation if occupied habitat is identified.

Implementation of Mitigation Measure BIO-5 would reduce the potential for impacts to nesting birds and raptors through pre-construction surveys, establishment of species-appropriate avoidance buffers around active nests, and avoidance of disturbance until nesting activity has concluded.

Implementation of Mitigation Measure BIO-6 would reduce indirect noise impacts by restricting construction hours and requiring staging of equipment to maximize distance between construction noise sources and nearby open space areas.

Implementation of Mitigation Measure BIO-7 would minimize indirect impacts associated with construction lighting by requiring that perimeter lighting be shielded and directed away from adjacent undeveloped open space areas.

Implementation of Mitigation Measure BIO-8 would reduce the potential for indirect impacts associated with pesticide use by prioritizing mechanical vegetation management and avoiding rodenticide use along the project perimeter and facility exteriors.

Implementation of Mitigation Measure BIO-9 would reduce the potential for the introduction or spread of invasive plant species by prohibiting the use of landscape species identified on the California Invasive Plant Council Species Inventory.

With implementation of Mitigation Measures BIO-2, BIO-3, BIO-5 through BIO-9, indirect construction-related impacts to biological resources associated with construction noise, lighting, pesticide use, and invasive plant species would be **less than significant**.

Operation

Noise

Operation of the proposed project would generate ongoing noise associated with vehicle trips, on-site activities, and building operations. As discussed in Section 3.12, *Noise*, operational noise levels would remain consistent with existing ambient conditions in the project vicinity, which are influenced by nearby roadways, industrial uses, and recreational activity within the Santa Fe Dam Recreation Area.

The proposed project would not significantly increase indirect noise effects in adjacent open space areas after construction is completed. Modeled post-construction noise levels at the four long term monitoring locations west of the project range between 44.8 dBA to 49.6 dBA (see Figure 10 in Appendix E, *SoundPLAN Modeled Project Noise Contours*).

The post construction increases over ambient range from 0 to approximately 1.2 dBA. These changes fall below levels generally perceptible to humans or most wildlife and remain within the range of normal day to day variability in the existing sound environment. Project design features further reduce potential noise exposure in the Santa Fe Dam Recreation Area.

Truck docks are designed to face away from open space areas to the west, and dock doors would face south along the southern study area boundary. This orientation prevents direct line of sight noise transmission and limits higher frequency, more disruptive noise from reaching the open space. Additionally, the three western buildings along the western study area boundary form a structural barrier between operational areas of the project and the open space to the west, further reducing indirect noise effects on nearby open space.

Modeled operational noise levels at the four west-side monitoring locations remain comparable to the existing freeway dominated background levels, indicating that the proposed project would not create a substantial or sustained change in the overall acoustic environment used by wildlife. Wildlife already using this open space are adapted to consistent transportation noise, and the small project related increases would not represent a meaningful change in ambient conditions. Wildlife that are already successfully using the open space area to the west are expected to continue using these areas after project buildout, with no substantial indirect noise impacts.

As discussed in the indirect noise impacts analysis above, modeled post-construction noise increases are minimal and remain within the range of existing ambient variability. Therefore, operational noise would not result in significant impacts to candidate, sensitive, or special-status species. This impact would be **less than significant**.

Significance without Mitigation: Less than significant.

Lighting

Operational lighting associated with the proposed project could introduce nighttime illumination to the project site. Artificial lighting has the potential to affect wildlife behavior if it spills into adjacent open space areas, including the Santa Fe Dam Recreation Area.

As described in Section 3.1, *Project Design*, exterior lighting would be designed in accordance the Specific Plan design standards, described in Section 3.3.4, *Applicable Specific Plan Development Standards and Design Guidelines*, which require that exterior lighting be fully shielded, directed downward, and designed to minimize glare and off-site light trespass, with fixtures arranged and positioned to confine illumination to the project site and prevent visibility of light sources from off-site locations. Lighting would also be limited to the areas necessary for safety and operational purposes and would avoid projecting light toward adjacent open space areas, including the Santa Fe Dam Recreation Area.

However, despite these design standards, operational lighting could still result in light spillover into nearby habitat areas and may affect wildlife movement, foraging behavior, or other nocturnal activity patterns for species utilizing adjacent open space areas. Therefore, operational lighting could result in indirect a **potentially significant** impact to candidate, sensitive, or special-status species.

Significance without Mitigation: Potentially significant.

Impact BIO-5: Operational lighting associated with the proposed project could result in indirect lighting-related impacts to candidate, sensitive, or special-status wildlife species utilizing adjacent open space habitats.

Implement Mitigation Measure BIO-7, Lighting.

Significance with Mitigation: Implementation of Mitigation Measure BIO-7 would further reduce the potential for light spillover into adjacent open space habitats through the use of shielding, directional lighting, and other lighting controls designed to minimize off-site illumination. Although the proposed project incorporates lighting design standards that require exterior lighting to be fully shielded, directed downward, and designed to minimize glare and off-site light trespass, Mitigation Measure BIO-7 would provide additional assurances that operational lighting would not substantially affect adjacent habitat areas. By minimizing artificial nighttime illumination within the Santa Fe Dam Recreation Area and other nearby open space habitats, potential effects on wildlife movement, foraging behavior, and other nocturnal activities of candidate, sensitive, or special-status species would be reduced. Therefore, with implementation of Mitigation Measure BIO-7, indirect lighting-related impacts would be **less than significant**.

Traffic

Operation of the proposed project would result in additional vehicle trips on surrounding roadways associated with employee travel, truck deliveries, and on-site industrial operations. As discussed in Section 3.14, *Transportation*, traffic increases would occur on an existing roadway network that already experiences moderate to high traffic volumes.

Project traffic would primarily occur on existing rights-of-way and would terminate within the project site at one of four proposed warehouse structures. The western edge of the project site, which is adjacent to undeveloped open space, would accommodate smaller vehicle parking areas, while the north and south sides of the buildings would accommodate truck loading and delivery areas. Although the proposed project would increase traffic volumes relative to existing conditions, vehicle activity would remain concentrated within the project site and along existing roadways.

Wildlife movement in the proposed project vicinity is already constrained by surrounding development, roadways, and infrastructure associated with the Santa Fe Dam Recreation Area. The proposed project would not introduce new barriers to wildlife movement or substantially increase wildlife–vehicle interactions relative to existing conditions.

Traffic-related disturbances such as vehicle noise or lighting could result in minor indirect effects to wildlife utilizing adjacent open space areas. However, the proposed project would incorporate design features that reduce these potential edge effects, including a 200-foot setback between buildings and the western project perimeter, selective placement of loading bays, and orientation of commercial traffic away from adjacent open space. As discussed under *Lighting*, perimeter lighting would also be shielded and directed away from adjacent natural areas, further minimizing indirect effects.

Therefore, operational traffic would not result in significant impacts to candidate, sensitive, or special-status species. This impact would be **less than significant**.

Significance without Mitigation: Less than significant.

Stormwater Discharge

Operation of the proposed project would include on-site stormwater management and discharge in compliance with applicable State and regional water quality requirements. As described in Section 3.9, *Hydrology and Water Quality*, stormwater runoff from the project site would be treated using on-site best management practices (BMP) designed to remove pollutants prior to discharge.

Although the project site is adjacent to the Santa Fe Dam Recreation Area and the San Gabriel River, operational stormwater discharges would not introduce pollutants at concentrations that

would adversely affect aquatic habitat or wildlife. Stormwater treatment systems would be designed to meet or exceed applicable water quality standards, and no direct discharge of untreated runoff to sensitive habitat would occur.

In addition, project drainage infrastructure would regulate runoff such that post-project flows entering downstream watercourses do not exceed pre-project conditions. Compliance with applicable stormwater regulations and implementation of operational Best Management Practices (BMPs) would prevent degradation of downstream water quality or aquatic habitat. Therefore, operational stormwater discharges would not result in substantial adverse effects on candidate, sensitive, or special-status species. This impact would be **less than significant**.

Significance without Mitigation: Less than significant.

Human-Wildlife Interactions

Operation of the proposed project would introduce increased human activity to a site that is currently disturbed and largely devoid of natural habitat. The project would expand existing industrial operations and increase the number of employees, deliveries, and associated vehicle activity on-site. However, these activities would occur within developed areas of the project site, which already support industrial uses such as truck parking, truck deliveries, and operations associated with the adjacent brewery.

Although the project site is located adjacent to undeveloped open space areas associated with the Santa Fe Dam Recreation Area, the site itself does not provide suitable habitat for sensitive wildlife species. In addition, the project would not include residential uses or features that would attract wildlife, such as open water, unmanaged food sources, or wildlife corridors. The project also would not provide public access to adjacent open space areas, trails, or recreational facilities.

Industrial activities, including employee parking, truck deliveries, and on-site operations, would be confined to the developed portions of the site and existing roadway network. Furthermore, the perimeter of the site is enclosed by an approximately six-foot-tall chain-link fence, which would remain or be improved as part of the proposed project, limiting the potential for wildlife to enter operational areas.

Therefore, operational activities would not substantially increase the likelihood of adverse interactions between humans and wildlife. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

Bird Collisions

Buildings proposed under the project would be low rise and comparable in height to existing on-site infrastructure. As discussed in the Biological Technical Report, low-rise buildings in developed and previously disturbed environments are generally considered to pose a low risk for bird collisions, as they do not intersect primary migratory flight paths and allow birds to readily adjust flight behavior.

In addition, building design under the proposed project would comply with the Specific Plan design standards, which emphasize articulated building façades, varied massing, the use of overhangs and architectural elements, and avoidance of large expanses of uninterrupted reflective glass. These design features reduce the extent of highly reflective and transparent surfaces that can create visual confusion for birds in flight.

Given the low building heights, the disturbed context of the project site, and compliance with applicable Specific Plan design standards, the proposed project would not substantially increase the risk of bird collisions. Impacts would be **less than significant.**

Significance without Mitigation: Less than significant.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The Biological Technical Report identifies a total of 150.11 acres of vegetation communities and land uses within the project site, the majority of which consist of developed, disturbed, or non-native-dominated habitat types. Approximately 83.89 acres support unvegetated developed (48.29 acres), disturbed (32.01 acres), or mixed ornamental (3.59 acres) land cover. An additional 9.95 acres are dominated by non-native vegetation, including burned eucalyptus groves (1.41 acres), eucalyptus groves (2.94 acres), upland mustard fields (5.17 acres), and pepper tree groves (0.43 acre).

Native-dominated habitat totals approximately 56.27 acres and includes California buckwheat scrub (2.78 acres), California sagebrush scrub (10.56 acres), deerweed scrub (10.17 acres), laurel sumac scrub (14.16 acres), fountain grass swards/California sagebrush scrub (17.66 acres), and Goodding's willow riparian woodland and forest (0.94 acre), as summarized above in Table 3.3-1 and shown in Figure 3.3-1.

Of the habitat types present on-site, Goodding's willow riparian woodland and forest is the only vegetation community identified as a sensitive natural community pursuant to the CDFW Natural Communities List. This community occurs in localized areas associated with historic

mining pits and represents less than 1 percent (approximately 0.65 percent) of the total project site acreage.

Implementation of the proposed project would result in permanent impacts to approximately 144.69 acres of vegetation communities and land uses within the 150.11-acre project site, including 0.94 acre of Goodding's willow riparian woodland and forest, as a result of construction of four proposed industrial buildings and associated parking, loading, and infrastructure improvements. Because this vegetation community is considered a sensitive natural community under CDFW guidance, permanent impacts would be **potentially significant**.

Significance without Mitigation: Potentially significant.

Impact BIO-6: The proposed project would result in permanent impacts to Goodding's willow riparian woodland and forest, a sensitive natural community identified by the CDFW.

> **Mitigation Measure BIO-10: CDFW Jurisdiction.** Prior to issuance of a grading permit, the City shall obtain proof of a Streambed Alteration Agreement from CDFW. Permanent impacts to CDFW jurisdiction shall be mitigated through: (1) on-site preservation, enhancement, restoration, and/or creation of jurisdictional streambed at a ratio of no less than 2:1; (2) off-site preservation, enhancement, restoration, and/or creation of jurisdictional streambed at a ratio of no less than 2:1; and/or (3) purchase of credits at an approved mitigation bank at a ratio of no less than 1:1, provided that the credits represent successfully implemented streambed creation.
>
> BMPs to minimize and avoid impacts to CDFW jurisdiction during and after construction shall be addressed as part in the Streambed Alteration Agreement. Minimization and avoidance measures may include, but are not limited to:
>
> - Construction-related equipment shall be stored in developed/disturbed areas, outside of drainages. No equipment maintenance shall be done within or adjacent to the drainage.
> - Mud, silt, spoil sites, raw cement, asphalt, or other pollutants from construction activities shall not be placed within or adjacent to the drainage.
> - Open trenches or other excavated areas shall be properly secured at the end of the day to avoid entrapment of animals, or an escape ramp shall be provided.
> - To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site.

- Construction personnel shall strictly limit their activities, vehicles, equipment, and construction material to the proposed project footprint, staging areas, and designated routes of travel.
- Exclusion fencing shall be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities.
- To the extent feasible, construction shall be conducted outside of the nesting bird season (see Mitigation Measure BIO-5).

Significance with Mitigation: Goodding's willow riparian woodland and forest is consistent with CDFW jurisdiction, and the proposed project would provide compensatory mitigation for permanent impacts to this habitat in accordance with applicable regulatory requirements. With implementation of compensatory mitigation consistent with CDFW requirements described in Mitigation Measure BIO-10, impacts to sensitive vegetation communities would be **less than significant**.

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

As documented in the Biological Technical Report, the project site supports four drainages (Drainages A, B, C, and D) that are regulated as waters of the State by the Regional Water Quality Control Board (RWQCB) pursuant to the Porter-Cologne Water Quality Control Act. Collectively, these features total approximately 0.37 acre of RWQCB-jurisdictional waters of the State, including approximately 0.17 acre of wetland waters of the State.

Implementation of the proposed project would result in permanent impacts to approximately 0.36 acre of RWQCB-jurisdictional waters of the State, including approximately 0.17 acre of wetland waters of the State, through grading, filling, and site redevelopment activities. These impacts would result in the direct removal of state-protected wetland and non-wetland aquatic resources.

The project would also result in permanent impacts to approximately 1.25 acres of CDFW-jurisdictional streambed and associated riparian vegetation, including approximately 0.94 acre of Goodding's willow riparian woodland and forest. While Goodding's willow riparian woodland and forest is a sensitive natural community and riparian habitat regulated by CDFW, the primary concern under this significance threshold is the direct impact to waters of the State and wetland resources.

In addition to direct impacts, construction activities could result in indirect effects to adjacent jurisdictional resources through erosion, sedimentation, dust deposition, or accidental

discharge of pollutants. Although standard construction BMPs would reduce the potential for such effects, the proposed project would permanently impact jurisdictional waters and wetlands. Therefore, impacts to state-protected wetlands and other waters of the State would be **potentially significant**.

Significance without Mitigation: Potentially significant.

Impact BIO-7: The proposed project would result in permanent direct impacts to waters of the State, including wetland Waters of the State regulated by the RWQCB.

Mitigation Measure BIO-11: RWQCB Jurisdiction. Prior to issuance of a grading permit, the City shall obtain proof of appropriate regulatory permits from RWQCB. Regulatory permits are anticipated to include a Waste Discharge Requirements for impacts to non-federal waters through preparation and submittal of a SWRCB Report of Waste Discharge. Compensatory mitigation for permanent impacts to RWQCB jurisdiction shall be required as part of subsequent permitting requirements. Permanent impacts to RWQCB jurisdiction shall be mitigated through: (1) on-site preservation, enhancement, restoration, and/or creation of jurisdictional streambed at a ratio of no less than 2:1; (2) off-site preservation, enhancement, restoration, and/or creation of jurisdictional streambed at a ratio of no less than 2:1; and/or (3) purchase of credits at an approved mitigation bank at a ratio of no less than 1:1, provided that the mitigation is creation of streambed and has already been successfully implemented.

BMPs to minimize and avoid impacts to RWQCB jurisdiction during and after construction shall be addressed as part of the Nationwide Permit, Water Quality Certification, and Waste Discharge Requirements. Minimization and avoidance measures may include, but are not limited to, the following:

- Construction-related equipment shall be stored in developed/disturbed areas, outside of the drainage. No equipment maintenance shall be done within or adjacent to the drainage.
- Source control and treatment control BMPs shall be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs shall be implemented throughout the project to capture and treat potential contaminants.
- Substances harmful to aquatic life shall not be discharged into the drainage. Harmful substances include, but are not limited to, chemical discharges such as oil, gas, hydraulic fluid, wet concrete, certain herbicides and pesticides, and plastics. All hazardous substances shall be properly handled and stored.
- A Storm Water Pollution Prevention Plan shall be prepared to prevent sediment from entering the drainage during construction.

- To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site.
- Construction personnel shall strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel.
- Exclusion fencing shall be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities.

Significance with Mitigation: Implementation of Mitigation Measure BIO-11 would require compliance with RWQCB permitting requirements and compensatory mitigation for permanent impacts to RWQCB-jurisdictional waters of the State, including wetland waters of the State. In addition, permit conditions and BMPs would minimize temporary construction-related effects on jurisdictional aquatic resources. With implementation of compensatory mitigation and avoidance and minimization measures required pursuant to Mitigation Measure BIO-11, impacts to State-protected wetlands and other waters of the State would be **less than significant**.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?

The project site is located within a previously disturbed and partially developed landscape and does not function as a regional wildlife movement corridor or designated wildlife linkage. The Biological Technical Report does not identify any established native resident or migratory wildlife corridors within the project site. Wildlife movement in the vicinity is primarily constrained by existing development, infrastructure, and the altered condition of the site.

The project site supports three drainages (Drainage A, Drainage B, Drainage C and Drainage D) that may be considered waters of the State under the jurisdiction of the RWQCB pursuant to the Porter-Cologne Water Quality Act (see Table 3.3-3, *Existing Jurisdictional Features*). The proposed project would result in permanent impacts to approximately 0.37 acre of RWQCB-jurisdictional waters, including approximately 0.17 acre of wetland waters of the State. These features provide limited aquatic and semi-aquatic habitat functions and do not serve as primary wildlife movement corridors or regionally important nursery habitat. However, permanent impacts to these drainages could incrementally affect localized movement, dispersal, or habitat functions for wildlife species that opportunistically use waters of the State.

In addition, the Biological Technical Report identifies that vegetation on the project site, including shrubs, ground cover, and trees, has the potential to support nesting migratory birds.

Construction activities conducted during the nesting season could disturb or destroy active nests, eggs, or young, which would interfere with wildlife reproductive functions and constitute a violation of the Migratory Bird Treaty Act. Disturbance of active nests would impede the use of on-site nursery habitat by migratory species and is considered a potentially significant impact.

Therefore, project-related impacts to RWQCB-jurisdictional waters and potential disturbance of nesting migratory birds could result in **potentially significant** impacts related to localized wildlife movement and nursery habitat functions.

Significance without Mitigation: Potentially significant.

Impact BIO-8: Project-related impacts to RWQCB-jurisdictional drainages could result in localized interference with wildlife movement or habitat functions associated with waters of the State.

Implement Mitigation Measure BIO-5 and BIO-11.

Significance with Mitigation: Implementation of Mitigation Measure BIO-5 would reduce potential impacts to nesting migratory birds and raptors by requiring pre-construction nesting bird surveys, establishment of species-appropriate avoidance buffers around active nests, and avoidance of disturbance until nesting activity has concluded. Implementation of Mitigation Measure BIO-11 would reduce impacts to Waters of the State through compliance with RWQCB permitting requirements, compensatory mitigation for permanent impacts to RWQCB jurisdiction, and implementation of avoidance and minimization measures during construction.. With mitigation incorporated, impacts related to wildlife movement and nursery habitat functions would be **less than significant**.

e) 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 ordinance pertains specifically to vegetation occurring within public rights-of-way and does not identify specific tree species that require special avoidance, preservation, or protection measures. The proposed project would not involve tree removal within public rights-of-way and would not conflict with the provisions of the City's tree ordinance.

As described in the Biological Technical Report, biological resources present on the project site have been evaluated, and project impacts to biological resources would be addressed through applicable permitting requirements and implementation of mitigation measures identified in this section, where required. The proposed project does not conflict with the intent or requirements of any local policies or ordinances protecting biological resources.

Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources. This impact would be **less than significant**.

Significance without Mitigation: Less than significant.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state habitat conservation plan?

The Biological Technical Report indicates that the project site is not located within the boundaries of an adopted Habitat Conservation Plan (HCP); Natural Community Conservation Plan (NCCP); or other approved local, regional, or state habitat conservation plan. No such plans apply to the project site or govern biological resource conservation for the area in which the project is located.

Because the proposed project is not subject to any adopted habitat conservation plans, implementation of the proposed project would not conflict with the provisions of an HCP, NCCP, or other approved habitat conservation plan. Therefore, this impact would be **less than significant**.

Significance without Mitigation: Less than significant.

3.3.6 Cumulative Impact Analysis

Chapter 3, *Environmental Analysis*, identifies cumulative development projects within the vicinity of the project site that are planned, under construction, or recently completed. A summary of these projects is provided in Table 3-2, *Cumulative Projects within Two Miles of the Project Site*. Potential cumulative impacts would occur if the proposed project, when considered together with other cumulative projects, would result in a substantial adverse effect on biological resources. For purposes of this analysis, the geographic scope includes the surrounding area where cumulative projects and the proposed project could affect shared biological resources or environmental conditions.

Would the project have a cumulative effect related to biological resources?

As discussed above, the proposed project could result in potentially significant impacts to biological resources related to special-status species, sensitive vegetation communities, waters of the State, wildlife movement, nesting birds, and indirect disturbance factors such as lighting, noise, pesticide use, and invasive plant species. These impacts would be reduced to a less than significant level through implementation of project-specific mitigation measures, including Mitigation Measures BIO-1 through BIO-11, which address pre-construction surveys, species

avoidance, relocation procedures, compensatory mitigation for jurisdictional resources, protection of nesting birds, lighting and noise controls, pesticide management, and invasive plant species restrictions.

As listed in Table 3-2, *Cumulative Projects within Two Miles of the Project Site*, 25 projects are either planned, entitled, or under construction within the designated radius. These projects are in the Cities of Irwindale, Azusa, Covina, and Duarte and are shown on Figure 3.0-1, *City of Irwindale Cumulative Projects Within Two Miles of the Proposed Project*, and Figure 3.0-2, *Cumulative Projects Within Two Miles of the Proposed Project in Surrounding Jurisdictions*. Of the 25 current or future projects, 21 projects are situated within fully developed urban or industrial areas and are not adjacent to natural open space. As infill development, these projects lack the physical characteristics (e.g., vegetation, streambeds, open water) necessary to support wildlife habitat or sensitive biological resources. These sites also do not facilitate movement between habitat areas due to the surrounding urban land uses. Given the absence of suitable habitat and connectivity to open space areas, these infill projects would not contribute to cumulative impacts on biological resources in the region. Therefore, these projects are not discussed further.

Four projects located adjacent to open space or mine pits were identified for more detailed evaluation. Three of these projects (Project Nos. 1, 2, and 5) are adjacent to the southwest boundary of the Santa Fe Dam Recreational Area, approximately 1.6 miles southwest of the proposed project (Figure 3.0-1). These projects are bordered by industrial uses to the northwest, west, and south.

The northeast side of Projects Nos. 2 and 5 abut Arrow Highway, a multi-lane road that separates the sites from the approximately 650-foot-wide Santa Fe Dam. Based on available aerial imagery, Project No. 1 previously consisted of an industrial office building on a 5.13-acre site, which was demolished in 2025 for construction of a 102,500-square-foot concrete tilt-up warehouse, which is currently under construction. Project No. 2 is a 17.22-acre industrial building project that appears to be nearing completion. Project No. 5 is a pending 1.88-acre project located within an existing business development and is planned for construction of a 40,000-square-foot warehouse/office building. The remaining project (Project No. 6) is located approximately 1.9 miles south of the proposed project (Figure 3.0-1). Project No. 6 is a pending 7.92-acre project located within an existing industrial development and is planned for construction of a 189,300-square-foot speculative industrial building.

Although these four projects are adjacent to mine pits or open space, they occur on land that does not support native vegetation communities, special-status species habitat, wildlife movement corridors, or other sensitive biological resources. The surrounding area consists of extensive industrial land uses that present long-standing physical barriers to wildlife movement. Arrow Highway and the Santa Fe Dam further separate Projects Nos. 1, 2, and 5 from native habitat within the Santa Fe Dam Recreational Area. Azusa Canyon Road separates Project No. 6

from vegetation within the adjacent mining pit. These projects do not have the potential to generate biological impacts individually because they are located within fully developed, urbanized areas; lack habitat connectivity to natural areas; and involve redevelopment of existing industrial/commercial sites (except Project No. 2). Therefore, these projects would not combine with the proposed project to contribute to cumulative impacts on biological resources within the region.

In addition, cumulative projects would be required to comply with applicable regulatory requirements and permitting processes administered by agencies such as the California Department of Fish and Wildlife, Regional Water Quality Control Board, U.S. Army Corps of Engineers, and U.S. Fish and Wildlife Service, as applicable. If subject to CEQA, these projects would also be required to evaluate and mitigate biological resource impacts on a project-specific basis.

With implementation of Mitigation Measures BIO-1 through BIO-11, including avoidance and minimization measures for special-status species, compensatory mitigation for jurisdictional resources, protection of nesting birds, and controls on lighting, noise, pesticide use, and invasive plant species, the proposed project would not result in the incremental loss of biological resources that would be cumulatively considerable when viewed in combination with other past, present, or reasonably foreseeable future projects. Therefore, implementation of the proposed project would not cumulatively contribute to impacts related to biological resources, and impacts would be less than cumulatively considerable.

3.3.7 References

Helix Environmental Planning, Inc. 2026. Irwindale Brew Yard Project: Biological Technical Report. Prepared for the City of Irwindale. Appendix E to this DEIR.

Irwindale, City of. 2008. City of Irwindale General Plan Update. https://www.irwindaleca.gov/DocumentCenter/View/38.

Irwindale. 2024. City of Irwindale General Plan Safety Element Update. https://www.irwindaleca.gov/DocumentCenter/View/9124.

3.4 CULTURAL RESOURCES

This section is focused on cultural resources related to archaeological and historical resources. Archaeology studies human artifacts, such as places, objects, and settlements that reflect group or individual religious, cultural, or everyday activities. Historical resources include sites, structures, objects, or places that are at least 50 years old and are significant for their engineering, architecture, cultural use or association, etc. Paleontological resources are discussed in Section 3.6, *Geology and Soils*.

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

- *Cultural and Paleontological Resources Assessment for the Irwindale Brew Yard Specific Plan Project, City of Irwindale, Los Angeles County, California*, Cogstone Resource Management, January 2026
- Tribal Consultation correspondence pursuant to AB 52 and SB 18

This information provided as appendices to this DEIR; portions that contain confidential information have been removed. Complete copies of these studies are included in the Technical Appendices to this Draft EIR as Appendices G1 and G2, respectively.

During the NOP comment period (March 6, 2024, through April 12, 2024), one comment letter was received from the Native American Heritage Commission (NAHC) in response to the Notice of Preparation (NOP) related to cultural resources review procedures and tribal consultation pursuant to Assembly Bill 52 and Senate Bill 18.

3.4.1 Regulatory and Planning Framework

FEDERAL

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The act authorized the National Register of Historic Places (NRHP), which lists districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review ensures that historic properties are considered during federal project planning and implementation. The

Advisory Council on Historic Preservation, an independent federal agency, administers the review process with assistance from state historic preservation offices.

National Register of Historic Places

The NRHP is the nation's official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archeology, engineering, and culture. The NRHP recognizes resources of local, state, and national significance that have been documented and evaluated according to uniform standards and criteria.

Authorized under the NHPA, the NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect historic and archeological resources. The NHRP is administered by the National Park Service, which is part of the U.S. Department of the Interior.

To be eligible for listing in the NRHP, a resource must meet at least one of the following criteria:

A. Is associated with events that have made a significant contribution to the broad patterns of our history.

B. Is associated with the lives of persons significant in our past.

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

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

Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 regulates the protection of archaeological resources and sites on federal and Indian lands.

American Indian Religious Freedom Act

The American Indian Religious Freedom Act recognizes that Native American religious practices, sacred sites, and sacred objects have not been properly protected under other statutes. It establishes as national policy that traditional practices and beliefs, sites (including right of access), and the use of sacred objects shall be protected and preserved.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American

cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants or culturally affiliated Indian tribes.

STATE

The California Office of Historic Preservation, a division of the California Department of Parks and Recreation, is responsible for carrying out the duties described in the Public Resources Code (PRC) and maintaining the California Historic Resources Inventory and the California Register of Historic Resources (CRHR). The state-level regulatory framework also includes CEQA, which required the identification and mitigation of substantial adverse impacts that may affect the significance of eligible historical and archaeological resources.

California Environmental Quality Act

CEQA requires a lead agency to analyze whether historic and/or archaeological resources may be adversely impacted by a proposed project. Under CEQA, a "project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment" (PRC Section 21084.1). Answering this question is a two-part process. First, the determination must be made as to whether the proposed project involves cultural resources. Second, if cultural resources are present, the proposed project must be analyzed for a potential "substantial adverse change in the significance" of the resource.

Historical Resources

According to CEQA Guidelines Section 15064.5, for the purposes of CEQA, historical resources are:

- A resource listed in, or formally determined eligible…for listing in the California Register of Historical Resources. (PRC 5024.1, Title 14 California Code of Regulations [CCR], Section 4850 et seq.)
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significance in a historic resources survey meeting the requirements of Section 5024.1(g) of the PRC.
- Any object, building, structure, site, area, place, record, or manuscript that the lead agency determines to be eligible for national, state, or local landmark listing; generally, a resource shall be considered by the lead agency to be historically significant (and therefore a historic resource under CEQA) if the resource meets the criteria for listing on the California Register (as defined in PRC Section 5024.1, Title 14 CCR, Section 4852).

- Resources nominated to the CRHR must retain enough of their historic character or appearance to convey the reasons for their significance. Resources whose historic integrity (as defined above) does not meet NRHP criteria may still be eligible for listing in the CRHR.

According to CEQA, the fact that a resource is not listed in or determined eligible for listing in the CRHR or is not included in a local register or survey shall not preclude the lead agency from determining that the resource may be a historical resource (PRC Section 5024.1). Pursuant to CEQA, a project with an effect that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (State CEQA Guidelines, Section 15064.5[b]).

Substantial Adverse Change and Indirect Impacts to Historical Resources

CEQA Guidelines specify that a "substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (State CEQA Guidelines, Section 15064.5). Material impairment occurs when a project alters in an adverse manner or demolishes "those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion" or eligibility for inclusion in the NRHP, CRHR, or local register. In addition, pursuant to State CEQA Guidelines Section 15126.2, the "direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects."

The following guides and requirements are of relevance to this study's analysis of indirect impacts to historic resources. Pursuant to the CEQA Guidelines (Section 15378), study of a project under CEQA requires consideration of "the whole of an action, which has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." State CEQA Guidelines Section 15064(d) further defines direct and indirect impacts:

1. A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project.
2. An indirect physical change in the environment is a physical change in the environment which is not immediately related to the project, by which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment.
3. An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project.

Archaeological Resources

In terms of archaeological resources, PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type of the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If it can be demonstrated that a proposed project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2[a], [b], and [c]). Pursuant to CEQA, if an archaeological resource is neither a unique archaeological resource nor a historical resource, the effects of the project on those resources shall not be considered to be a significant effect on the environment (State CEQA Guidelines Section 15064.5[c][4]).

California Public Resources Code

Archaeological, paleontological, and historical sites are protected under a wide variety of state policies and regulations in the PRC. In addition, cultural and paleontological resources are recognized as nonrenewable resources and receive protection under the PRC and CEQA.

PRC Sections 5020 to 5029.5 continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the CRHR and is responsible for designating State Historical Landmarks and Historical Points of Interest.

PRC Sections 5079 to 5079.65 define the functions and duties of the Office of Historic Preservation, which administers federal- and State-mandated historic preservation programs in California as well as the California Heritage Fund.

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites; identify the powers and duties of the NAHC; require that descendants be notified when Native American human remains are discovered; and provide for treatment and disposition of human remains and associated grave goods.

California Register of Historical Resources

Created in 1992 and implemented in 1998, the CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Sections 21083.2 and 21084.1). Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties that are recognized under the California Points of Historical Interest (CPHI) program, identified as significant in historical resources surveys, or designated by local landmarks programs may be nominated for inclusion in the CRHR.

Resources eligible for listing include buildings, sites, structures, objects, or historic districts that retain historical integrity and are historically significant at the local, state, or national level under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. It is associated with the lives of persons important in our past;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history.

Resources nominated to the CRHR must retain enough of their historic character or appearance to convey the reasons for their significance. Resources whose historic integrity does not meet NRHP criteria may still be eligible for listing in the CRHR.

California Health and Safety Code

California Health and Safety Code Section 7052 states that it is a felony to disturb Native American cemeteries. Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the County Coroner can determine whether the remains are those of a Native American. Section 7050.5(b) outlines the procedures to follow should human remains be inadvertently discovered in any location other than a dedicated cemetery. The section also states that the County Coroner, upon recognizing the remains as being of Native American origin, is responsible to contact the NAHC within 24 hours. The NAHC has various powers and duties to provide for the ultimate disposition of any Native American remains, as does the assigned "most likely descendant" (MLD).

State Laws Pertaining to Human Remains

Any human remains encountered during ground-disturbing activities are required to be treated in accordance with California Code of Regulations Section 15064.5(e) (CEQA Guidelines), PRC Section 5097.98, and the California Health and Safety Code Section 7050.5. California law protects Native American burials, skeletal remains, and associated grave goods regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Specifically, Section 7050.5 of the California Health and Safety Code states that 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 remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are determined to be of Native American origin, the county coroner must contact the California NAHC within 24 hours of this identification. An NAHC representative will then identify a Native American MLD to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods. In addition, CEQA Guidelines Section 15064.5 specifies the procedures to be followed in case of the discovery of human remains on non-federal land. The disposition of Native American burials falls within the jurisdiction of the NAHC.

California State Assembly Bill 52

Assembly Bill 52 of 2014 (AB 52) amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3.

Consultation with Native Americans

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Tribal Cultural Resources

Section 4 of AB 52 adds Sections 21074 (a) and (b) to the PRC, which address tribal cultural resources and cultural landscapes. Section 21074 (a) defines tribal cultural resources as one of the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

a. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Section 5024.1. In applying the criteria set forth in subdivisil(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.

Section 1 (a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

LOCAL

Historic Preservation Ordinance

The City of Irwindale established a historic preservation ordinance in 2009 that allows for the designation of individual landmarks. The City has not yet conducted a citywide survey of historic resources. The "Cultural and Historic Resources" section in the City's General Plan lists "Existing Historic Resources in Irwindale" by identifying three sites of historical significance. The 2025 Housing Element and General Plan Update did not revise the historic preservation ordinance or the historic resources inventory (Irwindale 2025).

3.4.2 Existing Conditions

REGIONAL GEOLOGIC SETTING

The project site lies within the Los Angeles Basin, a sedimentary basin which includes the coastal plains of Los Angeles and Orange Counties and extends west to Catalina Island. This region is bounded by the Santa Ana Mountains to the east, the Santa Monica Mountains to the

north, and the San Joaquin Hills to the south. The Los Angeles Basin began to develop in the early Miocene, about 23 million years ago, initially in a marine setting. The basin transitioned to terrestrial deposition by the middle Pleistocene, about 1 million years ago.

The Los Angeles Basin is part of the coastal section of the northernmost Peninsular Range Geomorphic Province and is characterized by elongated northwest-trending mountain ridges separated by sediment-floored valleys. Subparallel faults branching off from the San Andreas Fault to the east create the local mountains and hills. The Peninsular Ranges Geomorphic Province is in the southwestern corner of California and is bounded by the Transverse Ranges Geomorphic Province to the north and the Colorado Desert Geomorphic Province to the east.

The project site is mapped entirely as Holocene, gravel rich, alluvial fan that was deposited less than 11,700 years ago. These sediments were deposited by the San Gabriel River. Older and potentially fossiliferous Pleistocene deposits are usually present at approximately eight feet deep in California valleys.

HISTORIC OVERVIEW

The City's beginning may be traced back to the 1860s with the area's first settlement by two families originally from Sonora, Mexico—the Ayons and the Fraijos. Both families had lived in the San Juan Capistrano and Anaheim areas until Gregorio Fraijo acquired title to 80 acres of land to the south of what is now Arrow Highway and near Irwindale Avenue. This site is now occupied by the Civic Center. Fraijo subsequently sold half his land holding to his close friend, Facundo Ayon. Don Gregorio grew tobacco, corn, beans, and chilies on his land, and both men subsequently further divided their land holdings among their children. Many of the later settlers were expert horsemen and earned their living tending cattle and sheep. Over the years, the two families became closer through marriage. Eventually, four of their sons and daughters married each other, giving rise to a thriving, close-knit community.

The first homes in what would later become Irwindale were constructed of the abundant native river rock, laboriously moved from the wide floodplain of the San Gabriel River. Water was obtained locally via a trench excavated from the river or from deep wells. As the years passed, several men from the area became master stone craftsmen, building practical and beautiful buildings, waterways, and fences. In 1899, a Mr. Irwin bought property in the Cypress Street-Vincent Avenue area and established a successful citrus farm with the assistance of the area's first gasoline-powered water pump. When the City was incorporated in 1957 as a general law city, it was named after this pioneer settler. On November 2, 1976, the City changed to a charter city.

Historic resources listed in the City's General Plan include:

- **El Divino Salvador Presbyterian Church (now Saint Cyril of Alexandria Coptic Orthodox Church)** at 5116 Irwindale Avenue. It was the first church in the City and thought to be the oldest Spanish-speaking Protestant church in continuous existence in Southern California. It was first constructed in 1889 but later destroyed by high winds. The current chapel was completed in 1902 and is still in use today.
- **Our Lady of Guadalupe Catholic Mission,** located at 16239 Arrow Highway and constructed between 1917 and 1919.
- **Southern Pacific Railway Depot** served as the first post office. The post office was constructed in 1915 and was relocated three times between 1929 and 1941 to different parts of the city before moving to Baldwin Park in 1958.
- **Residence** at 2408 Mountain Avenue. This building served as a half-way house for the stage line.
- **Don Gregorio Fraijo home site** at the terminus of Central Avenue.
- **Don Facundo Ayon home site** a short distance east of the Fraijo residence. It currently serves as city hall for the City of Irwindale.
- **Mr. Irwin's Ranch property** extended along Cypress Avenue from what is now the City's corporate boundary with Baldwin Park to Vincent Avenue. (Irwindale 2008)

The project site contains previously developed and heavily disturbed areas associated with historical gravel quarrying, landfill operations, and subsequent industrial uses. Cultural resources investigations identified several historic-age built environment features in the Specific Plan area; however, none were determined to be significant or eligible for listing in the CRHR or the NRHP. There are no historical resources recorded within the project site (Cogstone 2025).

CULTURAL RESOURCES ON THE PROJECT SITE

Cultural Resources Identification Methodology

Cultural resources in the Specific Plan area and its vicinity were identified through a combination of records searches and field investigations conducted by Cogstone (see Appendix G1). The methodology was designed to establish baseline existing conditions for cultural resources to determine whether archaeological or historic-age built environment resources are in the Specific Plan area or within a one-mile radius.

A cultural resources records search was conducted through the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The initial

records search was completed in April 2024 and included a review of previously conducted cultural resources studies, previously recorded prehistoric and historic archaeological resources, historic built environment resources, and other cultural resources within the Specific Plan area and within a one-mile radius of the project site. A supplemental architectural historian review was conducted in December 2025 to update and confirm records search results and to evaluate historic-age built environment resources within the Specific Plan area.

Field investigations included a pedestrian archaeological survey of the Specific Plan area conducted by Cogstone. The pedestrian survey consisted of systematic visual inspection of ground surfaces to identify any cultural materials or features that may indicate the presence of archaeological resources. Survey coverage included all accessible portions of the Specific Plan area. Ground visibility was influenced by extensive prior disturbance associated with historic quarrying, landfill operations, and ongoing site reclamation activities.

In addition, Cogstone conducted a reconnaissance-level survey of historic-age built environment resources in the Specific Plan area. The built environment survey focused on identifying and documenting structures, railroad features, and other aboveground resources that may be subject to evaluation under the CRHR and the NRHP. Identified resources were documented through field observations and photographic recordation and were subsequently evaluated for eligibility in accordance with applicable criteria.

A Sacred Lands File search was requested from the Native American Heritage Commission (NAHC) to identify any known Native American sacred lands or culturally sensitive resources within or near the project site. The results of the Sacred Lands File search and subsequent tribal consultation are described in the following subsections.

Records Search

A cultural resources records search was conducted as part of the Cultural and Paleontological Resources Assessment for the Irwindale Brew Yard Specific Plan Project. Records were obtained from the CHRIS through a records search completed in April 2024, and a supplemental architectural historian review was conducted in December 2025 at the SCCIC. The purpose of the records search was to identify previously conducted cultural resources studies, previously recorded prehistoric and historic archaeological resources, historic built environment resources, and other cultural resources in the Specific Plan area and within a one-mile radius.

The records search results indicate that 4 previous cultural resources studies have been conducted within the Specific Plan area, and an additional 31 cultural resources studies have been completed within a one-mile radius of the project site. These studies are summarized in Appendix C, Table C-1, of the Cultural Resources Assessment (see Appendix G1).

The records search also identified ten previously recorded cultural resources within a one-mile radius of the Specific Plan area. Of these, two historic built environment resources, consisting of

railroad segments associated with the Union Pacific Azusa Industrial Lead and the Atchison, Topeka and Santa Fe Railroad, are within the Specific Plan area. The remaining eight previously recorded cultural resources are outside the Specific Plan area but within the one-mile search radius and consist of historic archaeological sites and historic built environment resources, including railroad infrastructure, bridges, utility corridors, and flood control facilities. Previously recorded cultural resources within a one-mile radius of the Specific Plan area are summarized in Table 3.4-1, *Previously Recorded Cultural Resources Within a One-Mile Radius of the Specific Plan Area*.

Table 3.4-1 Previously Recorded Cultural Resources Within a One-Mile Radius of the Specific Plan Area

Primary (P-19)	Recorder and Year	Age/ Period	Site Description	Distance from Specific Plan Area	Eligibility for Listing on the CRHR
P-19-001368	Not evaluated (SCCIC records)	Historic era	Historic refuse scatter	0.5–1 mile	Unknown
P-19-002207	Not evaluated (SCCIC records)	Historic era	Concrete footings and historic debris scatter	0.25–0.5 mile	Unknown
P-19-186110	Various recorders (multiple surveys)	Historic era	Pacific Electric Railway / Southern Pacific Railroad / Union Pacific Railroad rail segments	Within Specific Plan area	Not evaluated
P-19-186804	Various recorders (multiple surveys)	Historic era	Atchison, Topeka & Santa Fe Railroad / Burlington Northern Santa Fe rail segments	Within Specific Plan area	Not evaluated
P-19-188983	Not evaluated (SCCIC records)	Historic era	Department of Water and Power Boulder Lines 1 and 2	0.5–1 mile	Unknown
P-19-189104	Not evaluated (SCCIC records)	Historic era	Atchison, Topeka & Santa Fe Railroad bridge over the San Gabriel River	0–0.25 mile	Unknown
P-19-190992	Not evaluated (SCCIC records)	Historic era	Foothill Boulevard Bridge	0.5–1 mile	Unknown
P-19-190993	Not evaluated (SCCIC records)	Historic era	Pacific Electric Bridge (Puente Largo)	0.5–1 mile	Unknown

Source: Cogstone 2025.

Notes: CRHR = California Historical Resources Information System
SCCIC = South Central Coastal Information Center

As documented in the Cultural Resources Assessment, the historic-age resources identified within the Specific Plan area were evaluated for significance and determined not to be eligible

for listing in the CRHR or the NRHP. Therefore, no historical resources as defined by CEQA are present within the project site.

Sacred Lands File Search Results

The NAHC was contacted on February 29, 2024, to request a search of the Sacred Lands File and to obtain a list of potentially interested Native American tribes. The purpose of the search was to determine whether Native American sacred lands or other culturally sensitive resources are present within or near the project site.

In a letter dated April 16, 2024, the NAHC responded that the Sacred Lands File search was negative, indicating that no Native American sacred lands are recorded within the project site. The Native American Heritage Commission also provided a list of 13 potentially interested tribal groups and recommended that the Gabrieleño Band of Mission Indians–Kizh Nation be contacted for additional information due to previous requests to consult on future development within the project area.

Tribal Consultation

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

On June 5, 2024, the City of Irwindale sent consultation letters to eleven California Native American tribes that had previously submitted general consultation requests pursuant to Assembly Bill 52. These tribes included the Gabrieleño Band of Mission Indians–Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino-Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Soboba Band of Luiseno Indians, Santa Rosa Band of Cahuilla Indians, and Gabrielino/Tongva Nation. One of the tribes contacted, Gabrieleño Band of Mission Indians–Kizh Nation, expressed interest in the proposed project. Consultation was completed on December 19, 2025.

3.4.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact on cultural resources if it would:

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

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.

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

All these impact thresholds are addressed in Section 3.4.5. Impacts to tribal cultural resources are addressed in Section 3.15, *Tribal Cultural Resources*, of this DEIR.

3.4.4 Applicable Specific Plan Development Standards and Design Guidelines

DEVELOPMENT STANDARDS

Development standards are detailed in Chapter 3 of the Brew Yard Specific Plan, included as Appendix B to this DEIR. The Specific Plan would govern buildout and operation of the proposed project. Table 3-2, Industrial Uses Development Standards, and Table 3-3, Commercial Uses Development Standards, describe site requirements, including lot size, setbacks, building heights, and parking and height requirements. These provisions govern future development in the Specific Plan area but do not include requirements specific to the identification, protection, or treatment of cultural resources.

DESIGN GUIDELINES

Design guidelines are detailed in Chapter 4 of the Specific Plan and are aimed at promoting the quality of development envisioned for the Specific Plan area. The Design Guidelines focus on building massing, architectural style, materials, colors, landscaping, and streetscape treatments to promote cohesive and high-quality development. The Specific Plan does not include design guidelines or development standards specific to the identification, protection, or treatment of archaeological resources, historical resources, or tribal cultural resources.

3.4.5 Project Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

The cultural resources records search and built environment survey conducted for the project identified several historic-age built environment features in the specific plan area, including

former industrial facilities and railroad-related features. These resources were evaluated in accordance with CEQA Guidelines Section 15064.5, including consideration of eligibility for listing in the CRHR and the NRHP.

As part of the Cultural Resources Assessment, Cogstone conducted a reconnaissance-level survey and evaluation of historic-age built environment resources in the Specific Plan area to determine whether any resources meet the definition of a historical resource pursuant to CEQA Guidelines Section 15064.5. The evaluation focused on historic-age transportation infrastructure and standing structures identified through records searches and field observations.

RAILROAD RESOURCES

Two railroad alignments previously recorded in the Specific Plan Area were evaluated—segments associated with the Union Pacific Azusa Industrial Lead (P-19-186110) and the Atchison, Topeka and Santa Fe Railroad (P-19-186804). These rail segments were constructed to serve industrial and freight-related uses and have undergone modifications over time. Field observations indicate that the railroad segments lack sufficient historic integrity of design, materials, workmanship, and setting to convey significance under the CRHR or the NRHP. In addition, the rail segments are common examples of utilitarian transportation infrastructure and are not associated with events, persons, or engineering characteristics that rise to the level of historical significance.

STANDING STRUCTURES

Two standing structures in the Specific Plan area, a training center building and a warehouse building, were also evaluated. Both structures were constructed in or after 1983 and are representative of standard industrial building types associated with late twentieth-century site operations. The buildings do not have distinctive architectural characteristics, are not associated with significant historical events or persons, and do not retain significance under any of the California Register criteria. Therefore, these structures do not qualify as historical resources for the purposes of CEQA.

FORMER QUARRIES

The two former quarry pits in the Specific Plan area were evaluated as part of the built environment and historical resources assessment. The quarry pits reflect the project site's historical industrial extraction use; however, they do not constitute historical resources for purposes of CEQA because they do not meet the criteria for listing in the CRHR or NRHP and do not possess significance as historical engineering features, structures, or cultural landscapes.

Based on the results of the records searches, field surveys, and built environment evaluations, none of the historic-age built environment resources evaluated in the Specific Plan area meet

the criteria for listing in the CRHR or the NRHP. Because no historical resources as defined by CEQA are present in the Specific Plan area, implementation of the proposed project would result in **no impact** and would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

Significance without Mitigation: No impact.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

As described in Section 3.4.2, *Existing Conditions*, the Specific Plan area has been extensively disturbed by historic gravel quarrying, landfill operations, and subsequent industrial uses. These activities resulted in substantial ground disturbance across much of the project site, including excavation, grading, and placement of fill, which have shaped existing baseline conditions. Project planning and site constraints are further described in materials prepared for the Specific Plan, including the IDEFO package (see Appendix C), which documents the approved limits of grading and operational disturbance and confirms that future development associated with the proposed project would be in areas that have been previously disturbed.

The cultural resources records search and archaeological field survey for the project did not identify any prehistoric or historic-period archaeological resources within the specific plan area. In addition, no previously recorded archaeological resources are on the project site. The archaeological field survey confirmed that the site has been subject to extensive prior disturbance from historical quarrying, landfill operations, and subsequent industrial uses, which have substantially reduced the potential for intact archaeological deposits.

Based on the absence of identified archaeological resources and the extensive prior disturbance of the site, no archaeological resources that meet the definition of a historical resource or a unique archaeological resource under CEQA are present within the specific plan area.

Nonetheless, although the project site has a low potential for archaeological resources, previously unidentified subsurface (buried) resources could potentially be uncovered during ground-disturbing activity in areas that were not excavated during the quarrying activities and for off-site improvements. Because there remains a remote possibility of encountering undocumented resources, impacts to archaeological resources are considered **potentially significant**.

Significance without Mitigation: Potentially significant.

> **MM CUL-1** Prior to the issuance of any permits allowing ground-disturbing activities, the project proponent/operator shall retain a Qualified Archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional

archaeology (U.S. Department of the Interior, 2011), to carry out all mitigation measures related to archaeological resources. The contact information for this Qualified Archaeologist shall be provided to the City of Irwindale Planning Department prior to the commencement of any construction activities on-site.

MM CUL-2 In the event that unanticipated cultural resources are encountered during any phase of project construction, all construction work within 50 feet of the find shall cease and the Qualified Archaeologist and designated Native American representative, as defined in Mitigation Measure TCR-2 (Section 3.15, *Tribal Cultural Resources*), shall assess the find for importance. Construction activities may continue in other areas. If the discovery is determined to not be significant by the Qualified Archaeologist and/or designated Native American representative, work will be permitted to continue in the area.

If a find is determined to be important by the Qualified Archaeologist and designated Native American representative, he or she shall immediately notify the City. The City shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the California Register of Historical Resources (CRHR). Work may not resume within the no-work radius until the lead agency, through consultation as appropriate, determines that the site either: (1) is not eligible for the CRHR; or (2) that the treatment measures have been completed to their satisfaction.

Significance with Mitigation: With implementation of Mitigation Measures CUL-1 and CUL-2, potential impacts related to unanticipated cultural resources would be reduced to a less than significant level. These measures require retention of a qualified archaeologist and establish procedures for halting work, evaluating discoveries, consulting with the City, and implementing appropriate treatment measures if resources are determined to be eligible for listing in the CRHR. Compliance with these requirements would ensure that any unanticipated cultural resources encountered during construction are appropriately evaluated and treated in accordance with CEQA. Therefore, impacts would be **less than significant** with mitigation.

Significance with Mitigation: Less than significant.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

There are no known human remains in or near the project site, and there are no cemeteries in the vicinity of the proposed project. Additionally, and as shown in Figure 2-3, *Project Site*

Boundary/Aerial Photo, the project site is in an urbanized area of the City and has already been previously disturbed and developed. Therefore, the likelihood that human remains may be discovered during site clearing and grading activities is considered extremely low.

However, the proposed project would involve ground-disturbing activities that could have the potential to encounter previously undiscovered subsurface human remains, if any exist. In the unlikely event that human remains are uncovered during construction, all work would cease in the vicinity of the discovery and procedures would be implemented in accordance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. These procedures include notification of the Los Angeles County Coroner, and if the remains are determined to be Native American, notification of the Native American Heritage Commission.

In addition, implementation of Mitigation Measures CUL-1 and CUL-2 would ensure that a qualified archaeologist is retained and that appropriate evaluation, consultation, and treatment procedures are followed in the event of an inadvertent discovery of cultural resources, including human remains.

Therefore, compliance with existing law and implementation of Mitigation Measures CUL-1 and CUL-2 would result in a **less than significant** impact.

Significance with Mitigation*:* Less than significant.

3.4.6 Cumulative Impact Analysis

Would the project have a cumulative effect related to cultural resources?

Implementation of the proposed project in conjunction with other planned projects in other areas of the City could unearth unknown significant archeological resources. Other planned development projects in the City would involve ground disturbance and could damage archeological resources that could be buried in those project sites.

However, as with the proposed project, other development projects in the City would be required to undergo discretionary review and would be subject to the same resource protection requirements and CEQA review. For example, other development projects would require the preparation of site-specific cultural resource assessments, which would include some degree of surface-level surveying. As a part of the assessments, a cultural resources records search of the SCCIC and a Sacred Land Files search would also be required. Additionally, as with the proposed project, other development projects would similarly be required to comply with all applicable existing regulations, procedures, and policies that are intended to address archeological resource impacts.

Furthermore, as demonstrated above, with mitigation, impacts on archeological resources as a result of implementation of the proposed project would be reduced to a level of less than significant.

In consideration of the preceding, contribution to cumulative archeological resource impacts as a result of development accommodated by the proposed project would be rendered less than significant, and therefore impacts would not be cumulatively considerable.

Significance with Mitigation: Less than significant.

3.4.7 References

Irwindale, City of. 2008. General Plan Update.
https://www.irwindaleca.gov/DocumentCenter/View/38/General-Plan?bidId=.

Irwindale. 2025. Housing Element & General Plan Update.
https://www.irwindaleca.gov/570/Housing-Element-General-Plan-Update.

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3.5 ENERGY

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for energy-related impacts associated with the Irwindale Brew Yard Specific Plan (proposed project) and ways in which it would reduce unnecessary energy consumption, consistent with the suggestions in Appendix F of the CEQA Guidelines. Energy service providers to the project site include Southern California Edison (SCE) for electrical service and Southern California Gas Company (SoCalGas) for natural gas. The analysis in this section is based in part on the following technical report.

- *Irwindale Brew Yard Specific Plan Energy Analysis*, Urban Crossroads, June 2, 2026 (Appendix H).

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

In accordance with Appendices G and F of the State CEQA Guidelines, this DEIR includes relevant information and analyses that address the energy implications of the proposed project. This section summarizes the proposed project's anticipated energy needs, impacts, and conservation measures. Other aspects of the proposed project's energy implications are discussed elsewhere in this DEIR, including Chapter 2, *Project Description*, and Sections 3.2, *Air Quality*, and 3.7, *Greenhouse Gas Emissions*.

No comments related to energy impacts were received during the Notice of Preparation (NOP) public review period (March 6, 2024, through April 5, 2024) and the scoping meeting (held on February 23, 2024).

3.5.1 Regulatory Framework

FEDERAL

Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 was established in response to the 1973 oil crisis. The act created the Strategic Petroleum Reserve, established vehicle fuel economy standards, and prohibited the export of US crude oil (with a few limited exceptions). It also created Corporate Average Fuel Economy (CAFE) standards for passenger cars starting in model year 1978. The CAFE standards are updated periodically to account for changes in vehicle technologies, driver behavior, and/or driving conditions.

The federal government issued new CAFE standards in 2012 for model years 2017 to 2025 that required a fleet average of 54.5 miles per gallon (mpg) for model year 2025. However, on March 30, 2020, the US Environmental Protection Agency (EPA) finalized an updated CAFE and greenhouse gas (GHG) emissions standards for passenger cars and light trucks and established new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021–2026. Under SAFE, the fuel economy standards would increase 1.5 percent per year compared to the 5 percent per year under the CAFE standards of 2012. Overall, SAFE required a fleet average of 40.4 mpg for model year 2026 vehicles (EPA and NHTSA 2020).

On December 21, 2021, under direction of Executive Order (EO) 13990 issued by President Biden, the National Highway Traffic Safety Administration repealed Safer Affordable Fuel Efficient Vehicles Rule Part One, which had preempted state and local laws related to fuel economy standards. In addition, on March 31, 2022, the National Highway Traffic Safety Administration (NHTSA) finalized new fuel standards in response to EO 13990. Fuel efficiency under the standards proposed would increase 8 percent annually for model years 2024 to 2025 and 10 percent annually for model year 2026. Overall, the new CAFE standards require a fleet average of 49 mpg for passenger vehicles and light trucks for model year 2026, which would be a 10 MPG increase relative to model year 2021 (NHTSA 2021).

In response to President Trump's EO 14154, Unleashing American Energy, which was published on January 20, 2025, the EPA announced on March 12, 2025, its intention to reconsider regulations and actions that rely on the Endangerment Finding, including the CAFE standards. On June 6, 2025, the NHTSA published an interpretive rule that recognizes NHTSA's authority to revise the CAFE standards without consideration of electric vehicles. On July 29, 2025, the EPA released its proposal to rescind the 2009 Endangerment Finding and repeal all greenhouse gas (GHG) emissions standards for light-duty, medium-duty, and heavy-duty on-road vehicles and engines pursuant to Clean Air Act Section 202(a) (USEPA 2025). The proposed rule would remove GHG-related provisions from 40 CFR Part 600 without affecting provisions related to

CAFE standards and fuel economy labeling (Vol. 90 Federal Register, No. 146, 36288). Nonetheless, implementation of these standards remains uncertain.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (Public Law 110-140) seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government. The Act set higher CAFE standards; the Renewable Fuel Standard; appliance energy efficiency standards; building energy efficiency standards; and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration (USEPA 2026b).

Energy Policy Act of 2005

Passed by Congress in July 2005, the Energy Policy Act includes a comprehensive set of provisions to address energy issues. This Act includes tax incentives for energy conservation improvements in commercial and residential buildings, fossil fuel production and clean coal facilities, and construction and operation of nuclear power plants, among other things. Subsidies are also included for geothermal, wind energy, and other alternative energy producers.

Natural Gas Pipeline Safety Act of 1968

The Natural Gas Pipeline Safety Act of 1968 authorizes the United States Department of Transportation to regulate pipeline transportation of flammable, toxic, or corrosive natural gas and other gases as well as the transportation and storage of liquefied natural gas. The Pipeline and Hazardous Materials Safety Administration within the Department of Transportation develops and enforces regulations for the safe, reliable, and environmentally sound operation of the nation's 2.6-million-mile pipeline transportation system.

Intermodal Surface Transportation Efficiency Act of 1991

The ISTEA promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that metropolitan planning organizations were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, metropolitan planning organizations adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions.

The Transportation Equity Act for the 21st Century

The TEA-21 was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. The TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. The TEA-21 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 TEA-21 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.

STATE

California Energy Commission

The California Energy Commission (CEC) was created in 1974 under the Warren-Alquist Act as the State's principal energy planning organization to meet the energy challenges facing the state in response to the 1973 oil embargo. The CEC is charged with six basic responsibilities when designing state energy policy:

- Forecast statewide electricity needs.
- License power plants to meet those needs.
- Promote energy conservation and efficiency measures.
- Develop renewable energy resources and alternative energy technologies.
- Promote research, development and demonstration.
- Plan for and direct the state's response to energy emergencies.

California Public Utilities Commission

In September 2008, the California Public Utilities Commission (CPUC) adopted the Long-Term Energy Efficiency Strategic Plan, which provides a framework for energy efficiency in California through the year 2020 and beyond. It articulates a long-term vision, as well as goals for each economic sector, identifying specific near-term, mid-term, and long-term strategies to assist in achieving these goals. This Plan sets forth the following four goals, known as Big Bold Energy Efficiency Strategies, to achieve significant reductions in energy demand:

- All new residential construction in California will be zero net energy by 2020.
- All new commercial construction in California will be zero net energy by 2030.
- Heating, Ventilation and Air Conditioning (HVAC) will be transformed to ensure that its energy performance is optimal for California's climate.

- All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

With respect to the commercial sector, the Long-Term Energy Efficiency Strategic Plan notes that commercial buildings, which include schools, hospitals, and public buildings, consume more electricity than any other end-use sector in California. The commercial sector's five-billion-plus square feet of space account for 38 percent of the State's power use and over 25 percent of natural gas consumption. Lighting, cooling, refrigeration, and ventilation account for 75 percent of all commercial electric use; space heating, water heating, and cooking account for over 90 percent of gas use.

The CPUC and CEC have adopted the following goals to achieve zero net energy (ZNE) levels by 2030 in the commercial sector:

Goal 1: New construction will increasingly embrace zero net energy performance (including clean, distributed generation), reaching 100 percent penetration of new starts in 2030.

Goal 2: 50 percent of existing buildings will be retrofit to zero net energy by 2030 through achievement of deep levels of energy efficiency and with the addition of clean distributed generation.

Goal 3: Transform the commercial lighting market through technological advancement and innovative utility initiatives.

California Energy Action Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The State Energy Plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

Renewables Portfolio Standard

First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standards (RPS) require retail sellers of electric services to increase procurement from eligible renewable resources to 44 percent of total retail sales by 2024 (Appendix H).

Senate Bills 1078, 107, X1-2, and Executive Order S-14-08

The RPS Program was established in 2002 under SB 1078 (Sher) and 107 (Simitian). The RPS program required investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. Initially under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. EO S-14-08 was signed in November 2008, which expanded the state's Renewable Energy Standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). The CPUC is required to provide quarterly progress reports on progress toward RPS goals. This has accelerated the development of renewable energy projects throughout the state. For year 2022, the three largest retail energy utilities provided an average of 52 percent of their supplies from renewable energy sources. Small and multi-jurisdictional utilities provided an average of 39 percent of their supplies from renewable sources (CPUC 2025).

Senate Bill 350

Governor Jerry Brown signed SB 350 on October 7, 2015, which expands the RPS by establishing a goal of 50 percent renewable sources of the total electricity sold to retail customers in California per year by December 31, 2030. In addition, SB 350 includes the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses upon which an energy efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. Senate Bill 350 also provides for the transformation of the California Independent System Operators into a regional organization to promote the development of regional electricity transmission markets in the western states and to improve the access of consumers served by California independent system operators to those markets, pursuant to a specified process.

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100, which replaces the SB 350 requirements. Under SB 100, the RPS for public-owned facilities and retail sellers consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Senate Bill 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill established an overall state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Senate Bill 1020

Senate Bill 1020 was signed into law on September 16, 2022. It requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent by 2040. Additionally, SB 1020 requires all state agencies to procure 100 percent of electricity from renewable energy and zero-carbon resources by 2035.

Appliance Efficiency Regulations

California's Appliance Efficiency Regulations contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California (California Code of Regulations [CCR] Title 20, Sections 1600–1608). These standards are updated regularly to allow consideration of new energy efficiency technologies and methods (CEC 2017).

Title 24 Energy Efficiency Standards and California Green Building Standards

CCR Title 24, Part 6, The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption.

The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR Title 24, Part 11, California Green Building Standards Code (CALGreen), is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission.

The 2025 California Title 24 Energy Standards became effective on January 1, 2026. As the project is expected to be completed in 2030, it will need to comply with the Title 24 Energy Standards in effect at that time, which may include further updates beyond the 2025 version.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2025 California Green Building Code Standards that went into effect on January 1, 2026. The project would be required to comply with the applicable standards in place at the time plan check submittals are made.

AB 1493 Pavley Regulations and Fuel Efficiency Standards

California AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks). Although aimed at reducing GHG emissions, specifically, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in

fuel consumption. For more mobile-source GHG emission regulations promulgated by State agencies that subsequently support improved fuel efficiency, please refer to Table 3.7-4, *California Regulations to Reduce GHG Emissions*, in Chapter 3.7, *Greenhouse Gas Emissions*.

Executive Order N-79-20

On August 25, 2022, CARB approved the Advanced Clean Cars II rule, which codifies the goals set out in Executive Order N-79-20 and establishes a year-by-year roadmap such that by 2035, 100 percent of new cars and light trucks sold in California will be zero-emission vehicles. Under this regulation, automakers are required to accelerate deliveries of zero-emission light-duty vehicles, beginning with model year 2026. CARB estimates that between 2026 and 2040, the regulation would reduce GHG emissions by a cumulative 395 million metric tons, equivalent to reducing petroleum use by 915 million barrels. However, asserting disputed authority under the Congressional Review Act, Congress passed and the president signed a joint resolution (H.J. Res 88) that disapproved the EPA waiver for the Advanced Clean Cars II rule. California is challenging these actions, but at the time of publication of the EIR, there is uncertainty about whether these rules will take place. Therefore, while ACC II is discussed for the sake of providing a complete picture of the potential regulatory framework, it is conservatively assumed for purposes of this analysis that ACC II is not, and will not, take effect.

Integrated Energy Policy Report

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report (IEPR) that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (Public Resources Code sec. 25301[a]). The CEC prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report.

The 2024 IEPR was adopted September 2025 and works toward improving electricity, natural gas, and transportation fuel energy use in California. The 2024 IEPR provides critical updates on California's energy future, focusing on several key areas. It includes an updated energy demand forecast, offering revised projections for electricity consumption and generation needs. Additionally, the report evaluates the feasibility, costs, and potential benefits of wave and tidal energy resources in accordance with SB 605, which aims to explore alternative renewable energy sources for the state.

Compared to the 2023 IEPR, the 2024 update introduces new insights and considerations, particularly in the context of emerging renewable energy technologies like wave and tidal energy and further refines the demand forecasts. This edition provides a more comprehensive

view of California's evolving energy landscape and the role of innovative resources in meeting future energy needs.

REGIONAL

SCAG's 2024-2050 Regional Transportation Plan/ Sustainable Communities Strategy

SB 375 requires each MPO to prepare a sustainable communities strategy in its regional transportation plan. SCAG's 2024-2050 RTP/SCS, Connect SoCal, was adopted on April 4, 2024, and is an update to the 2020-2045 RTP/SCS (SCAG 2024). In general, the RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land use strategies in development of the SCAG region through the horizon year 2050 (SCAG 2024).

3.5.2 Existing Conditions

ELECTRICITY

The Specific Plan area is in SCE's service area. SCE provides electric power to more than 15 million people in 15 counties and in 180 incorporated cities, and its service area encompasses 50,000 square miles. Based on SCE's 2024 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers (Appendix H). Table 3.5-1, *SCE 2024 Power Content Mix*, shows SCE's specific proportional shares of electricity sources in 2024.

The Specific Plan area is currently vacant (except for ancillary structures) and does not have any current existing permanent uses. The commercial area includes an existing 2,500-square-foot building that has not been used for several years and has no current energy use.

Table 3.5-1 SCE 2024 Power Content Mix

Energy Resources	2024 SCE Power Mix (Percentage)
Eligible Renewable	35
Biomass & Waste	0
Geothermal	4
Eligible Hydroelectric	1
Solar	19
Wind	11
Large Hydroelectric	5
Nuclear	9
Emerging Technologies	0
Other	0
Natural Gas	8
Unspecified Power (primarily fossil fuels)*	43
Total	**100**

Source: Appendix H.

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

NATURAL GAS

SoCalGas provides gas service in Irwindale, including the Specific Plan area. The service area of SoCalGas spans much of the southern half of California, from Imperial County in the southeast to San Luis Obispo County in the northwest, to part of Fresno County in the north, and to Riverside County and most of San Bernardino County in the east (CEC 2022). Total natural gas consumption in SoCalGas's service area was 4,859 million therms for 2024 (CEC 2025). As stated, the project site does not currently have any existing permanent uses.

FUEL CONSUMPTION

California is among the top producers of petroleum in the country, with crude oil pipelines throughout the state connecting to oil refineries in the Los Angeles, the San Francisco Bay, and the Central Valley regions. In addition to producing petroleum, California is also one of the top consumers of fuel for transportation. On January 1, 2024, the Department of Motor Vehicles reported 35.7 million registered vehicles in California with an estimated fuel consumption of approximately 17.5 billion gallons of fuel annually. While gasoline consumption has been declining since 2008, it is still by far the dominant fuel, and 86 percent of the petroleum consumed in California is used in the transportation sector (Appendix H).

3.5.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to energy if it would:

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

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

METHODOLOGY

Information from the CalEEMod Version 2022.1 outputs for the Irwindale Brew Yard Specific Plan Air Quality Impact Analysis (see Appendix D) was utilized in this analysis to determine project-related construction and operational equipment, transportation and facility energy demands.

This analysis also used the annual EMFAC 2021 emission inventory to determine the estimated annual fuel consumption associated with vehicle usage during project construction and operational activities. For purposes of analysis, the 2025 through 2030 analysis years were utilized to determine the average vehicle fuel economy throughout the duration of the construction and operations. Additional information about the project's energy consumption assumptions is provided in Appendix H.

Construction

Buildout of the proposed project is anticipated in 2031. However, it should be noted that for analytical purposes, the energy analysis assumed that project buildout would occur in 2030, consistent with the Transportation Impact Study (see Appendix P1). This assumption of an earlier buildout year is conservative, because a base assumption of the emission factors used in the modeling is that vehicles and equipment become cleaner each year with fleet turnover and new emission standards. Therefore, this construction schedule represents a "worst-case" analysis scenario. The duration of construction activity and associated equipment are based on a reasonable approximation of the expected construction fleet, as required by the CEQA Guidelines.

Construction equipment is based on applicant-provided information, which has been independently reviewed for accuracy, and each piece of equipment is conservatively assumed to

operate up to nine and a half hours per day. The haul truck and worker trips are consistent with the Transportation Impact Study (see Appendix P1). Worker trips for the building construction, paving, and architectural coating phases as well as vendor trips are based on CalEEMod defaults. The following describes additional assumptions and sources used to calculate construction energy consumption:

- **Electricity**. Electrical energy consumption from on-site construction activities was estimated using the 2025 National Construction Estimator's power cost per 1,000 square feet of construction ($2.85 per month). Using this estimated power cost, SCE's general service rate of $0.17 per kilowatt hour (kWh) of electricity for industrial uses was used to derive the proposed project's total on-site construction electricity usage.

- **Fuel.** Construction fuel equipment usage was estimated using the CalEEMod default horsepower ratings for each piece of equipment used in the Air Quality Analysis modeling (see Appendix D) and the fuel consumption rate factors from CARB's 2018 Emissions Factors Tables. The calculations are based on all construction equipment being diesel-powered which is consistent with industry standards.

- **Transportation.** Consistent with the project's CalEEMod default fleet mix, this analysis assumed that 50 percent of all worker trips are from light-duty-auto vehicles, 25 percent are from Class 1 light-duty-trucks, and 25 percent are from Class 2 light-duty-trucks.[1] For vendor trips, 50 percent are assumed to be medium-heavy duty trucks and 50 percent heavy-heavy duty trucks, and 100 percent of hauling trips are assumed to be heavy-heavy duty trucks. Vehicle fuel efficiencies for these vehicle classes were estimated using information in the EMFAC 2021 database for the California subarea in the 2025 through 2030 calendar years.

Operation

The following describes the assumptions and sources used to estimate operational energy consumption:

- **Transportation.** As with worker, vendor, and hauling trips, operational vehicle fuel efficiencies were estimated using information generated in EMFAC 2021. EMFAC 2021 was run for the Los Angeles (SC) area for the 2030 calendar year. Passenger vehicle and truck trip VMT used the VMT modeled in the project's Transportation Impact Analysis (see Appendix P1).

- **Emergency Engine Fuel Demands.** The proposed project was conservatively assumed to include a total of five emergency fire pumps and one emergency generator. Each emergency

1. Class 1 Light Heavy-Duty trucks refers to a Gross Vehicle Weight Rating (GVWR) of 8,501 lbs. to 10,000 lbs. Class 2 Light Heavy-Duty trucks refers to a GVWR less than or equal to 8,500 lbs.

fire pump was assumed to be diesel fueled and rated at 350 brake horsepower,[2] and the emergency generator was assumed to be diesel fueled and rated at 2,000 brake horsepower. Each emergency engine was assumed to operate for up to 1 hour per day, 1 day per week for up to 50 hours per year for maintenance and testing purposes.

- **On-Site Cargo Handling Equipment**. The analysis assumed 11 pieces of exterior cargo handling equipment in the building's truck court areas. Each piece of equipment was modeled as a 175-horsepower natural-gas-powered port tractor and assumed to operate 4 hours a day for 365 days of the year.

- **Facility.** Operation of project buildings would result in the consumption of electricity, which would be supplied through rooftop solar as well as SCE. Project electricity and natural gas demand are based on CalEEMod defaults.

3.5.4 Applicable Specific Plan Development Standards and Design Guidelines

DEVELOPMENT STANDARDS

The Specific Plan has an overall objective of providing standards for landscaping and building systems that are aimed at reducing unnecessary water use, energy use, and fossil fuel consumption in the Irwindale Brew Yard Specific Plan area.

Section 3.6, Parking, specifies the minimum parking requirements for projects in the Irwindale Brew Yard Specific Plan, including compliance with applicable provisions of the California Green Building Standards Code (CALGreen) for bicycle parking and EV charging stalls.

DESIGN GUIDELINES

The Specific Plan guidelines have overall objectives to encourage sustainable design solutions that reduce energy consumption, use water efficiently and minimize waste.

2 Brake power is the usable power an engine produces at its crankshaft, measured after accounting for internal losses from friction, heat, and accessories, but before losses in the transmission or drivetrain.

3.5.5 Project Impact Analysis

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

Construction

Construction associated with the proposed project would create a temporary increase in demands for electricity and fuels compared to existing conditions and would result in short-term transportation-related energy use. Most of the off-road construction equipment used during construction work would be gas or diesel powered, and electric-powered construction equipment would be limited to hand tools (e.g., power drills, table saws, compressors) and lighting. Natural gas is not generally required to power construction equipment and therefore is not anticipated during the construction phases. Transportation energy use during construction of the proposed project would come from delivery vehicles, haul trucks, and construction-employee vehicles as well as off-road construction equipment. A summary of the electricity, diesel, and gasoline consumed by these construction-related sources is provided in Table 3.5-2, *Construction Energy Consumption*.

Table 3.5-2 Construction Energy Consumption

Source	Energy Consumption
On-Site	
Electricity (kWh)	3,383,185
Construction Equipment (gallons)	987,674
Vehicle	
Construction Worker Fuel (gallons)	255,101
Vendor and Hauling Fuel (gallons)	3,673,829

Source: Appendix H.

In 2014, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turn over the oldest and dirtiest equipment to newer, cleaner models and prevent fleets from adding older, dirtier equipment. As such, the equipment used for project construction would conform to CARB regulations and California emissions standards. It should also be noted that there are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for

comparable activities or equipment that would not conform to current emissions standards (and related fuel efficiencies).

Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.

Additional construction-source energy efficiencies would result from required California regulations and best available control measures. For example, 13 CCR Section 2449(d)(3), Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Section 2449(d)(3) requires that grading plans shall reference the requirement and that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

In general, the construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing, and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

Operation

Operation of the proposed project would create additional demands for electricity and natural gas as compared to existing conditions due to the increase in proposed building space and commercial and industrial uses. Operational use of energy would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; use of on-site equipment and appliances; and indoor and outdoor lighting.

Electricity Demand

The estimated electricity consumption for the proposed project is summarized in Table 3.5-3, *Operational Electricity and Fuel Consumption*.

Table 3.5-3 Operational Electricity and Fuel Consumption

Source	Electricity (kWh/year)
High-Cube Cold Storage	5,347,070
High-Cube Fulfillment Center (Sort)	5,669,798
Warehousing	1,657,564
High-Cube Short-Term Storage Warehouse	1,657,564
Strip Retail	79,807
Parking Lot	2,287,224
Total	**16,699,027**[1]

Source: Appendix H.

1. Provided by SCE.

Electrical service for the proposed project would be provided by SCE through connections to existing off-site electrical lines and new on-site infrastructure as needed. Though the proposed project would generate new energy demand at the site, it would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements. Energy efficiency/energy conservation attributes of the proposed project would be complemented by increasingly stringent state and federal regulatory actions addressing enhanced building/utilities energy efficiencies mandated under California building codes. The proposed project would also include contemporary design features such as photovoltaic systems or renewable energy. Specifically, the proposed project would install rooftop solar systems to offset 45 percent of the warehouse electrical demands. The proposed project would also not result in a substantial increase in demand for transmission service, resulting in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure (other than site-adjacent and on-site connects to local utilities). Therefore, impacts would be **less than significant**.

Natural Gas Demand

The natural gas consumption associated with the proposed project is shown in Table 3.5-4, *Operation-Related Natural Gas Consumption*. As seen in the tables, the natural gas demand by the proposed project would total 60,951,840 kilo-British thermal units per year. Natural gas service for the proposed project would be provided by SoCalGas through connections to existing off-site natural gas pipelines and new on-site infrastructure as needed.

Development associated with the proposed project would be built to meet the Building Energy Efficiency Standards, which would be consistent with the goals in Appendix F of the CEQA

Guidelines. As such, the proposed project would not result in wasteful, inefficient, or unnecessary natural gas demands. The proposed project would also not result in a substantial increase in demand for natural gas service, resulting in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure (other than site-adjacent and on-site connections to local utilities). Therefore, operation of the proposed project would result in **less than significant** impacts with respect to natural gas usage.

Table 3.5-4 Operational Natural Gas Demand

Source	Natural Gas (kBTU/year)
High-Cube Cold Storage	13,402,323
High-Cube Fulfillment Center (Sort)	29,961,336
Warehousing	8,759,188
High-Cube Short-Term Storage Warehouse	8,759,188
Strip Retail	69,805
Parking Lot	0
Total	**60,951,840**

Source: Appendix H.

Transportation Energy and On-Site Cargo Handling Equipment Fuel Demands

Energy that would be consumed by project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the project site . The proposed project would result in 64,075,275 annual VMT and an estimated annual fuel consumption of 3,533,959 gallons of fuel (see Appendix H).

Additionally, as shown in Table 3.5-5, *On-Site Cargo Handling Equipment Fuel Consumption Estimates*, on-site operational cargo handling equipment is estimated to consume approximately 51,071 gallons of fuel per year at buildout.

Table 3.5-5 On-Site Cargo Handling Equipment Fuel Consumption Estimates

Equipment	Quantity	Usage Hours	Fuel Consumption (gal/hr)	Activity (hrs./yr)	Total Fuel Consumption (gal/yr)
Port Tractor	11	4	3.18	16,060	51,071

Source: Appendix H.

Fuel would be provided by current and future industrial vendors. Trip generation, VMT, and on-site handling equipment use associated with the proposed project are consistent with other industrial uses of similar scale and configuration. As such, the proposed project operations would not result in excessive and wasteful vehicle trips and VMT, nor excess and wasteful vehicle or on-site cargo handling equipment energy consumption compared to other industrial uses.

Heavy duty trucks involved in goods movements are generally controlled on the technology side and through fleet turnover of older trucks and engines to newer and cleaner trucks and engines. The first battery-electric heavy-heavy-duty trucks are being tested this year, and South Coast AQMD is looking to integrate this new technology into large-scale truck operations. The following state strategies reduce GHG emissions from medium and heavy-duty trucks:

- **CARB's Mobile Source Strategy** focuses on reducing GHGs through the transition to zero and low emission vehicles and from medium-duty and heavy-duty trucks.
- **CARB's Sustainable Freight Action Plan** establishes a goal to improve freight efficiency by 25 percent by 2030, deploy over 100,000 freight vehicles and equipment capable of zero-emissions operation, and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.
- **CARB's Emissions Reduction Plan** for Ports and Goods Movement (Goods Movement Plan) focuses on reducing heavy-duty truck-related emissions by establishment of emissions standards for trucks, fleet turnover, truck retrofits, and restriction on truck idling (Appendix H). While the focus of the Goods Movement Plan is to reduce criteria air pollutant and air toxic emissions, the strategies to reduce these pollutants would also generally have a beneficial effect in reducing fuel use.
- **CARB's On-Road Truck and Bus Regulation (2010)** requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. While the focus of the On-Road Truck and Bus Regulation is to reduce particulate matter, the strategies to reduce this pollutant would also generally have a beneficial effect in reducing fuel use.
- **CARB's Heavy-Duty (Tractor-Trailer)** GHG Regulation requires SmartWay tractor trailers that include idle-reduction technologies, aerodynamic technologies, and low-rolling resistant tires that reduce fuel consumption and associated GHG emissions.

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) could further decrease future gasoline fuel demands per VMT. The project's

location near regional and local road networks helps decrease VMT in the area, which in turn reduces the overall energy demand for vehicles in the region. Notwithstanding the uncertainty in implementing future regulations, the proposed project would implement sidewalks, facilitating and encouraging pedestrian access. Facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption. In all cases, transportation energy use would be comparable to other industrial uses of similar scale and configuration. As supported by the preceding discussions, the proposed project's transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. Therefore, this impact is **less than significant**.

Emergency Engine Fuel Demands

As presented in Table 3.5-6, *Emergency Engine Fuel Consumption Estimates*, emergency engine operation for maintenance and testing purposes would consume an estimated 7,061 gallons of diesel fuel per year at buildout.

Table 3.5-6 Emergency Engine Fuel Consumption Estimates

Equipment	Quantity	Horsepower	Fuel Consumption (gal./hour)	Activity (hrs./yr)	Total Fuel Consumption
Fire Pump	5	350	13.18	50	3,295
Emergency Generator	1	2,000	75.32	50	3,766
Total Annual Fuel Consumption:					**7,061**

Source: Appendix H.

The proposed project would comply with the applicable Title 24 standards, including the Building Energy Efficiency Standards, which would be consistent with the goals in Appendix F of the CEQA Guidelines. Energy efficiency/energy conservation attributes of the proposed project would be complemented by increasingly stringent state and federal regulatory actions addressing enhanced building/utilities energy efficiencies mandated under California building codes. The proposed project would also include contemporary design features such as photovoltaic systems or renewable energy. Specifically, the proposed project would install rooftop solar systems to offset 45 percent of the warehouse electrical demands, which would reduce the demand for emergency generators. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Construction

As discussed above, the proposed project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, construction equipment, and the use of electricity for temporary buildings used during construction, lighting, and other sources. Sections 2449 and 2485 of 13 CCR limit idling from both on-road and off-road diesel-powered equipment and are enforced by CARB. The proposed project would comply with these regulations. There are no policies at the local level applicable to energy conservation specific to the construction phase. Thus, it is anticipated that construction of the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. Therefore, construction-related energy efficiency and renewable energy standards consistency impacts would be **less than significant**.

Operation

The proposed project would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on 24 CCR Part 6 energy efficiency standards. Part 6 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. For example, the lighting power density requirements define the maximum wattage of lighting that can be used in a building based on its square footage. Part 6 standards, widely regarded as the most advanced energy efficiency standards, would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation.

Compliance with the aforementioned mandatory measures would ensure that the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. Therefore, operational energy efficiency and renewable energy standards consistency impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.5.6 Cumulative Impact Analysis

The areas considered for cumulative impacts to electricity and natural gas supplies are the service areas of SCE and SoCalGas, respectively, as described above in Section 3.5.2

Would the project have a cumulative effect related to energy?

Other development projects in the service areas would generate increased electricity and natural gas demands. However, as with development associated with the proposed project, all projects within the SCE and SoCalGas service areas would be required to comply with the current and future Building Energy Efficiency Standards and CALGreen, which would contribute to minimizing wasteful energy consumption. All heavy-duty trucks involved in goods movements would be controlled on the technology side and through fleet turnover of older trucks and engines to newer and cleaner trucks and engines. Development projects would also abide by the requirements of CARB's truck and off-road construction equipment regulations. Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) could further decrease future gasoline fuel demands per VMT.

As discussed under Impact Discussion 5.4.5(a), construction- and operation-related energy impacts resulting from implementation of the proposed project would not be considered inefficient, wasteful, or unnecessary. The proposed project would therefore not contribute to any cumulative energy impacts when considered together with cumulative development projects and would not be cumulatively considerable.

Significance without Mitigation: Less than significant.

3.5.7 References

CEC (California Energy Commission). 2017. 2016 Appliance Efficiency Regulations. https://pdf4pro.com/cdn/2016-appliance-efficiency-regulations-5104f7.pdf.

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CEC. 2025. California Natural Gas Consumption. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1.

CPUC (California Public Utilities Commission). 2025. Renewables Portfolio Standard (RPS) Program. https://www.cpuc.ca.gov/rps/#:~:text=Current%20Renewable%20Procurement%20Status,the%20large%20IOUs%20RPS%20Projects.&text=An%20unexpected%20error%20occurred.,contact%20your%20Tableau%20Server%20Administrator.

EPA and NHTSA (US Environmental Protection Agency and National Highway Traffic Safety Administration). 2020, April 30. "The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks." Final Rule. *Federal Register* 85, No. 84. https://www.federalregister.gov/documents/2020/04/30/2020-06967/the-safer-affordable-fuel-efficient-safe-vehicles-rule-for-model-years-2021-2026-passenger-cars-and.

NHTSA (National Highway Traffic Safety Administration). 2021, August 5. "USDOT Proposes Improved Fuel Economy Standards for MY 2024-2026 Passenger Cars and Light Trucks." Press release. https://www.nhtsa.gov/press-releases/fuel-economy-standards-2024-2026-proposal.

USEPA (United States Environmental Protection Agency). 2026a, February 13. "Proposed Rule: Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards." https://www.epa.gov/regulations-emissions-vehicles-and-engines/proposed-rule-reconsideration-2009-endangerment-finding.

USEPA. 2026b, January 14 (accessed). Summary of the Energy Independence and Security Act Public Law 110-140 (2007). https://www.epa.gov/laws-regulations/summary-energy-independence-and-security-act.

3.6 GEOLOGY AND SOILS

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the proposed Irwindale Brew Yard Specific Plan to impact geological and soil resources, paleontological resources, or unique geologic features in the City of Irwindale. The analysis in this section is based in part on the following technical reports:

- *Geotechnical Report for Environmental Impact Report, Proposed Brew Yard Development,* HD Geosolutions, January 14, 2026.
- *Draft Operations Plan, Brew Yard Inert Debris Engineered Fill Operation*, Heavy Iron Contracting, December 1, 2025.
- *Cultural and Paleontological Resources Assessment for the Irwindale Brew Yard Specific Plan Project*, Cogstone, January 2026.

Complete copies of these studies are included in the technical appendices to this Draft EIR as Appendix I, C, and G1, respectively.

No comments related to geology and soils were raised during the NOP comment period (March 6, 2024, through April 5, 2024) or at the scoping meeting held on February 23, 2024.

3.6.1 Regulatory Framework

Federal, state, and local laws, regulations, plans, or guidelines that are related to the protection and preservation of geologic and paleontological resources and applicable to the proposed project are summarized below.

FEDERAL

There are no federal regulations directly applicable to the geotechnical conditions at the proposed project site. Nonetheless, installations of any underground utility lines are required to comply with industry standards specific to the type of utility (National Clay Pipe Institute for sewers, American Water Works Association for water lines, etc.), and the discharge of contaminants is required to be controlled through the National Pollutant Discharge Elimination System (NPDES) permitting program for management of construction and municipal stormwater runoff. These standards contain specifications for installation, design, and maintenance to reflect site-specific geotechnical conditions.

Clean Water Act

Under the Clean Water Act (CWA) of 1977, the United States Environmental Protection Agency (EPA) seeks to restore and maintain the chemical, physical, and biological integrity of the nation's waters. The statute employs a variety of regulatory and nonregulatory tools to reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. The CWA authorizes the EPA to implement water quality regulations. Please see Chapter 3.9, *Hydrology and Water Quality*, of this Draft EIR for more detail.

National Pollution Discharge Elimination System

The NPDES permit program was established by the CWA to regulate municipal and industrial discharges to surface waters of the United States from municipal separate storm sewer systems.

Paleontological Resources Preservation Act

The federal Paleontological Resources Preservation Act of 2002 limits the collection of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers who have obtained a permit from the appropriate state or federal agency. These researchers must agree to donate any materials recovered to recognized public institutions where they will remain accessible to the public and other researchers. The act incorporates key findings of a report, "Fossils on Federal Land and Indian Lands," issued by the Secretary of the Interior in 2000, which establishes that most vertebrate fossils and some invertebrate and plant fossils are considered rare resources.

STATE

California Alquist-Priolo Earthquake Fault Zoning Act

The California Alquist-Priolo Earthquake Fault Zoning Act was signed into state law in 1972 and has been amended since. Its primary purpose is to mitigate the hazards of fault rupture by prohibiting structures for human occupancy across the trace of an active fault. This state law was a direct result of the 1971 San Fernando Earthquake, which was associated with extensive surface fault ruptures that damaged homes, commercial buildings, and other structures. The act requires the State Geologist of the California Geologic Survey to delineate regulatory zones known as "earthquake fault zones" along faults that are "sufficiently active" and "well defined" and to issue and distribute appropriate maps to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Pursuant to this act and as stipulated in the California Code of Regulations (CCR), Title 14, Section 3603(a), structures for human occupancy are not permitted to be placed across the trace of an active fault. The act also prohibits structures for human occupancy within 50 feet of the trace of an active fault, unless proven by an appropriate geotechnical investigation and report that the development site is not underlain by active branches of the active fault, as stipulated in 14 CCR Section

3603(a). Furthermore, the act requires that cities and counties withhold development permits for sites within an earthquake fault zone until geologic investigations demonstrate that the sites are not threatened by surface displacement from future faulting, as stipulated in 14 CCR Section 3603(d).

Seismic Hazard Mapping Act

The Seismic Hazard Mapping Act was adopted by the state in 1990 to protect the public from the effects of earthquake hazards other than surface fault rupture, such as strong ground shaking, liquefaction, seismically induced landslides, or other ground failure. The goal of the act is to minimize loss of life and property by identifying and mitigating seismic hazards. The California Geologic Survey prepares and provides local governments with seismic hazard zone maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. Section 2697(a) of the act states that "cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard."

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act was adopted by the state in 2014 to establish a statewide framework to help protect groundwater resources over the long term. The act established a priority framework for all 515 groundwater basins in California, categorizing them into very low, low, medium, and high priority based on eight components. The act requires local agencies to form groundwater sustainability agencies for the high- and medium-priority basins. These agencies develop and implement groundwater sustainability plans to avoid undesirable results and mitigate overdraft within 20 years. The project site is within the Main San Gabriel Groundwater Basin, which is classified as a very low priority basin.

California Building Code

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the California Building Code (CBC) within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission, and the code is in 24 CCR Part 2. 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 contains 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 at a site.

Chapters 16 and 16A of the CBC deal with structural design requirements governing seismically resistant construction (Section 1604), including factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the

proposed building design (Section 1610). Chapters 18 and 18A include the requirements for foundation and soil investigations (Section 1803); excavation, grading, and fill (Section 1804); allowable load-bearing values of soils (Section 1806); retaining walls (Section 1807); the design of footings, foundations, and slope clearances (Sections 1808); and pier, pile, driven, and cast-in-place foundation support systems (Section 1810). Chapter 33 includes requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes (Section 3304). Appendix J of the CBC includes grading requirements for the design of excavations and fills (Sections J106 and J107) and for erosion control (Section J110). Construction activities are subject to occupational safety standards for excavation, shoring, and trenching as specified in Cal/OSHA regulations (CCR Title 8). The CBC is revised every three years. The 2025 CBC took effect January 1, 2026. City of Irwindale adopted the Los Angeles Conty Building Code by Reference and Amended Local Appendix J.

Soils Investigation Requirements

Requirements for soils investigations for new construction are in California Health and Safety Code Sections 17953 to 17955, and in Section 1803 of the CBC. Testing of samples from subsurface investigations is required, such as from borings or test pits. Studies must be done as needed to evaluate slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on load-bearing capacity, compressibility, liquefaction, differential settlement, and expansiveness as part of the geotechnical evaluation required by the CBC.

California Public Resources Code

Paleontological sites are protected under a wide variety of state policies and regulations in the California Public Resources Code (PRC). In addition, paleontological resources are recognized as nonrenewable resources and receive protection under the PRC and CEQA. PRC Division 5, Chapter 1.7, Section 5097.5, and Division 20, Chapter 3, Section 30244 state:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

This statute prohibits the removal, without permission, of any paleontological site or feature from lands under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. As a result, local agencies are required to comply with PRC 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. California Public Resources Code Section 5097.5 establishes the removal of paleontological resources as a misdemeanor and

requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, and district) lands.

Statewide General Construction Permit

Construction projects of one acre or more are regulated under the Construction General Permit, Order WQ 2022-0057-DWQ, issued by the State Water Resources Control Board in 2022. Projects obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan estimating sediment risk from construction activities to receiving waters and specifying best management practices (BMP) that would be used by the project to minimize pollution of stormwater.

LOCAL

Irwindale General Plan

The City of Irwindale Public Safety Element establishes guidelines and policies pertaining to geologic and seismic hazards. The policies include the following:

- **Guiding Policy SAF10.1**. **Building Codes.** Ensure that new and retrofitted buildings comply with the most recently adopted applicable city, county, and state building codes governing seismic safety to minimize the potential for damage from earthquakes.
- **Guiding Policy SAF10.2**. **Geotechnical Study.** Require detailed geologic, geotechnical, or soil investigations in areas of potential seismic or geologic hazards as part of the environmental and/or development review process.
- **Guiding Policy SAF10.3**. **Structural Hazards.** Mitigate structural hazards related to seismic events through appropriate methods such as excavating and refilling land with engineered fill, slope stabilization, and other appropriate mitigation.

City of Irwindale Municipal Code

The City of Irwindale Municipal Code (IMC) Title 15, Chapters 8.28, 15.04, and 16.14 are relevant to potential geological impacts of the proposed project. Chapter 8.28 provides minimum requirements to control the discharge of pollutants into the City's municipal storm drain system and to ensure that discharges from the municipal storm drain system comply with the current NPDES Permit No. CAS004001, including amendments and California Regional Water Quality Control Board approvals. Chapter 15.04, Building Code, establishes the adoption of the Los Angeles County Building Code with amendments for the City of Irwindale. Section 16.14.010, Grading, requires a grading plan to be prepared by a registered civil engineer and submitted to the City Engineer for approval prior to the issuance of a building permit.

City of Irwindale Ordinance No. 756

Adopted in 2021, Ordinance No. 756 identifies mines in Irwindale that are exempt from the requirements of SMARA. These include but are not limited to mining pits, such as the pits on the project site, which had mining operations conducted prior to January 1, 1976, and which are required to have, or requested to have, additional reclamation. The reclamation of Non-SMARA pits is allowed only upon approval by the City of a Development Agreement, with appropriate standards and public benefits to be negotiated with the City and complying with all other standards imposed by the chapter.

City of Irwindale Hazard Mitigation Plan

The Disaster Mitigation Act of 2000, Public Law 106-390 (Section 322(a–d)) requires that local governments, as a condition of receiving federal disaster mitigation funds, adopt a mitigation plan that describes the process for identifying hazards, vulnerabilities, and risks; identifies and prioritizes mitigation actions; encourages the development of local mitigation; and provides technical support for those efforts. In response to this and the requirements of the California Office of Emergency Services, the City of Irwindale adopted the 2014 Hazard Mitigation Plan (HMP) on February 27, 2013. The HMP focuses on reducing risks from natural hazards such as earthquakes, floods, and wildfires. In 2025, the City began the preparation of the updated HMP. The anticipated adoption of the final document is slated for the third or fourth quarter 2026.

City of Irwindale Guidelines

Stability Analyses of Open-Pit Mine Slopes

The City adopted its Guidelines for Stability of Open-Pit Mine Slopes on December 23, 2003, to provide a standardized framework for evaluating the safety of aggregate mine slopes under static and earthquake conditions. These guidelines define required shear strength parameters for local sand, gravel, and cobble deposits and mandate methods to calculate potential seismic slope displacement.

Above-Water Backfilling of Open-Pit Mines

The City adopted its Guidelines for Above-Water Backfilling of Open-Pit Mines on November 23, 2005, to provide technical standards for reclaiming mining pits to allow for future commercial development. These guidelines focus on ensuring structural stability, proper compaction of fill, and protection of the underlying aquifer by managing fill material composition, placement, drainage, and long-term monitoring.

Underwater Backfilling of Open-Pit Mines

The City adopted its Guidelines for Underwater Backfilling of Open-Pit Mines on May 20, 2005. These guidelines are often applied in conjunction with the City's Guidelines for Above-Water Backfilling of Open-Pit Mines and focus on reclaiming quarry pits using inert materials to prevent groundwater contamination in the Main San Gabriel Valley Basin. These regulations require certified fill, strict monitoring of water quality, and specific placement methods.

3.6.2 Existing Conditions

The project site consists of vacant land and two former quarries (see Figure 2-3, *Project Site Boundary/Aerial Photo*). Aerial photographs show active sand and gravel excavation evident as early as 1928. The quarry in the southeastern portion of the site ceased operations in 1938. The quarry in the northwestern portion of the project site ceased operations by the early 1970s. The northwestern quarry is approximately 52 acres at the surface grade with a maximum depth of approximately 270 feet. The southeastern quarry is approximately 25 acres at the surface grade with a maximum depth of approximately 140 feet. Parcels 1 and 2, located along the south side of the Specific Plan area, are relatively level and representative of the original ground surface. This area is primarily used for truck access and parking.

REGIONAL GEOLOGY

The Specific Plan area is in the central San Gabriel Valley along the east bank of the San Gabriel River. The San Gabriel Valley is in the northern part of the Peninsular Ranges Geomorphic Province. This geomorphic province extends approximately 900 miles southward from the Los Angeles Basin to Baja California, Mexico, and is characterized by elongated northwest-trending mountain ranges separated by sediment-floored valleys. The most dominant features of the province are the northwest-trending fault zones, most of which die out, merge with, or terminate at the steep reverse faults at the southern margin of the San Gabriel Mountains in the Transverse Ranges Geomorphic Province north of the site.

The San Gabriel Valley is bordered by the San Gabriel Mountains on the north, the San Jose Hills to the east, the Puente Hills on the south, and the San Rafael and Repetto Hills on the west. Most of the San Gabriel Valley is underlain by alluvial fans shed southward primarily from the San Gabriel Mountains and, to a lesser degree, from the other nearby ranges. Coarser materials are contained in broad fans below larger mountain drainages and in channels defined along the major drainages, including the San Gabriel River and Rio Hondo. The basement rock of the San Gabriel Mountains includes Cretaceous-aged quartz-diorite that has been intruded and faulted into older metamorphic rocks. Materials shed from these "basement complex" igneous and metamorphic rocks tend to consist primarily of larger, erosion-resistant gravels and sands with relatively minor amounts of silt and clay. Alluvial deposits outside of and beyond the immediate

influence of the major drainage systems consist of sand and gravel with discontinuous lenses of silt and clay (HD Geosolutions 2026).

GEOLOGIC UNITS

The resulting quarry excavation in the Specific Plan area exposes alluvium with isolated areas of non-engineered fill. The site was quarried in the past to extract the gravelly alluvial sediments deposited largely within the braided San Gabriel River drainage and alluvial fans. These materials consist primarily of weakly cemented sand, gravel, and cobbles, and boulders that are beige-tan-brown in color. The coarse-grained alluvium grades laterally into the finer grained materials comprising the adjacent floodplain deposits. Areas of non-engineered fill are also present within the quarry that were placed during and/or following mining operations.

In addition to the non-engineered fill in the quarries, the Geotechnical Report anticipates that relatively shallow and intermittent non-engineered fill of variable depths may also exist in the relatively level portions of the Specific Plan area that were not previously quarried. Where the ground surface has been undisturbed by previous mining and grading activities, alluvium is also expected to be present. The alluvium extends to an unknown depth below the Specific Plan area (HD Geosolutions 2026).

GROUNDWATER

Groundwater levels in the site vicinity have been near historic low elevations in recent years. The California Department of Water Resources website depicts Well SF 1 just south of the site. The water level at Well SF 1 was reported at 283.73 feet below ground surface (bgs) on January 31, 2024. During past high groundwater levels, groundwater could have been exposed in the bottoms of both pits (HD Geosolutions 2026).

SEISMIC SETTING

Regional Faulting

Faults in the vicinity of the Specific Plan area are depicted in Figure 3.6-1, *Regional Fault Map*. Classification of faults in California include active, potentially active, and inactive faults based on criteria developed by the California Division of Mines and Geology (CalGEM), now known as the California Geological Survey (CGS) for the AP Zone Act program. By definition, an active fault has ruptured within the Holocene geologic time (about the last 11,000 years).

The closest active faults to the Specific Plan area are the Duarte fault, the Upper Duarte fault, and the Sierra Madre fault. These faults are approximately 0.5 to 2 miles north of the Specific Plan area along the southern edge of the San Gabriel Mountains, along with others within a narrow zone that extends along the base of the San Gabriel Mountains. All of these faults are included as Alquist-Priolo Earthquake Fault Zones.



Source: HD Geosolutions 2023.

Figure 3.6-1
Regional Fault Map

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Additionally, the Specific Plan area is about four miles southeast of the Raymond fault and nine miles northeast of the boundary of the Elysian Park Fold and Thrust Belt. The Raymond fault is a Alquist-Priolo Earthquake Fault Zone, and the Elysian Park Fold and Thrust Belt should be considered active features capable of generating future earthquakes. The East Montebello fault is a short fault segment in an Alquist-Priolo Earthquake Fault Zone about nine miles southwest of the site. The Whittier segment of the Whittier-Elsinore fault zone approaches within about 10.5 miles south of the site. The fault is in Alquist-Priolo Earthquake Fault Zones over most of this distance (HD Geosolutions 2026). A list of known active and potentially faults and their distances from the Specific Plan area are listed in Table 3.6-1, *Major Faults Considered Active and Potentially Active in Southern California*.

Table 3.6-1 Major Faults Considered Active or Potentially Active in Southern California

Fault	Maximum Credible Earthquake	Distance from Site (miles)	Direction from Site
Active Faults			
Duarte	6.7	0.5	N
Sierra Madre	7.3	2.0	N
Raymond	6.7	4.0	NW
Elysian Park Fold and Thrust Belt	7.1	9.0	SSW
East Montebello	N/D	9.0	SW
Whittier	7.1	10.5	S
Verdugo	6.8	16.0	WNW
Hollywood	7.0	19.0	W
Cucamonga	7.0	16.0	ENE
Newport-Inglewood Zone	7.0	24.0	SW
Northridge	6.9	31.0	WNW
San Fernando	6.8	24.0	NW
San Andreas (Mojave Segment)	8.2	22.0	NE
Potentially Active Faults			
San Jose	6.7	7	SE
Indian Hill	N/D	3.5	E
Norwalk	6.7	15	S
Chino-Central Avenue	7.0	12.5	SE
Rialto-Colton	6.4	32.5	E
Los Alamitos	6.2	22	SSW

Sources: HD Geosolutions 2026 (Appendix I).
Note: N/D = not determined.

Secondary effects of seismic shaking that may affect the Specific Plan area include ground lurching and shallow ground rupture, soil liquefaction, and dynamic settlement. These secondary effects are a possibility throughout the Southern California region and are dependent on the distance between the site and causative fault as well as the on-site geology.

Fault Rupture

Alquist-Priolo earthquake fault zones are regulatory zones surrounding the surface traces of active faults in California. Wherever an active fault exists, if it has the potential for surface rupture, a structure for human occupancy cannot be placed over the fault and must be a minimum distance from the fault (generally 50 feet).

There are no known active or potentially active faults passing through or immediately adjacent to the Specific Plan area, and the Specific Plan area is not within an Alquist-Priolo Earthquake Fault Zone (HD Geosolutions 2026).

Seismic Ground Shaking

Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter and therefore the potential exists for strong seismic ground shaking at the project site. The potential severity of ground shaking depends on many factors, including the size and type of the earthquake, the distance of the site from the earthquake epicenter, and the nature of the earth materials beneath a given site. The Los Angeles Basin region has experienced several large earthquakes throughout recorded history, with the last most sizable event being the magnitude 6.7 Northridge Earthquake in 1994. The earthquake occurred on a blind thrust fault centered in the San Fernando Valley community of Northridge. The hazards associated with seismic ground shaking are common in southern California, and the Specific Plan area is not exposed to a greater than normal seismic risk as compared to other areas of Southern California.

Liquefaction and Lateral Spreading

Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based upon three main contributing factors: 1) cohesionless, granular soils having relatively low densities (usually of Holocene age);[1] 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking. Cohesionless and granular soils are sand or gravel, typically with little or no clay content. Soil liquefaction generally occurs in submerged granular soils and non-plastic silts during or after strong ground shaking.

The Seismic Hazards Mapping Act (1990) directed the State Geologist to delineate regulatory "zones of required investigation" to reduce the threat to public health and safety and to

[1] The Holocene epoch began 12,000 to 11,500 years ago.

minimize the loss of life and property posed by earthquake-triggered ground failures. Zones of required investigation, referred to as "Seismic Hazard Zones" in CCR Article 10, Section 3722, are areas shown on Seismic Hazard Zone Maps where site investigations are required to determine the need for mitigation of potential liquefaction and/or earthquake-induced landslide ground displacements. As shown on Figure 3.6-2, *Seismic Hazards Map*, the Specific Plan area is not in a zone designated by the State Geologist as being susceptible to soil liquefaction (HD Geosolutions 2026).

Lateral spreading involves lateral ground movements caused by seismic shaking. These lateral ground movements are often associated with a weakening or failure of an embankment or soil mass overlying a layer of liquefied sands or weak soils. Shallow groundwater; liquefiable, cohesionless soils; and the presence of a free face such as a stream bank are all contributing factors in determining the likelihood of lateral spreading.

Settlement

Seismically induced settlement is often caused by the densification of dry to partially saturated, loose- to medium-dense granular soils during ground shaking. While uniform settlement beneath a structure may not cause significant damage, the variations in distribution, density, and confining conditions of natural soils cause seismic settlement, which is generally non-uniform and can cause structural damage. The Geotechnical Report noted that the alluvial areas in the Specific Plan area are generally susceptible to seismic settlement somewhat greater than the engineered fill (HD Geosolutions 2026).

Settlement may also occur in the non-engineered fill located in the Specific Plan area under new fill or building loads.

GEOLOGIC HAZARDS

Landslides

Natural landslides occur when soils or bedrock lose strength in a sloping area (often during heavy rains or an earthquake), and gravity causes the materials to slide downhill. Human activities can also cause landslides; these activities include undercutting a hill, placing a heavy weight at the top of a slope, or substantially increasing the amount of water in a hillside.

Figure 3.6-2 depicts earthquake-induced landslide zones generally along the perimeter of the two pits, corresponding to the existing quarry slopes. These slopes are comprised primarily of alluvium (HD Geosolutions 2026).

Expansive Soils

Expansive soils are silts and clays that swell and shrink as the amount of water in the soil increases and decreases, respectively. This change in water content primarily occurs in the near-

surface environment, and deeper soils may undergo much less change in water content; also, the weight of overlying soils minimizes swelling uplift.

The alluvium within the Specific Plan are sandy with little to some silt and include gravel and cobbles. Based on laboratory test results the alluvial soils are non-expansive (see Appendix I). The non-engineered fill could vary from expansive to non-expansive.

Erosion

Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved; removed from one place; and transported to another. Precipitation, running water, and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. Accelerated erosion in a developed area can cause damage by undermining structures; blocking storm drains; and depositing silt, sand, or mud on roads and in tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life.

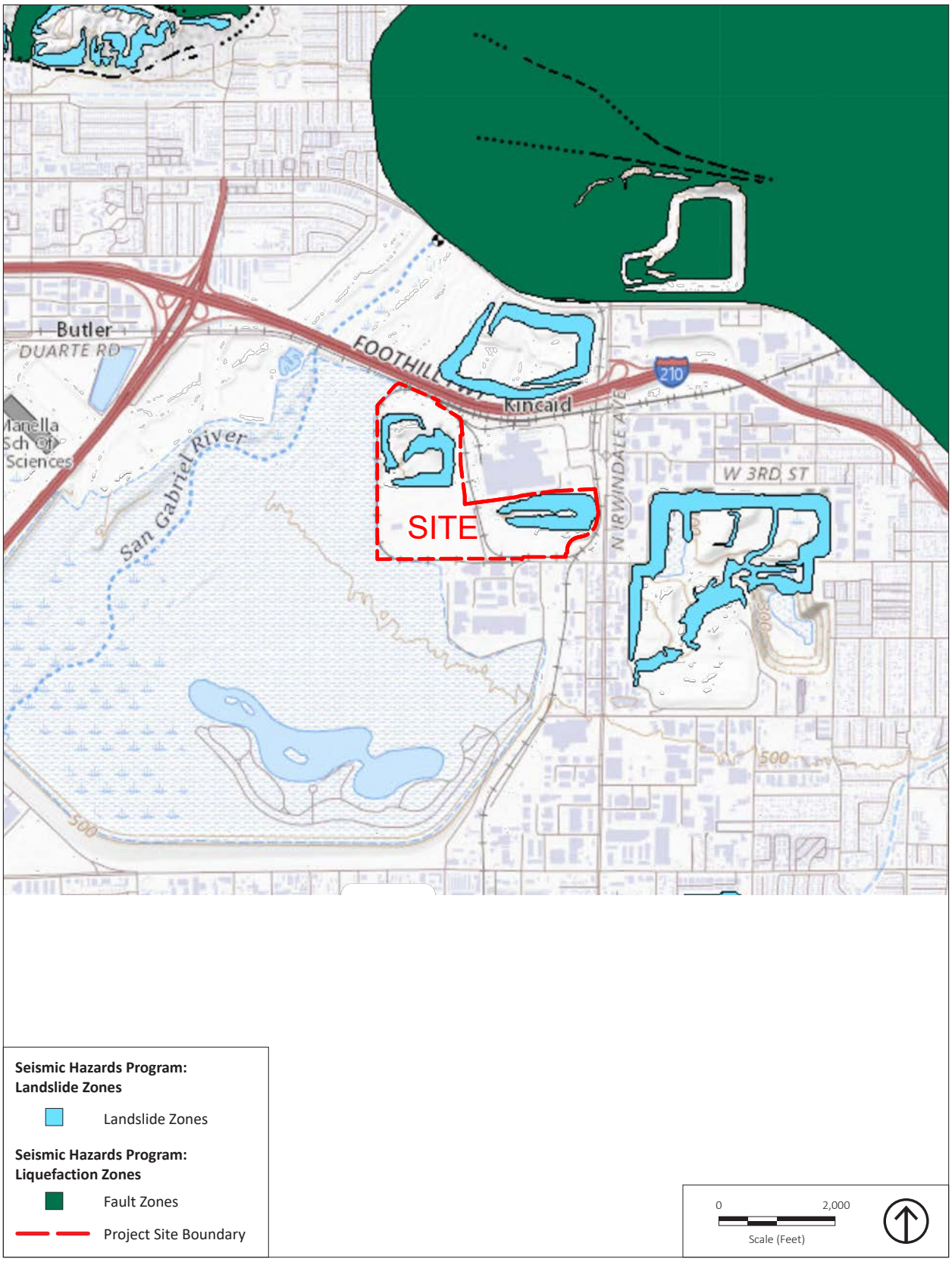
Erosion can occur when rainfall or another source results in a significant amount of water on a sloping, bare-earth surface. Eroded soils can cause damage if they enter a waterway or a storm drain facility that deposits the collected water and entrained sediment into a waterway.

Topsoil is the thin, rich layer of soil where most nutrients for plants are found and where most land-based biological activity takes place. The loss of topsoil through erosion is a major agricultural and water quality problem. The Specific Plan Area has been heavily disturbed due to decades of mining both northwest and southeast gravel quarries, therefore very little topsoil remains on the project site.

Subsidence

Subsidence of the ground surface has been reported in alluvial basins where significant amounts of groundwater (often in an overdraft condition) or petroleum are withdrawn over long periods. The primary cause of nontectonic subsidence has been due to removal of large quantities of groundwater or petroleum and a significant lowering of the groundwater levels.

The Specific Plan area is not in an area of known subsidence (ground surface settlement) associated with fluid withdrawal (groundwater or petroleum), peat oxidation, or hydrocompaction (HD Geosolutions 2026).



Source: HD Geosolutions 2023.

Figure 3.6-2
Seismic Hazards Map

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PALEONTOLOGICAL SETTING

Paleontological resources are fossils -that is, organisms or fragments, impressions, or traces of organisms preserved in rock. The Specific Plan area is mapped entirely as Holocene gravel rich alluvial fan which was deposited less than 11,700 years ago. These sediments were deposited by the San Gabriel River.

Cogstone performed an archaeological and paleontological field survey of the Specific Plan area on December 12, 2025, in concert with the built environment pedestrian survey. No paleontological resources were observed during the survey.

Cogstone requested a records search through the Natural History Museum of Los Angeles County. Staff also reviewed online collections databases of the University of California, Museum of Paleontology, the California Academy of Sciences, the Paleobiological Database, prior reports, and print sources. No fossil localities were found within the Specific Plan area; however one Pleistocene locality was discovered within five miles that produced mastodon. The La Brea tar pits are a similarly aged, late Pleistocene deposit and while it is the largest fauna, other late Pleistocene localities across southern California have also produced similar fossils.

Based on other recorded localities around California, Pleistocene fossils from areas mapped as Pleistocene or Holocene alluvium typically begin appearing about eight to ten feet deep in California valleys. Shallower sediments in the valleys usually do not contain the remains of extinct animals, although Holocene (<11,000 years old) remains may be present. It is important to note that when the surficial sediments are mapped as very old or old, fossils may occur at shallower depths than those recorded near the Specific Plan area. Due to the proximity to the San Gabriel River, the larger clast size reduces the potential for fossils. As such, all sediments within the Specific Plan area are assigned a low potential (see Appendix G1).

3.6.3 Standards for Analysis

Thresholds of Significance

Appendix G, “Environmental Checklist Form,” of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to geology if it would:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

    i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist

for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.)

ii) Strong seismic ground shaking.

iii) Seismic-related ground failure, including liquefaction.

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 18-1B 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.

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

Methodology

Geology and Soils

Impacts related to geology and soils are based on the proposed project's Geotechnical Report (see Appendix I). The report is based on a review of historic topographic maps, State Water Resources Control Board website (GeoTracker), the Geotechnical Evaluation for the MillerCoors Brewing Facility, and available published and unpublished geologic and seismic literature.

Paleontological Resources

A multilevel ranking system was developed by professional resource managers within the Bureau of Land Management as a practical tool to assess the sensitivity of sediments for fossils. The Potential Fossil Yield Classification (PFYC) system has a multi-level scale based on demonstrated yield of fossils. The PFYC system provides additional guidance regarding assessment and management for different fossil yield rankings.

Sediments that are close to their basement rock source are typically coarse; those farther from the basement rock source are finer. The chance of fossils being preserved greatly increases once

the average size of the sediment particles is reduced to five millimeters in diameter or less. Moreover, fossil preservation also greatly increases after natural burial in rivers, lakes, or oceans. Remains left on the ground surface become weathered by the sun or consumed by scavengers and bacterial activity, usually within 20 years or less. So the sands, silts, and clays of rivers, lakes, and oceans are the most likely sediments to contain fossils.

Using the PFYC system, geologic units are classified according to the relative abundance of vertebrate fossils or scientifically significant invertebrate or plant fossils and their sensitivity to adverse impacts within the known extent of the geological unit. Although significant localities may occasionally occur in a geologic unit, a few widely scattered important fossils or localities do not necessarily indicate a higher PFYC value; instead, the relative abundance of localities is intended to be the major determinant for the value assignment (see Appendix G1).

3.6.4 Applicable Specific Plan Development Standards and Design Guidelines

DEVELOPMENT STANDARDS

There are no Specific Plan development standards pertaining to geology and soils.

DESIGN GUIDELINES

There are no Specific Plan design guidelines pertaining to geology and soils.

3.6.5 Project Impact Analysis

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

The Specific Plan area includes two former quarries in the northwestern and southeastern portions of the Specific Plan area. The northwestern quarry is approximately 52 acres at the

surface grade and would require approximately six million cubic yards to fill. The southeastern quarry is approximately 25 acres at the surface grade and would require approximately two million cubic yards to fill. The proposed project includes filling and rough grading both pits pursuant to the Inert Debris Engineering Fill Operation (IDEFO) Operations Plan (see Appendix C). Phase I of rough grading would include moving approximately two million cubic yards of fill material from the northwestern quarry to fill the southeastern quarry. A temporary retention basin in the southwest portion of the site in Phase I would capture runoff from the existing brewery north of the Specific Plan area (see Figure 2-21, *Overall Rough Grading Plan: Phase I*). Phase II of rough grading would include filling the northwestern quarry with approximately eight million cubic yards of imported fill material (see Figure 2-22, *Overall Rough Grading Plan: Phase II*). Phase I and II fill operations would cover 51 percent of the Specific Plan area.

At completion of the IDEFO, the site would consist of a flat pad suitable for the development as proposed: up to 3,000,000 square feet of industrial/ business park building space and 12,000 square feet of commercial building space with associated circulation improvements, utility infrastructure, and landscaping (see Figure 2-7, *Site Plan: Planning Area 1*, and Figure 2-8, *Site Plan: Planning Area 2*).

Regional Faulting

There is no identified fault-rupture hazard zone as defined by the Alquist-Priolo Special Studies Zones Act within or near the Specific Plan area (HG Geosolutions 2026). Based on there being no known active surface faults in the project vicinity, fault rupture is considered unlikely, and impacts related to fault rupture would be **less than significant**.

Seismic Ground Shaking

Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter and could occur within the project site. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site.

The proposed project is required to be designed in compliance with seismic requirements of the CBC and other 24 CCR criteria for seismic safety. Additionally, future development would be required to comply with established IMC and CBC standards regulating grading and building construction for seismic safety. The Geotechnical Report identifies seismic and other geotechnical hazards and how to avoid them, including the requirement for full time geotechnical observation during the placement and compaction of fill and site-specific evaluations of all relevant seismic hazards to ensure the level of safety required by the IMC and CBC standards. A Final Geotechnical Report would be prepared, based on final project design, prior to any construction activity. Any recommendations in the Final Geotechnical Report to ensure compliance with the IMC and CBC standards would be implemented during project

construction and design. Compliance with established standards would ensure impacts related to structural collapse or other shaking related hazards are **less than significant**.

Landslides

Landslides are a type of erosion in which masses of earth and rock move downslope as a single unit. Susceptibility of slopes to landslides and lurching (earth movement at right angles to a cliff or steep slope during ground shaking) depend on several factors that are usually present in combination—steep slopes, condition of rock and soil materials, presence of water, formational contacts, geologic shear zones, and seismic activity. Figure 3.6-2 depicts earthquake-induced landslide zones generally along the perimeter of the two pits, corresponding to the existing quarry slopes (HD Geosolutions 2026).

The Operations Plan includes a Load Checking Program and Waste Acceptance Plan that details the requirements for testing and approving imported fill material. Imported fill material would consist of clean dirt, brick, rock, fully cured asphaltic material, concrete, and other inert materials (e.g. glass, etc.). Following initial inspection, loads are directed to processing/placement areas, based on the nature of the import. Trucks would be unloaded under the direction of the trained and supervised spreading area crews. Following spreading, the loads would be inspected for non-compliant materials. Non-compliant materials would be segregated and removed. Material imported by rail would be inspected before unloading and moved to the processing/placement areas.

Concurrent with removal of non-compliant materials, material is processed, as necessary, to create fill specification compliant material. Finer grained material would be mixed into each lift to minimize nesting. The design fill would consist of a mixture of sediment sizes and would include fines and gravel-sized debris. Debris would be processed to reduce the size per geotechnical requirements for compaction. The resultant mixture would be inspected and approved by the project geotechnical engineer and would then be placed in thin lifts to maximize compaction. Each lift would be moisture conditioned and compacted by both track (bulldozer) and wheeled equipment (import trucks, water trucks, rock trucks, loaders, etc.). Compaction monitoring and testing would be conducted by a California professional geotechnical engineer to ensure that the material is properly compacted. Compaction and settlement monitors would be installed and verified according to the Guidelines for Above-Water Backfilling of Open-Pit Mines. Settlement monitors would be placed at select locations. Areas that do not pass the compaction standards would be excavated and re-placed. The IDEFO would bench fill contacts to native sediment in the sidewalls of the depleted quarries to minimize structural setbacks.

Areas of non-engineered fill present within the quarries would be removed and replaced with engineered inert debris. The relatively shallow and intermittent non-engineered fill within the unquarried areas would be over-excavated and replaced with an engineered soil fill. Imported

soil intended for use in the upper 15 feet of the Specific Plan area would be evaluated by the project geotechnical engineer prior to import. New structures would be supported on foundations developing their support entirely within either the engineered inert debris or engineered soil fill. Native soil would be over-excavated and recompacted to provide foundation support.

Additionally, acceptable fill recommendations would be provided in the Final Geotechnical Report. The project geotechnical engineer would actively monitor and test all import fill to confirm materials meet the minimum requirements per the Final Geotechnical Report.

As a result of the IDEFO, seismically induced landslide hazards would be mitigated once the quarries are filled. Filling associated with the planned IDEFO/engineered soil fill activities would raise the grade within the two pits, thus reducing the slope heights and improving the site from its quarried condition. When the reclamation of the two pits is completed, the existing slopes at the site would no longer remain.

However, Phase I of the fill operations would create an import receiving area in the northwestern quarry pit with cut slopes on three sides and an access road. The cut slope on the eastern side of this quarry pit would be below existing improvements for the brewery and could result in slope instability or a seismically induced landslide associated with this interim construction phase. It is also anticipated that dewatering would be necessary during wetter years to drain the pits during the fill operation. Therefore, impacts associated with landslides and slope instability are **potentially significant**.

Impact GEO-1: Impacts associated with interim conditions during the construction phase could result in slope instability and seismically induced landslides.

> **Mitigation Measure GEO-1:** Prior to the issuance of a grading permit, the Project Applicant shall submit a Final Geotechnical Report to the Irwindale Public Works/Engineering Building and Safety Department for review and approval. The Final Geotechnical Report shall meet the design standards of Chapter 15.04 of the City's municipal code, the County of Los Angeles Department of Public Works' Geotechnical and Materials Engineering Division 2021 Administrative Manual, and the following City of Irwindale guidelines:
>
> - Guidelines for Above-Water Backfilling of Open-Pit Mines (dated November 23, 2005)
> - Guidelines for Underwater Backfilling of Open-Pit Mines, Irwindale (dated May 20, 2005)
> - Irwindale Mining Bulletin – Settlement of Mine Backfills (dated November 22, 2022)

Mitigation Measure GEO-2: The Final Geotechnical Report shall include a slope stability analysis that considers the interim conditions present during the phased construction. Slope stability should be evaluated for cut slopes and should include both static and seismic analyses. The slope stability analysis shall be conducted per the City of Irwindale's Guidelines for Stability Analyses of Open-Pit Mine Slopes.

Significance with Mitigation: Implementation of Mitigation Measures GEO-1 and GEO-2 would ensure that impacts associated with landslides and slope instability would be mitigated to **less than significant**.

Seismic Induced Settlement

The planned structures at the Specific Plan area would be located within the limits of engineered fill, either in the pit reclamation areas, or in areas of recommended over excavation, while utilities would pass from the engineered fill into the native materials located at the site perimeter and the portions of the Specific Plan area that weren't previously quarried. In areas of engineered fill, a low potential for dry/partially-saturated seismic settlements would occur. The alluvial areas would generally be susceptible to seismic settlement somewhat greater than the engineered fill resulting in impacts to utilities passing from engineered fill into the natural materials. Therefore, this impact is **potentially significant**.

Impact GEO-2: Differential settlement of engineering fill versus natural alluvium could result in impacts to utilities passing from the engineered fill into the natural alluvium.

Mitigation Measure GEO-3: Subsurface exploration and testing to characterize the perimeter materials shall be conducted for the Final Geotechnical Report to develop specific recommendations for utilities, and structures if applicable, where these would cross from alluvium to engineered fill. The native materials at the margins of the site and within areas not previously quarried shall be evaluated for seismically induced settlement. Quantitative estimates of the potential seismic settlement shall be developed, as necessary, and compared to the total and differential settlement tolerances for the applicable utilities and structures. Utilities passing from engineered fill into the natural materials at the perimeter of the engineered fills shall require flexible connections at the fill/native transitions and/or remedial grading sufficient to accommodate potential differential movement.

Significance with Mitigation: Implementation of Mitigation Measures GEO-3 would ensure that impacts associated with seismically induced settlement and seismic-related ground failure would be mitigated to **less than significant**.

Liquefaction

The Specific Plan area is not in an area designated as susceptible to liquefaction. Future groundwater levels are not anticipated to rise above approximately 200 feet below the final site grade. All engineering fill would meet the requirements of the IDEFO Operations Plan, and the Specific Plan. Based on the density of required engineered fill and the anticipated future high groundwater depths, the potential for liquefaction at the site is low (HG Geosolutions 2026). Therefore, the proposed project would not subject people or structures to substantial liquefaction hazards, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Soils are particularly prone to erosion during the grading phase of development, especially during heavy rains. Construction projects of one acre or more are regulated under the General Construction Permit, Order WQ 2022-0057-DWQ, issued by the State Water Resources Control Board in 2022. Projects obtain coverage by developing and implementing a Storm Water Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters and specifying BMPs that would be used by the project to minimize pollution of stormwater. The use of a SWPPP, which specifies BMPs for temporary erosion controls, reduces the potential for erosion during construction period activities. Standard erosion control measures would be implemented as part of a SWPPP for the proposed project to minimize the risk of erosion or sedimentation during construction. The SWPPP must include an erosion control plan that prescribes measures such as phasing grading, limiting areas of disturbance, designating restricted-entry zones, diverting runoff from disturbed areas, protecting sensitive areas and outlets, and providing for revegetation or mulching.

Additionally, the IDEFO would require Waste Discharge Requirements (WDR) from the Los Angeles Regional Water Quality Control Board (RWQCB). The WDR would regulate inert material used in engineered fills to ensure they do not contain hazardous waste or soluble pollutants that exceed water quality objectives. The WDR would also be submitted to the California Department of Resources, Recycling, and Recovery as part of the notification of intent to operate. If the IDEFO violates the requirements of the WDR, the Los Angeles RWQCB would take enforcement actions, such as cease-and-desist orders or cleanup and abatement orders. The RWQCB would also ensure the proper closure and post-closure maintenance of the site to protect long-term water quality[2]. Therefore, impacts related to erosion would be **less than significant**.

[2] For a more comprehensive discussion of erosion and water quality please refer to Section 3.9, *Hydrology and Water Quality*.

Significance without Mitigation: Less than significant.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Refer to the Impact 3.6.5 (a) for a discussion on landslides, seismically induced structural collapse, and liquefaction. Subsidence, lateral spreading, and collapse due to settlement are discussed below.

Subsidence

The Specific Plan area is not located within an area of known subsidence (ground surface settlement) associated with fluid withdrawal (groundwater or petroleum), peat oxidation, or hydrocompaction (HD Geosolutions 2026).

Additionally, as discussed in Section 3.16, *Utilities and Service Systems*, the proposed project would be served by the existing water systems and would not directly pump groundwater. As such, the proposed project would not substantially increase the amount of groundwater pumped from beneath the Specific Plan area and thus would not result in subsidence. Therefore, the impact of subsidence would be **less than significant.**

Significance without Mitigation: Less than significant.

Settlement

Areas of non-engineered fill are present within the quarry that were placed during and/or following mining operations. In addition to the non-engineered fill within the quarries, the Geotechnical Report anticipates that relatively shallow and intermittent non-engineered fill of variable depths may also exist within the relatively level portions of the Specific Plan area that were not previously quarried (HD Geosolutions 2026).

The non-engineered fill within the Specific Plan area could undergo settlement under new fill or building loads which could lead to building or infrastructure collapse. Removal of non-engineering fill would be based on historical aerials, geophysical testing, daily observations during removals, and targeted subsurface exploration consisting of test pits and borings that are appropriate to the material being encountered. Non-engineered fill would be evaluated and removed as much as is practical.

Once the pits have been filled, the planned structures at the Specific Plan area would be located within the limits of engineered fill—either in the pit reclamation areas or in the non-quarried areas that would be over excavated and replaced with an engineered soil fill. Building footprints could extend from the reclaimed areas to the non-quarried areas in some cases. Potential

differential building movements may result from conditions where building pads have significant differentials in fill thickness in these transition zones. Potential differential building movements may also result from conditions where the proposed building pads have significant differentials in engineered fill thickness. Therefore, this impact is **potentially significant**.

Impact GEO-3: Impacts associated with the existing non-engineered fill within the Specific Plan area and fill differentials at the edges of the quarries could result in excessive post-grading settlement and collapse. Potential differential building movements may also result from conditions where the proposed building pads have significant differentials in engineered fill thickness.

> **Mitigation Measure GEO-4:** The Final Geotechnical Report shall include requirements for excavating native materials beneath the bottoms of proposed foundations near the edges of the quarries. These requirements shall include the depth of excavation required to ease abrupt transitions from native materials to engineering fill. Quantitative estimates of the potential static settlement shall be developed, as necessary, and compared to the total and differential settlement tolerances for structures.
>
> **Mitigation Measure GEO-5:** The Final Geotechnical Report shall require settlement monitors within the engineering fills and include recommendations for settlement monument arrays.
>
> **Mitigation Measure GEO-6:** The Final Geotechnical Report shall include requirements for a maximum differential fill thickness across any building pad. These requirements should consider the significant depth of fill that would be placed and be designed to minimize post-grading settlement.

Significance with Mitigation: Implementation of Mitigation Measures GEO-4, GEO-5 and GEO-6 would ensure that impacts associated with settlement would be mitigated to **less than significant**.

Lateral Spreading

Lateral spreading involves lateral ground movements caused by seismic shaking. These lateral ground movements are often associated with a weakening or failure of an embankment or soil mass overlying a layer of liquefied sands or weak soils. Shallow groundwater, liquefiable, cohesionless soils and the presence of a free face such as a stream bank are all contributing factors in determining the likelihood of lateral spreading.

Because the highest anticipated groundwater levels at the Specific Plan area are below the proposed grades, the likelihood of lateral spread is remote. Additionally, both the southeast and

northwest pits would be filled, further reducing the likelihood of lateral spread. Therefore, this impact would be **less than significant.**

Significance without Mitigation: Less than significant.

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

Expansive soils swell when they become wet and shrink when they dry out, resulting in the potential for cracked building foundations and, in some cases, structural distress of the buildings themselves. The soils surrounding the pits to be backfilled consist of natural alluvial soils and fill soils derived from natural alluvium. These soils are sandy with little to some silt and include gravel and cobbles. The alluvial soils are non-expansive. Areas of non-engineered fill present within the quarries would be removed and replaced with engineered fill. The relatively shallow and intermittent non-engineered fill within the unquarried areas would be over excavated and replaced with an engineered soil fill.

At the completion of the IDEFO and over excavation, the materials at the Specific Plan area would mainly consist of engineered blended rubble fill, engineered soil fill, and alluvium. The blended rubble fill and alluvium are anticipated to behave like coarse grained materials and would be non-expansive (see Appendix I). Soil fill, whether derived from onsite non-engineered fill sources or various import sources, would be evaluated on a case-by-case basis in accordance with the IDEFO plan. Where fill sources may be expansive, recommendations may include blending with other soils of very low to low expansion to avoid potential special earthwork measures related to soil expansion. The geotechnical engineer may reject the use of certain source materials upon evaluation prior to use in accordance with the IDEFO Operations Plan (see Appendix C).

Furthermore, standard grading technologies and compliance with current grading requirements in accordance with the Operations Plan and seismic requirements of the CBC would ensure impacts from expansive soils are **less than significant**.

Significance without Mitigation: Less than significant.

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

The proposed project would not involve the use of septic tanks or alternative wastewater disposal systems. The proposed project would utilize the local sewer system. **No impacts** would result from project implementation.

Significance without Mitigation: No Impact.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The probability for finding significant fossils in a Specific Plan Area can be broadly predicted from previous records of fossils recovered from the geologic units present in and/or adjacent to the Specific Plan Area. The geological setting and the number of known fossil localities help determine the paleontological sensitivity according to PFYC criteria.

Based on other recorded localities around California, Pleistocene fossils from areas mapped as Pleistocene or Holocene alluvium typically begin appearing about eight to 10 feet deep in California valleys. Shallower sediments in the valleys usually do not contain the remains of extinct animals, although Holocene (<11,000 years old) remains may be present. It is important to note that when the surficial sediments are mapped as very old or old, fossils may occur at shallower depths than those recorded from near to the project. Due to the proximity to the San Gabriel River, the larger clast size reduces the potential for fossils. As such, all sediments within the Specific Plan area are assigned a low potential (PFYC 2).

Augering, potholing, cast-in-drilled-hole, and pile and pile driving activities would not require monitoring. While such activities may result in fossil fragments being brought to the surface, any specimens produced in this manner would lack needed context such as depth/elevation, formation identification, and other data critical to scientific significance. No mitigation is recommended for these or other excavation activities that would not allow the context of the fossil to be observed (see Appendix G1).

The project site is not characterized by unique geologic features. There are no distinctive rock formations, fault exposures, caves, volcanic features, or rare landforms. The quarries, although visually dramatic, are man-made features and are not considered unique geologic features that typically would be natural. Therefore, the project would not impact unique geologic features and this impact would be **less than significant**.

Significance without Mitigation: Less than significant.

3.6.6 Cumulative Impact Analysis

For the purpose of this analysis, the geographic context used for the cumulative assessment of geology and soil impacts is the Specific Plan area.

Would the project have a cumulative effect related to geological resources?

Impacts associated with geology and soils are by their nature focused on specific sites or areas, so the less-than-significant impacts (or less than significant with mitigation) in the Specific Plan area to geology and soils from the proposed project would not contribute to a cumulative increase in hazards in the immediate vicinity of the Specific Plan area. Mandatory compliance with state and city regulations, such as the CBC and IMC, would ensure that impacts at the Specific Plan area would be less than significant. Similarly, impacts to paleontological resources are considered site specific in nature, and all sediments within the Specific Plan area are assigned a low potential (PFYC 2). Therefore, cumulative impacts associated with geology and soils would be **less than significant**.

Significance without Mitigation: Less than significant.

3.6.7 References

Cogstone. 2026, January. Cultural and Paleontological Resources Assessment for the Irwindale Brew Yard Specific Plan Project. (Appendix G1)

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Heavy Iron Contracting. 2025, December 1. Draft Operations Plan, Brew Yard Inert Debris Engineered Fill Operation. (Appendix C)

Morton, D. M., and F. K. Miller. 2003. Preliminary Geologic Map of the San Bernardino 30'30' x 60' Quadrangle, California. Version 1.0. United States Geological Survey Open-File Report 03-293. Scale 1:100,000.

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3.7 GREENHOUSE GAS EMISSIONS

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the proposed Irwindale Brew Yard Specific Plan (proposed project) to cumulatively contribute to greenhouse gas (GHG) emissions impacts. Because no single project is large enough to result in a measurable increase in global concentrations of GHG, climate change impacts of a project are considered on a cumulative basis. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (South Coast AQMD).

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

- *Irwindale Brew Yard Specific Plan Greenhouse Gas Analysis*, Urban Crossroads, June 1, 2026.

A complete copy of this report is included in the Technical Appendices to this Draft EIR as Appendix J.

During the Notice of Preparation (NOP) public review period (March 6, 2024, through April 5, 2024) comments regarding greenhouse gas emissions were received from the Coalition of Responsible Equitable Economic Development. The comments requested that project-related GHG emissions be compared to a quantitative threshold and that the DEIR include a discussion of how the proposed project would offset GHG impacts. These comments have been addressed below in Impacts 3.7.5 (a) and (b). No comments related to greenhouse gas emissions were received at the scoping meeting held on February 23, 2024.

Terminology

The following are definitions for terms used throughout this section.

- **Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP).** Metric used to describe how much heat a molecule of a greenhouse gas absorbs relative to a molecule of carbon dioxide (CO_2) over a given period of time (20, 100, and 500 years). CO_2 has a GWP of 1.
- **Carbon-dioxide equivalent (CO_2e).** The standard unit to measure the amount of greenhouse gases in terms of the amount of CO_2 that would cause the same amount of warming. CO_2e is based on the GWP ratios between the various GHGs relative to CO_2.
- **$MTCO_2e$.** Metric ton of CO_2e.
- **$MMTCO_2e$.** Million metric tons of CO_2e.

GREENHOUSE GASES AND CLIMATE CHANGE

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed in the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).[1,2] The major GHGs applicable to the proposed project are briefly described.

- **Carbon dioxide (CO_2)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.

- **Methane (CH_4)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in landfills and water treatment facilities.

- **Nitrous oxide (N_2O)** is emitted during agricultural and industrial activities as well as during the combustion of fossil fuels and solid waste.

- **Refrigerants:** Refrigerants are emitted throughout the lifecycle of cooling equipment, primarily through leaks during operation (due to wear, poor maintenance) and significantly at end-of-life during disposal or decommissioning if not recovered properly, with smaller releases occurring during installation and manufacturing. Emissions are often higher in

1 Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant because it is considered part of the feedback loop rather than a primary cause of change.

2 Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with current legislation aiming to reduce black carbon emissions by 50 percent below 2013 levels by 2030 due to existing programs that target reducing PM from diesel engines and burning activities (CARB 2023). However, state and national GHG inventories do not include black carbon due to ongoing work resolving the precise global warming potential of black carbon. The State's existing air quality policies will virtually eliminate black carbon.

summer due to increased system use and higher vapor pressure, and improper servicing (intentional venting) also contributes.

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have stronger greenhouse effects than others. These are referred to as high GWP gases. The GWPs of GHG emissions are shown in Table 3.7-1, *GHG Emissions and Their Relative Global Warming Potential Compared to CO_2*. The GWP is used to convert GHGs to CO_2-equivalence (CO_2e) to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. For example, under IPCC's Sixth Assessment Report (AR6) GWP values for CH_4, a project that generates 10 metric tons (MT) of CH_4 would be equivalent to 280 MT of CO_2.[3]

Table 3.7-1 GHG and Its Relative Global Warming Potential Compared to CO_2

GHGs	Second Assessment Report Global Warming Potential Relative to CO_2	Sixth Assessment Report Global Warming Potential Relative to CO_2
Carbon Dioxide (CO_2)	1	1
Methane (CH_4)	21	28
Nitrous Oxide (N_2O)	310	273
HFC-23	11,700	14,600
HFC-134a	1,300	1,526
HFC-152a	140	164
SF6	23,900	25,200

Sources: Urban Crossroads 2026 (Appendix J).

Human Influence on Climate Change

For approximately 1,000 years before the Industrial Revolution, the amount of GHGs in the atmosphere remained relatively constant. During the 20th century scientists observed a rapid change in the climate and the quantity of climate change pollutants in the Earth's atmosphere that is attributable to human activities. The amount of CO_2 in the atmosphere has increased by more than 35 percent since preindustrial times and has increased at an average rate of 1.4 parts per million per year since 1960, mainly due to the combustion of fossil fuels and deforestation (IPCC 2007). These recent changes in the quantity and concentration of climate change

3 The global warming potential of a GHG is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants (CAT 2006). In the past, gradual changes in the earth's temperature changed the distribution of species, availability of water, etc. Human activities are accelerating this process so that environmental impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime (IPCC 2007).

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are hard to predict. Projections of climate change depend heavily upon future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in emissions and on observations of the climate record that assess the human influence of the trend and projections for extreme weather events. Climate-change scenarios are affected by varying degrees of uncertainty. For example, there are varying degrees of certainty on the magnitude of the trends for:

- Warmer and fewer cold days and nights over most land areas.
- Warmer and more frequent hot days and nights over most land areas.
- An increase in the frequency of warm spells and heat waves over most land areas.
- An increase in frequency of heavy precipitation events (or proportion of total rainfall from heavy falls) over most areas.
- Larger areas affected by drought.
- Intense tropical cyclone activity increases.
- Increased incidence of extreme high sea level (excluding tsunamis).

Potential Climate Change Impacts on California

Observed changes over the last several decades across the western United States reveal clear signs of climate change. Statewide, average temperatures increased by about 1.7°F from 1895 to 2011, and warming has been greatest in the Sierra Nevada (CCCC 2012). The years from 2014 through 2016 showed unprecedented temperatures, with 2014 being the warmest (OEHHA 2018). By 2050, California is projected to warm by approximately 2.7°F above 2000 averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase by 5.7 to 8.8°F, depending on emissions levels (CNRA 2019).

In California and western North America, observations of the climate have shown: 1) a trend toward warmer winter and spring temperatures; 2) a smaller fraction of precipitation falling as snow; 3) a decrease in the amount of spring snow accumulation in the lower- and middle-elevation mountain zones; 4) advanced shift in the timing of snowmelt of 5 to 30 days earlier in the spring; and 5) a similar shift (5 to 30 days earlier) in the timing of spring flower blooms (CAT

2006). Statewide precipitation has become increasingly variable from year to year, with the driest consecutive three years from 2020 to 2022 (NOAA 2023). According to the California Climate Action Team—a committee of state agency secretaries and the heads of agencies, boards, and departments, led by the California Environmental Protection Agency—even if actions could be taken to immediately curtail climate change emissions, the potency of emissions that have already built up, their long atmospheric lifetimes (see Table 5.6-1), and the inertia of the Earth's climate system could produce as much as 0.6°C (1.1°F) of additional warming. Consequently, some impacts from climate change are now considered unavoidable. Global climate change risks to California are shown in Table 3.7-2, *Summary of GHG Emissions Risks to California*, and include impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy.

Table 3.7-2 Summary of GHG Emissions Risks to California

Impact Category	Potential Risk
Public Health Impacts	Heat waves will be more frequent, hotter, and longer Fewer extremely cold nights Poor air quality made worse Higher temperatures increase ground-level ozone levels
Water Resources Impacts	Decreasing Sierra Nevada snowpack Challenges in securing adequate water supply Potential reduction in hydropower Loss of winter recreation
Agricultural Impacts	Increasing temperature Increasing threats from pests and pathogens Expanded ranges of agricultural weeds Declining productivity Irregular blooms and harvests
Coastal Sea Level Impacts	Accelerated sea level rise Increasing coastal floods Shrinking beaches Worsened impacts on infrastructure
Forest and Biological Resource Impacts	Increased risk and severity of wildfires Lengthening of the wildfire season Movement of forest areas Conversion of forest to grassland Declining forest productivity Increasing threats from pests and pathogens Shifting vegetation and species distribution Altered timing of migration and mating habits Loss of sensitive or slow-moving species

Table 3.7-2 Summary of GHG Emissions Risks to California

Impact Category	Potential Risk
Energy Demand Impacts	Potential reduction in hydropower Increased energy demand

Sources: CEC 2006, 2009; CCCC 2012; CNRA 2014.

Specific climate change impacts that could affect the state of California include:

- **Water Resources Impacts.** By late this century, all projections show drying, and half of the projections suggest 30-year average precipitation will decline by more than 10 percent below the historical average. This drying trend is caused by an apparent decline in the frequency of rain and snowfall. Even in projections with relatively small or no declines in precipitation, central and southern parts of the state can be expected to be drier from the warming effects alone—the spring snowpack will melt sooner, and the moisture in soils will evaporate during long dry summer months (CCCC 2012).

- **Wildfire Risks.** Earlier snowmelt, higher temperatures, and longer dry periods over a longer fire season will directly increase wildfire risk. Indirectly, wildfire risk will also be influenced by potential climate-related changes in vegetation and ignition potential from lightning. Human activities will continue to be the biggest factor in ignition risk. The number of large fires statewide is estimated to increase from 58 percent to 128 percent above historical levels by 2085. Under the same emissions scenario, estimated burned area will increase by 57 percent to 169 percent, depending on location (CCCC 2012).

- **Health Impacts.** Many of the gravest threats to public health in California stem from the increase of extreme conditions—principally, more frequent, more intense, and longer heat waves. Particular concern centers on the increasing tendency for multiple hot days in succession and simultaneous heat waves in several regions throughout the state. Public health could also be affected by climate change impacts on air quality, food production, the amount and quality of water supplies, energy pricing and availability, and the spread of infectious diseases. Higher temperatures also increase ground-level ozone levels. Furthermore, wildfires can increase particulate air pollution in the major air basins of California (CCCC 2012).

- **Increase Energy Demand.** Increases in average temperature and higher frequency of extreme heat events combined with new residential development across the state will drive up the demand for cooling in the increasingly hot and longer summer season and decrease demand for heating in the cooler season. Warmer, drier summers also increase system losses at natural gas plants (reduced efficiency in the electricity generation process at higher temperatures) and hydropower plants (lower reservoir levels). Transmission of electricity will also be affected by climate change. Transmission lines lose 7 percent to 8 percent of

transmitting capacity in high temperatures while needing to transport greater loads. This means that more electricity will need to be produced to make up for both the loss in capacity and the growing demand (CCCC 2012).

3.7.1 Regulatory Framework

Federal, state, and local laws, regulations, plans, or guidelines related to greenhouse gas emissions that are applicable to the proposed project are summarized in this section.

FEDERAL

United States Environmental Protection Agency

The US Environmental Protection Agency (EPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. The EPA's final findings respond to the 2007 U.S. Supreme Court decision that GHG emissions fit within the Clean Air Act definition of air pollutants. The findings do not impose any emission reduction requirements, but allow the EPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation (USEPA 2009).

To regulate GHGs from passenger vehicles, EPA was required to issue an endangerment finding. The finding identified emissions of six key GHGs—CO_2, CH_4, N_2O, hydrofluorocarbons, perfluorocarbons, and SF6—that have been the subject of scrutiny and intense analysis for decades by scientists in the United States and around the world. The first three are applicable to the proposed project's GHG emissions inventory because they constitute the majority of GHG emissions, and according to guidance by the South Coast AQMD, are the GHG emissions that should be evaluated as part of a project's GHG emissions inventory.

However, on his first day in office of his second term, President Trump ordered a review of the endangerment finding. Then, on July 29, 2025, EPA Administrator Lee Zeldin formally proposed to rescind the endangerment finding. Because the endangerment finding is a prerequisite for regulating GHG emissions from new motor vehicles and new motor vehicle engines, if the proposed rule rescinding the endangerment finding becomes final, then according to the purposes stated by the EPA, the EPA would lack statutory authority under Section 202 of the Clean Air Act to prescribe standards for GHG emissions.

As a result of these proposed changes, engine and vehicle manufacturers would no longer have any future obligations for the measurement, control, and reporting of GHG emissions for any highway engine and vehicle, including model years manufactured prior to this proposal. Therefore, if finalized, this rule would prevent implementation of many of the previously contemplated greenhouse gas reduction measures discussed in this report.

US Mandatory Reporting Rule for GHGs (2009)

In response to the endangerment finding, the EPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (large stationary sources, etc.) to report GHG emissions data. Facilities that emit 25,000 MT CO_2e or more per year are required to submit an annual report.

Update to Corporate Average Fuel Economy Standards (2021 to 2026)

The federal government issued new Corporate Average Fuel Economy (CAFE) standards in 2012 for model years 2017 to 2025, which required a fleet average of 54.5 miles per gallon (mpg) in 2025. On March 30, 2020, the EPA finalized an updated CAFE and GHG emissions standards for passenger cars and light trucks and established new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021 to 2026. Under SAFE, the fuel economy standards will increase 1.5 percent per year compared to the 5 percent per year under the CAFE standards established in 2012. Overall, SAFE requires a fleet average of 40.4 miles per gallon (mpg) for model year 2026 vehicles (85 Federal Register 24174 (April 30, 2020)).

On December 21, 2021, under direction of Executive Order (EO) 13990 issued by President Biden, the National Highway Traffic Safety Administration repealed Safer Affordable Fuel Efficient Vehicles Rule Part One, which had preempted state and local laws related to fuel economy standards. In addition, on March 31, 2022, the National Highway Traffic Safety Administration finalized new fuel standards in response to EO 13990. Fuel efficiency under the standards proposed will increase 8 percent annually for model years 2024 to 2025 and 10 percent annual for model year 2026. Overall, the new CAFE standards require a fleet average of 49 mpg for passenger vehicles and light trucks for model year 2026, which would be a 10 mpg increase relative to model year 2021 (NHTSA 2022). President Trump revoked this order on January 20, 2025.

STATE

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in EO S-03-05 and EO B-30-15, EO B-55-18, Assembly Bill 32 (AB 32), Senate Bill 32 (SB 32), and SB 375.

Executive Order S-03-05

EO S-03-05 was signed June 1, 2005, and set the following GHG reduction targets for the state:

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

Assembly Bill 32, the Global Warming Solutions Act (2006)

AB 32 was passed by the California state legislature on August 31, 2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in EO S-03-05. The California Air Resource Board (CARB) prepared the 2008 Scoping Plan to outline a plan to achieve the GHG emissions reduction targets of AB 32.

Executive Order B-30-15

EO B-30-15, signed April 29, 2015, set a goal of reducing GHG emissions within the state to 40 percent of 1990 levels by year 2030. EO B-30-15 also directed CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires state agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for 2050 in EO S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaption strategy, "Safeguarding California," to ensure climate change is accounted for in State planning and investment decisions.

Senate Bill 32 and Assembly Bill 197

In September 2016, Governor Brown signed SB 32 and AB 197 into law, making the EO B-30-15 goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires CARB to prioritize direct emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

Executive Order B-55-18

Executive Order B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." Executive Order B-55-18 directs CARB to work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions should be offset by equivalent net removals of CO_2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Assembly Bill 1279

On August 31, 2022, the California Legislature passed AB 1279, which requires California to achieve net-zero GHG emissions no later than 2045 and to achieve and maintain negative GHG emissions thereafter. Additionally, AB 1279 also establishes a GHG emissions reduction goal of 85 percent below 1990 levels by 2045. CARB will be required to update the Scoping Plan to identify and recommend measures to achieve the net-zero and GHG emissions-reduction goals.

2022 Climate Change Scoping Plan

CARB adopted the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on December 15, 2022, which lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the state's anthropogenic GHG emissions (CARB 2022). The Scoping Plan provides updates to the previously adopted 2017 Scoping Plan and addresses the carbon neutrality goals of EO B-55-18 and the ambitious GHG reduction target as directed by AB 1279. Previous Scoping Plans focused on specific GHG reduction targets for our industrial, energy, and transportation sectors—to meet 1990 levels by 2020, and then the more aggressive 40 percent below that for the 2030 target. The 2022 Scoping Plan updates the target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. Carbon neutrality takes it one step further by expanding actions to capture and store carbon, including through natural and working lands and mechanical technologies, and drastically reducing anthropogenic sources of carbon pollution at the same time.

The path forward was informed by the recent Sixth Assessment Report (AR6) of the IPCC and the measures would achieve 85 percent below 1990 levels by 2045 in accordance AB 1279. CARB's 2022 Scoping Plan identifies strategies, as shown in Table 3.7-3, *Priority Strategies for Local Government Climate Action Plans*, which would be most impactful at the local level for ensuring substantial progress toward the State's carbon neutrality goals.

Table 3.7-3 Priority Strategies for Local Government Climate Action Plans

Priority Area	Priority Strategies
Transportation Electrification	Convert local government fleets to zero-emission vehicles (ZEV) and provide EV charging at public sites.
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans).
Vehicle Miles Travelled (VMT) Reduction	Reduce or eliminate minimum parking standards.
	Implement Complete Streets policies and investments, consistent with general plan circulation element requirements.
	Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, micro transit, etc.
	Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking.

Table 3.7-3 Priority Strategies for Local Government Climate Action Plans

Priority Area	Priority Strategies
	Implement parking pricing or transportation demand management pricing strategies.
	Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing allowable density of the neighborhood).
	Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).
Building Decarbonization	Adopt all-electric new construction reach codes for residential and commercial uses.
	Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers).
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances.
	Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing).
	Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings).

Source: CARB 2022.

The first approach that the State recommends for proposed land use developments to demonstrate that they are aligned with State climate goals is based on the attributes of land use development that reduce operational GHG emissions while simultaneously advancing fair housing (CARB 2022). If the first approach to demonstrating consistency is not applicable, the second approach to project-level alignment with state climate goals is to achieve net zero GHG emissions. The third approach to demonstrating project-level alignment with state climate goals is to align with GHG thresholds of significance, which many local air quality management districts and air pollution control districts have developed or adopted (CARB 2022). The

proposed project is within the jurisdiction of South Coast AQMD, which has identified a screening-level threshold of 3,000 $MTCO_2e$ annually for all land use types.

Senate Bill 375

SB 375, the Sustainable Communities and Climate Protection Act, was adopted in 2008 to connect the GHG emissions reduction targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPO). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial counties. Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target.

2017 Update to SB 375 Targets

CARB is required to update the targets for the MPOs every eight years. CARB adopted revised SB 375 targets for the MPOs in March 2018. The updated targets became effective in October 2018. All SCSs adopted after October 1, 2018, are subject to these new targets. CARB's updated SB 375 targets for the SCAG region were an 8 percent per capita GHG reduction in 2020 from 2005 levels (unchanged from the 2010 target) and a 19 percent per capita GHG reduction in 2035 from 2005 levels (compared to the 2010 target of 13 percent) (CARB 2018).

The targets consider the need to further reduce VMT, as identified in the 2017 Scoping Plan Update (for SB 32), while balancing the need for additional and more flexible revenue sources to incentivize positive planning and action toward sustainable communities. Like the 2010 targets, the updated SB 375 targets are in units of "percent per capita" reductions in GHG emissions from automobiles and light trucks relative to 2005; this excludes reductions anticipated from implementation of state technology and fuels strategies and any potential future state strategies, such as statewide road user pricing. The proposed targets call for greater per-capita GHG emission reductions from SB 375 than are currently in place, which for 2035 translate into proposed targets that either match or exceed the emission reduction levels in the MPOs' currently adopted SCSs to achieve the SB 375 targets. CARB foresees that the additional GHG emissions reductions in 2035 may be achieved from land use changes, transportation investment, and technology strategies (CARB 2018).

Assembly Bill 1346

AB 1346 requires CARB to develop regulations phasing out new sales of gas-powered Small Off-Road Engines (SORE), like leaf blowers and lawnmowers, with bans starting January 1, 2024, for most equipment, aiming to reduce air pollution and improve health. The law doesn't ban existing equipment but mandates zero-emission standards for new sales of SOREs (under 25 horsepower), with financial incentives available for businesses to transition to electric alternatives.

CARB Refrigerant Management Program

CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is in the California Code of Regulations Title 17, Sections 95380 to 95398. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and verify GHG emission reductions.

Other Related Regulations

Table 3.7-4, *California Regulations to Reduce GHG Emissions*, provides a summary list of other regulations in California that reduce GHG emissions.

Table 3.7-4 California Regulations to Reduce GHG Emissions

Sector	Regulation	Description
Transportation	Advanced Clean Fleets and Advanced Clean Trucks	CARB adopted the Advanced Clean Fleets (ACF) regulation in 2023 to accelerate the transition to zero-emission medium- and heavy-duty vehicles. In conjunction with the Advanced Clean Trucks (ACT) regulation, the ACF regulations helps to ensure that medium- and heavy-duty zero-emission vehicles (ZEV) are brought to the market, by requiring certain fleets to purchase zero emission vehicles (ZEVs). The ACF ZEV phase-in approach which provides initial focus where the best fleet electrification opportunities exist, sets clear targets for regulated fleets to make a full conversion to ZEVs, and creates a catalyst to accelerate development of a heavy-duty public charging infrastructure network.

Table 3.7-4 California Regulations to Reduce GHG Emissions

Sector	Regulation	Description
	Assembly Bill 1493	AB 1493 (Pavley I) Reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016.
	Executive Order S-01-07	Established declining LCFS for transportation fuels sold in the state. The LCFS requires a reduction of 2.5 percent in the carbon intensity of California's transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The standard applies to refiners, blenders, producers, and importers of transportation fuels, and would use market-based mechanisms to allow these providers to choose how they reduce emissions during the "fuel cycle" using the most economically feasible methods.
	Executive Order B-16-2012	Established benchmarks to accommodate zero-emissions vehicles in major metropolitan areas, including infrastructure to support them (e.g., electric vehicle charging stations). The executive order also directed the number of zero-emissions vehicles in California's state vehicle fleet to increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are ZE by 2015 and at least 25 percent by 2020. The executive order also established a target for the transportation sector of reducing GHG emissions 80 percent below 1990 levels by 2020.
	Executive Order N-79-20	Establishes a time frame for the transition to zero-emission passenger vehicles and trucks in addition to off-road equipment. It directs CARB to develop the following: 1) Passenger vehicle and truck regulations requiring increasing volumes of new zero emission vehicles sold California toward the target of 100 percent of in-state sales buy 2035; 2) Medium- and heavy-duty vehicle regulations requiring increasing volumes of new ZE trucks and buses sold and operated in California toward the target of 100 percent of the fleet transitioning to ZEVs by 2045 everywhere feasible, and for all drayage trucks to be ZE by 2035; Strategies to achieve 100 percent zero emission from all off-road vehicles and equipment operations in California by 2035, in cooperation with other State agencies, the Environmental Protection Agency, and local air districts.
Renewable Energy	SB 107, SB X1-2, Executive Order S-14-08,	Renewables Portfolio Standard. Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. Executive Order S-14-08, signed in November 2008, expanded the state's renewable energy standard to 33 percent renewable power by

Table 3.7-4 California Regulations to Reduce GHG Emissions

Sector	Regulation	Description
		2020. This standard was adopted by the legislature in 2011 (SB X1-2).
	SB 350	Established tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures.
	SB 100	RPS for publicly owned facilities and retail sellers will consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill establishes an overall state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.
	Executive Order B-55-18	Executive Order B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." Executive Order B-55-18 directs CARB to work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.
	Senate Bill 1020	SB 1020 was signed into law on September 16, 2022. It requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent by 2040. Additionally, SB 1020 requires all state agencies to procure 100 percent of electricity from renewable energy and zero-carbon resources by 2035.
Energy Efficiency	Title 24, Part 6, Building Energy Efficiency Standards	Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 (24 CCR, Part 6). Title 24 requires the design of

Table 3.7-4 California Regulations to Reduce GHG Emissions

Sector	Regulation	Description
		building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Building Energy Efficiency Standards were approved by the California Building Standards Commission in December 2021. The 2022 standards became effective and replaced the existing 2019 standards on January 1, 2023. The 2022 standards require mixed-fuel single-family homes to be electric-ready to accommodate replacement of gas appliances with electric appliances. In addition, the new standards also include prescriptive photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers (CEC 2021).
	Title 24, Part 11, Green Building Standards Code (CALGreen)	On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR, Part 11), or "CALGreen," was adopted as part of the California Building Standards Code. CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The mandatory provisions of CALGreen became effective January 1, 2011, and were last updated in 2022. The 2022 CALGreen standards became effective January 1, 2023.
	Title 20, Appliance Efficiency Regulations	The 2006 Appliance Efficiency Regulations (20 CCR §§ 1601–1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances. Though these regulations are now often viewed as "business as usual," they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.
Solid Waste	AB 939	California's Integrated Waste Management Act of 1989, AB 939 (Public Resources Code §§ 40050 et seq.) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than

Table 3.7-4 California Regulations to Reduce GHG Emissions

Sector	Regulation	Description
		tonnage. To help achieve this, the act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.
	AB 341	AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multifamily residential land uses. Section 5.408 of CALGreen also requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.
	AB 1327	The California Solid Waste Reuse and Recycling Access Act, AB 1327 (Public Resources Code §§ 42900 et seq.) requires areas to be set aside for collecting and loading recyclable materials in development projects. The act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.
	AB 1826	In October of 2014, Governor Brown signed AB 1826 requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses and multifamily residential dwellings with five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed with food waste.
Water	SBX7-7	The 20x2020 Water Conservation Plan was issued by the Department of Water Resources (DWR) in 2010 pursuant to Senate Bill 7, which was adopted during the 7th Extraordinary Session of 2009–2010 and therefore dubbed "SBX7-7." SBX7-7 mandated urban water conservation and authorized the DWR to prepare a plan implementing urban water conservation requirements (20x2020 Water Conservation Plan). In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 required urban water providers to adopt a water conservation

Table 3.7-4 California Regulations to Reduce GHG Emissions

Sector	Regulation	Description
		target of 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.
	AB 1881	The Water Conservation in Landscaping Act of 2006, AB 1881 requires local agencies to adopt the updated DWR model ordinance or an equivalent. AB 1881 also requires the CEC to consult with the DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.
Short-Lived Climate Pollutants	SB 1383	On September 19, 2016, the governor signed SB 1383 to supplement the GHG reduction strategies in the Scoping Plan to consider short-lived climate pollutants, including black carbon and methane (CH_4). Black carbon is the light-absorbing component of fine particulate matter produced during incomplete combustion of fuels. SB 1383 required the state board, no later than January 1, 2018, to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The bill also established targets for reducing organic waste in landfills, which includes a 50 percent reduction in statewide organic waste disposal from 2014 levels by 2020 and a 75 percent reduction from 2014 levels by 2025. Under SB 1383, jurisdictions are required to implement organic waste collection services for all residents and businesses by January 1, 2022. On March 14, 2017, CARB adopted the Short-Lived Climate Pollutant Reduction Strategy, which identifies the state's approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants. Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (charbroiling), and industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s, despite the tripling of diesel fuel use (CARB 2017). In-use, current legislation is expected to reduce black carbon emissions by 50 percent below 2013 levels by 2030 (CARB 2023).

REGIONAL

SCAG's 2024-2050 Regional Transportation Plan/ Sustainable Communities Strategy

SB 375 requires each MPO to prepare a sustainable communities strategy in its regional transportation plan. SCAG's 2024-2050 RTP/SCS, Connect SoCal, was adopted on April 4, 2024, and is an update to the 2020-2045 RTP/SCS (SCAG 2024). In general, the RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land use strategies in development of the SCAG region through the horizon year 2050 (SCAG 2024).

3.7.2 Existing Conditions

CALIFORNIA'S GHG INVENTORY

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the U.S. emissions inventory total. CARB compiles GHG inventories for the State of California. Based upon the 2024 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2022 GHG emissions period, California emitted an average 371.1 million metric tons of CO_2e per year ($MMTCO_2e/yr$) (5.85 percent of the total U.S. GHG emissions). Based on data published by the U.S. Energy Information Administration, California's per capita (9.12 metric tons) GHG emissions are much less than the nationwide per capita average (15.8 metric ton) (Urban Crossroads 2026).

EXISTING EMISSIONS

The project site was historically vacant land used as gravel pits. Aerial photographs show active quarrying evident as early as 1939 with two areas of installed railroad spurs apparently serving the quarries. Photographs from the 1960s and 1970s indicate a few on-site support buildings and the Irwindale Racetrack passing south of the northwest quarry. The track was gone by 1979. Sand and gravel were excavated from two quarries, which were depleted and ceased operations in the early 1970s. In the 2000s a truck parking area was developed in the southwest portion of the site and a solar farm in the southeast corner of the project site. Therefore, for analysis purposes, it is assumed that the Specific Plan area does not generate any GHG emissions under existing conditions.

3.7.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to greenhouse gas emissions if it would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

THRESHOLD GUIDANCE

South Coast Air Quality Management District

South Coast AQMD adopted a significance threshold of 10,000 $MTCO_2e$ per year for permitted (stationary) sources of GHG emissions for which South Coast AQMD is the designated lead agency. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, South Coast AQMD convened a GHG CEQA Significance Threshold Working Group. Based on the last Working Group meeting in September 2010 (Meeting No. 15), the South Coast AQMD Working Group identified a tiered approach for evaluating GHG emissions for development projects where South Coast AQMD is not the lead agency (South Coast AQMD 2010a). The following tiered approach has not been formally adopted by South Coast AQMD.

- **Tier 1.** If a project is exempt from CEQA, project-level and contribution to significant cumulative GHG emissions are less than significant.
- **Tier 2.** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (e.g., city or county), project-level and contribution to significant cumulative GHG emissions are less than significant.
- **Tier 3.** If GHG emissions are less than the screening-level criterion, project-level and contribution to significant cumulative GHG emissions are less than significant. For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, South Coast AQMD Working Group requires an assessment of GHG emissions. Project-related GHG emissions include on-road transportation, energy use, water use, wastewater generation, solid waste disposal, area sources, off-road emissions, and construction activities. The South Coast AQMD Working Group decided that because construction

activities would result in a "one-time" net increase in GHG emissions, construction activities should be amortized into the operational phase GHG emissions inventory based on the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame, since this is a typical interval before a new building requires the first major renovation. South Coast AQMD Working Group identified a screening-level threshold of 3,000 $MTCO_2e$ annually for all land use types (bright-line screening level). The bright-line screening-level criteria are based on a review of the Governor's Office of Land Use and Climate Innovation database of CEQA projects. Based on review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds. Therefore, projects that do not exceed the bright-line threshold would have a nominal and less than cumulatively considerable impact on GHG emissions. South Coast AQMD Working Group recommends use of the 3,000 $MTCO_2e$ interim bright-line screening-level criterion for all project types (South Coast AQMD 2010b).

- **Tier 4.** If emissions exceed the screening threshold, a more detailed review of the project's GHG emissions is warranted.

The South Coast AQMD Working Group's bright-line screening-level criterion of 3,000 $MTCO_2e$ per year is used as the significance threshold for the proposed project. If the project operation-phase emissions exceed this criterion, GHG emissions would be considered potentially significant without mitigation measures.

Mass Emissions and Health Effects

On December 24, 2018, in *Sierra Club et al. v. County of Fresno et al.* (Friant Ranch), the California Supreme Court determined that the EIR for the proposed Friant Ranch project failed to adequately analyze the project's air quality impacts on human health. The EIR prepared for the project, which involved a master planned retirement community in Fresno County, showed that project-related mass emissions would exceed the San Joaquin Valley Air Pollution Control District's regional significance thresholds. In its findings, the California Supreme Court affirmed the holding of the Court of Appeal that EIRs for projects must not only identify impacts to human health, but also provide an "analysis of the correlation between the project's emissions and human health impacts" related to each criterion air pollutant that exceeds the regional significance thresholds or explain why it could not make such a connection. In general, the ruling focuses on the correlation of emissions of toxic air contaminants and criteria air pollutants and their impact to human health.

In 2009, the EPA issued an endangerment finding for six GHGs—CO_2, CH_4, N_2O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and SF_6—to regulate GHG emissions from passenger vehicles. The endangerment finding is based on evidence that shows an increase in mortality and morbidity associated with increases in average temperatures, which increase the likelihood of heatwaves and ozone levels. The effects of climate change are identified in Table

3.7-2. Though identified effects such as sea level rise and increased extreme weather can indirectly impact human health, neither the EPA nor CARB has established ambient air quality standards for GHG emissions. The state's GHG reduction strategy outlines a path to avoid the most catastrophic effects of climate change. The state's GHG reduction goals and strategies are based on the state's path toward reducing statewide cumulative GHGs as outlined in AB 32, SB 32, and EO S-03-05.

Because no single project is large enough to result in a measurable increase in global concentration of GHG emissions, climate change impacts of a project are considered on a cumulative basis. Without federal ambient air quality standards for GHG emissions and given the cumulative nature of GHG emissions and the District's significance thresholds, which are tied to reducing the state's cumulative GHG emissions, it is not feasible at this time to connect the project's specific GHG emissions to the potential health impacts of climate change.

3.7.4 Applicable Specific Plan Development Standards and Design Guidelines

DEVELOPMENT STANDARDS

The Specific Plan has an overall objective of providing standards for landscaping and building systems that are aimed at reducing unnecessary water use, energy use, and fossil fuel consumption in the Irwindale Brew Yard Specific Plan area.

Section 3.6, Parking, specifies the minimum parking requirements for projects within the Irwindale Brew Yard Specific Plan, including compliance with applicable provisions of the California Green Building Standards Code (CALGreen) for bicycle parking and EV charging stalls.

DESIGN GUIDELINES

The Specific Plan guidelines have overall objectives to encourage sustainable design solutions that reduce energy consumption, use water efficiently and minimize waste; and to create simple building designs that result in efficient use of space, materials and resources while maintaining a high level of design integrity.

Section 4.4.2, Site Design, notes that the site should include wayfinding measures to promote efficient paths of travel for pedestrians, cyclists, and all vehicles, including large truck traffic, and that the site should be organized in a way that reduces conflicts between pedestrian and vehicular paths of travel.

Section 4.4, Landscape Design, of the Specific Plan includes general landscaping requirements and recommendations, including water quality features and the use of plant materials that are water- wise such as native and drought tolerant plants. This section encourages sustainable

design solutions that use water efficiently. Section 4.4 also includes a Preliminary Plant Palette and use of plant material that is not listed within the palette is permitted subject to approval by the Community Development Director and provided it is consistent with the core elements of this chapter.

Section 4.4.6, Service Areas and Utility Placement and Screening, notes that truck and service vehicle entries should be designed to provide clear and convenient access to truck courts and loading areas such that passenger vehicle, pedestrian, and bicycle circulation is not adversely affected.

3.7.5 Project Impact Analysis

METHODOLOGY

This GHG evaluation was prepared in accordance with the requirements of CEQA to determine if significant GHG impacts are likely in conjunction with implementation of the proposed project. The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including South Coast AQMD, released CalEEMod 2022 in May 2022. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for the proposed project to determine GHG emissions. Output from the model runs for construction and operational activity are provided in Appendix J. CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water, refrigerants, and stationary sources.

Construction Phase

Project construction activities would generate CO_2 and CH_4 emissions from the following activities:

- Demolition
- Filling of Northwest Pit
- Filling of Southeast Pit
- Site Infrastructure/Grading
- Building Construction
- Paving
- Architectural Coating

The construction schedule utilized in the analysis, shown in Table 3-1 of Appendix J, represents a conservative analysis scenario should construction occur any time after the respective dates

since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.

Site-specific construction fleet may vary due to specific project needs at the time of construction. The associated construction equipment was generally based on data provided by the project applicant and shown in Table 2-7, *Construction Equipment*.

For construction phase emissions, GHGs are quantified and amortized over the life of the project. To amortize the emissions over the life of the proposed project, the South Coast AQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 3.7-5, *Amoritzed Annual Construction Emissions.*

Table 3.7-5 Amortized Annual Construction Emissions

Year	Emissions (MT/yr)				
	CO_2T	CH_4	N_2O	R	Total CO_2e
2025	5,794.61	0.33	0.66	4.11	6,003.69
2026	12,876.83	0.69	1.50	10.32	13,351.64
2027	10,646.68	0.52	1.39	8.30	11,081.75
2028	9,663.53	0.50	1.28	6.94	10,065.38
2029	7,915.34	0.42	1.02	5.39	8,235.67
2030	1,750.09	0.05	0.11	1.33	1,785.71
Total	**48,647.08**	**2.51**	**5.97**	**36.39**	**50,523.84**
Amortized	**1,621.57**	**0.08**	**0.20**	**1.21**	**1,684.13**

Operational Phase

Operational activities associated with the proposed project would result in emissions of CO_2, CH_4, N_2O, and refrigerant emissions from the following primary sources:

- Mobile Source Emissions
- Area Source Emissions
- Energy Source Emissions
- Water Supply, Treatment, Distribution, and Wastewater
- Solid Waste
- Refrigeration
- Stationary Source Emissions

- Cargo Handling Equipment Source Emissions
- Transportation Refrigeration Unit (TRU) Emissions

Mobile Source Emissions

The primary source of mobile greenhouse gas emissions is from the combustion of fuel (i.e., gasoline and diesel). The analysis assumed a total of 13,219 daily two-way vehicle trips, including 1,070 daily two-way truck trips at buildout (Appendix P1).

CalEEMod default parameters for trip lengths and fleet mix were used to determine mobile-source emissions from the commercial uses. CalEEMod defaults were also utilized for trip length and trip purpose for passenger cars for the proposed industrial land uses. The analysis assumed that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks (LDT1 and LDT2), Medium-Duty-Vehicles (MDV), and Motorcycles (MCY). To account for emissions generated by passenger cars, the fleet mix in Table 3.7-6, *Passenger Vehicle Fleet Mix*, was utilized.

Table 3.7-6 Passenger Vehicle Fleet Mix

Land Use	Percentage Vehicle type				
	LDA	LDT1	LDT2	MDV	MCY
High-Cube Cold Storage Warehouse	50.76	4.3	26.75	15.75	2.44
High-Cube Fulfillment Center Warehouse (Sort)					
Warehousing					
High-Cube Short-Term Warehouse					

Sources: Urban Crossroads 2026 (Appendix J).

Note: The project-specific passenger car fleet mix used in this analysis is based on a proportional split utilizing the default CalEEMod percentages assigned to LDA, LDT1, LDT2, MDV, and MCY vehicle types.

To determine emissions from trucks for the proposed industrial uses, the analysis incorporated the South Coast AQMD recommended truck trip length of 39.9 miles for 4+-axle (HHDT) trucks and conservatively applied this to all truck trips, as shown in Table 3.7-7, *Truck Fleet Mix*. This trip length assumption is higher than the CalEEMod default trip length. Heavy trucks are broken down by truck type (or axle type) and are categorized as either Light-Heavy-Duty Trucks (LHDT1 and LHDT2)/2-axle, Medium-Heavy-Duty Trucks (MHDT)/3-axle, and Heavy-Heavy-Duty Trucks (HHDT)/4+-axle.

Table 3.7-7 Truck Fleet Mix

Land Use	Trip Length (miles)	Percentage Vehicle Type			
		LHDT1	LHDT2	MHDT	HHDT
High-Cube Cold Storage Warehouse	39.90	60.35	13.41	3.55	22.69
High-Cube Fulfillment Center Warehouse (Sort)	39.90	60.47	13.35	3.54	22.64
Warehousing	39.90	60.44	13.32	3.53	22.71
High-Cube Short-Term Warehouse	39.90	60.00	13.44	3.56	23.00

Sources: Urban Crossroads 2026 (Appendix J).

Note: Project-specific truck fleet mix is based on the number of trips generated by each truck type (LHDT1, LHDT2, MHDT, and HHDT) relative to the total number of truck trips.

Off-Model Adjustment Factors

On-road mobile source emissions for the proposed project were estimated using the CARB's Emissions Factor Model version 2021 (EMFAC2021) model. EMFAC 2021 is the most recent version of EMFAC approved by the EPA for use in State Implementation Plans (SIP) and federal transportation conformity determinations, and it remains the standard analytical platform for regional air quality planning in California.

On November 21, 2025, the EPA approved the use of EMFAC 2021 off-model adjustment factors. These adjustment factors remove the estimated emission benefits that were attributed to California's Advanced Clean Trucks, Zero-Emission Airport Shuttle, Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions, and Heavy-Duty Omnibus regulations from EMFAC 2021. Because the preemption waivers for these regulations no longer have effect, these regulations are no longer enforceable. These adjustment factors are multipliers provided by CARB that adjust CO_2, CH_4, and N_2O emission factors by year, region, and vehicle category to account for the removal of these regulations that are accounted for in EMFAC 2021. Due to fleet turnover, the adjustment factors result in greater emission increases over the base EMFAC 2021 model outputs in later analysis years.

Although these adjustment factors were approved by the EPA, primarily for SIP and conformity analysis purposes, they have been incorporated into this analysis to provide a conservative estimation of emissions in an evolving regulatory environment.

Conservatism and Applicability Under CEQA

The use of EMFAC 2021 off-model adjustment factors is not required for CEQA purposes. CEQA does not mandate the use of EPA-approved models or SIP-specific adjustment techniques. Instead, CEQA requires a reasonable, good-faith effort to disclose a project's potential environmental impacts using methodologies supported by substantial evidence.

The decision to apply EMFAC 2021 off-model adjustment factors was made to be conservative and precautionary. By incorporating these EPA-approved adjustment factors, the analysis avoids understating emissions that could result if certain regulatory impacts were omitted from the base model outputs.

SCAQMD CEQA guidance recognizes the use of CARB's EMFAC model for estimating on-road mobile source emissions and does not prescribe a single mandatory modeling configuration for CEQA analyses. The application of EMFAC 2021 with CARB-developed, EPA-approved off-model adjustment factors falls within accepted professional practice and reflects a reasonable exercise of technical judgment.

Area Source Emissions

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the proposed project. It should be noted that AB 1346 aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower by January 1, 2024, which is now in effect. However, for purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod and do not incorporate the emissions reductions that would be realized from implementation of AB 1346.

Energy Source Emissions

Greenhouse gas emissions are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. Greenhouse gas emissions are also emitted during the generation of electricity from fossil fuels; these emissions are considered indirect emissions. The site is not expected to utilize natural gas for the building envelope and therefore would not generate any emissions from direct energy consumption.

Water Supply, Treatment, and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used.

Solid Waste

The proposed land uses would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions of the proposed project associated with the disposal of solid waste were calculated by CalEEMod using default parameters.

Refrigerants

Air conditioning (A/C) and refrigeration equipment associated with the buildings are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the EPA. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. Per 17 CCR Section 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022. Additionally, beginning January 1, 2025, all new air conditioning equipment may not use refrigerants with a GWP of 750 or greater. GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters.

Stationary Source Emissions

The proposed project was conservatively assumed to include a total of five emergency fire pumps and one emergency generator. Each emergency fire pump was assumed to be diesel fueled and rated at 350 brake horsepower. The emergency generator was assumed to be diesel fueled and rated at 2,000 brake horsepower. Each fire pump and emergency generator was assumed to operate for up to one hour per day, one day per week for up to 50 hours per year for maintenance and testing purposes. Emissions associated with the stationary diesel-powered emergency engines were calculated using CalEEMod.

On-Site Cargo Handling Equipment Emissions

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. The analysis assumed the operation of 11 pieces of equipment. Each piece of equipment was modeled as a 175-horsepower natural-gas-powered port tractor and assumed to operate four hours a day for 365 days of the year.

TRU Source Emissions

In order to account for the refrigerated uses, trucks associated with the cold-storage land use are assumed to also have TRUs. Therefore, for modeling purposes, 201 trucks (401 two-way truck trips per day) have the potential to include transportation refrigeration units (TRU). TRUs are accounted for during on-site and off-site travel. The TRU calculations are based on EMFAC2021, developed by CARB. EMFAC2021 does not provide emission rates per hour or mile as with the on-road emission model and only provides emission inventories. Emission results are produced in tons per day, and all activity, fuel consumption, and horsepower hours were reported at annual levels. The emission inventory is based on specific assumptions, including the average horsepower rating of specific types of equipment and the hours of operation annually. These assumptions are not always consistent with assumptions used in the modeling of project-level emissions. Therefore, the emissions inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with project-level details. This was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each criteria pollutant by equipment type and the average daily hours of operation.

Life cycle emissions are not included in the GHG analysis, consistent with California Resources Agency directives.[4] Black carbon emissions are not included in the GHG analysis because CARB does not include this short-lived climate pollutant in the state's AB 32 inventory but treats it separately.[5] Additionally, though not anticipated, industrial sources of emissions that require a

4 Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

5 Particulate matter emissions, which include black carbon, are analyzed in Section 5.3, *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel

permit from South Coast AQMD (permitted sources) are not included in the proposed project's community inventory since they have separate emission reduction requirements. GHG modeling is included in Appendix J of this DEIR.

To account for CARB's withdrawal of its request for an EPA waiver for the zero-emission TRU portions of its TRU Regulation, the analysis conservatively utilized 2029 emission factors for truck-mounted TRUs in EMFAC.

IMPACT ANALYSIS

Impact GHG-1: The proposed project's construction and operation GHG emissions would exceed the South Coast AQMD's numeric threshold of 3,000 $MTCO_2e$/yr and would therefore have a significant impact on the environment.

A numerical threshold for determining the significance of GHG emissions in the SoCAB has not been established by South Coast AQMD for projects where it is not the lead agency. As an interim threshold based on guidance provided in the CAPCOA *CEQA and Climate Change* handbook, the City of Irwindale has opted to use a non-zero threshold approach based on Approach 2 of the handbook. Threshold 2.5, Unit-Based Thresholds Based on Market Capture, establishes a numerical threshold based on capture of approximately 90 percent of emissions from future development. The latest threshold developed by South Coast AQMD using this method is 3,000 $MTCO_2e$/yr for all projects.

As shown in Table 3.7-8, *Project Construction and Operation GHG Emissions,* the proposed project would result in GHG emissions of approximately 44,850 $MTCO_2e$/yr at buildout and would exceed the South Coast AQMD's numeric threshold of 3,000 $MTCO_2e$/yr. Thus, the proposed project would result in a **potentially significant** impact.

particulate matter. The State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017a).

Table 3.7-8 Project Construction and Operation GHG Emissions

Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction emissions amortized over 30 years	1,621.57	0.08	0.20	1.21	1,684.13
Mobile	31,079.49	1.11	2.78	29.04	31,964.95
Area	61.09	0.00	0.00	0.00	61.31
Energy	6,109.28	0.65	0.05	0.00	6,140.47
Water	787.47	22.67	0.55	0.00	1,516.78
Waste	252.75	25.26	0.00	0.00	884.27
Refrigeration	0.00	0.00	0.00	90.29	90.29
Stationary	71.40	0.00	0.00	0.00	71.64
Cargo Handling Equipment					521.13
TRUs					1,915.75
Total CO_2e (All Sources)	**44,850.72**				

Sources: Urban Crossroads 2026 (Appendix J).

Significance without Mitigation: Potentially significant.

Mitigation Measures

The following mitigation measures, as included for Air Quality, would also serve to reduce GHG emissions:

> **Mitigation Measure AQ-1:** The construction contractor(s) shall specify in the construction bid that the construction contractor(s) shall:
>
> - Provide electrical hook ups to the power grid rather than use diesel-fueled generators for electric construction tools such as saws, drills, and compressors, and shall use such electric tools.
> - Keep all equipment maintenance records and data sheets, including design specifications and emission control tier classifications, onsite or at the contractor's office and furnish documents to the Lead Agency or other regulators upon request.
> - Place legible, durable, weather-proof signs at construction staging areas within the project site. At a minimum, each sign shall include: 1) instructions for construction

workers to shut off engines when not in use; 2) instructions for operators of heavy-duty diesel construction equipment to restrict idling to no more than three minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager to report violations.

- Require that all diesel-fueled offroad equipment of 25 horsepower or greater to comply with Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 4 Final offroad emissions standards or equivalent and ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications.

Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the City of Irwindale Public Works/Engineering and Community Development Departments clearly show these requirements. The City of Irwindale shall conduct an on-site inspection to verify compliance.

Mitigation Measure AQ-2: The Project Applicant/Developer shall include a note on grading plans that prohibit grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone in the Project area. Daily Air Quality Index forecasts for the next day of grading shall be checked via the airnow.gov system the day prior by the project contractor(s). Prior to grading, the project applicant/developer shall ensure that all grading plans submitted to the City of Irwindale Public Works/Engineering and Community Development Departments clearly show this requirement.

Mitigation Measure AQ-3: The project designer and contractor(s) shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g., bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor(s) shall be required to utilize "Super-Compliant" VOC paints, which are defined in South Coast AQMD's Rule 1113. The construction contractor shall be required to utilize "Super-Compliant" VOC paints, which are defined in South Coast AQMD's Rule 1113. Prior to construction, building specifications submitted to the City of Irwindale Public Works/Engineering and Community Development Departments should clearly show these construction requirements. The City of Irwindale shall conduct an on-site inspection to verify compliance.

Mitigation Measure AQ-4: The Project Applicant/Developer shall identify a person to act as a community liaison concerning onsite construction activities and provide contact information for the community liaison to the surrounding community. The contact of the community liaison shall be provided to the City Planning Division and be posted on the

construction site prior to issuance of a demolition permit. The City of Irwindale shall conduct an on-site inspection to verify compliance.

Mitigation Measure AQ-5: Prior to construction, the Project Applicant/Developer shall provide documentation to the City demonstrating that information on transit and ridesharing programs and services shall be provided to construction employees. The City of Irwindale shall conduct an on-site inspection to verify compliance.

Mitigation Measure AQ-6: Prior to the shell building permit approval, the Project Applicant shall provide documentation to the City demonstrating that an electrical room(s) and/or exterior area(s) of the site shall be designated where future electrical panels would be located for the purpose of supplying power to on-site charging facilities for electric powered trucks. Conduits shall be installed from this designated area where the panel would be located to the onsite location where the charging facilities would be located and where electric-powered trucks would park and connect to charging facilities to charge the batteries that power the motors of the electric-powered trucks.

Mitigation Measure AQ-7: Prior to issuance of an Occupancy Permit for a new tenant/business entity, the Project Developer/Successor-in-interest shall provide documentation to the City demonstrating that building occupants shall be provided with information related to South Coast AQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles. Information shall also include, but not be limited to, the health effect of diesel particulates, benefits of reduced idling time, and CARB regulations. Tenants shall be notified about the availability of:

- Alternatively fueled cargo handling equipment.
- Grant programs for diesel-fueled vehicle engine retrofit and/or replacement.
- Access to alternative fueling stations proximate to the site that supply compressed natural gas.
- The EPA's SmartWay program.

Mitigation Measure AQ-8: Prior to issuance of a Certificate of Occupancy, legible, durable, weather-proof signs shall be installed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations. At a minimum, each sign shall include the following instructions for truck drivers to shut off engines when not in use:

- Instructions for drivers of diesel trucks to restrict idling to no more than five minutes once the vehicle is stopped, the transmission is set to "neutral" or "park" and the parking brake is engaged.
- Telephone numbers of the building facilities manager and CARB to report violations.

The Project Applicant/Developer shall ensure that building design plans submitted to the City of Irwindale Public Works/Engineering and Community Development Departments clearly show these requirements.

Mitigation Measure AQ-9: Prior to issuance of an Occupancy Permit for a new tenant/business entity, the Project Developer/Facility Owner and Tenant/Business entity shall provide to the City of Irwindale Community Development Department a signed document (verification document) noting that the Project Developer/Facility Owner has disclosed to the tenant/business entity the requirement to implement the following measures:

- Sites shall clearly mark entry and exit points for trucks and service vehicles.
- Facility operators shall maintain records of their fleet equipment owned by the facility and ensure that all diesel-fueled Medium-Heavy Duty Trucks (MHDT) and Heavy-Heavy Duty Trucks (HHD) use year CARB 2010 or newer engines. The records should be maintained on-site and be made available for inspection by the Lead Agency.
- Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Signs should be posted in the appropriate locations and/or handouts should be provided that show the locations of the nearest food options, fueling, truck maintenance services, and other similar convenience services.
- Each facility shall designate a Compliance Officer responsible for implementing the measures described herein. Contact information shall be provided to the City and updated annually, and signs shall be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community. The Compliance Officer shall also coordinate with CARB and South Coast AQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.
- Signs shall be posted in the appropriate locations noting that heavy truck shall park and perform any self-maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets.
- Project plans and specifications shall include signs at every truck exit driveway providing directional information to the truck route.

Mitigation Measure AQ-10: Prior to issuance of building permits, the following features shall be demonstrated on the project's building plans to the extent feasible over minimum California Code of Regulations Title 24 requirements. Installation shall be verified by the City prior to issuance of a Certificate of Occupancy.

- For use by employees and visitors conducting business at the building, install automobile electric vehicle (EV) charging stations shall be installed at the minimum number required by the California Code of Regulations Title 24. All charging stations shall be equipped with Level 2 or faster chargers. Signs shall be posted indicating that the charging stations are for exclusive use by the building's employees and by visitors conducting business at the building.
- Install appropriate electrical infrastructure sufficiently sized to accommodate the potential installation of additional auto and truck EV charging stations in the future.
- Install raceways for conduit to tractor trailer parking areas in logical, gated locations determined by the Project Applicant during construction document plan check, for the purpose of accommodating the future installation of EV truck charging stations at such time this technology becomes commercially available. The charging station location(s) are to be located inside the gated and secured truck courts.

Mitigation Measure AQ-11: Prior to issuance of building permits, the following features shall be demonstrated on the project's building and landscape plans to the extent feasible. Installation shall be verified by the City prior to issuance of a Certificate of Occupancy.

- Install Energy Star-rated heating, cooling, lighting, and appliances
- Structures shall be equipped with outdoor electric outlets in the front and rear to facilitate use of electrical lawn and garden equipment.
- Design buildings that exceed the 2019 Title 24 building envelope energy efficiency standards by at least 50 percent.

Mitigation Measure AQ-12: Prior to issuance of a Certificate of Occupancy, the following language shall be included within tenant lease agreements in order to reduce operational air pollutant emissions to the extent feasible:

- Information about energy efficiency, energy-efficient lighting and lighting control systems, energy management, and existing energy incentive programs.
- Information about funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.

- Requirements to use the cleanest technologies available and to provide the necessary infrastructure to support zero-emission vehicles, equipment, and appliances that would be operating on site at such time this technology becomes commercially available. This requirement shall apply to equipment such as forklifts, handheld landscaping equipment, yard trucks, office appliances, etc.
- Requirements to operate in compliance with, and to monitor compliance with, all current and applicable air quality regulations for on-road trucks including the CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation.
- Requirements and identification of the responsible party to maintain, replace, and upgrade rooftop solar panels per the manufacturer's recommendations for the life of the lease. The proposed project would comply with existing solar requirements per the California Energy Code in effect during permitting of the Project (at the time of Construction Drawing Plan Check Submittal). In the case that the tenant requires additional solar capacity, this shall be addressed during the tenant improvement process. The proposed project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project.
- Requirements and identification of the responsible party to maintain, replace, and repair the legible, durable, weather-proof signs that were installed at initial building occupancy placed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations.
- The tenant agreement shall include notification that the tenant shall comply with CARB Truck and Bus regulation, including requirements that only haul trucks meeting model year 2010 engine emission standards shall be used for the on-road transport of materials to and from the project site.
- Requirements for the building owner to provide a Green Cleaning Products and Paint Education Program available to the building tenant, to keep at the building's office, break room, leasing space, or on an accessible website.

Mitigation Measure AQ-13: The City Occupancy Permit shall require that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2014 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators which own vehicles subject to Section 2025 shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.

Additionally, the proposed project would abide by the requirements listed in 3.7-4, including requirements for water-efficient fixtures. The GHG emissions from the proposed project were calculated with mitigation measures incorporated.[6] The estimated GHG emissions with mitigation for the proposed project are summarized in Table 3.7-9, *Project GHG Emission: With Mitigation*. Detailed operation model outputs for the proposed project are presented in Appendix J. As shown, with mitigation construction and operation of the proposed project would generate approximately 43,726 MTCO2e/yr at buildout, which exceeds South Coast AQMD's threshold. Therefore, the proposed project results in a **significant and unavoidable** impact.

Table 3.7-9 Project Construction and Operation GHG Emissions

Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction emissions amortized over 30 years	1,621.57	0.08	0.20	1.21	1,684.13
Mobile	31,079.49	1.11	2.78	29.04	31,964.95
Area	0.00	0.00	0.00	0.00	0.00
Energy	5,216.30	0.54	0.04	0.00	5,240.60
Water	706.61	20.44	0.49	0.00	1,364.06
Waste	252.75	25.26	0.00	0.00	884.27
Refrigeration	0.00	0.00	0.00	90.29	90.29
Stationary	71.40	0.00	0.00	0.00	71.64
Cargo Handling Equipment					521.13
TRUs					1,915.75
Total CO_2e (All Sources)	**43,736.82**				

Sources: Urban Crossroads 2026 (Appendix J).

Significance with Mitigation: Significant and unavoidable.

6 Under MM AQ-11, the modeling assumed that the proposed project would utilize Energy Star-rated appliances, all landscape maintenance equipment would be electric, and that the proposed project would exceed 2019 Title 24 building envelope energy efficiency standards by 50 percent.

Impact GHG-2: The proposed project's construction and operation GHG emissions would exceed the South Coast AQMD's numeric threshold and would therefore conflict with the 2022 CARB Scoping Plan.

SCAG's Regional Transportation Plan / Sustainable Communities Strategy

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that would function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecast development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024). In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements.

As demonstrated in Section 3.10, *Land Use and Planning*, the proposed project would be generally supportive and consistent with the Connect SoCal goals (refer to Table 3.10-1). As discussed in Section 5.4.2, *Population and Housing,* the new jobs generated by the proposed project would provide additional employment opportunities for residents in the area and, with an anticipated opening year of 2032, would be accommodated within SCAG's 2035 projection. Therefore, the proposed project would not interfere with SCAG's ability to implement the regional strategies in Connect SoCal. Therefore, overall, the proposed project would not conflict or interfere with implementation of Connect SoCal, and impacts would be **less than significant**.

2022 CARB Scoping Plan Consistency

CARB's latest Climate Change Scoping Plan (2022) outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279. The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. However, new regulations adopted by the state agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that would affect a local jurisdiction's emissions inventory from the top down.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the CAFE standards, and other early action measures as necessary to ensure the

State is on target to achieve the GHG emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen. The proposed project would comply with these GHG emissions reduction measures since they are statewide strategies. The proposed project's GHG emissions would, to the extent permitted by federal law, be reduced by compliance with statewide measures that have been adopted since AB 32, SB 32, and AB 1279 were adopted. However, since the proposed project would result in an exceedance of the numeric GHG significance thresholds, the proposed project has been conservatively determined to have the potential to conflict with an applicable GHG reduction plan. Therefore, this impact would be **potentially significant**.

Significance without Mitigation: Potentially significant.

Table 3.7-9 shows the estimated GHG emissions for the proposed project after the implementation of Mitigation Measures AQ-1 through AQ-13. As shown in the table, with mitigation, the construction and operation GHG emissions of the proposed project would exceed South Coast AQMD's threshold. Therefore, the proposed project results in a **significant and unavoidable** impact.

3.7.6 Cumulative Impact Analysis

Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide.

Impact GHG-3: The proposed project's GHG emissions would exceed the South Coast AQMD's numeric threshold described above and would therefore result in a cumulative effect related to GHG emissions.

Since project-related GHG emissions are dispersed worldwide, Impact GHG-1 is not a project-specific impact, but the proposed project's contribution to a cumulative impact. Implementation of the proposed project would result in annual emissions that would exceed South Coast AQMD's threshold. Therefore, project-related GHG emissions and their contribution to global climate change would be cumulatively considerable, and GHG emissions impacts would be **potentially significant**.

Significance without Mitigation: Potentially Significant.

Table 3.7-8 shows the estimated GHG emissions for the proposed project after the implementation of Mitigation Measures AQ-1 through AQ-13. As shown in the table, with mitigation, the construction and operation GHG emissions of the proposed project would

exceed the numeric threshold used in this Draft EIR. Therefore, the proposed project results in a **significant and unavoidable** impact.

3.7.7 References

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3.8 HAZARDS AND HAZARDOUS MATERIALS

This section evaluates the potential impacts on human health and the environment due to exposure to hazardous materials or conditions associated with implementation of the proposed Irwindale Brew Yard Specific Plan. Potential project impacts and appropriate mitigation measures or standard conditions are included as necessary. The analysis in this section is based, in part, on the following source:

- *Phase I Environmental Site Assessment*, *Portion of 15801 1st Street (APN #8533-009-026, -027, & -029) Irwindale, California 917006-620*, Anacapa Geoservices Inc., December 17, 2024.
- *Draft Operations Plan: Brew Yard Inert Debris Engineered Fill Operation, 15801 W 1st Street, Irwindale, California 91706*, Heavy Iron Contracting, LLC, December 1, 2025.

Complete copies of these studies are included in the Technical Appendices to this Draft EIR (see Appendix K and Appendix C). No comments specific to Hazards and Hazardous Materials were received during the NOP comment period (March 6, 2024, through April 12, 2024).

3.8.1 Regulatory Framework

FEDERAL

Clean Water Act

The United States Environmental Protection Agency (EPA) is the lead federal agency responsible for water quality management. The Clean Water Act (CWA) of 1972 (33 US Code Sections 1251–1376) is the primary federal law that governs and authorizes water quality control activities by the EPA and the states.

Under federal law, the EPA has published water quality regulations under Volume 40 of the Code of Federal Regulations. Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. As defined by the CWA, water quality standards consist of two elements: (1) designated beneficial uses of the water body in question and (2) criteria that protect the designated uses. Section 304(a) requires the EPA to publish advisory water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use.

When water quality does not meet CWA standards and compromises designated beneficial uses of a receiving water body, Section 303(d) of the CWA requires that the water body be identified

and listed as "impaired." Once a water body has been designated as impaired, a total maximum daily load (TMDL) must be developed for the impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards, with a factor of safety included. Once established, the TMDL allocates the loads among current and future pollutant sources to the water body.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program was established by the CWA to regulate municipal and industrial discharges to surface waters of the United States, including discharges from municipal separate storm sewer systems. Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable concentrations and/or mass emissions of pollutants in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities.

Under the NPDES program, all facilities that discharge pollutants into waters of the United States are required to obtain an NPDES permit. Requirements for stormwater discharges are also regulated under this program. In California, the NPDES permit program is administered by State Water Resources Control Board (SWRCB) through the nine Regional Water Quality Control Boards (RWQCB). The specific plan area lies within the jurisdiction of the Los Angeles RWQCB (Region 4) and therefore is also subject to the requirements set forth in the Los Angeles County MS4 permit.

Resource Conservation and Recovery Act

Federal hazardous waste laws are generally promulgated under RCRA. These laws provide for the "cradle to grave" regulation of hazardous wastes. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed. The California Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program as well as California's own hazardous waste laws, which are collectively known as the Hazardous Waste Control Law. Under the Certified Unified Program Agency (CUPA) program, the California Environmental Protection Agency (Cal/EPA) has in turn delegated enforcement authority to the County of Los Angeles for State law regulating hazardous waste producers or generators. For the proposed project, the Los Angeles County Fire Department (LACFD) Health Hazardous Materials Division is the designated CUPA.

Comprehensive Environmental Response, Compensation and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 protects water, air, and soil resources from the risks created by past chemical disposal practices. This law is also called the Superfund Act and regulates sites on the National Priority List, which are called Superfund sites. The act was intended to encompass the prevention of and response to uncontrolled hazardous substances releases. It provides mechanisms for reacting to emergencies and chronic hazardous material releases. In addition to procedures to prevent and remedy problems, it established a system for compensating appropriate individuals and assigning appropriate liability. It is designed to plan for and respond to failure in other regulatory programs and remedy problems resulting from action taken before the era of comprehensive regulatory protection.

Emergency Planning and Community Right-to-Know Act

Title III of the Superfund Amendments and Reauthorization Act authorized the Emergency Planning and Community Right-to-Know Act (EPCRA) (42 US Code sec. 11001 et seq.) to inform communities and citizens of chemical hazards in their areas. It requires businesses to report the locations and quantities of chemicals stored on-site to state and local agencies; releases to the environment of more than 600 designated toxic chemicals; off-site transfers of waste; and pollution prevention measures and activities and to participate in chemical recycling. EPA maintains and publishes an online, publicly available, national database of toxic chemical releases and other waste management activities by specific industry groups and federal facilities—the Toxics Release Inventory.

To implement EPCRA, each state appoints a state emergency response commission to coordinate planning and implementation activities associated with hazardous materials. The commissions divide their states into emergency planning districts and name each district's local emergency planning committee. The federal EPCRA program is implemented and administered in California by the Governor's Office of Emergency Services, a state commission, 6 district committees, and 81 CUPAs. The Office of Emergency Services coordinates and provides staff support for the commission and district committees.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 gives the EPA the authority to require reporting, record-keeping, testing requirements, and restrictions related to chemical substances and/or mixtures. TSCA addresses the production, importation, use, and disposal of specific chemicals, including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint. Title IV of the TSCA directs the EPA to regulate lead-based paint hazards.

TSCA Sections 402 and 404 require those engaged in lead abatements, risk assessments, and inspections in homes or child-occupied facilities before 1978 (such as in daycare centers and

kindergartens) to be trained and certified in specific practices to ensure accuracy and safety. TSCA Section 403, Residential Hazard Standards for Lead in Paint, Dust, and Soil, sets standards for dangerous lead levels in paint, household dust, and residential soil.

Hazardous Materials Transportation Act

The United States Department of Transportation regulates hazardous materials transportation to reduce risks to life and property from hazards associated with the transport of hazardous materials under Title 49 of the Code of Federal Regulations, which reflects laws passed by Congress as of January 2, 2006, last amended April 15, 2022. State agencies responsible for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol and the California Department of Transportation. These agencies also govern permitting for hazardous materials transportation.

STATE

California Health and Safety Code and Code of Regulations

California Health and Safety Code Chapter 6.95 and California Code of Regulations (CCR), Title 19, Section 2729 set out the minimum requirements for business emergency plans and chemical inventory reporting. A business that uses hazardous materials or a mixture containing hazardous materials must establish and implement a business plan if the hazardous material is handled in certain quantities. These regulations require businesses to provide emergency response plans and procedures, training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled on-site.

California Code of Regulations

- **22 CCR Division 4.5** sets forth the requirements for hazardous waste generators; transporters; and owners or operators of treatment, storage, or disposal facilities. These regulations include the requirements for packaging, storage, labeling, reporting, and general management of hazardous waste prior to shipment. In addition, the regulations identify standards applicable to transporters of hazardous waste. These regulations specify the requirements for transporting loads of hazardous waste, including manifesting, vehicle registration, and accidental emergency discharges during transportation.

- **CCR Title 14 Section 17388.3,** Inert Debris Engineering Fill Operations, outlines the specific regulatory requirements for inert debris engineered fill operations (IDEFO) in California, including mandatory annual reporting of the total amount of inert debris deposited and adherence to operating criteria, handling, equipment, and control standards. Operators must also comply with specific regulations upon the completion or cessation of fill activities and adhere to all applicable RWQCB Waste Discharge Requirements. Inert debris engineered fill operations also need to submit notifications to the enforcement agency, as set forth in

CCR, Title 14, section 18100. The enforcement agency for the proposed project is the California Department of Resources, Recycling, and Recovery (CalRecycle).California Code of Regulations Title 17, Division 2

- **CCR Title 17, Division 2, Chapter 4, Subchapter 3, Article 4,** SWRCB–Development of Waste Discharge Requirements (WDR), details the requirements for WDRs associated with IDEFOs and issued and managed by the RWQCB. Any person discharging or proposing to discharge solid waste to land where water quality could be affected as a result of such discharge shall obtain a WDR from the RWQCB.

Asbestos-Containing Materials Regulations

In conjunction with the EPA and California Occupational Safety and Health Administration (Cal/OSHA), state-level agencies regulate removal, abatement, and transport procedures for asbestos-containing materials. These regulations prohibit asbestos releases from industrial, demolition or construction activities, and medical evaluation and monitoring are required for employees performing activities that could expose them to asbestos. The regulations include warnings and practices needed to reduce the risk of asbestos emissions and exposure. For example, 8 CCR Section 1529 provides for exposure limits, exposure monitoring, respiratory protection, and good working practices for workers exposed to asbestos. Finally, federal, state, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos.

Polychlorinated Biphenyls Regulations

The EPA prohibited the use of PCBs in most of the new electrical equipment starting in 1979 and initiated a phase-out for much of the existing PCB-containing equipment. The provisions of the TSCA regulate the inclusion of PCBs in electrical equipment and the handling of PCBs. Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and outline safety procedures for their disposal. The state likewise considers PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste and regulates them; accordingly, these regulations require that such materials be treated, transported, and disposed of as hazardous waste. At lower concentrations for nonliquids, regional water quality control boards may exercise discretion over classifying such wastes.

Lead Regulations

Cal/OSHA's "Lead in Construction Standard" is in 8 CCR Section 1532.1. This section applies to all construction work where an employee may be exposed to lead. The regulations address these areas: permissible exposure limits; exposure assessment; compliance methods; respiratory protection; protective clothing and equipment; housekeeping; medical surveillance;

medical removal protection; employee information, training, and certification; signage; record keeping; monitoring; and agency notification.

Hazardous Materials Disclosure Programs

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) administered by the State of California consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for environmental and emergency management programs, which include Hazardous Materials Release Response Plans and Inventories (business plans), the California Accidental Release Prevention Program, and the Underground Storage Tank (UST) Program. The Unified Program is implemented at the local government level by CUPAs. The LACFD is the designated CUPA for hazardous materials in Los Angeles County. Under the Unified Program, the LACFD's Health Hazardous Materials Division consolidates, coordinates, and makes consistent the administrative requirements, permits, inspection, and enforcement activities associated with several regulatory programs.

Underground Storage Tank Program

The purpose of the UST Program is to protect people and the environment from releases of petroleum and other hazardous substances from tanks. The statutes govern the UST Program in the Solid Waste Disposal Act (1965). Because of the localized nature of USTs, the EPA shifts enforcement and oversight authority to local governments. California laws and regulations authorize the State Water Board to implement the UST program. The State Water Board then delegates the field implementation to CUPAs.

There are four program elements related to USTs:

1. Leak Prevention includes requirements for tank installation, construction, testing, leak detection, spill containment, and overfill protection. The state issues CUPAs as the overseer for the Leak Prevention Program. Within the City of Irwindale, the CUPA responsible for implementing this program element is the Los Angeles County CUPA.
2. Cleanup of leaking tanks includes groundwater and soil testing followed by remediation. The Los Angeles County CUPA oversees the cleanup of "soils-only" contamination cases. The local CUPA refers sites with groundwater contamination to the Los Angeles Regional Water Quality Control District.
3. Enforcement of existing regulations is delegated by the State Water Resources Control Board to local agencies enforcing UST requirements (LA County CUPAs) for everything except cleanup of groundwater contamination.
4. Tank Tester Licensing tests the integrity of tanks and is required by law and administered by the Office of Tank Tester Licensing within the State Water Board.

California Fire Code

The California Fire Code is in 24 CCR Part 9. The code is updated every three years and includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, fire hydrant locations and distribution, and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

The California Department of Forestry and Fire Protection (CAL FIRE) is dedicated to the fire protection and stewardship of over 31 million acres of California's wildlands. The Office of the State Fire Marshal supports CAL FIRE's mission to protect life and property through fire prevention engineering programs, law and code enforcement, and education. The State Fire Marshal provides for fire prevention by enforcing fire-related laws in state-owned or -operated buildings; investigating arson fires in California; licensing those who inspect and service fire protection systems; approving fireworks for use in California; regulating the use of chemical flame retardants; evaluating building materials against fire safety standards; regulating hazardous liquid pipelines, and tracking incident statistics for local and state government emergency response agencies. The California Fire Plan is the state's road map for reducing wildfire risk through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health. The California Fire Plan is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE.

LACFD provides emergency management and fire protection for the City of Irwindale. The LACFD is a full-service fire department that provides fire suppression, urban search and rescue, paramedic ambulance service, fire prevention inspections/permits, public fire education programs, emergency preparedness planning, fire cause and origin investigation, fire patrols, and other services based on community needs. LACFD calls for service pertaining to the City of Irwindale are dispatched from Station No. 29 in the City of Baldwin Park at 14334 Los Angeles Street, and Station No. 48 in the City of Irwindale at 15546 Arrow Highway. Station No. 29 is the closest fire station to the project site, approximately 1.9 roadway miles southeast of the project site. (Also see Section 5.12, *Public Services*.) In addition, the LACFD is also responsible for disaster preparedness and other services, such as building plan review, fire prevention, and fire hydrant testing.

SWRCB Construction General Permit

The SWRCB adopted the revised Statewide Construction General Permit on September 8, 2022 (Order WQ 2022-0057-DWQ), which became effective on September 1, 2023. Under the terms of the permit, applicants must file permit registration documents (PRD) with the SWRCB prior to the start of construction. The PRDs include a Notice of Intent, risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System website.

Applicants must demonstrate conformance with applicable best management practices (BMP) and prepare a SWPPP containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. Additionally, the SWPPP must contain a weekly visual monitoring program and BMP inspections prior to, during, and after qualifying precipitation events. Water quality monitoring is also required with a schedule based on the risk level of the site.

Hazardous Materials Transportation

Section 31303 of the California Vehicle Code and the U.S. Department of Transportation (USDOT) regulate hazardous materials transport. The California Highway Patrol (CHP) and California Department of Transportation (Caltrans) are the enforcement agencies. The California Governor's Office of Emergency Services provides emergency services involving hazardous materials incidents.

REGIONAL

South Coast Air Quality Management District

South Coast Air Quality Management District's Rule 1403 governs the demolition of buildings containing asbestos materials. Rule 1403 specifies work practices to minimize asbestos emissions during building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing material (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. In addition, Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earth-moving and grading activities. Rule 402 prohibits any person from discharging quantities of air contaminants or other materials from any source that would result in injury, detriment, nuisance, or annoyance to any considerable numbers of persons or to the public. Additionally, the discharge of air contaminants would also be prohibited where it would endanger the comfort, repose, health, or safety of the public, or would cause, or have a natural tendency to cause, injury or damage to business or property.

Los Angeles County All-Hazards Mitigation Plan

The Disaster Mitigation Act of 2000, Public Law 106-390 (Section 322a–d) requires that local governments, as a condition of receiving federal disaster mitigation funds, adopt a mitigation plan that describes the process for identifying hazards, vulnerabilities, and risks; identifies and prioritizes mitigation actions; encourages the development of local mitigation; and provides

technical support for those efforts. In response to this and the requirements of the California Office of Emergency Services, the County prepared the Los Angeles County All-Hazards Mitigation Plan to reduce and/or eliminate the effects of hazards through well-organized public education and awareness efforts, preparedness, and mitigation.

Los Angeles County Operational Area Emergency Response Plan

The Los Angeles County Operational Area Emergency Response Plan establishes the County's coordinated emergency management system, which includes prevention, protection, response, recovery, and mitigation within the operational area. When a county proclaims a local emergency pursuant to Section 8630 of the Government Code, based upon conditions that include both incorporated and unincorporated territory of the county, it is not necessary for the cities to also proclaim the existence of a local emergency independently. Further, cities within a county are bound by county rules and regulations adopted by the county under Section 8634 of the Government Code during a county-proclaimed local emergency when the local emergency includes both incorporated and unincorporated territory of the county, even if the cities do not independently proclaim the existence of a local emergency. The plan describes:

- Emergency organization.
- Authorities and responsibilities of the emergency organization.
- Mutual aid process during emergencies to ensure effective coordination of needed resources.

LOCAL

Irwindale Municipal Code

The City of Irwindale Municipal Code addresses hazards and hazardous materials in the following chapters:

- Chapter 8.20: Solid Waste Collection and Salvage of Recyclable Materials
- Chapter 8.28: Storm Water and Urban Runoff Pollution
- Chapter 17.11, Section 17.11.110: Water Quality
- Chapter 17.11, Section 17.11.170: Hazardous Materials
- Chapter 17.21, Section 17.21.070: Hazardous and Extremely Hazardous Materials

Airports

Airport authorities and other agencies regulate aircraft activity. The State Aeronautics Act of the California Public Utilities Code establishes statewide requirements for airport land use compatibility planning. It requires nearly every county to create an Airport Land Use Commission (ALUC) or an alternative. Los Angeles County opted for an ALUC. There are 15

airports under LA County ALUC's jurisdiction. Five are county owned; other public entities own nine; and one is privately owned. The airport land use compatibility plan is primarily concerned with land uses near Los Angeles International Airport, Long Beach Municipal Airport, Bob Hope Airport, and Torrance Airport. The project site is not in an airport influence area or protection zone.

3.8.2 Existing Conditions

As part of the Phase I Environmental Site Assessment (ESA) (see Appendix K), Anacapa Geoservices assessed the conditions on the entire 150.1-acre project site and surrounding properties by reviewing historical aerial photographs and topographic maps; reviewing regulatory records and previous environmental reports; and conducting a field reconnaissance. The historical and existing conditions at the project site as described in the project-specific Phase I ESA are summarized in this section.

HISTORICAL USES OF THE PROJECT SITE

The Phase I ESA reviewed historical sources to evaluate past land uses at the project site, including historical aerial photographs, U.S. Geological Survey topographic maps, and available directory information. Review of aerial photographs dating from 1928 through 2020 indicates that the Specific Plan area and surrounding vicinity were historically part of the San Gabriel River floodplain and were largely undeveloped in the early aerials. From approximately 1928 through the mid-1940s, the project site consisted of vacant land with gravel and sand quarrying and associated railroad spurs. In the early 1950s, quarrying activity appeared limited to the northwestern portion of the property. By the late 1970s, quarry operations and associated infrastructure were no longer present, and the Specific Plan area remained mostly vacant, with open storage areas observed in portions of the site. By 1979, site use had transitioned to include a large parking area, buildings, and open storage on exposed soil in the southwestern part of the project site. From the early 1980s through 2020, the Specific Plan area remained developed with truck parking, railroad spurs, and associated support buildings, and a solar facility was added in the southeastern part of the site in the mid-2010s. The review of historical records from 1928 to 2020 did not identify past uses that would be indicative of the presence or likely presence of hazardous substances or petroleum products at levels constituting recognized environmental conditions.

REGULATORY RECORDS REVIEW

Anacapa obtained and reviewed a regulatory agency database report provided by Environmental Data Resources (EDR) regarding reported releases of hazardous substances and petroleum products on or near the project site. The project site was not listed on any of the regulatory databases searched by EDR. One regulatory agency database listing (National Priority List) was identified within the minimum search distance of one mile used in the Phase I ESA

pursuant to American Society for Testing and Materials (ASTM) Practice E1527-13. The National Priority List listing was at a property approximately 660 feet east of the project site that is associated with the San Gabriel Valley (Area 2) Superfund site, which has volatile organic compound (VOC) known contamination in groundwater. Area 2 of the San Gabriel Valley Superfund Site, also known as the Baldwin Park Operable Unit, is being assessed and remediated under oversight by the federal government, and the project site is not included as a responsible party (see Appendix K). None of the sites listed in the federal and state agency databases are considered to represent a likely past, present, or material threat of release on the project site.

Anacapa contacted the City of Irwindale, the County of Los Angeles, and the Los Angeles RWQCB for records pertaining to the project site. None of these agencies indicated any environmental concerns.

AIRPORT HAZARDS

No airports are located in Irwindale (Irwindale 2020). The nearest airport is the El Monte Municipal Airport, 5.35 miles southwest of the project site.

WILDLAND FIRE HAZARDS

The Specific Plan area is in an area zoned M-2 (Heavy Industrial) in the City of Irwindale and bordered by the Santa Fe Dam Recreation Area to the west. The Fire Hazard Severity Zones (FHSZ) map compiled by CAL FIRE in 2011 showed the northern portion of the city designated as a very high FHSZ in a local responsibility area (LRA), and part of the Specific Plan area was within this boundary. However, on March 24, 2025, CAL FIRE and the Office of the State Fire Marshal issued the 2025 LRA FHSZ maps for Los Angeles County. The westernmost part of the Specific Plan area was previously designated as a very high FHSZ, but this area has been reduced to a moderate FHSZ. No other portions of the project site are in an FHSZ.

3.8.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, “Environmental Checklist Form,” of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to hazards and hazardous materials if it 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 that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would 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.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

3.8.4 Applicable Specific Plan Development Standards and Design Guidelines

DEVELOPMENT STANDARDS

There are no development standards in the Specific Plan that specifically regulate hazardous materials use, storage, transport, or disposal. However, development in the Specific Plan area is required to comply with applicable federal, state, and local regulations governing hazardous materials, including requirements related to fire protection, emergency access, and building and safety standards. The Specific Plan includes sitewide development standards related to emergency vehicle access, fire lane widths, and infrastructure design that support hazard avoidance and emergency response but do not establish project-specific hazardous materials standards.

DESIGN GUIDELINES

There are no Specific Plan design guidelines that specifically address hazardous materials. The Design Guidelines focus on architectural design, site layout, lighting, equipment screening, and safety-through-design principles, which may indirectly support public safety and emergency

response but do not regulate hazardous materials handling or impose hazard-specific design requirements.

3.8.5 Project Impact Analysis

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

CONSTRUCTION

Removal of Existing Hazardous Materials

The Phase I ESA identified a hazardous materials storage area on the project site that was observed to be secured and well maintained. Materials observed included labeled 55-gallon drums and discarded fluorescent lamps. No evidence of spills or leaks was observed. In accordance with existing regulatory requirements, these materials would be removed and disposed of at appropriate permitted facilities prior to or during construction, and the storage area would be inspected for evidence of staining or discolored soil. Following removal and proper disposal, routine site conditions would not pose a hazard related to hazardous materials.

Quarry Filling and Grading

As part of site preparation and construction, the proposed project would include implementation of an Inert Debris Engineered Fill Operation to fill and grade two on-site quarries. Inert debris consisting of clean dirt, concrete, and brick would be placed into the quarries to raise them to natural grade, on which the Specific Plan can be developed. A draft Operations Plan has been prepared (see Appendix C). The northwestern quarry encompasses approximately 52 acres at the surface and would require approximately 6 million cubic yards of fill material to reach finished grade. The southeastern quarry encompasses approximately 25 acres at the surface and would require approximately 2 million cubic yards of fill. The maximum depths of the northwestern and southeastern quarry pits are approximately 270 feet and 140 feet, respectively.

Fill operations would involve the controlled import, placement, and redistribution of non-hazardous inert debris suitable for fill and grading purposes. As shown in Figure 2-17, *Overall Rough Grade Phase 1*, and Figure 2-18, *Overall Rough Grade Phase 2*, fill material would be moved from the northwestern quarry to the southeastern quarry during Phase 1, and the northwestern quarry would be filled during Phase 2. An outline of the Draft Operations Plan is described below.

Draft Operations Plan

Operation

Waste Processing

- Incoming materials would be limited to approved inert debris types consistent with the Inert Debris Engineered Fill Operation and facility permit conditions.
- Waste-processing activities would be confined to designated operational areas shown on the approved site plan.
- Materials would be processed using approved equipment and methods designed to minimize the potential for release of hazardous substances.

Load Checking

- All incoming loads would be subject to visual inspection by trained personnel prior to acceptance.
- Loads identified as containing unauthorized or potentially hazardous materials would be rejected and removed from the site in accordance with facility procedures.
- Records of rejected loads would be maintained and made available to the City of Irwindale and the Los Angeles County Department of Public Health upon request.

Hazardous Materials Screening

- Incoming materials would be inspected for evidence of hazardous waste, including liquids, staining, odors, or containers.
- Any suspected hazardous materials would trigger immediate isolation of the load and notification of appropriate supervisory staff.

Employee Training

- Facility personnel would receive training related to hazardous materials identification, spill prevention, spill response, and emergency procedures.
- Training records would be maintained on-site and available for regulatory review.

On-Site Storage

- Fuels, lubricants, and maintenance materials would be temporarily stored in designated, secure areas with secondary containment, consistent with applicable regulations.

Environmental Controls

Accidental Spills

- The facility would implement spill prevention and response procedures to address accidental releases of fuel, oil, or other hazardous substances.
- Spill response equipment would be maintained on-site and readily accessible.
- Any spills would be contained, cleaned, and documented in accordance with regulatory requirements, and reported to appropriate agencies as required.

Stormwater and Drainage Controls

- Site drainage features would be designed to prevent contaminated runoff from leaving the site.
- Operational controls would be implemented to minimize contact between stormwater and operational areas.

Fire Prevention

- Fire prevention measures would include equipment maintenance, operational controls, and compliance with LACFD requirements.

Sequence of Development

- Site development phases would be consistent with approved grading and operational plans, which will be in substantial conformance with the Draft IDEFO plan included as Appendix C of this Draft EIR.
- Rough grading plans would establish final site elevations to support proper drainage, stability, and environmental protection.

Geology and Groundwater

Groundwater Protection

- Operations would be conducted in a manner designed to prevent infiltration of contaminants into underlying soils and groundwater.
- Drainage and leachate control measures would be implemented consistent with the governing water quality control plan.

Groundwater Monitoring

- Groundwater monitoring would be conducted as required under applicable permits.
- Monitoring results would be documented and submitted to the RWQCB, as required.

Operating Records

- Operating records would be maintained to document load inspections, rejected materials, spill incidents, monitoring results, and employee training.
- Records would be made available to the City, the Los Angeles County Department of Public Health, and the RWQCB, as applicable.

Compliance with the Inert Debris Engineered Fill Operation and other regulatory protocols would ensure that construction activities related to routine transport, use, or disposal of hazardous materials for the quarry fill operation would not create a significant hazard to the public or the environment. These impacts during construction, therefore, would be **less than significant**.

Building Construction and Site Infrastructure

Following site preparation and grading, implementation of the proposed project would include the construction of the industrial/business park and commercial development. Vertical construction activities would involve the routine transport, use, and disposal of hazardous materials commonly associated with building construction, including fuels, oils, lubricants, paints, coatings, adhesives, solvents, cleaning agents, welding materials, and similar construction-related products. These materials would be used in quantities typical of commercial and industrial construction activities and would be subject to applicable federal, state, and local regulations governing storage, handling, transportation, and disposal, including Cal/OSHA requirements, hazardous materials transportation regulations, and applicable fire and building code requirements. Compliance with these regulatory requirements would minimize the potential for routine hazardous materials use to create a significant hazard to construction workers, adjacent uses, or the general public. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be **less than significant**.

OPERATION

Long-term operation of the proposed industrial/business park and commercial uses would involve routine use, storage, transport, and disposal of hazardous materials typical of industrial and commercial facilities. Such activities would be regulated under applicable federal and state programs, including the RCRA, Hazardous Materials Transportation Act, California Code of Regulations Title 22 and Title 27, and applicable fire and building codes.

Future tenants would be required to comply with Hazardous Materials Business Plan requirements administered by the LACFD Health Hazardous Materials Division, the designated CUPA for Irwindale. Compliance with these requirements ensures safe handling, storage, and disposal of hazardous materials during routine operations.

Accordingly, impacts related to routine hazardous materials activities during long-term operation would be **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

CONSTRUCTION

As detailed under Impact threshold (a), compliance with regulatory requirements in addition to the Operations Plan (IDEFO) would ensure that potential hazards related to upset and accident conditions involving the release of hazardous materials during construction would be **less than significant.**

OPERATION

During long-term operation, upset or accident conditions could involve accidental releases of hazardous materials. Such accidental releases would be governed by existing regulations of several agencies. Regulations for uses that involve transporting, using, or disposing of hazardous materials include the RCRA, which provides “cradle to grave” regulation of hazardous wastes; the Comprehensive Environmental Response, Compensation, and Liability Act, which regulates closed and abandoned hazardous waste sites; the Hazardous Materials Transportation Act, which governs hazardous materials transportation on U.S. roadways; International Fire Code, which creates procedures and mechanisms to ensure the safe handling and storage of hazardous materials; CCR Title 22, which regulates the generation, transportation, treatment, storage and disposal of hazardous waste; and CCR Title 27, which governs the treatment, storage and disposal of solid wastes. California Government Code Section 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued to a business unless there is verification that the owner or authorized agent has met or is meeting the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Sections 25500 through 25520.

LACFD is the CUPA for the City and is responsible for enforcing Hazardous Materials Release Response Plans and Inventory (Chapter 6.95 of the Health and Safety Code). The CUPA is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. A hazardous materials business plan must contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of on development sites. The plan also contains an emergency response plan that describes the procedures for mitigating a hazardous release; procedures and equipment for minimizing the potential damage

of a hazardous materials release; and provisions for immediate notification of the CUPA and other emergency response personnel, such as the local fire agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, reducing potential adverse impacts. Furthermore, the CUPA must conduct ongoing routine inspections to ensure compliance with existing laws and regulations, identify safety hazards that could cause or contribute to an accidental spill or release, and suggest preventive measures to minimize the risk of a spill or release of hazardous substances.

Therefore, with regulatory compliance, hazards to the public or the environment arising from the routine transport, use, or disposal of hazardous materials, or reasonably foreseeable upset and accident conditions during project operation would not occur, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school?

The project site is not within one-quarter mile (1,320 feet) of an existing or proposed school. The nearest existing school is Duarte Preschool, approximately 2,992 feet northwest of the Specific Plan Area. The General Plan land use designations and zoning designate the surrounding areas as M-2 (Heavy Industrial), OS (Open Space), and RII (Reliance II Specific Plan). The M-2 (Heavy Industrial) zone allows colleges and trade schools by right, but the remaining designations would not accommodate school uses. There is potential for Duarte Preschool to be on the project's anticipated haul routes or designated truck routes that could be used for the transport of hazardous materials.

As discussed in Section 3.2, *Air Quality*, a health risk assessment (HRA) was prepared to evaluate potential exposure of nearby sensitive receptors, including schools, to toxic air contaminants associated with construction and operation of the proposed project. The Duarte Preschool was identified as the maximally exposed individual school child receptor. The HRA determined that the maximum incremental cancer risk attributable to project construction and operation at the preschool would be 0.20 in one million, which is below the South Coast AQMD significance threshold of 10 in one million. In addition, the maximum non-cancer hazard index was calculated to be less than or equal to 0.01, which is below the applicable significance threshold of 1.0.

The proposed project would involve the use, storage, and transport of hazardous materials typical of industrial and commercial development and would be required to comply with all applicable federal, State, and local regulations governing hazardous materials management. Based on the results of the HRA and compliance with applicable regulatory requirements,

operation of the proposed project would not expose students or staff at the Duarte Preschool to substantial hazardous emissions or hazardous materials risks. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

A review of online hazardous waste and substances site lists compiled and maintained by the State of California pursuant to Government Code Section 65962.5 determined that the project site is not found on any of these lists (DTSC 2025; SWRCB 2025). Therefore, there would be **no impact.**

Significance without Mitigation: No impact.

e) For a project 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?

There are no airports in the city of Irwindale The nearest airport is El Monte Airport, 5.35 miles southwest of the project site. The project site is not in an airport land use plan or within two miles of a public airport or public use airport. Therefore, there would be **no impact** on safety hazards or excessive noise for people residing or working in the project area.

Significance without Mitigation: No impact.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The proposed project would not conflict with adopted emergency response or evacuation plans. Los Angeles County adopted an All-Hazards Mitigation Plan in May 2020 that identifies the county's primary hazards; assesses risks to residents, buildings, and critical facilities; and establishes mitigation strategies to reduce exposure and support coordinated recovery. In addition, Los Angeles County updated its General Plan Safety Element in 2025 to identify evacuation routes throughout the county (LA County 2025, Figure 12.9, Evacuation Routes Map). The project site is in the City of Irwindale, which maintains jurisdiction over the local roadway network serving the project site, and no County-designated evacuation routes are located within or in the immediate vicinity of the project site. Both plans do not identify specific

evacuation routes in Irwindale; however, established City and County procedures guide emergency response and evacuation activities. Implementation of the proposed project would not impair or interfere with these procedures (Los Angeles County 2025a, 2025b).

CONSTRUCTION

Construction activities would primarily be within the boundaries of the project site; however, limited and temporary encroachments into adjacent public rights-of-way could occur at project site driveways along First Street and at the intersection of First Street and Irwindale Avenue in conjunction with utility connections and roadway improvements. Travel lanes would be maintained in each direction on surrounding roadways throughout the construction period, and emergency access would not be impeded.

To account for real-world conditions existing at the time project construction commences, a final construction staging and traffic management plan, as described in Section 3.14, *Transportation*, and in the Transportation Impact Study (see Appendix P) and meeting the minimum requirements identified below, would be prepared for the project and submitted to the City for review and approval prior to the start of construction. The plan would include information regarding temporary lane closures, detour routes (if required), haul routes, and construction staging areas. Construction activities would comply with applicable City requirements, Irwindale Municipal Code provisions, and notification procedures to ensure continued access for emergency responders. Construction would not block or restrict access to adjacent properties or interfere with emergency vehicle circulation.

Accordingly, with adherence to applicable regulations and implementation of the construction staging and traffic management plan, construction of the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Construction-related impacts would be **less than significant**.

OPERATION

The City of Irwindale is in the process of updating its hazard mitigation plan to reduce losses resulting from seismic hazards, flooding, hazardous materials, and other emergency conditions (Mitigate Hazards 2025). The proposed project would comply with these adopted plans during operation. The project site would be served by multiple access points, including First Street and Irwindale Avenue, providing adequate ingress and egress for emergency vehicles.

As part of the City's discretionary review process, future project development would be reviewed in accordance with the Irwindale Municipal Code to ensure that adequate emergency ingress and egress are maintained (Section 16.03.020). Therefore, operation of the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The project site is zoned M-2 (Heavy Industrial) and is bordered by O-S (Open Space) zoning to the west and the Santa Fe Dam Recreation Area, which contains open space and vegetated areas that could serve as a potential wildland fire source. However, according to the 2025 LRA FHSZ maps for Los Angeles County, the westernmost portion of the project site is classified as a moderate FHSZ (CAL FIRE 2025). The project site is not in a state responsibility area, and the nearest very high FHSZ is 1.4 miles north of the project site, on the opposite side of the Foothill Freeway.

Given the project site's adjacency the Santa Fe Dam Recreation Area, the proposed project could be indirectly exposed to wildfire hazards originating from nearby vegetated areas, even where the project site itself is not currently mapped as a very high FHSZ. An evaluation of wildfire hazards affecting the project site, including mapping context, surrounding fuel/vegetation conditions, and applicable fire safety requirements, is provided in Chapter 5, *Other CEQA Considerations*. As discussed in Chapter 5, compliance with applicable state and local fire safety regulations and LACFD requirements would reduce wildfire-related risk to people and structures to a level considered acceptable by the LACFD and other applicable fire-protection and regulatory agencies charged with enforcing fire and life-safety standards. Therefore, impacts related to wildland fire would be **less than significant**.

Significance without Mitigation: Less than significant.

3.8.6 Cumulative Impact Analysis

Would the project have a cumulative effect related to hazards and hazardous materials?

The assessment of potential cumulative impacts related to hazards and hazardous materials considers whether on-site or off-site hazardous materials conditions, combined with other past, present, or reasonably foreseeable future projects in the vicinity, could result in a cumulatively significant effect on the public or the environment. No project-level significant impacts related to hazards or hazardous materials were identified. As identified in Table 3-2, *Cumulative Projects Within Two Miles of the Proposed Project Site*, cumulative development in the project vicinity includes industrial, warehouse, commercial, mixed-use, and residential projects in Irwindale and surrounding jurisdictions, including the approved industrial development at 14005 Live Oak Avenue and the industrial development proposed at 4500 Azusa Canyon Road. These types of projects may involve the routine transport, storage, or use of hazardous materials during construction and operation, similar to the proposed project. Similar to other

past and present development projects in the City, future cumulative projects would be subject to applicable federal, state, and local regulations governing the handling, storage, transport, and disposal of hazardous materials during both construction and operation. Compliance with these regulatory requirements is enforced on a project-by-project basis through permitting, plan review, and inspection processes, which ensures that hazardous materials risks are adequately addressed and prevents the accumulation of hazardous conditions across multiple sites.

The project site and all associated truck and haul routes are not within one-quarter mile of an existing or proposed school, and the proposed project would not involve the routine use, storage, or disposal of large quantities of hazardous or acutely hazardous materials. Therefore, the adoption and buildout of the Specific Plan would not contribute to a cumulative impact related to hazardous materials exposure near schools.

The project site is not in an airport land use plan or within two miles of a public airport or private airstrip. As a result, adoption and buildout of the Specific Plan would not contribute to cumulative impacts related to airport safety hazards.

The project site area is not in a very high FHSV. The proposed project would be required to comply with applicable local and state fire safety regulations, including building and fire code requirements, which would reduce the potential for fire-related hazards.

The proposed project, along with other cumulative projects in the area, would be subject to applicable federal, state, and local regulations governing hazardous materials handling, storage, transport, and disposal. Compliance with these regulatory requirements ensures that hazardous materials risks are addressed on a project-by-project basis and prevents the accumulation of hazardous conditions across multiple sites. Therefore, the proposed project would not make a cumulatively considerable contribution to cumulative impacts related to hazards or hazardous materials, and cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.8.7 References

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3.9 HYDROLOGY AND WATER QUALITY

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts of the proposed Irwindale Brew Yard Specific Plan to hydrology and water quality conditions in the City of Irwindale. Hydrology deals with the distribution and circulation of water, both on land and underground. Water quality deals with the quality of surface- and groundwater. Surface water includes lakes, rivers, streams, and creeks; groundwater is under the earth's surface. The analysis in this section is based in part on the following technical reports:

- *Geotechnical Report for Environmental Impact Report*, HD Geosolutions Inc., January 14, 2026.
- *Preliminary Hydrology and Low Impact Development (LID) Plan*, Kimley Horn, March 13, 2026.
- *Water Supply Assessment*, Stetson Engineers, November, 2023.
- *Biological Technical Report*, Helix Environmental Planning, March, 2026.
- *Irwindale Brew Yard Project Section 404 Due Diligence*, Ruth Villalobos & Associates, August 5, 2025.
- *Draft Operations Plan: Brew Yard Inert Debris Engineered Fill Operation*, Heavy Iron Contracting, December 1, 2025.
- *IDEFO: Dewatering During and Post Pit Activities*, Kimley Horn, May 12, 2026.

Complete copies of these studies are included in the Technical Appendices to this Draft EIR as Appendices I, L1, L2, F, L3, C and L4, respectively.

The County of Los Angeles Department of Public Works raised comments related to hydrology and water quality during the NOP comment period (March 6, 2024, through April 5, 2024) in a letter dated March 21, 2024 (see Appendix A). The letter requests that the EIR discuss the region's need for groundwater recharge and whether the Specific Plan would result in an annual increase in flood hazards. These issues are discussed in Section 3.9.5, *Project Impact Analysis,* (b) (c) and (d), respectively. The County of Los Angeles Department of Public Works' offer to fill one of the two on-site pits with sediment in exchange for the other pit is discussed in Chapter 4, *Alternatives*. No comments related to Hydrology and Water Quality were received during the scoping meeting held on February 23, 2024.

3.9.1 Regulatory Framework

Federal, state, and local laws, regulations, plans, or guidelines related to hydrology and water quality that are applicable to the Specific Plan are summarized below.

FEDERAL

Clean Water Act

The United States Environmental Protection Agency (EPA) is the lead federal agency responsible for water quality management. The Clean Water Act of 1972 (CWA) (codified at 33 US Code Sections 1251 to 1376) is the primary federal law that governs and authorizes water quality control activities by the EPA and the states. Various elements of the CWA that address water quality are discussed below.

Permits to dredge or fill waters of the United States are administered by the United States Army Corps of Engineers (USACE) under Section 404 of the CWA. “Waters of the United States” are defined as territorial seas and traditional navigable waters, perennial and intermittent tributaries to those waters, lakes and ponds and impoundments of jurisdictional waters, and wetlands adjacent to jurisdictional waters. The regulatory branch of the USACE is responsible for implementing and enforcing Section 404 of the CWA and issuing permits. Any activity that discharges fill material and/or requires excavation in waters of the United States must obtain a Section 404 permit. Before issuing the permit, the USACE requires that an analysis be conducted to demonstrate that the proposed project is the least environmentally damaging practicable alternative. Also, the USACE is required to comply with the National Environmental Policy Act before it can issue an individual Section 404 permit.

Under Section 401 of the CWA, every applicant for a Section 404 permit that may result in discharge to a water body must first obtain State water quality certification that the proposed activity will comply with State water quality standards. Certifications are issued in conjunction with USACE Section 404 permits for dredge and fill discharges. In addition, an application for Individual Water Quality Certification and/or Waste Discharge Requirements must be submitted for any activity that would result in the placement of dredged or fill material in waters of the State that are not jurisdictional to the USACE, such as isolated wetlands, to ensure that the proposed activity complies with State water quality standards. In California, the authority to either grant water quality certification or waive the requirement is delegated by the State Water Resources Control Board (SWRCB) to the nine Regional Water Quality Control Boards (RWQCB).

The EPA has published water quality regulations under Volume 40 of the Code of Federal Regulations. Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. As defined by the CWA, water quality standards consist of two elements: (1) designated beneficial uses of the water body in question and (2) criteria that protect the designated uses. Section 304(a) requires the EPA to publish advisory water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use.

When water quality does not meet CWA standards and compromises designated beneficial uses of a receiving water body, Section 303(d) of the CWA requires that the water body be identified and listed as "impaired." Once a water body has been designated as impaired, a total maximum daily load (TMDL) must be developed for the impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards, with a factor of safety included. Once established, the TMDL allocates the loads among current and future pollutant sources to the water body.

Fish and Wildlife Coordination Act

The Fish and Wildlife Coordination Act provides the basic authority for the United States Fish and Wildlife Service to evaluate impacts to fish and wildlife from proposed water resource development projects. This act requires that all federal agencies consult with the US Fish and Wildlife Service, the National Marine Fisheries Service, and State wildlife agencies (e.g., the California Department of Fish and Wildlife) for activities that affect, control, or modify waters of any stream or bodies of water. Under this act, the US Fish and Wildlife Service has responsibility for reviewing and commenting on all water resources projects. For example, it would provide consultation to the USACE prior to issuance of a Section 404 permit.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program was established by the CWA to regulate municipal and industrial discharges to surface waters of the United States, including discharges from municipal separate storm sewer systems (MS4). Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable concentrations and/or mass emissions of pollutants in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities.

Under the NPDES program, all facilities that discharge pollutants into waters of the United States are required to obtain an NPDES permit. Requirements for stormwater discharges are also regulated under this program. In California, the NPDES permit program is administered by SWRCB through the nine RWQCBs. The Specific Plan area lies within the jurisdiction of the Los Angeles RWQCB (Region 4) and therefore would be subject to the requirements of the Los Angeles County MS4 permit.

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program, which provides subsidized flood insurance to communities that comply with FEMA

regulations limiting development in flood plains. FEMA also issues Flood Insurance Rate Maps that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection established by FEMA is the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.

National Dam Safety Act of the Federal Emergency Management Authority

The National Dam Safety Act of 2006 authorized a program to reduce the risks to life and property from dam failure by establishing a safety and maintenance program. As the lead federal agency for the National Dam Safety Program, FEMA is responsible for coordinating efforts to secure the safety of dams throughout the United States. The National Dam Safety Program targets the improvement of dams and the safety of those who live in surrounding communities. Since it was first authorized by Congress in 1996, there have been marked improvements in the safety of many of the nation's dams. The program makes federal funds available to the states, which are primarily responsible for protecting the public from failures of nonfederal dams and pursuing initiatives that enhance the safety of dams posing the greatest risk to people and property.

STATE

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act (Water Code Sections 13000 et seq.) is the basic water quality control law for California. This act established the SWRCB and divided the state into the nine RWQCBs. The SWRCB is the primary State agency responsible for the protection of California's water quality and groundwater supplies. The RWQCBs carry out the regulation, protection, and administration of water quality in each region. Each regional board is required to adopt a water quality control plan or basin plan that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region's ground and surface water, and local water quality conditions and problems.

The Porter-Cologne Act also authorizes the SWRCB and RWQCBs to issue and enforce Waste Discharge Requirements (WDRs), NPDES permits, Section 401 water quality certifications, or other approvals. Other State agencies with jurisdiction over water quality regulation in California include the California Department of Health Services for drinking water regulations, the California Department of Fish and Wildlife, and the Office of Environmental Health and Hazard Assessment.

SWRCB General Industrial Permit

The Statewide General Permit for Stormwater Discharges Associated with Industrial Activities—Order No. 2014-0057-DWQ and amended by 2015-0122-DWQ (2018)—implements the

federally required stormwater regulations in California for stormwater associated with industrial activities that discharge to waters of the United States. This regulation covers facilities that are required by federal regulations or by the RWQCBs to obtain an NPDES permit. Dischargers are required to eliminate nonstorm water discharges, develop Stormwater Pollution Prevention Plans (SWPPP) that include best management practices (BMP), conduct monitoring of stormwater runoff, and submit all compliance documents via the SWRCB's Stormwater Multiple Application and Report Tracking System (SMARTS) program.

SWRCB Construction General Permit

The SWRCB adopted the revised Statewide Construction General Permit on September 8, 2022 (Order WQ 2022-0057-DWQ), which became effective on September 1, 2023. Under the terms of the permit, applicants must file permit registration documents (PRD) with the SWRCB prior to the start of construction. The PRDs include a Notice of Intent, risk assessment, site map, SWPPP, annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the SMARTS website.

Applicants must demonstrate conformance with applicable BMPs and prepare a SWPPP containing a site map that shows the construction site perimeter; existing and proposed buildings, lots, roadways, and stormwater collection and discharge points; general topography both before and after construction; and drainage patterns across the project site. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. Additionally, the SWPPP must contain a weekly visual monitoring program and BMP inspections prior to, during, and after qualifying precipitation events. Water quality monitoring is also required with a schedule based on the risk level of the site.

SWRCB Trash Amendments

On April 7, 2015, the SWRCB adopted an amendment to "Water Quality Control Plan for Ocean Waters of California" to control trash. In addition, "Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California" added "Part 1, Trash Provisions." Together, they are collectively referred to as the "Trash Amendments." The Trash Amendments provide statewide consistency for the RWQCBs in their regulatory approach to protect aquatic life and public health beneficial uses, reduce environmental issues associated with trash in State waters, and focus limited resources on high-trash-generating areas.

The Trash Amendments apply to all Phase I and II permittees under the NPDES municipal MS4 permits. Compliance with the Trash Amendments requires municipalities to install certified trash treatment control systems on all catch basins no later than December 2, 2030.

California Water Code Division 7, Section 13260

California Water Code, Division 7, Chapter 4, Article 4, Section 13260, Waste Discharge Requirements, requires any person discharging waste, or proposing to discharge waste, to file a Report of Waste Discharge (ROWD) with the appropriate RWQCB if the discharge could affect the state's waters and is not going into a community sewer system. This report is necessary to obtain Waste Discharge Requirements (WDR) or a waiver for the discharge.

California Code of Regulations Title 14, Division 7, Chapter 5, Article 3, Section 18100

California Code of Regulations (CCR) Title 14, Section 18100 sets specific operational and notification requirements for limited solid waste transfer operations. The requirements of this section mandate operator plans for inspections by the enforcement agency. This section of the CCR ensures that facilities handling waste or related materials have robust safety protocols, are closely monitored, and are coordinated with local emergency services to protect the community and environment.

California Code of Regulations Title 14, Division 7, Chapter 3, Article 5.95, Section 17388.3

CCR Title 14 Section 17388.3, Inert Debris Engineering Fill Operations, outlines the specific regulatory requirements for inert debris engineered fill operations (IDEFO) in California, including mandatory annual reporting of the total amount of inert debris deposited and adherence to operating criteria, handling, equipment, and control standards. Operators must also comply with specific regulations upon the completion or cessation of fill activities and adhere to all applicable RWQCB WDRs. Inert debris engineered fill operations also need to submit notifications to the enforcement agency, as set forth in CCR, Title 14, section 18100. The enforcement agency for the proposed project is the California Department of Resources, Recycling, and Recovery (CalRecycle).

California Code of Regulations Title 17, Division 2

CCR Title 17, Division 2, Chapter 4, Subchapter 3, Article 4, SWRCB–Development of Waste Discharge Requirements (WDR), details the requirements for WDRs associated with IDEFOs and issued and managed by the RWQCB. Any person discharging or proposing to discharge solid waste to land where water quality could be affected as a result of such discharge shall obtain a WDR from the RWQCB.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) passed in September 2014 and is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities. SGMA requires the formation of local groundwater

sustainability agencies to assess local water basin conditions and adopt locally based management plans. SGMA provides 20 years for groundwater sustainability agencies to implement plans, achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. SGMA also provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, under SGMA, groundwater sustainability agencies responsible for high- and medium-priority basins must adopt groundwater sustainability plans within five to seven years, depending on whether the basin is in critical overdraft.

Senate Bill 92

On June 27, 2017, Governor Brown signed Senate Bill (SB) 92 into law, which set forth new requirements focused on dam safety. As part of this legislation, dam owners must now submit inundation maps to the Department of Water Resources (DWR). After the maps are approved, the dam owner must submit an emergency action plan to Governor's Office of Emergency Services (Cal OES). The dam owner must submit updated plans and inundation maps every 10 years, or sooner under certain conditions. Cal OES will review and approve the emergency action plans. This legislation set forth additional provisions for the emergency action plans including compliance requirements, exercises of the plan, and coordination with local public safety agencies.

Emergency Services Act

The Emergency Services Act under California Government Code Section 8589.5(b) calls for public safety agencies whose jurisdiction contains populated areas below dams to adopt emergency procedures for the evacuation and control of these areas in the event of a partial or total failure of the dam. Cal OES is responsible for the coordination of overall State agency response to major disasters and for assisting local governments with their emergency preparedness, response, recovery, and hazard mitigation efforts. In addition, the Cal OES Dam Safety Program provides assistance and guidance to local jurisdictions on emergency planning for dam failure events and is also the designated repository of dam failure inundation maps.

Division of Safety of Dams

Since 1929, the State of California has supervised all nonfederal dams in California through the Dam Safety Program under the jurisdiction of the California Department of Safety of Dams (DSOD). The DSOD came into existence as a direct result of the failure of St. Francis Dam in Southern California in 1928, which resulted in the death of more than 450 people.

The DSOD engineers and engineering geologists review and approve plans and specifications for the design of dams and oversee their construction to ensure compliance with the approved

plans and specifications. Reviews include site geology, seismic setting, site investigations, construction material evaluation, dam stability, hydrology, hydraulics, and structural review of appurtenant structures. In addition, the DSOD engineers inspect over 1,200 dams on a yearly schedule to ensure they are performing and being maintained in a safe manner.

REGIONAL

Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties

The Los Angeles RWQCB's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan:

- Designates beneficial uses for surface and ground waters.
- Sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy.
- Describes implementation programs to protect all waters in the region.

In addition, the Basin Plan incorporates (by reference) all applicable SWRCB and RWQCB plans and policies and other pertinent water quality policies and regulations.

The Basin Plan is a resource for the RWQCB and others who use water and/or discharge wastewater in Region 4. Other agencies and organizations involved in environmental permitting and resource management activities also use the Basin Plan. Finally, the Basin Plan provides valuable information to the public about local water quality issues.

Los Angeles RWQCB (MS4) Permit for the Coastal Watershed of Los Angeles and Ventura Counties

On July 23, 2021, the Los Angeles RWQCB adopted a Regional Phase I Municipal Separate Stormwater Sewer System (MS4) Permit for discharges within the coastal watersheds of Los Angeles and Ventura counties (Order No. R4-2021-0105, NPDES No. CAS004004). The municipal discharges of stormwater and nonstorm water by the City are subject to waste discharge requirements in this MS4 permit.

Los Angeles County Low Impact Development Standards Manual

The County of Los Angeles prepared the 2013 Low Impact Development (LID) Standards Manual to comply with the requirements of the NPDES MS4 Permit. The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects with the intention of improving water quality and mitigating potential water quality impacts from stormwater and nonstorm water discharges.

Los Angeles County Hydrology Manual

The Los Angeles County Hydrology Manual establishes the Los Angeles County Department of Public Works' hydrologic design procedures and serves as a reference and training guide. The manual contains charts, graphs, and tables necessary to conduct a hydrologic study in the County of Los Angeles. The hydrologic techniques in the manual apply to the design of local storm drains, retention and detention basins, pump stations, and major channel projects. The techniques also apply to storm drain deficiency and flood hazard evaluations (LACDPW 2006).

Los Angeles RWQCB Order No. R4-2023-0429

The Los Angeles RWQCB Order No. R4-2023-0429, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, regulates the discharge of treated or untreated groundwater from construction, dewatering, and project-related activities into surface waters within coastal watersheds in Los Angeles and Ventura counties.

LOCAL

Irwindale General Plan

The City of Irwindale Public Safety Element establishes guidelines and policies pertaining to flooding, including:

- **Guiding Policy SAF8.3. New Development.** Require new development to incorporate low-impact designs and nature-based solutions to minimize stormwater impacts on drainage and flood control facilities and promote groundwater recharge, where feasible.

City of Irwindale Municipal Code

Chapter 8.28, Storm Water and Urban Runoff Pollution, of the Irwindale Municipal Code was adopted pursuant to the CWA to protect and improve water quality of receiving waters by:

- Reducing illicit discharges to the municipal storm water system to the maximum extent practicable.
- Eliminating illicit connections to the municipal storm water system.
- Eliminating spillage, dumping, and disposal of pollutant materials into the municipal storm water system.
- Reducing pollutant loads in stormwater and urban runoff.

City of Irwindale Guidelines for Above-Water Backfilling of Open-Pit Mines

The City adopted its Guidelines for Above-Water Backfilling of Open-Pit Mines on November 23, 2005, to provide technical standards for reclaiming mining pits to allow for future commercial

development. These guidelines focus on ensuring structural stability, proper compaction of fill, and protection of the underlying aquifer by managing fill material composition, placement, drainage, and long-term monitoring.

City of Irwindale Guidelines for Underwater Backfilling of Open-Pit Mines

The City adopted its Guidelines for Underwater Backfilling of Open-Pit Mines on May 20, 2005. These guidelines are often applied in conjunction with the City's Guidelines for Above-Water Backfilling of Open-Pit Mines and focus on reclaiming quarry pits using inert materials to prevent groundwater contamination in the Main San Gabriel Valley Basin. These regulations require certified fill, strict monitoring of water quality, and specific placement methods.

3.9.2 Existing Conditions

REGIONAL DRAINAGE

The Los Angeles RWQCB oversees all coastal watersheds and drainages flowing to the Pacific Ocean between Rincon Point (on the coast of western Ventura County) and the eastern Los Angeles County line. In addition, the Los Angeles RWQCB's jurisdiction includes all coastal waters within three miles of the continental and island coastlines.

The Los Angeles RWQCB regulates over 1,000 discharges of wastewater from a variety of industrial and municipal sources and oversees the vast network of municipal separate sewer systems serving the two counties and 99 cities. In general, the largely uncontrolled discharges of pollutants from municipal separate storm sewer systems and from nonpoint sources are believed to be the greatest threats to rivers and streams in the Los Angeles RWQCB's region. Recent advances in permitting municipal separate storm sewer system discharges and control of certain nonpoint sources are expected to remedy many of these threats.

LOCAL DRAINAGE

The Specific Plan area is in the Lower San Gabriel watershed. The San Gabriel River is one of seven (7) major watersheds partly or completely within Los Angeles County (CDFW 2025). Most of the river lies in southeastern Los Angeles County, but a portion of this watershed originates in northern Orange County. During dry weather conditions and periods of light rainfall, the lower portion of the San Gabriel River is hydrologically separated from the upper San Gabriel River at an area commonly known as the Whitter Narrows where the upper San Gabriel River flows through a narrow gap in the hills surrounding the San Gabriel Valley (GWMA 2025).

The Lower San Gabriel Watershed encompasses approximately 78.5 square miles within Los Angeles County and comprises 11.4 percent of the drainage area for the San Gabriel River

Watershed. There are approximately 150 stream miles in the watershed (Lower San Gabriel River Watershed Group 2015).

SITE HYDROLOGY

Under existing conditions, the two former quarries self-retain as sump sites[1] while the existing brewery (located outside of the project site) discharges stormwater into the southeast quarry basin. Historically and prior to mining activities, the industrial portion of the site generally surface-drained from the northeast to the southwest through three box culverts (measuring two feet by five feet each) that run underneath the railroad and eventually into the Santa Fe Dam basin. These box culverts were sized to accommodate the industrial portion of the project site and the existing brewery for a total area of 219.54 acres. The historical, pre-quarry condition peak flow for the 25-year storm event was calculated at approximately 319 cubic feet per second (cfs). Based on an on-site investigation of the box culverts, which included field measurements, it was determined that the box culverts have a capacity of 225 cfs (see Appendix L1).

The commercial portion of the project site, located in the southeast corner near Irwindale Avenue and W 1st Street, drains to the adjacent streets. The existing 25-year storm event peak flow for the proposed commercial portion of the project site is 12.73 cfs. The Specific Plan area generally slopes from north to south and east to west.

An existing culvert near the northwest corner of the site discharges runoff from the I-210 freeway and the property immediately north of the freeway into the project site. This runoff is conveyed from east to west near the north property line, where it is eventually discharged through a railroad culvert at the northwest corner of the property and into the Santa Fe Dam basin. The northwest corner of the Specific Plan area sheet flows to the west, bypassing off-site runoff coming from the north side, and discharges into the northwest culvert. From there it is directed into the Santa Fe Dam basin. A small, 6.2-acre section of the site, in the southeast corner adjacent to Irwindale Avenue and W 1st Street, currently discharges onto the nearby street. This area has been designated for future commercial development (see Figure 3.9-1, *Existing Site Hydrology*).

There are no known LID stormwater quality treatment devices on-site under existing conditions. The project site is 10 percent impervious and 90 percent pervious under existing condition.

1 A sump site is a low-lying pit, basin, or tank designed to collect, hold, and facilitate the removal of unwanted water, sewage, stormwater, or industrial liquids.

SURFACE WATER QUALITY

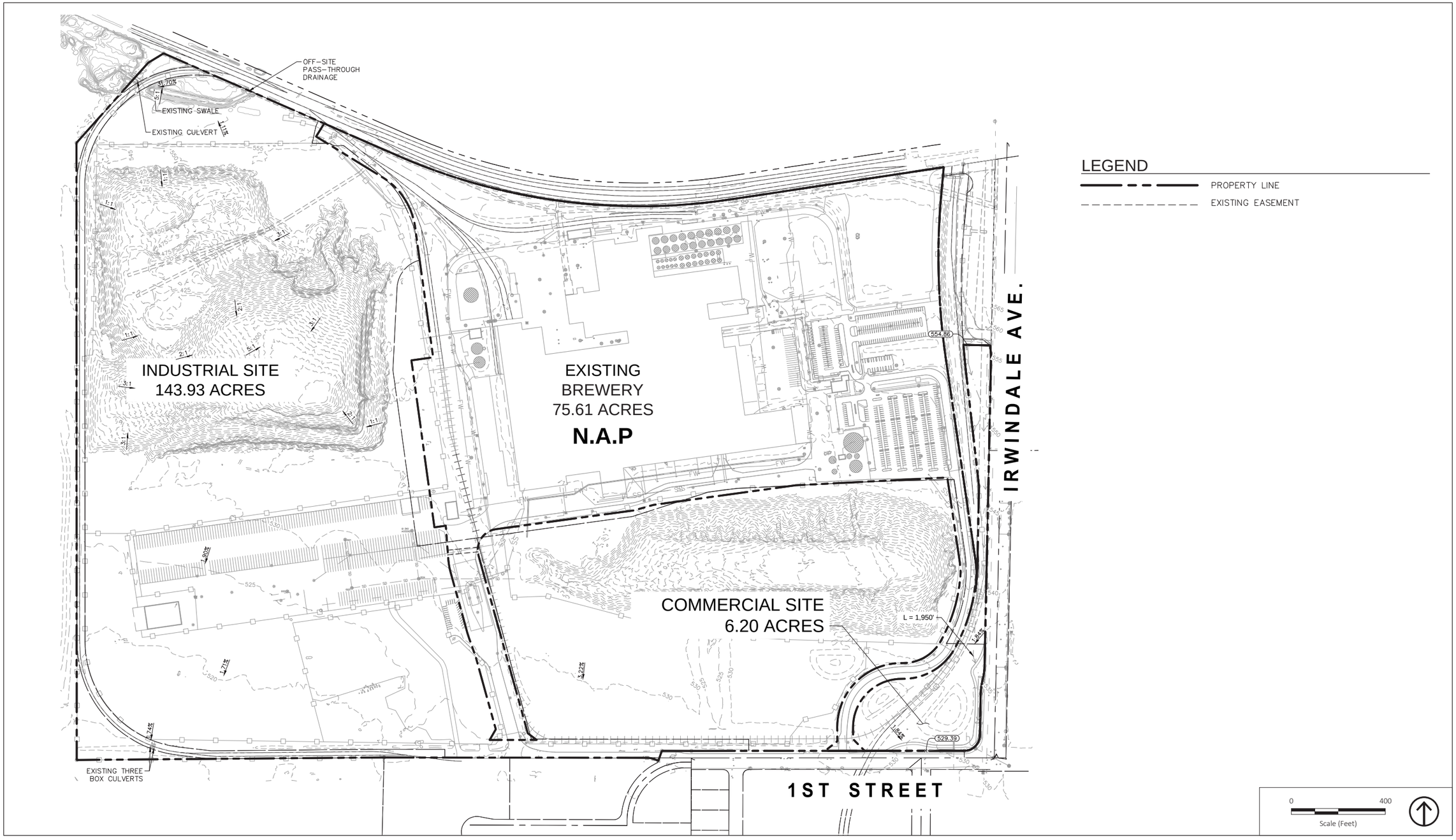
The Santa Fe Dam Basin discharges into the San Gabriel River, which then discharges into the San Gabriel River estuary and then the Pacific Ocean.

The San Gabriel River estuary and Reaches 1, 2 and 3 of the San Gabriel River are listed on the 2024 CWA Section 303(d) List of Water Quality Limited Segments. Reach 3 extends from Ramona Boulevard to Whittier Narrows dam, Reach 2 extends from the Whittier Narrows dam to Firestone, and Reach 1 extends from Firestone to the estuary. The San Gabriel River Estuary is listed for nickel and dissolved oxygen. Reach 1 is listed for pH, Reach 2 is listed for cyanide, and Reach 3 is listed for chlorine (SWRCQ 2024).

JURISDICTIONAL WATERS

The Specific Plan area supports three jurisdictional drainages, the first of which is along the northern boundary of the west pit. This drainage traverses the northern boundary after entering the project site via a culvert that passes beneath I-210 and exits the property via an existing culvert to the west. The second jurisdictional drainage is an ephemeral drainage feature in the bottom of the west pit that seasonally conveys runoff to the pit's lowest point. The third drainage feature is in the east pit. This feature supports nominal annual flows from an unknown source that outlets via pipe on the western end of the pit. This water passes through mining talus and rock to the lowest point on the eastern end, at which point it supports a small wetland (see Figure 3-3.2, *Jurisdictional Features and Impact Area*. The Specific Plan area supports approximately 0.36 acres of RWQCB waters of the State; it does not support USACE jurisdictional non-wetland waters of the US.

The Specific Plan area does not contain drainage features subject to RWQCB jurisdiction under Section 401 of the CWA; however, the drainage features in the Specific Plan area are subject to RWQCB jurisdiction under the Porter-Cologne Water Quality Act (see Appendixes F and L3).



Source: Kimley-Horn 2026.

Figure 3.9-1
Existing Site Hydrology

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GROUNDWATER

The Specific Plan area is in the Main San Gabriel Groundwater Basin, or Main Basin, which is a subbasin of the San Gabriel Valley Basin, which is in southeastern Los Angeles County and is bounded on the north by the San Gabriel Mountains, on the west by the San Rafael and Merced Hills, on the south by the Puente Hills and the San Jose Hills, and on the east by a low divide between the San Gabriel River system and the Upper Santa Ana River system. The Main Basin includes the water-bearing sediments underlying most of the San Gabriel Valley and a portion of the upper Santa Ana Valley that lies in Los Angeles County. The Main Basin is bounded on the north by the Raymond fault and the contact between Quaternary sediments and consolidated basement rocks of the San Gabriel Mountains. Exposed consolidated rocks of the Repetto, Merced, and Puente Hills bound the basin on the south and west, and the Chino fault and the San Jose fault form the eastern boundary.

The total freshwater storage capacity of the Main Basin is estimated to be 8.7 million acre-feet. Of that storage, about 1 million acre-feet are historically considered to have been actively managed for local public water supply. The court adjudication of the Main Basin in 1973 provided groundwater management that allows operation of basin storage to meet water demands and provides a mechanism to fund the purchase and replenishment of untreated imported water to supplement recharge of local water. DWR has not identified the Main Basin as a groundwater basin subject to critical overdraft.

Recharge of the basin is mainly from direct percolation of precipitation and percolation of stream flow. Stream flow is a combination of runoff from the surrounding mountains, imported water conveyed in the San Gabriel River channel to spreading grounds in the Central subbasin of the Coastal Plain of Los Angeles Groundwater Basin, and treated sewage effluent (DWR 2004).

Groundwater levels in the project site vicinity have been near historic low elevations in recent years. The DWR website depicts Well SF 1, just south of the site, with a reported water level at 283.73 feet below ground surface on January 31, 2024. The groundwater depths circa 2009 within about a mile of the site were reportedly around 260 feet. According to the Seismic Hazard Zone Reports for the Azusa and Baldwin Park 7.5-minute Quadrangles, the historic-high groundwater level is a depth that could have been exposed in the bottoms of both pits in the Specific Plan area (Appendix I).

FLOOD HAZARDS

Designated Flood Zones

According to mapping information available from FEMA, the Specific Plan area is not in a 100-year floodplain (FEMA 2008).

Seismically Induced Dam Inundation

One major dam is in Irwindale, the Santa Fe Dam and Reservoir. The Santa Fe Dam is directly west of the Specific Plan area. Built in 1949, the Santa Fe Dam is on the San Gabriel River about four miles downstream from the San Gabriel Canyon. The Santa Fe Dam and Reservoir are the primary flood control facilities in the city and both are components of the Los Angeles County Drainage Area flood control system. The dam area also includes approximately 835 acres that were granted to Los Angeles County for recreational use (Irwindale 2024).

The 2,300-acre dam and reservoir are owned by USACE and cover one-third of the City's total land area. The reservoir is bounded generally by Arrow Highway and the I-210 and I-605 freeways in the north-central portion of Irwindale. The dam was completed in 1948 and is an earthen fill structure with a 513-foot elevation, a crest width of 30 feet, and a crest length of 23,800 feet at the top. The reservoir area has both an east-west and north-south span of approximately two miles each. The Santa Fe Dam is designed to regulate the runoff from a drainage area of 236 square miles.

The reservoir area lies in a heavily urbanized area of both commercial and residential growth. For the protection of the nearby communities, during a flood event, releases of water from the reservoir may be increased to a maximum of 41,000 cubic feet per second (cfs). In the unlikely event of a dam failure, water would flow to the southwest (Irwindale 2008).

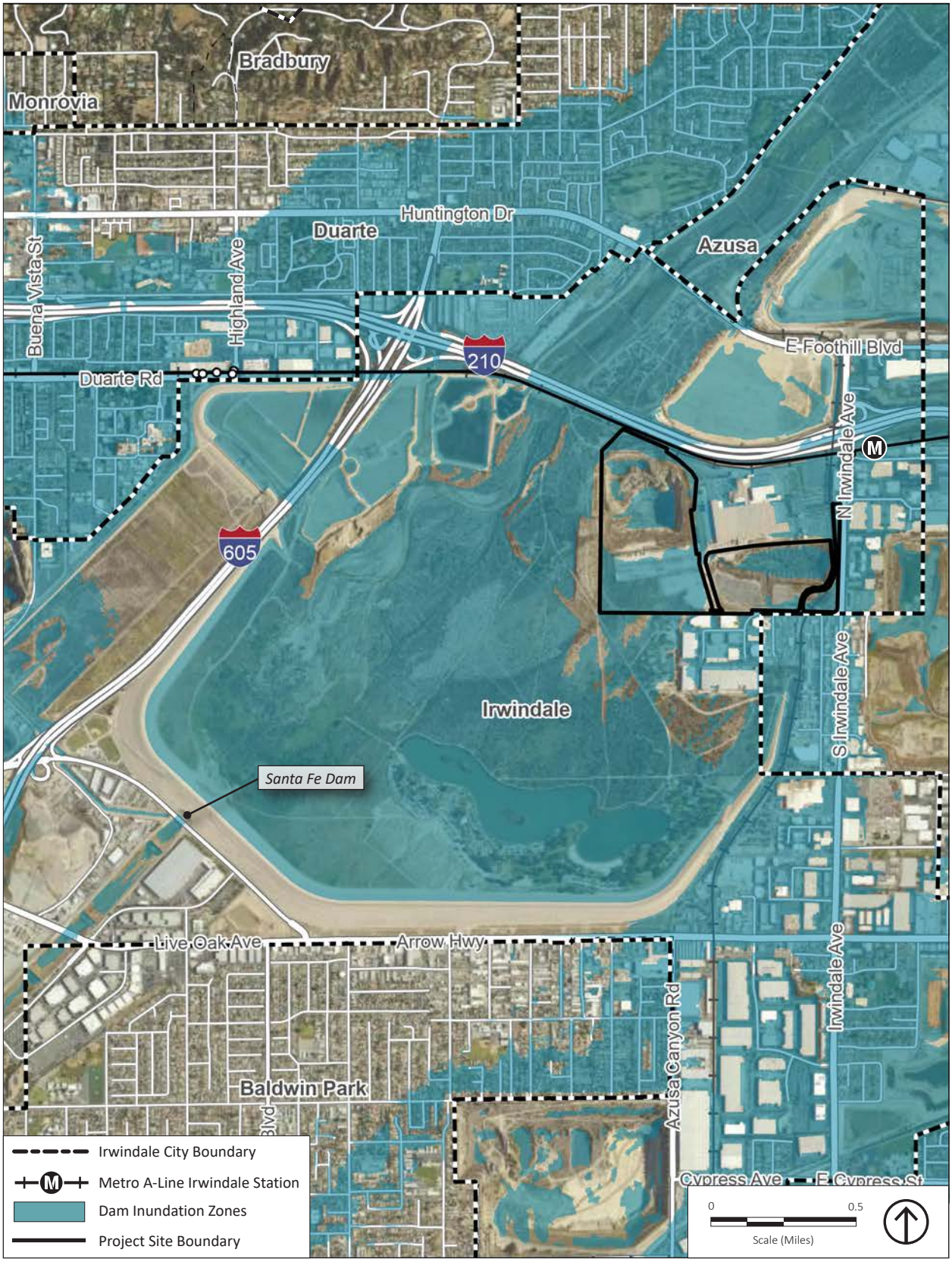
The expected inundation area in the event of dam failure is shown on Figure 3.9-2, *Dam Inundation Zones*. As shown on the figure, portions of the Specific Plan area are within the dam inundation zone of the Santa Fe Dam.

Seiches

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. The Specific Plan area lies adjacent to the Santa Fe Dam basin and could be subject to flooding due to a seiche resulting from an earthquake.

Tsunamis

A tsunami is an ocean wave caused by a sudden displacement of the ocean floor, most often due to earthquakes. The Specific Plan area is not at risk of flooding from tsunami because it is about 28 miles from the ocean (DOC 2022).



Source: Nearmap 2025.

Figure 3.9-2
Dam Inundation Zones

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3.9.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to hydrology if it would:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater 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.

iv) Impede or redirect flood flows.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.9.4 Applicable Specific Plan Development Standards and Design Guidelines

DEVELOPMENT STANDARDS

Chapter 2.4.3, *Grading and Drainage*, of the Specific Plan requires that the proposed development follow LID guidelines as described in the County of Los Angeles Department of

Public Works Low Impact Development Standards Manual (LID Manual). BMPs would be implemented to achieve LID Manual requirements (see Table 3.9-1, *Construction Best Management Practices*, for potential BMPs).

Table 3.9-1 Construction Best Management Practices

Category	Purpose	Examples
Erosion Controls	Protects the soil surface and prevents soil particles from being detached by rainfall, flowing water, or wind.	Scheduling, preserving existing conditions, mulch, soil binders, geotextiles, mats, hydroseeding, earth dikes, swales, velocity dissipating devices, slope drains, streambank stabilization, compost blankets, soil preparation/roughening, and non-vegetative stabilization.
Sediment Controls	Traps soil particles after they have been detached and moved by rain, flowing water, or wind.	Barriers such as silt fences, straw bales, sandbags, fiber rolls, and gravel bag berms; sediment basins; sediment traps; check dams; storm drain inlet protection; compost socks and berms; biofilter bags; manufactured linear sediment controls; and cleaning measures such as street sweeping and vacuuming.
Wind Erosion Controls	Minimizes dust nuisances.	Applying water or other dust palliatives to prevent or minimize dust nuisance, reducing soil-moving activities during high winds, and installing erosion control BMPs for temporary wind control.
Tracking Controls	Prevents or reduces the tracking of soil off-site by vehicles	Stabilized construction roadways and construction entrances/exits and entrance/outlet tire wash.
Non-storm Water Management Controls	Prevents pollution by limiting or reducing potential pollutants at their source or eliminating off-site discharge. Prohibits illicit connections or discharges.	Water conservation practices, BMPs specifying methods for: dewatering operations; temporary stream crossings; clear water diversions; pile driving operations; temporary batch plants; demolition adjacent to water; materials over water; potable water and irrigation; paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing.
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Proper material delivery and storage and material use, spill prevention and control, stockpile management, contaminated soil management, and management of solid, concrete, sanitary/septic, liquid, and hazardous wastes.

Source: CASQA 2019.

DESIGN GUIDELINES

There are no Specific Plan design guidelines pertaining to hydrology and water quality.

3.9.5 Project Impact Analysis

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

CONSTRUCTION

The Specific Plan area includes two former quarries in the northwestern and southeastern portions of the Specific Plan area. The northwestern quarry is approximately 52 acres at the surface grade and would require approximately six million cubic yards to fill. The southeastern quarry is approximately 25 acres at the surface grade and would require approximately two million cubic yards to fill. The maximum depths of the northwest and southeast quarry pits are approximately 270 feet and 140 feet, respectively.

The proposed project includes filling and rough grading both pits pursuant to the inert debris engineering fill operation (IDEFO) plan (see Appendix C). Phase I of rough grading would include moving approximately two million cubic yards of fill material from the northwestern quarry to fill the southeastern quarry. A temporary retention basin in the southwest portion of the project site in Phase I would capture runoff from the existing brewery north of the Specific Plan area (see Figure 2-21, *Overall Rough Grading Plan: Phase I*). Phase II of rough grading would include filling the northwestern quarry with approximately eight million cubic yards of imported fill material (see Figure 2-22, *Overall Rough Grading Plan: Phase II*). Phases I and II fill operations would cover 51 percent of the Specific Plan area. At completion of the IDEFO, the project site would consist of a flat pad suitable for the development as proposed: up to 3,000,000 square feet of industrial/ business park building space and 12,000 square feet of commercial building space, with associated circulation improvements, utility infrastructure, and landscaping (see Figure 2-7, *Site Plan: Planning Area 1*, and Figure 2-8, *Site Plan: Planning Area 2*).

Fill operations, clearing, grading, excavation, and construction activities associated with the proposed project have the potential to impact water quality through soil erosion, which could increase the amount of silt and debris carried in runoff. Additionally, the use of construction materials, such as fuels, solvents, and paints, present a risk to surface water quality. The refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

The SWRCB mandates that projects that disturb one or more acres of land must obtain coverage under the Statewide Construction General Permit (Order WQ 2022-0057-DWQ), which requires preparation and implementation of a SWPPP. A SWPPP incorporates BMPs to control contamination of runoff and prevent contaminants from reaching receiving water bodies. The Construction General Permit also requires the project developer to file permit registration documents with the SWRCB and provide proof of filing to the City before receiving a grading permit. The construction contractor must always keep a copy of the SWPPP at the site and implement all construction BMPs in the SWPPP. The SWPPP would cover both the fill operations and the development of the proposed buildings. Construction BMPs are listed and described in Table 3.9-1. The proposed project's SWPPP would include project-specific construction BMPs, similar to those listed in Table 3.9-1, that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources.

Fill operations would require waste discharge requirements from the Los Angeles RWQCB. These would regulate fills to ensure they do not contain hazardous waste or pollutants. The waste discharge requirements would be submitted to CalRecycle as part of the notification of intent to operate (as set forth in 14 CCR Section 18100). The Los Angeles RWQCB can enforce the waste discharge requirements through cease-and-desist orders or cleanup and abatement orders. The RWQCB would also ensure the proper closure and post-closure maintenance of the fill operations to protect long-term water quality.

The Fill Operations Plan would include a load checking program and waste acceptance plan through CalRecycle that details the requirements for testing and approving imported fill material, including logging imported loads into the RWQCB-required tracking system. Imported fill material would consist of clean dirt, brick, rock, fully cured asphaltic material, concrete, and other inert materials (e.g., glass). All fill materials would be in accordance with the requirements of the waste discharge requirements, the Fill Operations Plan, and the grading permit.

As loads of inert material and soil are brought on-site, they would be inspected for contaminated materials by an independent monitoring party, who would also perform random and unannounced inspections on behalf of the Los Angeles RWQCB, prepare quarterly progress reports, and conduct both scheduled and unannounced inspections on behalf of the City of Irwindale to ensure compliance with the Fill Operations Plan.

Groundwater would be monitored by an independent party during fill operations according to the waste discharge requirements and the proposed project's detection monitoring program. Quarterly reports would be submitted to the Los Angeles RWQCB.

The Fill Operations Plan would require personnel training that includes the detection and safe handling of suspect hazardous materials; housekeeping standards; and spill containment. A

draft Fill Operations Plan is included as Appendix C of this DEIR. The waste discharge requirements and final Fill Operations Plan would be approved by the City and the Los Angeles RWQCB before beginning any fill operations.

In addition, erosion control plans would be prepared as a Condition of Approval and implemented during construction, and the project developer would be required to comply with City grading permit regulations and inspections to reduce sedimentation and erosion. Project construction activities would also implement the requirements of Chapter 8.28, Storm Water and Urban Runoff Pollution, of the City's Municipal Code.

The Specific Plan area includes 0.36 acre of jurisdictional waters that would be impacted by the proposed construction activities. These waters are not subject to RWQCB jurisdiction under Section 401 of the CWA but are subject to the Porter-Cologne Water Quality Act (see Appendices F and L3). Before issuing a grading permit, the project developer is required to show proof of permits from the Los Angeles RWQCB. Regulatory permits would include waste discharge requirements for impacts to non-federal waters through preparation and submittal of a SWRCB Report of Waste Discharge. Best management practices to minimize and avoid impacts to RWQCB jurisdictional waters during and after construction shall be addressed as part of the nationwide permit, water quality certification, and waste discharge requirements. Minimization and avoidance measures may include, but are not limited to:

- Construction-related equipment would be stored in developed/disturbed areas, outside of the drainage. No equipment maintenance shall be done within or adjacent to the drainage.
- Source control and treatment control BMPs would be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs shall be implemented throughout the project to capture and treat potential contaminants.
- Substances harmful to aquatic life would not be discharged into the drainage. All hazardous substances would be properly handled and stored.
- To avoid attracting predators during construction, the project would be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site.
- Construction personnel would strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel.
- Exclusion fencing would be installed to demarcate the limits of disturbance. The exclusion fencing would be maintained until the completion of construction activities.

Therefore, through compliance with each of the above-listed regulatory requirements, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise degrade water quality during the construction phase and impacts would be **less than significant**.

OPERATIONS

Once the proposed project has been developed, urban runoff could include a variety of contaminants that could impact water quality. Runoff from buildings, streets, driveways, and parking lots typically contain oils, grease, fuel, antifreeze, and byproducts of combustion (such as lead, cadmium, nickel, and other metals) as well as fertilizers, herbicides, pesticides, and other pollutants. Precipitation at the beginning of the rainy season may result in an initial stormwater runoff (first flush) with high pollutant concentrations.

The proposed project is considered a "Designated Project" per the MS4 Permit since it disturbs more than one acre and adds more than 10,000 square feet of impervious surface area. Per the requirements of the MS4 Permit (Order No. R4-2021-0105, NPDES No. CAS004004), a Preliminary Hydrology and Low Impact Development (LID) Plan was prepared to demonstrate that the Stormwater Quality Design volume[2] (SWQDv) would be treated on-site (see Appendix L1).

Overall, the proposed drainage pattern would remain similar to the pre-quarrying historical condition. Under proposed conditions, runoff from the industrial portion of the project site would primarily sheet flow to catch basins with filter inserts and be conveyed through storm drains to on-site infiltration and detention BMPs. Overflows from the BMPs would be conveyed through pipes to a proposed headwall next to the existing culverts in the southwest corner of the Specific Plan area. From there, the runoff would flow to the existing box culverts into the Santa Fe Dam basin. For the commercial parcel, surface drainage would be directed away from the new building towards several low points across the site. The total runoff would be conveyed via underground storm pipes to the proposed underground basins. The flow from these two basins would be piped to bubbler catch basins and discharged to the adjacent street (see Figure 2-14, *Proposed Low Impact Development Drainage Plan*).

The Specific Plan area has been divided into five drainage management areas (DMA). Each DMA would be equipped with its own water quality and detention basin, which would capture and infiltrate the SWQDv while detaining peak flow rates for the 25-year design storm event, reducing the post-development peak flow to the pre-development flow rate.

2 The MS4 Permit requires designated projects to retain, on-site, the "stormwater quality design volume" from a "design storm event." The design storm event is determined using the 0.75-inch, 24-hour rain event or the 85th percentile 24-hour rain event, whichever is greater.

In addition to the Specific Plan area, the Preliminary Hydrology and Low Impact Development (LID) Plan includes the existing brewery adjacent to the Specific Plan area. Although the brewery site is not part of the proposed project, water quality and detention calculations for the brewery site were included in the Preliminary Hydrology and Low Impact Development (LID) Plan for the proposed project because the brewery site will continue to drain to the existing box culverts in the southwest corner of the Specific Plan Area. Overflow will be redirected in the historical pattern to the existing box culverts at the southwest corner of the site. Brewery drainage will not be commingled with the proposed project's infiltration/detention basins (see Figure 2-14).

Additionally, it should be noted that the brewery site is subject to a separate hydrology and LID plan. Due to the brewery's existing grade and site conditions, it is not feasible to route and mitigate the runoff from two small portions of the site within its boundaries. These areas are identified in the proposed project's LID plan as Off-site 1 and Off-site 2 drainage areas in Figure 2-14. Off-site 1 would be integrated with the proposed DMA 1, and Off-site 2 would be combined with DMA 2.

Off-site drainage from I-210 and the area to the north side of the freeway would continue to bypass the site at the northwest corner through the railroad culverts. The culvert, dirt swales, and berms near the northwest corner of the site would be preserved. The runoff from I-210 and the area to the north side of the freeway would be directed from east to west along the northern property boundary and ultimately discharged into the Santa Fe Dam basin.

Sizing and capacity analysis of the proposed basins were calculated following the design guidelines in Los Angeles County Department of Public Works' "Low Impact Development Standards Manual." As shown in Table 3.9-2, *Capacity Analysis for Proposed BMPs*, the BMPs have adequate capacity to treat the SWQDv. Infiltration of stormwater into the engineered fill is not feasible (see Appendix I). Therefore, the proposed basins would be located on the parts of the Specific Plan area that are currently level and would infiltrate into natural alluvial soils. The expected pollutants of concern for this project include oil and grease, trash and debris, sediment, nutrients, solvents, metals, organic compounds, pathogens and oxygen demanding substances. Hydrodynamic separators would be installed upstream of the infiltration/detention basins. The separators would be designed to remove 80 percent of the annual load for solid pollutants.

Table 3.9-2 Capacity Analysis for Proposed BMPs

Area	Acreage (acres)	SWQDv (cf)	BMP No.	Proposed Volume (cf)
DMA 1	47.85	162,870	BMP 1	299,595
Off-site 1	1.48	5,040		
DMA 2	44.65	151,980	BMP 2	274,925
Off-site 2	1.45	4,940		
DMA 3	30.77	104,820	BMP 3	186,183
DMA 4	20.66	70,380	BMP 4	129,062
DMA 5	6.20	21,120	BMP 5A BMP 5B	19,623 19,623
Brewery Site	72.68	199,690	Off-site BMP	409,684
Total	**225.73**	**720,840**	**-**	**1,420,754**

Source: Appendix L1.

Notes: cf= cubic feet; hrs =hours; SWQDv=stormwater quality design volume

The proposed project would also implement source control BMPs to prevent pollutants from contacting stormwater runoff and to prevent discharge of contaminated stormwater runoff to the storm drain system and/or receiving waters. The proposed source control BMPs include:

- Storm drain system stenciling and signage
- Properly designed trash storage areas
- Providing proof of ongoing BMP maintenance
- Properly designed loading/unloading dock areas

Additionally, the Low Impact Development Standards Manual requires all projects in natural drainage systems that have not been improved (e.g., channelized or armored with concrete, shotcrete, or rip-rap) or drainage systems that are tributary to a natural drainage system to implement hydromodification controls. The proposed project would discharge to the existing culvert boxes on the southwest and ultimately connect to the Santa Fe Dam basin that discharges to the San Gabriel River. Both drainage courses are improved and not susceptible to hydromodification.

Since the proposed project could include light industrial and manufacturing uses, some uses may require an NPDES permit pursuant to the Statewide General Permit for Stormwater Discharges Associated with Industrial Activities (Order No. 2014-0057-DWQ as amended by

2015-0122-DWQ). Dischargers would be required to eliminate nonstormwater discharges, develop SWPPPs that include BMPs, conduct monitoring of stormwater runoff, and submit all compliance documents via the SWRCB's SMARTS program.

Pursuant to the Construction General Permit, MS4 Permit, Industrial Permit for Stormwater Discharges, and Chapter 8.28 of the City's municipal code, the proposed project would be required to implement federal, State, and local water quality standards and post-construction site design, treatment, and source control BMPs to help keep pollutants out of stormwater. With implementation of these measures and regulatory provisions to limit runoff, the operational phase of the proposed project would result in a **less than significant impact**.

Significance without Mitigation: Less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

CONSTRUCTION

The DWR website depicts Well SF 1, just south of the site, with a reported water level at 283.73 feet below ground surface on January 31, 2024. The groundwater depths circa 2009 within about a mile of the site were roughly 260 feet. According to the Seismic Hazard Zone Reports for the Azusa and Baldwin Park 7.5-minute Quadrangles, the historic-high groundwater level is a depth that could have been exposed in the bottoms of both pits at the Specific Plan area (Appendix I).

It is anticipated that dewatering may be necessary during wetter years to drain the pits during the fill operation (Appendix L4). No dewatering would be required for the construction of the proposed buildings on-site in the existing (non-quarry) portions of the project site. The following steps, phasing, and engineering methods would be followed during implementation of the IDEFO:

Phase I: Northwest Pit Excavation and Southeast Pit Backfill

- Temporary detention basins would be constructed at the southwest and southeast of the site. A temporary storm piping system would link these basins. These basins would operate passively, with low flows infiltrating into the ground and high flows being routed via pipe from the southeast basin to the southwest basin. The southwest basin would implement an overflow spillway for high flows. This high flow runoff would be directed to an existing on-site culvert, eventually flowing off-site at the southwest. Flow volume and pattern would follow the existing condition at the outlet.
- Both pits would be prepared for erosion stabilization.

- The southeast pit filling would commence with fill material being excavated from the northwest. Fill would be placed in such a way that allows for rain entering the pit to drain to the edges of the pit, where runoff can infiltrate into native soils. For any pit filling while groundwater is present, the City of Irwindale's "Guidelines for Underwater Backfilling of Open-Pit Mines" shall be utilized.
- As backfilling approaches completion and during wetter years, dewatering pumps may be utilized to accelerate the draining of the pit from rain events. These dewatering pumps would pump water to the surface and into the southeast temporary basin. This flow would be passively infiltrated and/or routed off-site via pipe and spillway.
- Upon final pit filling, final erosion stabilization would be implemented in compliance with the approved SWPPP.

Phase II: Northwest Pit Backfill

- The pit would be prepared for erosion stabilization.
- The northwest pit filling would commence with inert debris fill material. Fill would be placed in such a way that allows for rain entering the pit to drain to the edges of the pit, where runoff can infiltrate into native soils. For any pit filling while groundwater is present, the City of Irwindale's "Guidelines for Underwater Backfilling of Open-Pit Mines" shall be utilized.
- As backfilling approaches completion and during wetter years, dewatering pumps may be utilized to accelerate the draining of the pit from rain events. These dewatering pumps would pump water to the surface. This flow would be surface drained south into the southwest temporary detention basin. This flow would be infiltrated and/or routed off-site passively via pipe and spillway.
- Upon final pit filling, final erosion stabilization would be implemented in compliance with approved SWPPP. (Appendix L4)

All dewatering activities would also be conducted in accordance with the requirements of the Los Angeles RWQCB Order No. R4-2023-0429, "Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties."

Additionally, the only water used during fill operations would be for dust control and moisture conditioning. Construction of 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. Impacts to groundwater supplies during construction would be **less than significant**.

OPERATION

The Specific Plan area is in the Azusa Light and Water's (ALW) water service area. ALW's primary source of water is groundwater pumped from 11 active wells in the Main Basin. ALW's water supply sources also include surface water diverted from the San Gabriel River, untreated imported water purchased from the San Gabriel Valley Municipal Water District, and treated imported water purchased from the Metropolitan Water District of Southern California. ALW's annual water supplies over the past 20 years—from fiscal year (FY) 2002-03 to FY 2021-22—have ranged from 16,572 acre-feet per year (AFY) to 28,347 AFY, with an average production of approximately 20,921 AFY. ALW's historical groundwater production from the Main Basin for the same period ranged from 10,430 AFY to 23,852 AFY, with an average of approximately 15,576 AFY.

The Water Supply Assessment for the Specific Plan (see Appendix L2) demonstrates that the combined capacities from ALW's sources of supply would provide sufficient water supply for ALW's projected water demand, including the proposed project, under future normal, single dry, and multiple (five consecutive) dry year scenarios, from FY 2024-25 through FY 2044-45. Water supply is discussed and analyzed in detail in Section 3.16, *Utilities and Service Systems*.

Furthermore, the Specific Plan area is not an active groundwater recharge site. Although the proposed project would increase the impervious area on the project site from 15.38 acres to 135.11 acres, the proposed project would include six infiltration BMPS in the five DMAs, which would allow stormwater to be infiltrated and would therefore not interfere with groundwater recharge on the project site. Because operation of 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, impacts would **be less than significant**.

Significance without Mitigation: Less than significant.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that 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 that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

iv) Impede or redirect flood flows?

Erosion and Siltation

Soils could experience erosion during construction of the proposed project. A SWPPP prepared in accordance with the Statewide Construction General Permit specifying BMPs for minimizing pollution of stormwater with soil and sediment during the construction of the proposed project would be prepared and implemented. Adherence to the BMPs in the SWPPP and preparation of erosion control plans would reduce, prevent, and minimize soil erosion from grading and construction activities sufficient to prevent runoff from resulting in substantial erosion or siltation on- or off-site. Additionally, waste discharge requirements would be obtained from the Los Angeles RWQCB for fill operations, and the Fill Operations Plan would include a load checking program, a waste acceptance plan, and a detection monitoring program. The project developer would also be required to comply with City grading permit regulations and Chapter 8.28, Storm Water and Urban Runoff Pollution, of the City's municipal code. Waste discharge requirements for impacts to nonfederal waters would also be obtained from the Los Angeles RWQCB per the requirements of the porter-Cologne Water Quality Act.

The proposed project includes six infiltration BMPS within the five DMAs that would capture, treat, and infiltrate the SWQDv from the project site. Sizing and capacity of the proposed BMPs were calculated following the design guidelines in Los Angeles County Department of Public Works' "Low Impact Development Standards Manual." As shown in Table 3.9-2, the BMPs have adequate capacity to treat the SWQDv. The proposed project would also implement source control BMPs to prevent pollutants from contacting stormwater runoff and to prevent discharge of contaminated stormwater runoff to the storm drain system and/or receiving waters.

Since the proposed project could include light industrial and manufacturing uses, some uses may require an NPDES permit pursuant to the Statewide General Permit for Stormwater Discharges Associated with Industrial Activities (Order No. 2014-0057-DWQ as amended by 2015-0122-DWQ). Dischargers would be required to eliminate nonstormwater discharges,

develop SWPPPs that include BMPs, conduct monitoring of stormwater runoff, and submit all compliance documents via the SWRCB's SMARTS program. Therefore, impacts would be **less than significant**.

Peak Flow Analysis

The proposed project would increase impervious areas on the Specific Plan area from 15.38 acres under existing conditions to 135.11 acres under proposed conditions. Per the requirements of the Los Angeles County Hydrology Manual and Los Angeles County Hydraulic Design Manual, development is required to have site-specific hydrology and hydraulic studies to determine the capacity of the existing storm drain systems and project impacts on such systems prior to approval by the City. The Hydrology and Low Impact Development (LID) Plan (see Appendix L1) analyzes the pre-development drainage condition and the post-development drainage condition to evaluate any impacts from the proposed project and demonstrate compliance with the Los Angeles County Hydrology Manual and other applicable regulatory standards.

Before the Specific Plan area was used as a quarry, the industrial portion of the project site generally surface drained from the northeast to the southwest through three box culverts (two feet by five feet each) that run underneath the railroad in the southwestern corner of the site. These box culverts were sized to accommodate the industrial portion project site and the existing brewery for a total area of 219.54 acres. The historical, pre-quarry condition peak flow for the 25-year storm event was calculated at approximately 319 cfs. Based on an on-site investigation of the box culverts, which included field measurements, it was determined that the box culverts have a capacity of 225 cfs (see Appendix L1). The more conservative value of 225 cfs was utilized to determine the maximum allowable peak runoff value for the industrial portion of the proposed project. The existing 25-year storm event peak flow from the proposed commercial portion of the project site is 12.73 cfs.

The total flow rate of 225 cfs has been proportionally distributed among the five DMAs and the brewery site based on their respective areas to calculate the allowable peak flows (see Table 3.9-3, *Peak Flow Analysis*). The existing flow from the commercial portion of the project site was used as the allowable peak flow for DMA 5. The Los Angeles County Hydrology Manual requires the analysis of the 25-year design storm event for urban projects, and Table 3.9-3 shows the mitigated and unmitigated flows from this storm event (Q25) under proposed conditions. Peak flows would be mitigated by the six infiltration/detention basins shown in Figure 2-14, which would consist of an underground, 96-inch corrugated metal pipe (CMP) infiltration system. A CMP infiltration system uses large metal pipes buried underground to collect, store, and slowly release rainwater into the surrounding soil.

The volume of storage in the underground CMP infiltration systems and the size of the outflow orifice and weir structures[3] would restrict peak flows in the proposed condition to levels equal to or less than the allowable flows defined for each DMA. Based on the basin routing for the 25-year storm event, the highest routed (mitigated) on-site outflows from the underground detention system result in proposed flows that are less than or equal to the existing flows.

Table 3.9-3 Peak Flow Analysis

Area	Acreage (acres)	Allowable Flow (cfs)	Unmitigated Q25 under Proposed Conditions (cfs)	BMP No.	Mitigated Q25 under Proposed Conditions (cfs)
DMA 1	47.85	47.70	113.70	BMP 1	45.48
Off-site 1	1.48	1.47	3.67		
DMA 2	44.65	44.5	106.08	BMP 2	40.97
Off-site 2	1.45	1.44	3.60		
DMA 3	30.77	30.67	80.33	BMP 3	30.62
DMA 4	20.66	20.59	53.94	BMP 4	18.07
DMA 5	6.20	12.73	17.11	BMP 5A BMP 5B	12.24
Brewery Site	72.68	72.45	165.75	Off-site BMP	55.38
Total	**225.73**	**237.73**	**544.18**	**-**	**206.7**

Source: Appendix L1.

Notes: cfs = cubic feet per second

Additionally, the proposed project must be operated in accordance with the MS4 Permit (Order No. R4-2021-0105, NPDES No. CAS004004) and Chapter 8.28 of the Irwindale municipal code. The MS4 Permit requires new development to retain and treat a specified volume of stormwater runoff on-site, as described in Impact 3.9(a).

Therefore, development pursuant to the Specific Plan would not be anticipated to cause substantial flooding on- or off-site during the operational phase. Development would also not

3 An outflow orifice is a precisely sized opening (circular or rectangular) that controls the slow release of stormwater from a detention basin, primarily managing frequent, small storm events and helping the basin drain completely after a storm. A weir structure is an engineered barrier or dam over which water flows, designed to manage larger, less frequent storm flows and provide an emergency overflow path when the water level exceeds the capacity of the lower outlets.

be anticipated to create or contribute runoff that would exceed the capacity of the existing or planned stormwater drainage system. Therefore, impacts would **be less than significant**.

Flood Flows

According to mapping information from FEMA, the Specific Plan area is not in a 100-year floodplain (FEMA 2008). However, as shown in Figure 3.9-1, portions of the Specific Plan area are within the dam inundation zone of the Santa Fe dam. The City of Irwindale has never been impacted by a failure of the Santa Fe Dam (Irwindale 2012).

Dams in California are monitored and inspected annually by the Division of Safety of Dams. In addition, dam owners are required to maintain emergency action plans that include procedures for damage assessment and emergency warnings. An emergency action plan identifies potential emergency conditions at a dam and specifies preplanned actions to help minimize property damage and loss of life should those conditions occur. Emergency action plans contain procedures and information that instruct dam owners to issue early warning and notification messages to downstream emergency management authorities. Additionally, the Dam Safety Act requires dam owners to submit inundation maps for those dams whose total failure would cause loss of life or personal injury. The City periodically reviews the inundation maps for the Santa Fe Dam to ensure these issues are considered as part of ongoing planning efforts (Irwindale 2012, 2024).

A seiche is the formation of large waves in landlocked bodies of water due to seismic activity. The Specific Plan area is approximately 0.6 mile northeast of the Santa Fe Reservoir. However, the Sante Fe Dam Recreation Area separates the reservoir from the Specific Plan area, providing a boundary that would help reduce the risk of flooding. Additionally, after final grading, the vast majority of the project site, except for the most southwestern portion of Parcel 3 beyond the existing perimeter road, would be at a higher elevation than the crest of the Santa Fe Dam. The northwest quarry could contain water as high as the historic high groundwater level. However, the borders of the quarry would be approximately 150 feet higher in case of such an event. As a result, the project site would not be subject to, nor would it impede or redirect, flood flows occurring because of flooding from water within the former quarry areas or the Sanat Fe dam. The proposed project would also not form of any new FEMA Special Flood Hazard Areas.

The Specific Plan area is approximately 31 miles northeast of the coastal areas and shoreline of the Pacific Ocean and due to this distance would not be exposed to the threat of tsunami. Therefore, the proposed project would not impede or redirect flood flows and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

Impact HYD-3: Implementation of BMPs outlined in the project specific SWPPP, erosion and sediment control plans, WQMPs, and adherence to General Plan policies would address hydrology and water quality impacts related to erosion and flooding.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

As noted in the response to Question (c), the proposed project is not in a 100-year floodplain (FEMA 2008). Portions of the Specific Plan area are in the dam inundation zone of the Santa Fe Dam, but the dam is monitored and inspected by the Division of Safety of Dams, and the US Army Corps of Engineers maintains an emergency action plan that includes procedures for damage assessment and emergency warnings and inundation maps for the dam. The City also periodically reviews the inundation maps for the dam to ensure it is considered as part of ongoing planning efforts (Irwindale 2012). Therefore, the project site is not expected to be at risk of flooding from a dam breach.

The Specific Plan area is also not likely to be inundated in the event of earthquake-induced seiches and would not be exposed to the threat of tsunami. Therefore, the proposed project would not release pollutants due to project inundation and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The proposed project would be connected to Azusa Light and Water's public water supply. Azusa Light and Water relies on groundwater from the Main Basin, which is an adjudicated basin that DWR has identified as a very-low-priority groundwater basin. In that regard, the basin is actively managed by the Main San Gabriel Basin Watermaster. Pursuant to the SGMA, the basin does not require a groundwater sustainability plan, and the Watermaster submits annual reports to DWR. The Watermaster ensures that the basins do not exceed their safe yield.

The proposed project would adhere to the State Construction General Permit, implement a Storm Water Pollutant Prevention Plan, abide by the waste discharge requirements, and adhere to the City's stormwater management requirements, as described in detail in Impact 3.9(a), and would thereby ensure that groundwater quality is not adversely impacted during construction. No dewatering or groundwater wells are required to implement the Specific Plan, and the project site is not in an active groundwater recharge area. In addition, the proposed project would implement LID BMPs that would capture and filter water contaminants to ensure that water quality is not impacted during the operational phase of the Specific Plan. The proposed project would also abide by the requirements of the General Industrial Permit. As a result, the

proposed project would not obstruct or conflict with the implementation of the Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties.

Therefore, the Specific Plan would not obstruct or conflict with groundwater management, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.9.6 Cumulative Impact Analysis

For the purpose of this analysis, the geographic context used for the cumulative assessment of hydrology and water quality impacts is the Lower San Gabriel watershed and the Main Basin. Potential cumulative impacts would occur if the proposed project, in combination with the identified cumulative projects, would result in significant effects related to hydrology and water quality resources.

Would the project have a cumulative effect related to hydrology or water quality?

Hydrology and Drainage

Cumulative projects in the Lower San Gabriel watershed could increase impervious areas and thus increase local runoff rates at those project sites. However, other projects in the region would be required to manage runoff on-site as applicable in accordance with the NPDES MS4 permit. Projects in the region would also be required to limit post-development runoff discharges per the requirements of the Los Angeles County Department of Public Works, as detailed in the Los Angeles County Hydrology Manual and the Los Angeles County Hydraulic Design Manual. Projects in the City would also need to comply with the requirements of Chapter 8.28 of the Municipal Code. As noted in Impact HYD-3, the volume of storage in the proposed underground CMP infiltration systems and the size of the outflow orifice and weir structures would restrict peak flows in the proposed condition to levels equal to or less than the allowable flows defined for each DMA (see Table 3.9-3). Thus, no significant cumulative drainage impact would occur, and project drainage impacts would not be cumulatively considerable; impacts would be **less than significant**.

Water Quality

Cumulative projects have the potential to generate pollutants during project construction and operation. All construction projects, including the proposed project, that disturb one acre or more of land would be required to prepare and implement SWPPPs to obtain coverage under the Statewide CGP. Fill operations associated with the proposed project would require waste discharge requirements from the Los Angeles RWQCB and would be implemented per the Fill Operations Plan. The Specific Plan area includes 0.36 acre of jurisdictional waters that would be

impacted by the proposed construction activities. Therefore, before issuing a grading permit, the project developer would show proof of permits from the Los Angeles RWQCB per the requirements of the Porter-Cologne Water Quality Act.

All designated projects within the watershed would also be required to implement LID BMPs pursuant to the MS4 permit that would be applied during project design and project operation to minimize water pollution from project operation. Additionally, industrial uses would need to comply with the Statewide General Permit for Stormwater Discharges Associated with Industrial Activities, and any project that may dredge or fill waters of the United States would need to comply with the requirements of Sections 404 and 401. The requirements of Chapter 8.28 of the City's municipal code would further keep pollutants out of stormwater. As noted in response to Question (a), the proposed project would implement the requirements of the project specific LID plan and would comply with the requirements of the Statewide General Permit for Stormwater Discharges Associated with Industrial Activities and the requirements of Chapter 8.28 of the City's Municipal Code.

Thus, no significant cumulative water quality impacts would occur, and the Specific Plan's water quality impacts would be **less than significant**.

Groundwater

Cumulative construction impacts would occur if the proposed project, together with other past, present, and reasonably foreseeable project, collectively resulted in substantial adverse impacts related to groundwater.

Construction activities associated with cumulative projects could encounter groundwater during excavations, grading, and below-grade construction activities. Therefore, dewatering may be required. Dewatering systems would be addressed per Statewide requirements in the CGP and the Los Angeles RWQCB adopted Order No. R4-2023-0429, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

Additionally, the proposed project's WSA demonstrates that the combined capacities from ALW's sources of supply would provide sufficient water supply for the proposed project and future anticipated growth with AWL's service area from FY 2024-25 through FY 2044-45.

The proposed project is not within an active recharge area and would not require dewatering and includes infiltration BMPS which would allow stormwater to be infiltrated. and would therefore not interfere with groundwater recharge on the project site. Thus, cumulative groundwater impacts would be **less than significant**.

Flooding

Cumulative impacts would occur if the proposed project, together with other past, present, and reasonably foreseeable project, collectively resulted in substantial adverse impacts related to flooding.

Cumulative projects may be constructed within 100-year flood zones. Projects within the 100-year flood zone would be mandated to purchase flood insurance through the National Flood Insurance Program. In addition, other jurisdictions within the watershed regulate development within flood zones and in compliance with FEMA standards to limit cumulative flood hazard impacts. The Specific Plan area is not in a 100-year floodplain (FEMA 2008).

Cumulative projects may be constructed within dam inundation zones. As discussed in response to Question (c), dams in California are monitored and inspected annually by the Division of Safety of Dams, and dam owners are required to maintain emergency action plans that include procedures for damage assessment and emergency warnings. Additionally, the Dam Safety Act requires dam owners to submit inundation maps for those dams whose total failure would cause loss of life or personal injury. The City periodically reviews the inundation maps for the Santa Fe Dam to ensure these issues are considered as part of ongoing planning efforts (Irwindale 2012, 2024). As shown in Figure 3.9-1, portions of the Specific Plan area are within the dam inundation zone of the Santa Fe dam, however after final grading, the vast majority of the project site, except for the most southwestern portion of Parcel 3 beyond the existing perimeter road, would be at a higher elevation than the crest of the Santa Fe Dam. Therefoe, cumulative impacts to flooding would be **less than significant**.

Cumulative Impacts: Cumulative water quality, hydrology, drainage, and flooding impacts would not be cumulatively considerable.

3.9.7 References

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3.10 LAND USE AND PLANNING

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts to land use in the City of Irwindale from implementation of the Irwindale Brew Yard Specific Plan (Specific Plan or proposed project).

Land use impacts can be either direct or indirect. Direct impacts are those that result in land use incompatibilities, division of neighborhoods or communities, or interference with other land use plans, including habitat or wildlife conservation plans. This section focuses on direct land use impacts. Indirect impacts are secondary effects resulting from land use policy implementation, such as an increase in demand for public utilities or services, or increased traffic on roadways. Indirect impacts are addressed in other sections of this DEIR.

During the NOP comment period (March 6, 2024, through April 5, 2024) comments related to land use and planning were received from the Coalition for Responsible Equitable Economic Development, the City of Baldwin Park's Planning Division, and Fred Barbosa.

- **City of Baldwin Park Planning Division** inquired about the type of commercial activities that would be permitted and whether it would include uses as a brew yard or other retail/recreational/assembly related uses. This DEIR addresses the allowable uses in the Specific Plan (see Appendix X). Commercial uses would be limited to Planning Area 2 (6.2 acres) and 12,000 square feet and primarily accommodate retail tenants (see Specific Plan, Table 3-1).

- **The Coalition for Responsible Equitable Economic Development (CREED)** suggested that if information about the nature of operations is unavailable, the City should study a reasonable worst-case scenario so that a broad and diverse range of environmental impacts are included. Potential uses are detailed in Table 3-1 of the Specific Plan, and each section in this DEIR describes the assumptions and methodology to ensure a conservative impact analysis.

- **Fred Barbosa** requested specific information related to the proposed warehouse use (type of warehouses, no. of bays, trucks per hour, etc.) and provided specific comments regarding the project signage. The Project Description detail requested is included in Chapter 2, *Project Description*, and the Specific Plan in Appendix X. Several of his comments are not CEQA issues and are not addressed in this DEIR.

  No comments related to land use and planning were raised at the scoping meeting held on February 23, 2024.

3.10.1 Regulatory Framework

REGIONAL

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization (MPO) representing six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. The region encompasses more than 38,000 square miles and had a 2020 population exceeding 19 million persons. As the designated MPO, SCAG addresses regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring federal and state law environmental documentation. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the Southern California region's metropolitan planning organization, SCAG cooperates with the Southern California Air Quality Management District (AQMD), the California Department of Transportation (Caltrans), and other agencies in preparing regional planning documents. SCAG has developed regional plans to achieve specific regional objectives.

Regional Transportation Plan / Sustainable Communities Strategy

The SCAG Regional Council adopted Connect SoCal 2024–2050, the current Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), in September 2024, replacing the prior 2020–2045 RTP/SCS. The RTP/SCS helps coordinate the development of the region's transportation improvements and provides a long-range vision for transportation investments throughout Southern California. Using growth forecasts and economic trends that project over a 20-plus-year planning horizon, the RTP/SCS considers the role of transportation in the broader context of economic, environmental, equity, environmental justice, public health, and quality-of-life goals.

Connect SoCal 2024–2050 builds upon and expands land use and transportation strategies of previous RTPs/SCSs, increases mobility options, and promotes a more sustainable regional development pattern. The RTP/SCS identifies a comprehensive set of regional goals and policies to guide transportation and land use decision-making. Consistency with applicable RTP/SCS goals is evaluated in Table 3.10-1, Section 3.10.4, *Impact Analysis*.

LOCAL

City of Irwindale General Plan

The Irwindale General Plan provides a source of information and a policy framework for future planning and development in the City. Through appropriate goals, policies, and programs it serves as a decision-making tool to guide growth and development. The Irwindale General Plan

was adopted in 2020 and has since been updated, including adoption of the 2021–2029 Housing Element update in 2025, updates to the Safety Element, and adoption of a new Environmental Justice Element, and consists of a series of State-mandated and optional elements to direct the City's physical, social, and economic growth.

Elements within the City of Irwindale General Plan include: Community Development, Housing, Infrastructure, Resource Management, Safety, Environmental Justice, and Implementation. The Public Safety Element has been updated and is now titled the Safety Element, consistent with current State General Plan requirements. Following is a discussion of the various elements.

The policies in each of the elements that are relevant to the proposed project are listed in Table 3.10-2, *Irwindale General Plan Consistency Analysis*, which analyzes the proposed project's consistency with these policies.

Community Development Element

The Community Development Element (CDE) complies with the State requirements for a land use element, and covers issues related to urban design and economic development. The CDE designates the general distribution and intensity of land use and development contemplated within the land area governed by the General Plan.

Housing Element

The Housing Element (HE) of the City of Irwindale General Plan was most recently updated and adopted as part of the City's 6th Cycle Housing Element, which was approved by the California Department of Housing and Community Development (HCD) on October 10, 2025. The update covers the 2021–2029 planning period and includes an analysis of existing and projected housing needs; inventory of sites to accommodate the City's Regional Housing Needs Allocation (RHNA); and identification of goals, policies, and programs to ensure adequate housing opportunities throughout the City. As required by State law, the Housing Element includes an assessment of housing needs and resources, an inventory of land suitable for residential development, an evaluation of constraints and opportunities, quantified objectives and policies for maintenance, conservation, and production of housing, and a program establishing specific actions and schedules to achieve the Element's goals and objectives during the planning period. The primary goal of the HE is to provide a framework to guide the City's efforts in addressing its housing needs across all income levels while ensuring compatibility with existing neighborhoods and community objectives (Irwindale 2025a).

Infrastructure Element

The City of Irwindale Infrastructure Element (IE) complies with the State requirements for a circulation element. The IE identifies and describes the City's existing and proposed

transportation network, including applicable levels of service for key roadway segments and intersections in the City. The IE promotes the maintenance of a safe and efficient circulation system for the City. A primary purpose of the IE is to provide for the maintenance of the City's transportation network to support the buildout of the General Plan land use plan.

Resource Management Element

The Resource Management Element (RME) meets the State's requirements for an open space element and conservation element. The RME establishes the long-range vision for the preservation and conservation of the City's remaining open space resources and programs that will aid in preventing their loss and wasteful exploitation. The RME focuses on four (4) key issue areas: cultural resources, ecological resources, natural resources, and open space resources used for recreation. Additionally, the RME includes a Resource Management Plan that establishes policies and programs related to the preservation of important natural and man-made resources within the City. The RME also discusses the development of reclamation plans in compliance with the State of California Surface Mining and Reclamation Act of 1975 (SMARA), which gives the City the authority to require quarry owners to reclaim/rehabilitate their land once mining operations have been completed. As discussed throughout this EIR, mining operations at the project site have been completed, and reclamation of the project site is to take place in accordance with the City's Municipal Code to allow for future development of the site.

Safety Element

An updated Safety Element was adopted in August 2025 along with the 6th Cycle Housing Element and new Environmental Justice Element. The Safety Element replaces the former Public Safety Element and expands its scope to assist in the mitigation and reduction of natural and man-made hazards to life, health, and property, and to ensure that emergency services in the City are adequate to meet the City's needs during both minor emergencies and major catastrophic situations.

Consistent with updated State requirements, the Safety Element integrates climate change adaptation and resilience considerations and addresses a broad range of hazards affecting public safety and community well-being. Policies in the Safety Element pertain to the following areas: air quality, drought, extreme weather, flooding (including dam failure), geologic and seismic hazards, hazardous materials, wildfire, law enforcement and crime, and emergency preparedness, and include coordination with emergency response providers and identification of vulnerable populations and evacuation considerations.

Implementation Element

The Implementation Element (IE) serves as a guide for implementation of the General Plan and lists the specific implementation programs that are included in the other Irwindale General Plan elements (described above). This includes but is not limited to policies pertaining to: air quality planning, building code review, cultural resources management, design guidelines, energy conservation, environmental review, fire prevention, hazardous materials, recreational facilities, and transportation-related issues.

City of Irwindale Zoning Code

The City of Irwindale Zoning Code is in Title 17 of the municipal code. The zoning code, amended May 2025, is a regulatory document that establishes specific standards for the use and development of all properties in the City by regulating development intensity, including limits on building setbacks, landscaping standards, and building heights. The zoning code also defines the permitted land uses in the various zones (Irwindale 2025b).

3.10.2 Existing Conditions

SURROUNDING LAND USES

The project site is located within an established, urbanized portion of the City characterized by industrial development, transportation infrastructure, utility corridors, and large-scale recreational open space. The surrounding land use pattern reflects the City of Irwindale's long-standing role as a regional center for industrial, manufacturing, logistics, and infrastructure-related activities (see Figure 2-3, *Project Site Boundary/Aerial*).

The Specific Plan area is bounded by Interstate 210 (I-210) to the north, which functions as a major regional transportation corridor and separates the site from additional industrial and utility-related uses (see Figure 2-2, *Local Vicinity*). Rail lines, transmission facilities, and freeway infrastructure are prominent features along the northern edge of the project site and contribute to the area's industrial land use character. To the east, Irwindale Avenue serves as a major arterial roadway and is characterized by rail-related facilities, utility infrastructure, transit-serving uses associated with the Irwindale A Line station, and light and heavy industrial development extending into the City of Azusa (see Figures 2-2 and 2-3). Commercial uses are also located east of Irwindale Avenue. The City of Azusa adjoins a portion of the southern project boundary and extends beyond the City of Irwindale boundary to the east and north of the project site. Land in the City of Azusa immediately adjacent to the project site is designated and zoned for industrial uses, reflecting a continuation of the industrial and employment-generating land use pattern present within the City of Irwindale (Azusa 2017).

South of the project site, First Street separates the Specific Plan area from additional industrial and distribution uses, rail easements, and portions of the Santa Fe Dam Recreation Area, including trail facilities associated with the San Gabriel River corridor. Arrow Highway is approximately one (1) mile south of the site and supports a mix of industrial and commercial uses. To the west, the project site abuts the Santa Fe Dam Recreation Area, a large regional open space that includes flood control facilities, trails, water features, and recreational uses, and additional transportation and utility infrastructure are farther to the west (see Figures 2-2 and 2-3).

Overall, surrounding land uses consist primarily of industrial, infrastructure, transportation, and recreational open space uses, with no residential neighborhoods adjacent to the project site. This land use context establishes an environment oriented to employment-generating uses and regional infrastructure rather than sensitive land uses.

ON-SITE USES

The project site encompasses 150.1 acres of previously disturbed land associated with historic sand and gravel quarrying, subsequent reclamation activities, and industrial support uses (see Figure 2-3). Quarry operations occurred on the site through the early 1970s and resulted in two , large, quarry pits in the northwestern and southeastern portions of the site. Following cessation of mining activities, the site has remained largely undeveloped and has been used intermittently for industrial staging, truck parking, and utility-related purposes.

Existing site features include paved areas, internal access routes, rail infrastructure associated with historic quarry operations, and utility improvements. A defunct solar energy facility occupies a portion of the southeastern area of the site, and a trailer storage area is near the northwestern quarry. Aside from a small security facility, the site does not contain permanent buildings or active industrial operations.

The site's existing land use condition is characterized by two large, former sand and gravel quarry pits; vacant and underutilized industrial land; disturbed ground surfaces; and infrastructure associated with former extractive and logistics-related uses (see Figure 2-3). These conditions are consistent with the surrounding industrial land use context.

GENERAL PLAN LAND USE AND ZONING DESIGNATIONS

Under the General Plan, the project site is designated Industrial/Business Park, which provides for industrial and employment-generating uses, including manufacturing, logistics, warehousing, and related commercial activities. The General Plan supports the continued use and redevelopment of former quarry and industrial lands for productive industrial, manufacturing, logistics, and related commercial activities.

The project site is currently zoned M-2 (Heavy Industrial) under the City's municipal code. The M-2 zoning designation allows a range of industrial and manufacturing uses and establishes development standards governing building height, setbacks, and site design.

3.10.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to land use if it would:

a) Physically divide an established community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

APPLICABLE SPECIFIC PLAN DEVELOPMENT STANDARDS AND DESIGN GUIDELINES

The proposed Specific Plan is intended as a comprehensive plan "establishing regulations, conditions, and programs for guiding the systematic development" of the project site. The Specific Plan encompasses the development standards and design guidelines that would otherwise be detailed pursuant to the City's General Plan designation and zoning applicable to the project site. The Specific Plan is intended to implement the overall project objectives identified in Section 2.5, *Project Objectives*, of the Project Description in this DEIR. A full copy of the Specific Plan is included as Appendix B of this DEIR.

Development Standards

Land use provisions are included in Chapter 4 of the proposed Specific Plan. Table 4-1, Allowable Uses, details allowable, conditional, ancillary, and prohibited land uses for Planning Area 1 and Planning Area 2. Development standards are detailed in Chapter 3 of the Specific Plan and include standards governing site requirements such as building height, setbacks, circulation, parking, and other development parameters applicable within the Specific Plan area.

Design Guidelines

Chapter 5 of the proposed Specific Plan provides design guidelines intended to establish the quality and character of development within the Specific Plan area. This chapter addresses site planning; building architecture (including form, massing, materials, and articulation); and

landscape architecture, including plant palettes, entry treatments, signage, lighting, and streetscape design.

3.10.4 Project Impact Analysis

a) Would the project physically divide an established community?

The project site is located within an established industrial and infrastructure-oriented area of the City and has historically been used for quarrying and related industrial activities. The surrounding area is characterized by industrial, manufacturing, logistics, transportation, and utility uses as well as large-scale recreational open space associated with the Santa Fe Dam Recreation Area. The City of Irwindale contains a very limited amount of land designated and zoned for residential use, with residential neighborhoods comprising a small and geographically isolated portion of the City relative to its predominantly industrial land use pattern.

Residential uses are not adjacent to the project site. The nearest residential receptors are located approximately 0.65 mile from the project site and are separated from the site by existing transportation corridors, flood control facilities, rail infrastructure, industrial development, and open space areas. The project site is located within a predominantly industrial area of the City and is not situated within or adjacent to an established residential neighborhood.

The proposed project would be confined entirely within the boundaries of the project site and would not introduce new public roadways, rail lines, or other linear infrastructure that could bisect or fragment existing neighborhoods. Project-related improvements would consist of internal circulation, access points, and supporting infrastructure necessary to serve development within the Specific Plan area. Modifications to surrounding roadways would occur within existing rights-of-way and at established intersections and would not alter roadway alignments or create new physical barriers affecting access or community cohesion.

Because the proposed project would redevelop a site within an existing industrial area and would not construct infrastructure that would separate residents from homes, businesses, schools, parks, or other community facilities, the proposed project would not physically divide an established community. Therefore, this impact would be **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The land use plans, policies, and regulations applicable to the proposed project and evaluated herein include those listed below, each of which is discussed in more detail. The impact analysis provided below applies to both options of the proposed project.

- SCAG Connect SoCal 2024–2050 RTP/SCS
- City of Irwindale General Plan
- City of Azusa General Plan
- City of Irwindale Zoning Code

SCAG 2024-2050 RTP/SCS Consistency

The SCAG 2024–2050 RTP/SCS establishes a long-range, regional framework intended to guide transportation investment, land use coordination, and policy decisions by jurisdictions and regional agencies in order to improve mobility, support economic vitality, reduce greenhouse gas emissions, and enhance overall quality of life. The RTP/SCS is primarily programmatic in nature and is implemented through actions by local governments, transportation agencies, and other public entities over time.

While many RTP/SCS goals are directed at regional coordination and local jurisdiction–level planning, certain goals are relevant to evaluating whether an individual project is generally consistent with the RTP/SCS's overarching objectives. Accordingly, the analysis below focuses on the RTP/SCS goals most applicable to the Specific Plan, given its scale, location, and role as a master-planned employment district within an urbanized area.

Table 3.10-1, *SCAG 2024-2050 RTP/SCS Goals Consistency Analysis*, provides an assessment of the RTP/SCS goals most applicable to the Brew Yard project and evaluates the project's general consistency with those goals. Goals related exclusively to regional housing production targets, funding strategies, or agency-level program implementation are not individually applicable to the proposed project and are therefore not included.

Table 3.10-1 SCAG 2024-2050 RTP/SCS Goals Consistency Analysis

Goals	Consistency Analysis
Communities: Develop, connect, and sustain communities that are livable and thriving.	
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances.	**Consistent**. The proposed project would redevelop two former quarries and industrial site within an existing urbanized area and would establish a master-planned employment district with internal pedestrian circulation, sidewalk connections to First Street and Irwindale Avenue, and proximity to regional transit and trail facilities. These features would support more efficient travel patterns and improved on-site connectivity consistent with the Connect SoCal 2024–2050 RTP/SCS.
Environment: Create a healthy region for the people of today and tomorrow.	
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change.	**Consistent**. The proposed project would include site preparation, infrastructure installation, and building development designed in accordance with CALGreen, the California Building Energy Efficiency Standards, and applicable City requirements. The proposed project would also incorporate stormwater detention and water quality facilities, utility upgrades, and long-term site design features that support operational resilience within the San Gabriel River floodplain.
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions, and enable more sustainable use of energy and water.	**Consistent**. The proposed project would concentrate new industrial and commercial development within an existing urban area proximate to regional freeways, arterial roadways, transit facilities, and the San Gabriel River Trail. The proposed project's internal circulation system, pedestrian connectivity, and land use configuration would support coordinated land use and transportation planning consistent with regional integration objectives.
Conserve the region's resources.	**Consistent**. The proposed project would reclaim a former mining site within an existing urbanized area rather than converting undeveloped or resource-rich land elsewhere in the region. By utilizing existing and planned infrastructure systems and incorporating water quality, drainage, and utility improvements, the project would support efficient use of land, infrastructure, and public resources consistent with regional conservation objectives under the Connect SoCal 2024–2050 RTP/SCS.

Table 3.10-1 SCAG 2024-2050 RTP/SCS Goals Consistency Analysis

Goals	Consistency Analysis
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents.	
Improve access to jobs and educational resources.	**Consistent**. The proposed project would accommodate up to three million square feet of industrial and business park uses and up to 12,000 square feet of commercial uses, supporting long-term employment opportunities in Irwindale. The proposed project's location near regional transportation facilities (including the Metro A Line (former Gold Line) Irwindale Station) would allow employment opportunities on the project site to be readily accessed via existing regional roadway and transit networks serving the San Gabriel Valley.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air, and quality of life for our communities.	**Consistent**. The proposed project would support goods movement–oriented land uses with direct access to First Street, Irwindale Avenue, and nearby regional freeways, and would include internal circulation designed to accommodate truck, trailer, and service vehicle operations. These features would support efficient logistics activity consistent with the City's long-term economic development and employment objectives.

Source: SCAG 2023.

City of Irwindale General Plan

Table 3.10-2, *General Plan Consistency Analysis*, reviews the proposed Specific Plan's consistency with the City's General Plan to confirm whether the proposed project would conflict with any General Plan goals or policies adopted to mitigate environmental effects.

Table 3.10-2 General Plan Consistency Analysis

Relevant Issue Areas and Policy	Consistency Analysis
COMMUNITY DEVELOPMENT ELEMENT (CDE)	
Issue Area – Land Use Planning. The City of Irwindale is committed to the development of a comprehensive land use plan that will enhance the City's livability and economic base for future generations.	
CDE Policy 1. The City of Irwindale, through continued comprehensive land use planning, will strive to preserve the overall mix of land uses and development in the community.	**Consistent**. The proposed project would reclaim and redevelop the former quarry sites and lands surrounding the existing Irwindale Brew Yard facility into a regional industrial commerce center. The proposed project would complement existing and planned surrounding industrial and commercial land uses within this portion of the City. The implementing projects of

Table 3.10-2 General Plan Consistency Analysis

Relevant Issue Areas and Policy	Consistency Analysis
	the Brew Yard Specific Plan area are consistent with the land use designations of Industrial/Business Park. The Specific Plan has been prepared in conformance with the goals and policies of the City of Irwindale General Plan as amended, providing commercial/industrial use on an underutilized property, promoting new employment opportunities, and providing regulations that support the success of an employment center for the City. Accordingly, the proposed project would preserve the overall mix of land uses within the community, consistent with this policy.
CDE Policy 2. The City of Irwindale will continue to plan for the transition of the quarries located within the City to other land uses.	**Consistent**. The Brew Yard Specific Plan area contains two former quarry sites totaling approximately 70 acres. The Specific Plan provides for development of a project that would include the filling and remediation of the existing, formerly used quarry sites and transition the sites to productive economic use with commercial and industrial development, continuing the redevelopment of the City's quarries with new uses. Accordingly, the proposed project would be consistent with this policy.
CDE Policy 3. The City of Irwindale will continue to ensure that the type, location, and intensity of all new development and intensified developments adhere to the requirements that are specified for their particular land use category in the General Plan.	**Consistent**. The proposed General Plan Amendment would revise the existing land use designation from Industrial/Business Park to "Specific Plan" to reflect the land uses, development standards, design guidelines, and implementation procedures proposed under the Specific Plan. The proposed uses and intensities permitted by the Specific Plan would provide employment-generating and economic investment uses supportive of the General Plan's vision for this area. The project's buildable square footage and floor area ratio (FAR) are consistent with the maximum FAR allowed under the General Plan. Accordingly, the proposed project would be consistent with this policy.
CDE Policy 5. The City of Irwindale will continue to promote comprehensive development consistent with this General Plan as opposed to piecemeal and incremental planning.	**Consistent**. The project site is approximately 150.1 acres that consist of unused industrial lands and two former quarries. The Specific Plan would provide for comprehensive redevelopment of the project site, with detailed development standards and design guidelines. Moreover, a Development Agreement between the City and developer would lock in how the Specific Plan is implemented over time. The Development Agreement would add certainty, timing, and enforceability beyond typical zoning. The approach to the project is a long-

Table 3.10-2 General Plan Consistency Analysis

Relevant Issue Areas and Policy	Consistency Analysis
	term comprehensive plan that would prevent piecemeal planning of the Specific Plan area. Accordingly, the proposed project would be consistent with this policy.
CDE Policy 6. The City of Irwindale will promote and support the future extension of the 'Gold Line" light rail line along the I-210 Freeway corridor.	**Consistent**. The Specific Plan area is immediately west of the Metro A Line (former Gold Line) Irwindale Station and in proximity to the Irwindale Station parking structure. Pedestrian and circulation connections between the project site and the existing station area would support transit access for employees and visitors. By locating employment-generating uses near an existing light rail station along the I-210 corridor, the proposed project would support the City's objective of promoting the A Line's role in serving local employment areas, consistent with this policy.
Issue Area – Economic Development. The City of Irwindale intends to continue its pursuit and promotion of economic development that will provide jobs and revenue for the community.	
CDE Policy 7. The City of Irwindale will continue to promote economic development through the use of redevelopment.	**Consistent**. The Specific Plan promotes the redevelopment of two former quarries on the project site into an industrial and commercial business park with the goal of promoting new employment opportunities and contributing to the economy of the region through new capital investment. The proposed project would generate new employment opportunities that could be filled by residents of Irwindale and surrounding communities and would stimulate economic activity in the local and regional economy. Accordingly, the proposed project would be consistent with this policy.
CDE Policy 8. The City of Irwindale will promote and support the development of a regional commercial center.	**Not Applicable.** The proposed project would allow for the development of 3,000,000 building square feet of industrial and office uses and 12,000 building square feet of commercial uses. The limited commercial uses are planned to meet local retail needs and not intended as part of a regional commercial center. Development of the project site with the intended uses would not preclude or inhibit the City's ability to implement this policy at other sites within the City.
CDE Policy 10. The City of Irwindale will promote development that will benefit the community as a whole in terms of both jobs and revenue generation.	**Consistent**. The proposed project would contribute to the economy of the region through new capital investment and the creation of new employment opportunities. The proposed project would generate long-term employment opportunities that could be filled by residents of Irwindale and surrounding communities and would support ongoing economic activity through industrial and commercial operations. In addition, the proposed project would generate public revenues that would

Table 3.10-2 General Plan Consistency Analysis

Relevant Issue Areas and Policy	Consistency Analysis
	benefit the City and support municipal services. Accordingly, the proposed project would be consistent with this policy.
Issue Area – Urban Design. The City of Irwindale will continue its efforts in improving the appearance of the community.	
CDE Policy 12. The City of Irwindale will continue to promote quality design in the review and approval of commercial and industrial development through the application of the commercial and industrial design guidelines.	**Consistent**. The proposed project would develop the project site in accordance with the Design Guidelines established in Chapter 4 of the Specific Plan, which include comprehensive architectural and landscape standards and development criteria that are compatible with the design and architecture of surrounding uses. Accordingly, the proposed project would be consistent with this policy.
CDE Policy 13. The City of Irwindale will continue to employ a design theme in the review of future commercial and industrial development and in the rehabilitation of existing commercial and industrial uses.	**Consistent**. Chapter 3, Development Standards, and Chapter 4, Design Guidelines, in the Specific Plan establish development standards and design guidelines consistent with City-wide guidelines for commercial and industrial uses that create a well-defined identity for the proposed project. While the Specific Plan does not establish a private entity for long-term property maintenance, ongoing maintenance of buildings, site improvements, landscaping, and infrastructure would be required through project conditions, City Code Enforcement, and applicable maintenance requirements incorporated into future development approvals. Accordingly, the proposed project would be consistent with this policy.
CDE Policy 16. The City of Irwindale will continue to work towards the development of streetscape, sign standards, and a Public Art Program.	**Consistent**. Chapter 4, Design Guidelines, of the Specific Plan includes architectural and landscape guidelines to ensure high-quality design and establishes comprehensive streetscape design standards for interior streets and along the project site's public frontages, including specific standards for signage and streetscape for subsequent implementing projects. The Design Guidelines define a cohesive design theme intended to create a visually cohesive and welcoming environment for employees, visitors, and the surrounding community. Accordingly, the proposed project would be consistent with this policy.
INFRASTRUCTURE ELEMENT (IE)	
Issue Area – Maintenance of Service Standards. The City of Irwindale will continue to maintain the highest levels of public service to respond to the existing and future demand for such services.	
IE Policy 1. The City will continue to support the efforts of the City of Irwindale Public Works Department	**Consistent**. The proposed project would provide for roadways, infrastructure, and utilities to support on site land uses as the project site evolves. Roadway, utility, and infrastructure improvements would be implemented in coordination with

Table 3.10-2 General Plan Consistency Analysis

Relevant Issue Areas and Policy	Consistency Analysis
in maintaining the highest service standards feasible.	future development of the Specific Plan and as required by the City of Irwindale and applicable public service providers. The proposed project and all subsequent development would comply with all applicable building and engineering standards during the plan check process. Improvements would be provided as necessary to serve the project site while maintaining adequate service levels for existing and surrounding land uses. Accordingly, the proposed project would be consistent with this policy.
IE Policy 2. The City will continue to cooperate with those utility providers in the City to ensure that sufficient infrastructure capacity is available to meet current and future service demands.	**Consistent**. The proposed project would provide infrastructure and utilities to support on site land development. Development under the Specific Plan would occur in coordination with the City of Irwindale and applicable public and private utility providers to ensure that adequate infrastructure capacity is available to serve current and future demands. Utility improvements and system connections would be designed and implemented consistent with applicable service provider requirements and City standards. Accordingly, the proposed project would be consistent with this policy.
Issue Area – Traffic and Circulation. The City of Irwindale will strive to improve safe and efficient circulation in the City.	
IE Policy 3. The City of Irwindale will continue to develop and enhance the existing streets and intersections in the City.	**Consistent**. The Specific Plan includes roadway and sidewalk/parkway improvements intended to facilitate efficient vehicular and non-vehicular circulation through and around the project site. Frontage improvements are proposed along the project site's public street frontages on First Street and Irwindale Avenue, and would be implemented within the public right-of-way adjacent to the project site. These improvements would include sidewalks, parkways, curb and gutter, street lighting, and related streetscape and utility improvements, consistent with City standards. Implementing projects would also be required to pay applicable Development Impact Fees and construct any project-related off-site roadway or intersection improvements identified through future traffic analysis and required by the City of Irwindale, thereby implementing the project's fair-share of infrastructure improvements. While CEQA evaluates transportation impacts using vehicle miles traveled (VMT) pursuant to SB 743, the City also requires an analysis of proposed projects' impacts on local transportation

Table 3.10-2 General Plan Consistency Analysis

Relevant Issue Areas and Policy	Consistency Analysis
	infrastructure. The Traffic Impact Study, DEIR Appendix P1, includes an analysis of potential project-related impacts on intersection operations and Level of Service (LOS) at 24 key intersection in the project vicinity. Recommended intersection and roadway improvements, including an estimate of fair-share contribution to those improvements, is included in the study. Roadway and intersection improvements will be required for project approval, and the proposed project, therefore, is consistent with this General Plan policy.
IE Policy 4: The City of Irwindale will strive to ensure that all new development implements its "fair-share" of infrastructure improvements to offset the potential adverse impacts associated with the additional traffic that will be generated by the new development.	**Consistent**. See response to IE Policy 3.
IE Policy 5. The City of Irwindale will continue to support the development and expansion of the region's public and mass transit system.	**Consistent**. The Specific Plan area is west of and in proximity to the Metro A Line. By concentrating employment-generating uses near an existing regional transit facility, the proposed project would support the use of public and mass transit as an alternative to auto-based commuting. Accordingly, the proposed project would be consistent with this policy.
RESOURCE MANAGEMENT ELEMENT (REM)	
Issue Area – Natural Resources. The City of Irwindale will continue to cooperate in the maintenance and conservation of the area's natural resources.	
RME Policy 1. The City of Irwindale will continue to work with the quarries and other regulatory agencies to facilitate their reclamation.	**Consistent**. The two former quarries within the Specific Plan area are inactive, pre- Surface Mining and Reclamation Act (SMARA) pits that ceased operations prior to enactment of the SMARA. As described in Chapter 2, *Project Description,* and Section 3.11, *Mineral Resources*, reclamation of the on-site quarry pits would be governed by a Draft Operations Plan prepared pursuant to Title 14 of the California Code of Regulations for inert debris engineered fill operations, rather than by the Specific Plan itself. The City of Irwindale retains authority over reclamation of these non-SMARA quarry pits pursuant to Irwindale Municipal Code Chapter 17.23 and Ordinance No. 756, which requires

Table 3.10-2 General Plan Consistency Analysis

Relevant Issue Areas and Policy	Consistency Analysis
	approval of a Development Agreement to govern reclamation activities, regulatory coordination, and post-reclamation land use. The Operations Plan describes required coordination with applicable regulatory agencies, including the Los Angeles County Department of Public Health and the Regional Water Quality Control Board, and establishes conditions under which reclamation would occur prior to or in conjunction with redevelopment. Accordingly, the proposed project would be consistent with this policy.
RME Policy 3. The City of Irwindale will work with the quarry owners and/or operators and regulatory agencies to help facilitate their timely reclamation.	**Consistent**. See response to RME Policy 3.
Issue Area – Resource Preservation. The City of Irwindale will maintain and preserve those natural and man-made amenities that contribute to the City's livability.	
RME Policy 9. The City will continue to cooperate with the other agencies that are charged with improving air and water quality in the region.	**Consistent**. As detailed in Section 3.2, *Air Quality*, Section 3.7, *Greenhouse Gas Emissions*, and Section 3.9, *Hydrology and Water Quality*, implementation of the proposed project would be subject to and required to comply with all applicable federal, state, regional, and local regulations related to air quality, greenhouse gas emissions, and water quality. These regulations are administered by agencies including the South Coast Air Quality Management District and the Los Angeles Regional Water Quality Control Board, among others. Compliance with these regulatory requirements would ensure protection of regional air and water quality. Accordingly, the proposed project would be consistent with this policy.
RME Policy 11. The City of Irwindale supports the ethic of conservation of non-renewable resources. This includes efforts to reduce the use of energy (in any form), greenhouse gas (GHG) emissions (consistent with AB 32) and efforts to find new and more energy efficient methods for delivering services. The City supports the development of building standards that enable the community to design energy saving features such as solar energy	**Consistent.** Projects are required to comply with building codes, including CALGreen and the California Building Energy Efficiency Standards, which support reduced energy use and greenhouse gas emissions through energy-efficient building design, water-efficient landscaping, and sustainable development practices. Implementing projects in the Specific Plan area will be required to comply with water quality requirements of the Los Angeles County Low Impact Development (LID) Manual, including implementation of best management practices to ensure applicable water quality standards are met. Through compliance with these adopted building and environmental standards, the proposed project would support the conservation of non-renewable resources

Table 3.10-2 General Plan Consistency Analysis

Relevant Issue Areas and Policy	Consistency Analysis
systems, water efficient landscaping, and sustainable, green, and energy efficient building standards.	and the City's objectives related to energy efficiency and greenhouse gas reduction. Accordingly, the proposed project would be consistent with this policy.
Issue Area – Mining and Reclamation. The following policies focus on those City policy actions that can be taken to improve environmental compliance, reclamation planning and long-term economic improvement of the mines and quarries (inactive, active and reclaimed) in Irwindale.	
RME Policy 20. The City of Irwindale will encourage site plan designs to provide the appropriate setbacks and/or design features that reduce toxic air contaminants at the source.	**Consistent**. The Specific Plan establishes development standards and design guidelines that regulate building placement, site layout, circulation, and landscaping for industrial and business park uses. These standards allow for separation between emission-generating activities and site boundaries, incorporation of landscaped buffers, and orientation of buildings and circulation areas to reduce potential exposure to air contaminants. By guiding site design through setback, landscaping, and building configuration requirements consistent with City design standards, the proposed project would support reduction of potential toxic air contaminant exposure at the site design level. Accordingly, the proposed project would be consistent with this policy.
RME Policy 23. The City of Irwindale will actively participate in decisions on the site or expansion of facilities of land uses (e.g., freeway expansions), to ensure the inclusion of air quality Mitigation Measures.	**Consistent**. The proposed project would not involve the expansion of any freeways or roadways. The project will contribute to off-site improvements such as landscaping, sidewalks and driveways. Accordingly, the proposed project would be consistent with this policy.
RME Policy 25. The City of Irwindale will monitor traffic and congestion to determine when and where the City needs new transportation facilities to achieve increased mobility efficiency.	**Not Applicable**. This policy relates to the monitoring and management of traffic congestion and the provision of transportation facilities to address congestion. Pursuant to Senate Bill 743, traffic congestion–based impacts are no longer evaluated under CEQA; nonetheless, the Project's consistency with LOS standards and recommended improvements is addressed in the non-CEQA analysis portion of the Transportation Impact Study for the Specific Plan, included as Appendix [XX] and discussed in Section 3.14, *Transportation* of this Draft EIR.
RME Policy 26. The City of Irwindale will design traffic plans, including the development of suggested routes for trucks, to minimize idling time.	**Consistent**. The Specific Plan requires development projects to utilize designated truck routes and establishes circulation standards intended to support efficient truck movement within and adjacent to the Specific Plan area. By directing truck access to Irwindale Avenue, a designated truck route under the General Plan, and providing internal circulation designed to

Table 3.10-2 General Plan Consistency Analysis

Relevant Issue Areas and Policy	Consistency Analysis
	accommodate truck movements, the proposed project would support efficient freight operations and reduce unnecessary vehicle queuing and idling. Accordingly, the proposed project would be consistent with this policy.
RME Policy 28. The City of Irwindale will require conditions for discretionary approvals that require fugitive dust controls and compliance mechanisms for stationary sources (landfill, composting facilities, aggregate facilities, etc.)	**Consistent**. While the Specific Plan does not propose landfill facilities, composting facilities, or aggregate processing facilities, implementation of the Specific Plan would include quarry reclamation activities involving the placement and grading of inert fill material. These activities have the potential to generate fugitive dust emissions during site preparation, filling, and grading operations. Consistent with this policy, future discretionary approvals and implementation activities would be subject to applicable South Coast Air Quality Management District requirements, City conditions of approval, and dust-control measures designed to minimize fugitive dust emissions. In addition, the Specific Plan proposes industrial, light manufacturing, warehouse distribution, logistics, and supporting office uses and does not include other stationary sources specifically identified in this policy. Accordingly, the proposed project would be consistent with this policy.
SAFETY ELEMENT	
Policy SAF16.8 – Critical Facilities. Ensure that critical public facilities and infrastructure that support community health and safety are designed to maximize resilience and ability to function during and after a disaster.	**Consistent**. Development under the proposed project would be required to comply with applicable California Building Code, Los Angeles County Building Code, and Fire Code requirements related to emergency access, fire protection, and structural safety. Future implementing projects would be reviewed by the City to ensure adequate emergency vehicle access and site circulation, consistent with Safety Element policies addressing resilience of facilities and emergency response capabilities. Accordingly, the proposed project would be consistent with this policy.
Policy SAF16.10 – Emergency Evacuation. Ensure that evacuation routes are adequately planned, maintained, and accessible to support safe and efficient evacuation during emergencies.	**Consistent.** The proposed project would include a coordinated internal circulation system and multiple access points connecting to the surrounding public roadway network, including First Street and Irwindale Avenue. Future implementing projects would be required to comply with applicable City and Fire Code requirements related to emergency access, roadway design, and site circulation. These features would support safe and efficient emergency access

Table 3.10-2 General Plan Consistency Analysis

Relevant Issue Areas and Policy	Consistency Analysis
	and evacuation consistent with Safety Element Policy SAF16.10. Accordingly, the proposed project would be consistent with this policy. The project site was not identified in Chapter 10 "Housing Sites Analysis" of the certified 2021–2029 Housing Element.

City of Azusa General Plan

Although the project site is located within the City of Irwindale, the City of Azusa adjoins portions of the project site's southern boundary and is located immediately east and north of the project site beyond the Irwindale city limits. Land uses in adjacent areas of Azusa are predominantly industrial, transportation, utility, and open space uses similar to those surrounding the project site within Irwindale. Because the proposed project would generate construction and operational traffic, including truck traffic utilizing regional roadway facilities such as Irwindale Avenue and First Street, project-related effects could extend beyond the City of Irwindale and into nearby areas of Azusa. In addition, construction activities, including material hauling and earthmoving operations, have the potential to generate temporary noise and traffic effects that could be experienced by adjacent uses within Azusa. However, because nearby Azusa land uses are predominantly industrial in character and are generally compatible with the types of industrial activities proposed by the project, the potential for land use conflicts across jurisdictional boundaries is limited.

City of Irwindale Zoning Code

The Irwindale Zoning Code, Title 17 of the Irwindale Municipal Code, establishes specific standards for the use and development of all properties in the City by regulating land uses and development intensity, including limits on building setbacks, landscaping standards, and building heights. Under existing conditions, the project site is zoned M-2 (Heavy Industrial).

As described in Chapter 2, *Project Description*, the proposed project includes adoption of the Brew Yard Specific Plan and approval of a Zone Change and Zone Ordinance Amendment to replace the existing M-2 zoning with the Brew Yard Specific Plan zoning framework. Upon adoption, the Specific Plan would establish the land use regulations and development standards applicable to future development within the project site.

Development under the Specific Plan would be governed by the land use designations, development standards, and design guidelines in the proposed Specific Plan, which would constitute the zoning regulations applicable to the site. Approval and implementation of the proposed zone change and Specific Plan would ensure that future development on the project

site is consistent with applicable zoning regulations. Municipal code subsection 1.5.2, "Relationship to Other Documents," states that where the Specific Plan is silent, the Irwindale Municipal Code shall apply. Additionally, the Specific Plan has been prepared to be consistent with the intent and framework of the Irwindale Municipal Code to the extent practicable, while providing tailored regulations necessary to implement the Specific Plan vision for the site. Therefore, where the Specific Plan contains specific development standards, those standards would govern; where the Specific Plan is silent, the applicable provisions of the Irwindale Municipal Code would apply.

Inconsistency with existing zoning, where a zone change is proposed as part of the project, does not in itself constitute a significant environmental impact because zoning consistency is a policy determination rather than a physical change to the environment. Potential environmental impacts associated with implementation of the proposed project are evaluated in the relevant environmental resource sections of this DEIR. Accordingly, the proposed project would result in a **less than significant** impact related to consistency with the City of Irwindale Zoning Code.

Significance without Mitigation: Less than significant.

3.10.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to land use?

A cumulative land use impact would be considered significant if implementation of the proposed project, when combined with past, present, and reasonably foreseeable development in the City of Irwindale and surrounding area, would result in conflicts with applicable land use plans, policies, or regulations, physically divide an established community, or otherwise create land use incompatibilities.

The proposed project would redevelop a large, previously disturbed site historically used for quarrying and industrial activities within an established industrial and infrastructure-oriented urban context. The project site is not located within or adjacent to an established residential neighborhood and would not physically divide an existing community. Surrounding and cumulative development in the area primarily consists of industrial, manufacturing, logistics, utility, and transportation-related uses as well as large-scale recreational open space in the Santa Fe Dam Recreation Area. The project site is also adjacent to portions of the City of Azusa, where nearby lands are designated and developed for industrial uses that are compatible with the proposed land use designations. Although construction and operation of the proposed project would generate traffic, including haul truck traffic and future operational truck trips that may utilize regional transportation facilities serving both Irwindale and Azusa, such activity would occur within an area characterized by existing industrial and transportation uses and would not result in land use incompatibilities across jurisdictional boundaries.

The proposed project is generally consistent with the City's General Plan land use framework, which supports the continued reuse and redevelopment of former quarry and industrial lands for employment-generating uses. Although adoption of the Specific Plan would require approval of a Zone Change and Zone Ordinance Amendment, the Specific Plan would establish a comprehensive, site-specific land use and development framework to guide future development of the site and ensure compatibility with surrounding uses. The proposed project would require an amendment to the General Plan Map and would be designed to implement the City's long-term land use and economic development objectives. The proposed project would not result in land use compatibility or transportation network-related impacts to the adjacent City of Azusa.

Cumulative development in the surrounding area would similarly be subject to applicable General Plan policies, zoning regulations, and project-level environmental review, which collectively ensure consistency with adopted land use plans and minimize land use conflicts. The proposed project would not introduce land uses that are incompatible with surrounding or cumulative development, nor would it create land use conflicts when considered in combination with other approved or reasonably foreseeable projects.

Accordingly, cumulative land use and planning impacts would be **less than significant,** and the proposed project's contribution would not be cumulatively considerable.

3.10.6 References

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SCAG (Southern California Association of Governments). 2023. Certified Final PEIR for Connect SoCal 2024. https://scag.ca.gov/peir.

3.11 MINERAL RESOURCES

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts of the proposed Irwindale Brew Yard Specific Plan to mineral resources in the City of Irwindale. Minerals are defined as any naturally occurring chemical elements or compounds formed from inorganic processes and organic substances. The analysis in this section is based in part on the following technical report:

- *Mineral Resource Impact Evaluation Report*, Crystal Waters Consulting, September 2025 (Appendix M)

3.11.1 Regulatory Framework

Federal, state, and local laws, regulations, plans, or guidelines related to mineral resources that are applicable to the Specific Plan are summarized below.

FEDERAL

Mining and Mineral Policy Act of 1970

The Mining and Mineral Policy Act of 1970 is intended to promote and expand the development of a domestic mineral industry. This statute established a federal policy regarding mineral resources across the United States, covered hard rock mining and oil and gas production, and established modern federal policy regarding mineral resources. The act applies to all minerals, including aggregate (sand and gravel), coal, geothermal, and oil and gas, that are subject to federal jurisdiction, including the Bureau of Land Management and United States Forest Service.

STATE

Surface Mining and Reclamation Act (SMARA)

The Surface Mining and Reclamation Act (SMARA) of 1975 requires that the State Mining and Geology Board (SMGB) map areas throughout California that contain regionally significant mineral resources. Aggregate mineral resources are classified by the SMGB by application of the Mineral Resource Zone (MRZ) system. The MRZ system is used to map all mineral commodities within identified jurisdictional boundaries. The MRZ system classifies lands that contain mineral deposits and identifies the presence or absence of substantial sand and gravel deposits and crushed rock source areas (i.e., commodities used as, or in the production of, construction materials). Mining operations and mine reclamation activities are required to be performed in accordance with laws and regulations adopted by the SMGB. The State Department of Conservation's Office of Mine Reclamation oversees reclamation requirements. Following are the MRZ designations:

- **MRZ-1:** Areas where adequate information indicates that no significant mineral deposits are present or where it is judged that little likelihood exists for their presence.
- **MRZ-2:** Areas where adequate information indicates significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- **MRZ-3:** Areas containing mineral deposits, the significance of which cannot be evaluated from available data.
- **MRZ-4:** Areas where available information is inadequate for assignment to any other MRZ.

SMARA Section 2790

> After receipt of mineral information from the State Geologist pursuant to subdivision (d) of Section 2761, the board may, by regulation adopted after a public hearing, designate specific geographic areas of the state as areas of statewide or regional significance and specify the boundaries of the geographic areas. The designation shall be included as a part of the state policy and shall indicate the reason for which the particular area designated is of significance to the state or region, the adverse effects that might result from premature development of incompatible land uses, the advantages that might be achieved from extraction of the minerals of the area, and the specific goals and policies to protect against the premature incompatible development of the area.

SMARA Section 2726

> "Area of regional significance" means an area designated by the board pursuant to Section 2790 which is known to contain a deposit of minerals, the extraction of which is judged to be of prime importance in meeting future needs for minerals in a particular region of the state within which the minerals are located and which, if prematurely developed for alternate incompatible land uses, could result in the permanent loss of minerals that are of more than local significance.

SMARA Section 2727

> "Area of statewide significance" means an area designated by the board pursuant to Section 2790 which is known to contain a deposit of minerals, the extraction of which is judged to be of prime importance in meeting future needs for minerals in the state and which, if prematurely developed for alternate incompatible land uses, could result in the permanent loss of minerals that are of more than local or regional significance.

Mineral Resources and Mineral Hazards Mapping Program

The California Geological Survey (CGS) provides geologic expertise and information about California's diverse nonfuel mineral resources. As required by the SMARA of 1975, the State Geologist classifies these resources in an effort to locate economically significant mineral deposits and potential areas of deposits based upon scientific data. Information relating to California's nonfuel resources, naturally occurring mineral hazards, and active and historic mining activities is collected to classify land under the Mineral Resources and Mineral Hazards Mapping Program. The CGS defines several geographic areas that collectively cover a single mineral classification study as Product-Consumption (P-C) regions. The CGS identifies MRZs for each P-C region, mine/quarry, or other geographic area included in a mineral classification study. Some MRZs are classified by the presence or absence of significant sand, gravel, or stone deposits that are suitable as sources of aggregate material. Construction aggregate is California's primary mineral resource.

California Department of Conservation, Geologic Energy Management Division

California Department of Conservation's Geologic Energy Management Division is responsible for monitoring the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells with the intention of environmental protection, protecting public health and safety, and general environmental conservation. The division is also responsible for collecting groundwater, oil, gas, and geothermal resource data for maintaining a record of all drilled and abandoned well locations.

California State Mining and Geology Board

The SMGB operates within the Department of Conservation. The SMGB serves as regulatory, policy, and appeals body to represent the State's interest in the reclamation of mined lands, geology, geologic and seismologic hazards, and the conservation of mineral resources.

Inert Debris Engineered Fill Operations

The California Code of Regulations, Title 14, Division 7, Chapter 3, Article 5.9 Section 17388.3, Inert Debris Engineered Fill Operations, requires operators to submit a specific "operation plan" to the enforcement agency with their notification of intent to operate. A Draft Operations Plan (see Appendix C) has been prepared for the Brew Yard Specific Plan fill operations for the two former on-site quarries.

The Draft Operations Plan describes:

- **Operation**, including site plan provisions for office trailer, temporary movable structures, signage, waste processing, load checking, equipment, hazardous waste inspection of incoming material, salvaging, employee training, and site storage.

- **Environmental Controls**, including noise, odor, litter, dust, rodents and insects, fires, sanitary facilities, and accidental spills.
- **Sequence of Development** includes the site development plan and final elevations (rough grading plans Phase I and Phase 2).
- **Geology and Groundwater** describes underlying geology, groundwater and governing water quality control plan, drainage control, leachate control, and groundwater monitoring.
- **Operating Records** describes the records that will be maintained for the lead agency (City of Irwindale) and the Los Angeles County Department of Public Health and Regional Water Quality Control Board.

LOCAL

City of Irwindale Municipal Code

The City of Irwindale Municipal Code addresses minerals and mineral resources.

- **Chapter 17.11, Quarry Overlay "Q" Zone.** This section implements standards applicable to the use of property during such time as mining and reclamation are occurring at such property within the quarry zone. Upon completion of the mining and reclamation activities in accordance with the applicable reclamation plan, to the satisfaction of the city, the applicable zoning of the property will revert to the underlying zone.
- **Chapter 17.22, Surface Mining and Reclamation Plans.** The purpose and intent of this chapter is to ensure the continued availability of important mineral resources, while regulating surface mining operations as required by California's Surface Mining and Reclamation Act and State Mining and Geology Board regulations for surface mining and reclamation practices.
- **Chapter 17.23, Reclamation of Mines Exempt from the Surface Mining and Reclamation Act.** This chapter governs the reclamation of exempt mines and establishes a local regulatory process under which applicable reclamation activities are subject to City oversight and a required Development Agreement. It specifically includes pits that were mined and ceased operation prior to the January 1, 1976 effective date for SMARA.
- **City of Irwindale Ordinance No. 756**. Adopted in 2021, Ordinance No. 756 identifies mines in Irwindale that are exempt from the requirements of SMARA. These include, but are not limited to:
    - Mining pits which had mining operations conducted prior to January 1, 1976, and which are required to have, or requested to have, additional reclamation;

- Mining pits excavated pursuant to SMARA, but not reclaimed, and which are required to have, or requested to have, additional reclamation; or
- Mining pits excavated and reclaimed pursuant to SMARA which are required to have, or requested to have, additional reclamation.

  "Reclamation" shall be defined as the combined process by which adverse environmental effects of surface mining are minimized and mined lands are returned to a beneficial end use.

  The reclamation of Non-SMARA Pits is allowed only upon approval by the city of a development agreement, with appropriate standards and public benefits to be negotiated with the city and complying with all other standards imposed by the chapter.

3.11.2 Existing Conditions

HISTORICAL OVERVIEW

As described Chapter 2, *Project Description*, based on aerial photographs, the project site had been mined by 1928 with two areas of installed railroad spurs apparently serving the quarries. Sand and gravel were excavated from two quarries, which were inactive and ceased operations in the early 1970s before SMARA was enacted.

In 1982, the State Geologist initially classified the project site as MRZ-2 in "Mineral Land Classification of the Greater Los Angeles Area," specifically "Part IV: Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region" (SR 143, Part IV). In this report, the project site was classified MRZ-2 and placed in Sector E, as shown in the 1982 portion of Figure 3.11-1, *Historical Mineral Classifications*.

After the State Geologist classified the area, the SMGB conducted the second phase of the process in 1984 and published the "SMARA Designation Report No. 3." During the designation process, the SMGB removed portions of Sector E because of incompatible land use concerns, past extraction activities, and the overall abundance of mineral resources in the region. The project site was one of the areas that the SMGB removed; subsequently, they did not designate the site as a mineral resource of statewide or regional significance. This is shown in the 1984 part of Figure 3.11-1, where the project site is outlined in red. Areas shaded in gray are those that the SMGB designated areas of statewide or regional significance. Areas not shaded in gray, including the project site, are not considered areas of statewide or regional significance.

In 2010, the State Geologist published Special Report 209, which updated the mineral classification for the San Gabriel Valley. Special Report 209 did not change the classification or designation of mineral resources for the project site. On the 2010 part of Figure 3.11-1, the green-shaded areas are classified and designated MRZ-2; the project site is not shaded green,

indicating the updated mineral classification report did not change the classification or designation for this area.

PRODUCT CONSUMPTION REGIONS

The City of Irwindale is the San Gabriel Valley Production-Consumption Region (P-C region), in which there are 56 cities. Of these, only four have active surface mining operations within their jurisdiction: Arcadia, Azusa, Irwindale, and Monrovia (SMGB 2014).

REGIONALLY SIGNIFICANT AGGREGATE RESOURCE SECTORS

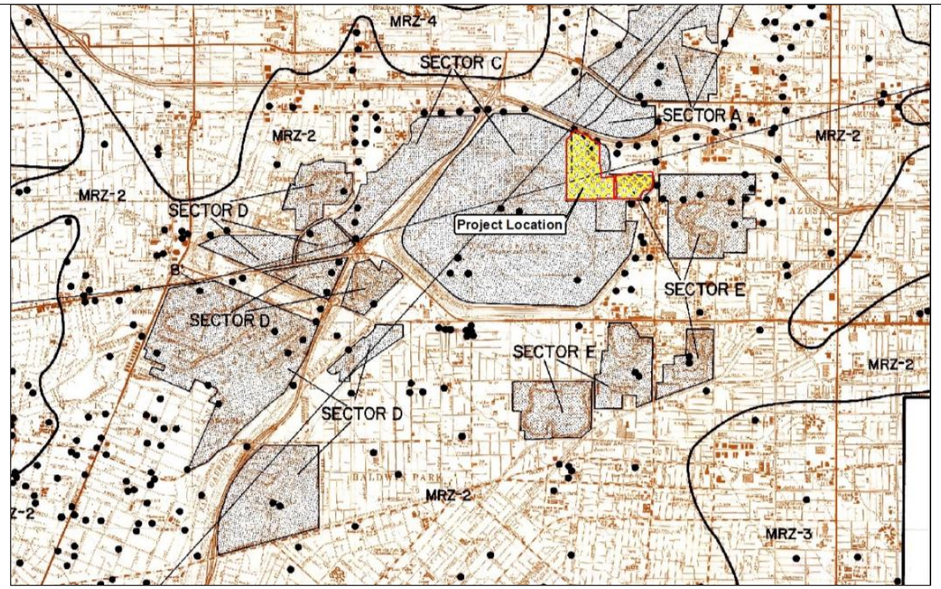
In 1971, the City adopted the "Q Zone" or Quarry Zone as a means of designating areas where quarries and related sand and gravel industries could locate. Areas in Irwindale that are classified by the State Geologist and designated by the SMGB Reclamation Regulations as regionally significant are in Q Zones.

The official zoning map for Irwindale identified Q Zones in four areas. Three Q Zones are on the western side of the City, and one is on the southern edge of the City (Irwindale 2025). The project site is not designated a Q Zone area because it is not classified by the State Geologist and designated by the SMGB as regionally significant; therefore, it is not identified in the General Plan as being an area of statewide or regional significance to the city, nor has it been identified as an area for future extraction.

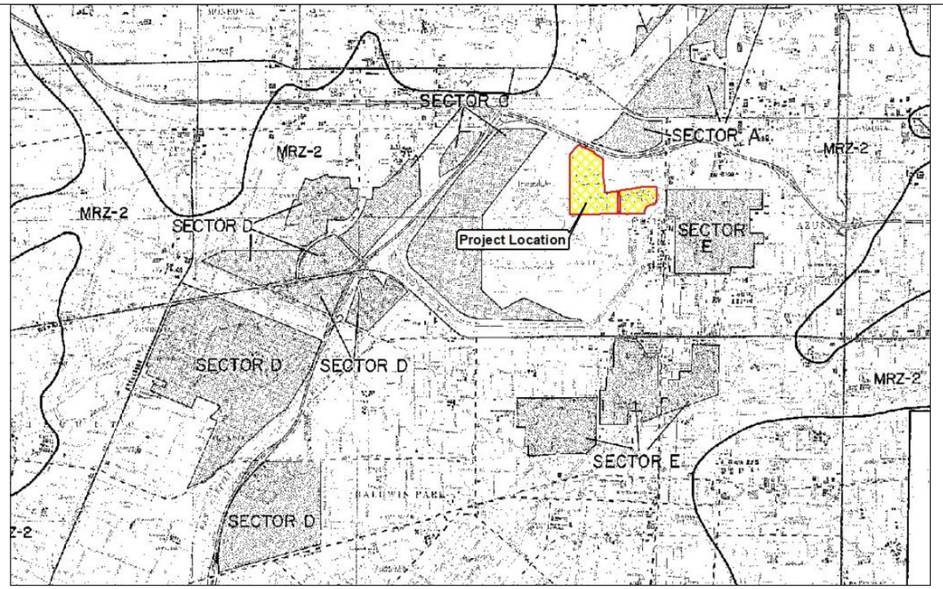
IRWINDALE GENERAL PLAN MINERAL RESOURCE POLICIES

The General Plan includes the following policies related to mineral sites and resources:

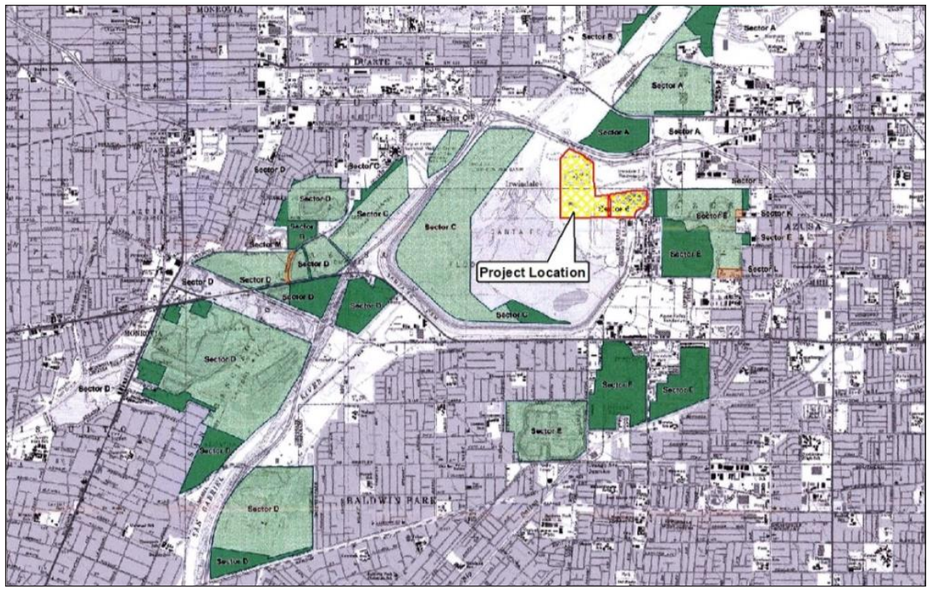
- **Community Development Element Policy 2.** The City of Irwindale will continue to plan for the transition of the quarries located within the City to other land uses.
- **Community Development Element Policy 11.** The City of Irwindale will permit quarry operations to continue as long as it is feasible to do so and only if the quarries are operating in a healthful and safe manner pursuant to existing codes and regulations.
- **Resource Management Element Policy 1.** The City of Irwindale will continue to work with the quarries and other regulatory agencies to facilitate their reclamation.
- **Resource Management Element Policy 3**. The City of Irwindale will work with the quarry owners and/or operators and regulatory agencies to help facilitate their timely reclamation.



1982 Mineral Classification of San Gabriel Valley



1984 Mineral Designation of San Gabriel Valley



2010 Mineral Designation of San Gabriel Valley

1982 – Site classified as MRZ-2 and placed in Sector E.
(MRZ-2 – areas where significant mineral deposits are present or where it is judged that a high likelihood of presence exists)

1984 – SMGB removed project site from Sector E.
(Gray areas are designated as statewide or regionally significant)

2010- Green areas are classified as MRZ-2.
(Project site not modified and not within a statewide or regionally significant designation)

Project Site Boundary

0 1
Scale (Miles)

Source: Crystal Waters Consulting 2025.

Figure 3.11-1
Historical Mineral Classifications of San Gabriel Valley

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- **Resource Management Element Policy 11**. The City of Irwindale will consider the establishment of a systematic environmental monitoring program for mining and landfill operations, and strengthening the existing annual inspection program, including assessments of slope stability, public safety hazards, air and water quality, noise, and security.
- **Resource Management Element Policy 14**. The City of Irwindale will implement improved reclamation planning at targeted sites to ensure post-mining land uses consistent with the City's long-term planning and economic development goals.
- **Resource Management Element Policy 16**. The City of Irwindale will also pursue legislative changes to SMARA, particularly to permit wider latitude for periodic revision of plans. Periodic review and update would ensure that reclamation plans developed today (and in years past), reflect modern technical standards, land use goals, and provisions for public health and safety at the time of reclamation implementation.

3.11.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to mineral resources if it would:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

3.11.4 Project Impact Analysis

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

As noted above, the project site was initially classified by the State Geologist as MRZ-2, which provides an initial indication that adequate information indicates that significant mineral resources are present or there is a likelihood of their presence. However, classification is only the first phase of an ultimate "designation" that formally determines whether a given mineral resource is one of regional or statewide significance. The second phase, designation, is the formal process where the SMGB determines whether an area classified as MRZ-2 qualifies as an area of statewide or regional significance under SMARA.

As described above, the SMGB has not designated the project site as a mineral resource of statewide or regional significance because of a combination of incompatible land use concerns, past extraction activities, and the overall abundance of mineral resources in the region. Because the site has been classified by the State Geologist, the City of Irwindale requested that an economic feasibility analysis be prepared to determine whether an independent mining operation would be economically viable at the property. A mineral resource impact evaluation report was prepared including a mineral mining economic analysis (Appendix M) for the Brew Yard Development Site.

As further explained in the mineral resource impact evaluation report, a classified mineral deposit would be considered of regional or statewide importance (and would be of value to the region and the residents of the state) if it is economically viable to extract. The term "economic" is defined as implying that "profitable extraction or production under defined investment assumptions has been established, analytically demonstrated, or assumed with reasonable certainty."

An economic feasibility analysis was therefore prepared to determine whether the mineral resources present on the site would be economically viable to extract. If found to be economically feasible to extract the resource (if the economic benefits are greater than the economic costs of operating an independent construction aggregate operation at the Brew Yard site), the mineral resource would be concluded to be of regional or statewide significance. The analysis evaluated the economic feasibility using the income method and a discounted cash flow model to estimate the Net Present Value (NPV) generated by potential mining over time. A positive NPV would indicate that the estimated earnings from the mining operation surpass the projected costs. Such a finding would indicate that the mining operation might potentially be economically viable, warranting further analysis of its feasibility. Alternatively, a negative NPV would indicate that the expected costs outweigh the earnings, signaling that a mining operation is economically infeasible.

For the analysis the project site was divided into Area A and Area B: Area A is approximately 85 acres and is west of the existing brewery and its access road; Area B is approximately 48 acres south of the existing brewery and east of its access road (see Figure 6 of Appendix M). The analysis assumed that the brewery's access road would remain and mining operations or activities could not disrupt the availability of that road.

A discounted cash flow analysis was conducted that assessed the NPV of a conceptual construction aggregate operation under conservative and industry-standard assumptions reflecting permitting risk, market conditions, reclamation requirements, and operational uncertainty. Because the site is not entitled for mining, discount rates of 12 percent and 15 percent were applied.

The evaluation assumed a stand-alone aggregate operation subject to SMARA requirements, including preparation of an EIR, approval of a land use permit and reclamation plan, and establishment of financial assurances. Production was assumed to ramp up following entitlement approval and continue until remaining reserves are exhausted. Average aggregate sales prices reflect prevailing market conditions in the Irwindale area and exclude transportation costs, consistent with standard industry practice. Costs include production, royalties, City mining taxes, regulatory fees, capital investment, property taxes, and reclamation financial assurances. Land acquisition and annual land carrying costs were excluded to conservatively test whether mineral extraction would be economically viable on a standalone basis.

As shown in Table 3.11-1, *Mining Economic Feasibility Results,* the base case analysis resulted in negative NPVs at both discount rates, indicating that the projected costs of mining would exceed potential revenues and that aggregate extraction at the site is economically infeasible.

Table 3.11-1 Mining Economic Feasibility Results

	Discount Rates	
	12%	15%
NPV Results	-$23.7 million	-$23.4 million

Source: Appendix M

To test whether alternate assumptions could materially change this conclusion, a sensitivity analysis evaluated multiple scenarios, including expanded mining areas, increased reserve volumes, higher sales prices, reduced capital costs, shorter entitlement time frames, acceptance of fill material with tipping fee revenue during reclamation, and reduced-scale processing alternatives. Even under these favorable and, in some cases, highly optimistic assumptions, all scenarios produced negative NPVs and failed to offset the substantial capital, reclamation, and regulatory costs associated with mining at the site.

The analysis also considered a reduced-processing "pit run" scenario intended to minimize capital investment by selling partially processed material for off-site finishing. This alternative remained economically infeasible due to material handling limitations, quality constraints, extended operational timelines, and continued reclamation obligations. Additional scenarios that significantly extended mine life would further delay site redevelopment without yielding economically viable outcomes.

Based on the base case and sensitivity analyses, the remaining mineral reserves at the Brew Yard Development site cannot be extracted in a manner that is economically feasible under reasonable market and regulatory conditions. The site is not designated by the SMGB and mineral extraction is not economically feasible under current assumptions, which are relevant indicators of value. Accordingly, the site does not contain mineral resources of statewide or regional significance as defined by CEQA. As an additional indication of this conclusion, the project site has not been designated as a mineral resource of statewide or regional significance because of incompatible land use concerns, past extraction activities, and the overall abundance of mineral resources in the region.

In sum, the project site does not contain mineral resources of value to the region and the residents of the state because the resources are not economical to extract. Moreover, since as described in Chapter 2.0, *Project Description,* the southeastern quarry pit would be filled with material from the northwest quarry pit. The mineral resource, therefore, is not being lost.

Therefore, the proposed project would not result in an impact related to loss of availability of a known mineral resource of regional or state value, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The applicable local land use plan for the project site is the City of Irwindale General Plan. The project site is Industrial/Business Park (see General Plan Exhibit 2-3, City of Irwindale Land Use Plan – Base Land Use Designations). The City also established a Quarry Overlay land use map for those areas that are being mined or could be mined.

> **Quarry/Quarry Overlay**. This land use designation applies to the quarry uses in the City. The Quarry Overlay designation supports a diverse array of zones including Commercial, Commercial-Recreation, Residential-Business Park, Industrial- Business Park, and Open Space. All new development within the Quarry Overlay Zone will be required to undergo discretionary review in terms of planning and environmental review. (Irwindale 2008)

The proposed project site is not designated Quarry Overlay.

General Plan Section 5, Resource Management Element, addresses mineral resources. This section references two inactive quarries within or on a portion of the project site (the Miller Brewing–Reliance and the Livingston Graham/Kincaid quarries). The General Plan does not describe or delineate either former quarry site as containing an important mineral resource.

No currently existing specific plan or other land use plan delineates the project site as a locally important mineral resource recovery site.

Additionally, all previously economically viable mineral resources have been extracted from the on-site quarries by past mining activity, which ceased several decades ago, and no active mining is occurring. The proposed Specific Plan would explicitly exclude mining as an allowable use in the future. Considering these historical and current land use conditions, combined with the fact that the project site is not delineated in the General Plan as a locally important mineral resource recovery site, the proposed project would not result in direct or indirect impacts related to the loss of availability of a locally important mineral resource recovery site delineated on a local plan, specific plan, or other land use plan. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.11.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to mineral resources?

Cumulative impacts refer to incremental effects of an individual project when viewed in connection with the effects of past projects, current projects, and probable future projects. The geographic area for cumulative analysis for minerals would be Los Angeles County.

As described above, the project site and surrounding areas are classified as MRZ-2, but the mineral resources at the project site have not been designated to be statewide or regional significance by the SMGB per SMARA Section 2790. Furthermore, there are currently no active mining operations on-site, and the project site has not been delineated on a local general plan, specific plan, or other land use plan result as a locally important mineral resources recovery site. Therefore, the project would not individually result in or contribute to the loss of mineral resources. Additionally, the proposed project would not interfere with nearby mining operations in the Q Zone, and no active oil or natural gas wells are near the project site.

Moreover, with respect to any potential future projects in mineral resource areas of the City of Irwindale (for example, within the Q Zone or other mineral resources of areas), those projects (as with the proposed project) would be required to undergo discretionary review and would

be subject to the same mineral resource protection requirements and CEQA review as the project.

Thus, the proposed project would not result in a cumulatively considerable impact related to (a) loss of availability of a known mineral resource that would be of value to the region and the residents of the state, or (b) loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, cumulative impacts would be **less than significant**.

3.11.6 References

Irwindale, City of. 2025, May. City of Irwindale: Official Zoning Map. https://www.irwindaleca.gov/DocumentCenter/View/11622/FINAL-Zoning-Map-Version-1-2025?bidId=.

Irwindale, City of. June 2008. City of Irwindale General Plan Update.

SMGB (State Mining and Geology Board). 2014. Updated Designation of Regionally Significant Aggregate Resources In the San Gabriel Valley Production-Consumption Region, Los Angeles County. https://www.conservation.ca.gov/smgb/reports/Documents/Designation Reports/Designation-Report-12-San-Gabriel.pdf.

3.12 NOISE

This section of the Draft Environmental Impact Report (DEIR) evaluates the noise and vibration impacts of the proposed Irwindale Brew Yard Specific Plan (proposed project) on sensitive receptors in the City of Irwindale. Specifically, this section summarizes relevant federal, State, and local noise guidelines, policies, and standards; reviews noise levels at existing receptor locations, and evaluates potential noise impacts using procedures and methodologies specified by the Federal Transit Administration (FTA). The analysis in this section is based in part on the following technical studies:

- *Noise Modeling Data*, PlaceWorks, December, 2025.
- *Transportation Impact Study Irwindale Brew Yard Specific Plan*, LLG, February 6, 2025.

Complete copies of these studies are included in the Technical Appendices to this Draft EIR as Appendices N and P, respectively.

No comments related to community noise were raised during the NOP comment period (March 6, 2024, through April 5, 2024) or at the scoping meeting held on February 23, 2024.

Noise and Vibration Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” The following are brief definitions of terminology used in this section:

TECHNICAL TERMINOLOGY

- **Sound.** A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.
- **Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- **Decibel (dB).** A unitless measure of sound on a logarithmic scale.
- **A-Weighted Decibel (dBA).** An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Equivalent Continuous Noise Level (Leq); also called the Energy-Equivalent Noise Level.** The value of an equivalent, steady sound level which, in a stated time period (often over an hour) and at a stated location, has the same A-weighted sound energy as the time-varying

sound. Thus, the Leq metric is a single numerical value that represents the equivalent amount of variable sound energy received by a receptor over the specified duration.

- **Statistical Sound Level (Ln).** The sound level that is exceeded "n" percent of time during a given sample period. For example, the L50 level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period); that is, half of the sampling time, the changing noise levels are above this value and half of the time they are below it. This is called the "median sound level." The L10 level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum) and this is often known as the "intrusive sound level." The L90 is the sound level exceeded 90 percent of the time and is often considered the "effective background level" or "residual noise level."
- **Lmin and Lmax.** The lowest and highest measured noise levels, in terms of root-mean-square noise levels.
- **Day-Night Sound Level (Ldn or DNL).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the sound levels occurring during the period from 10:00 pm to 7:00 am.
- **Community Noise Equivalent Level (CNEL).** The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added from 7:00 pm to 10:00 pm and 10 dB from 10:00 pm to 7:00 am. For general community/environmental noise, CNEL and Ldn values rarely differ by more than 1 dB (with the CNEL being only slightly more restrictive, that is, higher than the Ldn value). As a matter of practice, Ldn and CNEL values are interchangeable and are treated as equivalent in this assessment.
- **Sensitive Receptor.** Noise- and vibration-sensitive receptors include land uses where quiet environments are necessary for enjoyment and public health and safety. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, and nursing homes are examples.
- **Peak Particle Velocity (PPV).** The peak rate of speed at which soil particles move (e.g., inches per second) due to ground vibration.

SOUND FUNDAMENTALS

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in Hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the decibel (dB). Changes of 1 to 3 dBA are detectable under quiet, controlled conditions, and changes of less than 1 dBA are usually indiscernible. A 3 dBA change in noise levels is considered the minimum change that is detectable with human hearing in outside environments. A change of 5 dBA is readily discernable to most people in an exterior environment, and a 10 dBA change is perceived as a doubling (or halving) of the sound.

The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are "felt" more as a vibration. Similarly, while people with extremely sensitive

hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz. Since the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is usually used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal government, the State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

Sound Measurement

Sound intensity is measured through the A-weighted scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies.

Unlike linear units such as inches or pounds, decibels are measured on a logarithmic scale, representing points on a sharply rising curve. On a logarithmic scale, an increase of 10 dBA is 10 times more intense than 1 dBA, while 20 dBA is 100 times more intense, and 30 dBA is 1,000 times more intense. A sound as soft as human breathing is about 10 times greater than 0 dBA. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud).

Sound levels are generated from a source and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. This phenomenon is known as "spreading loss." For a single point source, sound levels decrease by approximately 6 dBA for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by on-site operations from stationary equipment or activity at a project site. If noise is produced by a line source, such as highway traffic, the sound decreases by 3 dBA for each doubling of distance in a hard site environment. Line source noise in a relatively flat environment with absorptive vegetation decreases by 4.5 dBA for each doubling of distance.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called L_{eq}), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the L_{50} noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. This level is also representative of the level that is exceeded 30 minutes in an

hour. Similarly, the L_2, L_8, and L_{25} values represent the noise levels that are exceeded 2, 8, and 25 percent of the time or 1, 5, and 15 minutes per hour. These "L" values are typically used to demonstrate compliance for stationary noise sources with a city's noise ordinance, as discussed below. Other values typically noted during a noise survey are the Lmin and Lmax. These values represent the minimum and maximum root-mean-square noise levels obtained over the measurement period.

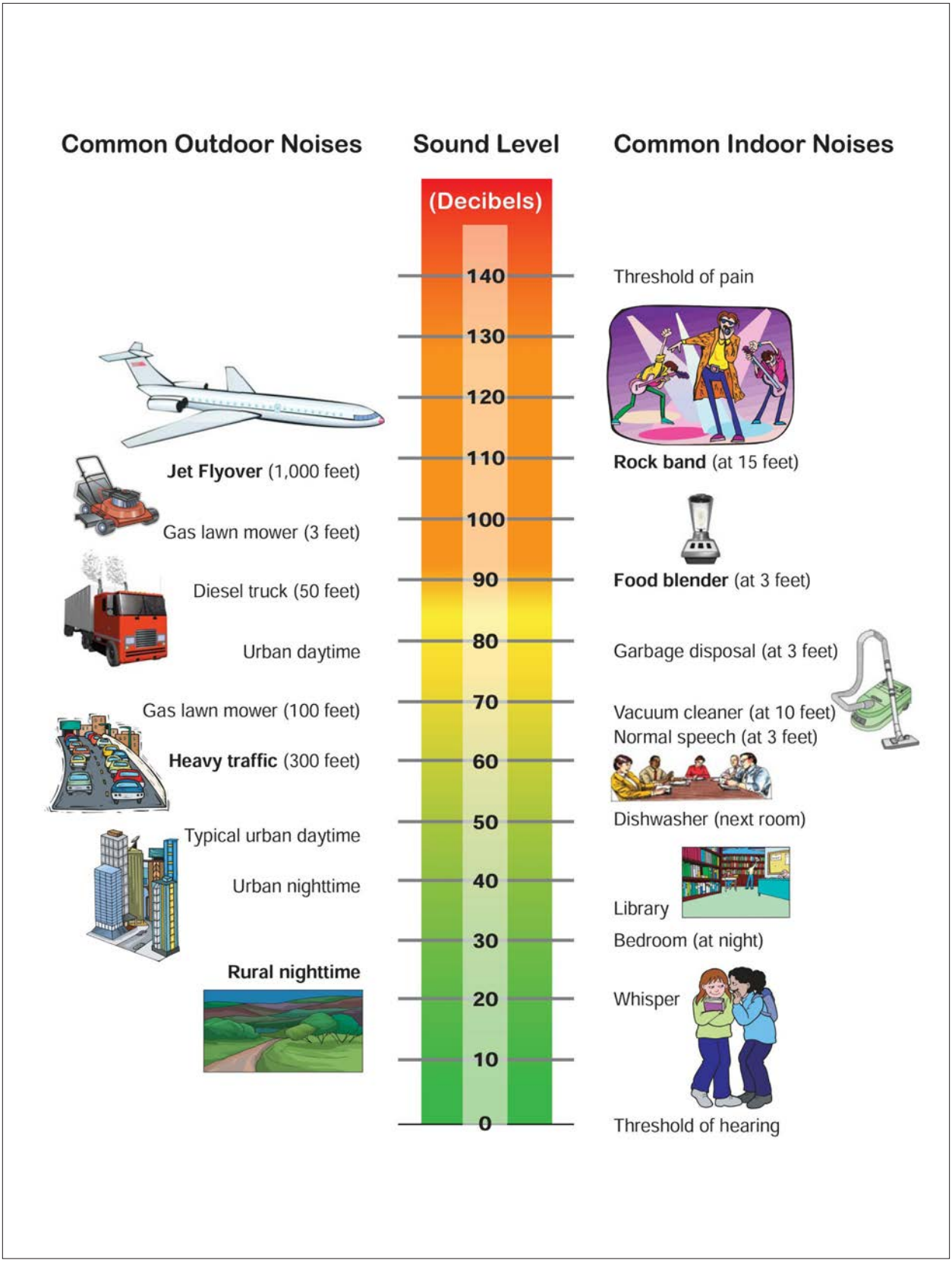
Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, an artificial dB increment is added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL) or Day-Night Noise Level (L_{dn}). The CNEL descriptor requires that an artificial increment of 5 dBA be added to the actual noise level for the hours from 7:00 am to 10:00 pm and 10 dBA for the hours from 10:00 pm to 7:00 am. The L_{dn} descriptor uses the same methodology except that there is no artificial increment added to the hours between 7:00 pm and 10:00 pm. Both descriptors give roughly the same 24 hour level with the CNEL being only slightly more restrictive (i.e., higher).

Shielding by Natural or Human-Made Features

A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receptor, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor with the specific purpose of reducing noise. A barrier that breaks the line of sight between a source and a receptor will typically result in at least 5 dBA of noise reduction. A higher barrier may provide as much as 20 dBA of noise reduction.

Psychological and Physiological Effects of Noise

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, and thereby affecting blood pressure, functions of the heart, and the nervous system. In comparison, extended periods of noise exposure above 90 dBA could result in permanent hearing damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear. This is called the threshold of pain. A sound level of 190 dBA will rupture the eardrum and permanently damage the inner ear. Figure 3.12-1, *Common Indoor and Outdoor Noise Levels*, shows typical noise levels from familiar noise sources at a specified distance.



Source: ADOT 2008.

Figure 3.12-1
Common Indoor and Outdoor Noise Levels

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VIBRATION FUNDAMENTALS

Vibration is an oscillatory motion through a solid medium, such as the ground or a building. Vibration is normally associated with activities stemming from operations of railroads or vibration-intensive stationary sources but can also be associated with construction equipment such as jackhammers, pile drivers, and hydraulic hammers.

Vibration amplitudes are usually described in terms of either the peak particle velocity (PPV) or the root mean square (RMS) velocity. PPV is the maximum instantaneous peak of the vibration signal, and RMS is the square root of the average of the squared amplitude of the signal. PPV is more appropriate for evaluating potential building damage. The units for PPV are normally inches per second (in/sec). Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration.

The way in which vibration is transmitted through the earth is called propagation. As vibration waves propagate from a source, the energy is spread over an ever-increasing area such that the energy level striking a given point is reduced with the distance from the energy source. This geometric spreading loss is inversely proportional to the square of the distance. The amount of attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

As with airborne sound, annoyance with vibrational energy is a subjective measure, depending on the level of activity and the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Persons accustomed to elevated ambient vibration levels, such as in an urban environment, may tolerate higher vibration levels. Table 3.12-1, *Human Reaction to Typical Vibration Levels*, shows the human response and the effects on buildings resulting from continuous vibration (in terms of various levels of PPV).

Table 3.12-1 Human Reaction to Typical Vibration Levels

Vibration Level Peak Particle Velocity	Human Reaction	Effect on Buildings
0.006–0.019 in/sec	Threshold of perception, possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08 in/sec	Vibrations readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected
0.10 in/sec	Level at which continuous vibration begins to annoy people	Virtually no risk of “architectural” (i.e., not structural) damage to normal buildings
0.20 in/sec	Vibrations annoying to people in buildings	Threshold at which there is a risk to “architectural” damage to normal

Table 3.12-1 Human Reaction to Typical Vibration Levels

Vibration Level Peak Particle Velocity	Human Reaction	Effect on Buildings
		dwellings – houses with plastered walls and ceilings
0.4–0.6 in/sec	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause "architectural" damage and possibly minor structural damage

Source: Caltrans 2013.

3.12.1 Regulatory Framework

FEDERAL

Federal Transit Administration

The Federal Transit Administration (FTA) oversees safety measures related to noise and vibration. The FTA's Transit Noise and Vibration Impact Assessment manual indicates that 80 A-weighted decibels (dBA) equivalent sound level (L_{eq}) is reasonable criteria for assessing construction noise levels at residential uses (FTA 2018). In the absence of local construction noise limits, the FTA recommended 80 dBA L_{eq} criteria is used to assess the significance of construction noise levels at residential receivers as recommended by the FTA are shown in Table 3.12-2, *FTA Detailed Analysis Construction Noise Criteria*.

Table 3.12-2 FTA Detailed Analysis Construction Noise Criteria

Building/Structural Category	L_{eq} (8hr) dBA		Ldn (30day) dBA
	Day	Night	
Residential	80	70	75
Commercial	85	85	80
Industrial	90	90	85

Source: FTA 2018.

The FTA also provides criteria for acceptable levels of groundborne vibration for various types of buildings. Structures amplify groundborne vibration; wood-frame buildings, such as typical residential structures, are more affected by ground vibration than heavier buildings. The level at which groundborne vibration is strong enough to cause architectural damage has not been determined conclusively, but the standards recommended by the FTA are shown in Table 3.12-3, *FTA Construction Vibration Damage Criteria*.

Table 3.12-3 FTA Construction Vibration Damage Criteria

Building/Structural Category	Peak Particle Velocity (PPV) (in/sec)	Approximate Vibration dB
I. Reinforced-concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Source: FTA 2018.
in/sec = inches per second

According to FTA's *Transit Noise and Vibration Impact Assessment Manual*, a vibration velocity (VdB) of 75 to 80 VdB will annoy individuals. Table 3.12-4, *Human Response to Different Levels of Groundborne Vibration and Noise*, presents the human response to different levels of ground-borne vibration and noise. For purposes of analysis in this Draft EIR, the threshold of 75 VdB will be applied.

Table 3.12-4 Human Response to Different Levels of Groundborne Vibration and Noise

Vibration Velocity Level	Nosie Level		Human Response
	Low Frequency	Mid Frequency	
65 VdB	25 dBA	40 dBA	Approximate threshold of perception for many humans. Low-frequency sound: usually inaudible. Mid-frequency sound: excessive for quiet sleeping areas.
75 VdB	35 dBA	50 dBA	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying. Low-frequency noise: tolerable for sleeping areas. Mid-frequency noise: excessive in most quiet occupied areas.
85 VdB	45 dBA	60 dBA	Vibration tolerable only if there are an infrequent number of events per day. Low-frequency noise: excessive for sleeping areas. Midfrequency noise: excessive even for infrequent events for some activities.

Source: FTA 2018, Table 5-5.
Low Frequency= Approximate noise level when vibration spectrum peak is near 30 hertz (Hz).
Mid Frequency= Approximate noise level when vibration spectrum peak is near 60 Hz.

STATE

California Code of Regulations

The State of California's noise insulation standards for nonresidential uses are codified in the California Code of Regulations (CCR), Title 24, Building Standards Administrative Code, Part 11, California Green Building Standards Code (CALGreen). CALGreen noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Proposed projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA L_{eq} (1hr).

General Plan Noise Compatibility Guidelines

The Office of Noise Control in the State Department of Health Services has developed criteria and guidelines for local governments to use when setting standards for human exposure to noise and preparing noise elements for General Plans. Table 3.12-5, *Noise and Land Use Compatibility Matrix*, presents criteria used to assess the compatibility of proposed land uses with the noise environment. These tables are the primary tools that allow the City to ensure integrated planning for compatibility between land uses and outdoor noise.

Table 3.12-5 Noise and Land Use Compatibility Matrix

Land Use	Community Noise Exposure Ldn or CNEL, dBA			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density	50 to 60	60 to 70	70 to 75	75 to 85
Residential – Multiple Family	50 to 65	65 to 70	70 to 75	75 to 85
Transient Lodging—Motels, Hotels	50 to 65	65 to 70	70 to 80	80 to 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 to 60	60 to 65	65 to 80	80 to 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 to 70	NA	70 to 85
Sports Arena, Outdoor Spectator Sports	NA	50 to 75	NA	75 to 85
Playgrounds, Neighborhood Parks	50 to 67.5	NA	70 to 80	75 to 85

Table 3.12-5 Noise and Land Use Compatibility Matrix

Land Use	Community Noise Exposure Ldn or CNEL, dBA			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 to 75	NA	70 to 80	80 to 85
Office Buildings, Business and Professional Commercial	50 to 67.5	67.5 to 77.5	77.5 to 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 to 70	70 to 80	80 to 85	NA

Source: LCI 2017

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.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

NA: Not Applicable.

Caltrans (Vibration)

Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment—air compressors, light trucks, hydraulic loaders, etc.—generate little or no ground vibration. To analyze vibration impacts originating from the operation and construction of the Brew Yard Specific Plan, vibration-generating activities are appropriately evaluated against standards established under the municipal code if such standards exist. However, the City of Irwindale does not identify specific construction vibration level limits. Therefore, for analysis purposes, vibration damage thresholds from the Caltrans Transportation and Construction Vibration Guidance Manual are used in this noise study to assess potential temporary construction-related impacts at building locations. The nearest noise-sensitive buildings to the project site can best be described as “older residential structures” with a maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec) (Caltrans 2020).

REGIONAL

County of Los Angeles County Code

As described in Section 3.12.2, *Existing Conditions*, the County of Los Angeles' Santa Fe Dam Recreation Area borders the project site to the west. The following describes Los Angeles County Code noise standards.

Operational Noise

The Los Angeles County Code, Section 12.08.390[A], establishes the noise level standards for stationary noise sources. For residential properties, the exterior noise level must not exceed 50 dBA Leq during the daytime hours (7:00 am to 10:00 pm) and 45 dBA Leq during the nighttime hours (10:00 pm to 7:00 am). Section 12.08.390[B] indicates that if the existing ambient noise level already exceeds any of the exterior noise level limit categories, then the standard must be adjusted to reflect the ambient conditions.

Construction Noise

The County of Los Angeles has set restrictions to control noise impacts associated with the construction of the proposed project. Code of Ordinances, Section 12.08.440, indicates that construction activity is limited to the hours of 7:00 am to 8:00 pm for daytime construction and identifies the construction noise level threshold for mobile and stationary sources. Mobile construction equipment is limited to 85 dBA at semi-residential and commercial uses during the daytime hours and 70 dBA during the nighttime hours during long term construction periods of 10 days or more. Stationary construction equipment is limited to 70 dBA at semi-residential and commercial uses during the daytime hours and 65 dBA during the nighttime hours during long term construction periods of 10 days or more.

LOCAL

Irwindale General Plan

The City of Irwindale Public Safety Element establishes guidelines and policies pertaining to the reduction and mitigation of noise levels for the safety of the surrounding community. The City's noise guidelines emphasize the need for limitations on noise level exposure associated with existing developmen0t and traffic. The policies include the following:

- **Guiding Policy 1**. The City of Irwindale will strive to reduce the community's exposure to noise from on-going manufacturing activities.
- **Guiding Policy 2**. The City of Irwindale will work towards reducing noise exposure in the City by considering noise and land use compatibility in land use planning.

- **Guiding Policy 3**. The City of Irwindale will continue to investigate strategies that will be effective in reducing the community's exposure to harmful noise levels.

The State Office of Noise Control's Guidelines for Noise Elements of General Plans, which provides guidance for compatibility of noise-sensitive land uses in areas subject to transportation noise are applied and recognized by City's General Plan Noise Element. The land use compatibility standards for various land uses within the City are summarized below:

- **Residential** uses are normally unacceptable in areas exceeding 70 dBA CNEL; and conditionally acceptable between 55 and 70 dBA CNEL for low-density single-family dwelling units, duplexes, and mobile homes, and between 60 and 70 dBA CNEL for multiple-family units.

- **Schools, libraries, hospitals, and nursing homes** are treated as noise-sensitive land uses, requiring acoustical studies within areas exceeding 60 dBA CNEL.

- **Commercial/professional office buildings and industrial** uses are normally unacceptable in areas exceeding 75 dBA CNEL, and are conditionally acceptable within 67 to 78 dBA CNEL (for commercial and professional offices only).

Irwindale Municipal Code

Operational Noise

Title 9, Chapter 9.28, Noise Regulation, of the Irwindale Municipal Code, controls any disturbing, excessive, or offensive noise that causes discomfort or annoyance to any reasonable person of normal sensitivity residing in the community. The adopted Noise Ordinance sets standards for noise levels citywide and provides the means to enforce the reduction of obnoxious or offensive noise. The noise sources enumerated in the Noise Ordinance include radios, phonographs, loudspeakers and amplifiers, electric motors or engines, animals, motor vehicles, and construction equipment.

Section 9.28.030(A) of the Noise Ordinance sets ambient base noise levels for all properties in designated noise zones. Section 9.28.030(B) states that any noise at a level that exceeds the ambient or the ambient base level of subsection A, whichever is greater, by more than 10 dBA when measured at any boundary line of the property from which the noise emanates, unless exempted, as shown in Table 3.12-6, *City of Irwindale Noise Ordinance Standards*, shall constitute sufficient proof a violation of the Noise Ordinance.

Table 3.12-6 City of Irwindale Noise Ordinance Standards

Designated Noise Zone Land Use (Receptor Property)	Time Interval	Ambient Base Noise Level (dBA)
Residential Properties	10:00 pm to 7:00 am (nighttime) 7:00 am to 10:00 pm (daytime)	45 50
Commercial Properties	10:00 pm to 7:00 am (nighttime) 7:00 am to 10:00 pm (daytime)	50 55
Industrial Properties	10:00 pm to 7:00 am (nighttime) 7:00 am to 10:00 pm (daytime)	60 70

Source: Irwindale Municipal Code Section 9.28.030.

Section 9.28.040 states that any person willfully causing any noise at a level that exceeds the ambient or the ambient base level in Section 9.28.030, whichever is greater, by more than 5 dBA when measured at any boundary line of the property from which the noise emanates, as shown in Table 3.12-6, is in violation of the Noise Ordinance.

Construction Noise

Section 9.28.110 of the Noise Ordinance limits construction activity within a residential zone or within a radius of 500 feet of residential zones to the noise limits of Section 9.28.040, so that project construction noise levels shall not exceed the ambient base noise level standard shown in Table 3.12-6 or the measured ambient noise level by more than 5 dBA, whichever is greater. In addition, construction hours shall be limited to 7:00 am to 7:00 pm.

Industrial Noise

Section 9.28.120, of the Noise Ordinance limits industrial uses to the levels of Section 9.28.040.

Azusa Municipal Code

The project site borders the city of Azusa to the south and east. Azusa Municipal Code Chapter 46, Article IX, Division 2, Noise Standards, contains the majority of the Azusa's policies related to noise generation. Additional noise standards for 24-hour limits on noise generation are in Azusa Municipal Code Section 88.31.020 in the Development Code.

Operational Noise

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. The area in proximity to the project site is designated as industrial by the Azusa General Plan. Azusa

Municipal Code Section 46-405 establishes exterior noise standards by Noise Zone. Uses in Noise Zone 4 are prohibited from generating noise above 70 dBA at any time.

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 am to 6:00 pm. Extended construction hours and workdays may be allowed by the review authority.

3.12.2 Existing Conditions

The project site is bordered by industrial and office/professional uses to the south and east, the Santa Fe Dam Recreation Area to the west, and Interstate 210 (I-210) to the north.

The noise environment around the project site is characterized by traffic noise from I-210, Irwindale Avenue, and 1st Street, as well as noise emanating from the existing Irwindale Brew Yard north and east of the project site. As an industrial hub of the city, traffic along these corridors frequently consists of heavy-duty vehicles that access the site and surrounding industrial and commercial uses. Metro, Burlington Northern and Santa Fe, and Union Pacific Railroad main-line railroad tracks are adjacent to and north of Planning Area 1 of the project site. The nearest permanent sensitive receptors to the project site are residential uses approximately 3,600 feet to the east. However, for the purposes of this analysis, the recreational uses at the Santa Fe Dam Recreation Area, adjacent to the western and southern boundary of the project site are considered sensitive uses. The nearest publicly accessible portion of the Santa Fe Dam Recreation Area to the project site is along the San Gabriel River Trail, which runs north-south approximately 500 feet west of the project site. The closest portion of the trail to the project site is approximately 200 feet southwest. There is a day use area associated with the Santa Fe Dam Recreation Center approximately 1,000 feet south of the project site, adjacent to existing light industrial warehouse uses.

SHORT-TERM NOISE MEASUREMENTS

Short-term (15-minute) measurements were conducted at four locations around the project site. Measurements were conducted during the morning and midday on December 10, 2025. The short-term sound level meter (SLM), a Larson Davis LxT, satisfies the American National Standards Institute standard for Type 1 instrumentation. The meter was set to “slow” response and “A” weighting (dBA) and calibrated prior to and after each monitoring period. Measurements were at least five feet above the ground and away from reflective surfaces.

Temperatures were moderate, approximately 81 degrees Fahrenheit, with wind speeds of up to 6 miles per hour and moderate humidity. Measurement locations are described below and shown on Figure 3.12-2, *Noise Monitoring Locations*, and results are summarized in Table 3.12-7, *Short-Term Noise Measurements Summary in A-Weighted Sound Levels*.

Table 3.12-7 Short-Term Noise Measurements Summary in A-Weighted Sound Levels

Monitoring Location	Description	15-Minute Noise Level, dBA						
		L_{eq}	L_{max}	L_{min}	L_{50}	L_{25}	L_{8}	L_{2}
ST-1	Santa Fe Dam Recreation Area 12/10/25, 10:06 AM	49.6	56.9	45.4	48.3	49.7	52.7	55.0
ST-2	Corner of East 1st Street and Martin Road 12/10/25, 10:53 AM	63.6	79.6	45.5	56.1	62.5	68.7	72.8
ST-3	6030 Irwindale Avenue 12/10/25, 11:14 AM	69.1	82.6	47.5	67.2	70.4	72.5	75.0
ST-4	100 feet west of at 6360 Irwindale Avenue 12/10/25, 11:41 AM	63.7	83.3	50.0	59.3	62.2	67.4	71.1

Source: Appendix N.

Short-Term Location 1 (ST-1) was in the Santa Fe Dam Recreation Area, approximately 160 feet south of the project site on an elevated berm overlooking the project site. A 15-minute noise measurement began at 10:06 am on Wednesday, December 10, 2025. The noise environment is characterized by distant truck loading/unloading and exhaust noise at the project site and surrounding industrial uses, in addition to frequent aircraft over-flight noise. Noise levels measured 49.6 dBA L_{eq} and 56.9 dBA L_{max} during the measurement period at ST-1.



Source: Nearmap 2025; PlaceWorks 2025.

Figure 3.12-2
Noise Monitoring Locations

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Short-Term Location 2 (ST-2) was at the intersection of East 1st Street and Martin Road, approximately 90 feet south of the project site and 200 feet east of the Q&B Foods building. A 15-minute noise measurement began at 10:53 am on Wednesday December 10, 2025. The noise environment is characterized by vehicle traffic along 1st Street and Martin Road. Several large, heavy-duty vehicles passed by during the measurement period. Noise levels from vehicles were increased by textured concrete pavement forming a pedestrian walkway along Martin Road. Noise levels measured 63.6 dBA L_{eq} and 79.6 dBA L_{max} during the measurement period at ST-2.

Short-Term Location 3 (ST-3) was in the parking lot of the Southern California Edison corporate offices on 6030 Irwindale Avenue. The measurement was approximately 150 feet east of the project site across Irwindale Avenue. A 15-minute noise measurement began at 11:14 am on Wednesday, December 10, 2025. The noise environment is characterized by near-constant vehicle traffic along Irwindale Avenue. Noise levels measured 69.1 dBA L_{eq} and 82.6 dBA L_{max} during the measurement period at ST-3.

Short-Term Location 4 (ST-4) was along a side passage of Irwindale Avenue, approximately 100 feet west of the industrial uses at 6360 Irwindale Avenue. The measurement location was approximately 50 feet below grade of the primary portion of Irwindale Avenue to the west and approximately 400 feet east of the project site. A 15-minute noise measurement began at 11:41 am on Wednesday, December 10, 2025. The noise environment is characterized by fast-moving traffic along Irwindale Avenue and occasional vehicles passing by along the frontage road to Irwindale Avenue. Noise levels measured 63.7 dBA L_{eq} and 83.3 dBA L_{max} during the measurement period at ST-4.

LONG-TERM NOISE MEASUREMENTS

Ambient noise monitoring was conducted over a 24-hour period from December 10 to December 11, 2025. Three long-term noise meters were mounted at locations along the San Gabriel River Trail proximate to the project site. The noise environment was characterized primarily by noise on I-210, occasional cyclists and maintenance vehicles, and airplanes flying overhead. The Picollo II SLMs deployed for noise monitoring satisfy the American National Standards Institute standard for Type II instrumentation. Long-term SLMs were set to “slow” response and “A” weighting (dBA), five feet above the ground, and away from reflective surfaces. Long-term measurement results at each of the three locations are described in the following paragraphs and summarized in Tables 3.12-8 to 3.12-10, *Long-Term Noise Measurements*. Figure 3.12-2 shows the long-term (24-hour) noise measurement locations. Additional noise monitoring data are shown in Appendix N to this Draft EIR.

Long-Term Location 1 (LT-1) was at the northernmost part of the San Gabriel River Trail, approximately 450 feet south of I-210. LT-1 was approximately 610 feet northwest of the project

site. The noise environment was characterized by traffic noise on I-210. Aircraft over-flight noise was also audible, and approximately 5 cyclists would pass every hour. Noise levels measured 73.2 dBA CNEL, with average daytime hourly noise levels of 62.8 dBA Leq at LT-1. Table 3.12-8, *LT-1 Long-Term Noise Measurements*, shows the hourly noise levels measured.

Long-Term Location 2 (LT-2) was along the San Gabriel River Trail, approximately 770 feet west of the project site and 1,750 feet south of I-210. The noise environment was characterized by distant traffic noise on I-210, aircraft over-flights, and occasional cyclists passing on the trail. Average hourly noise levels at LT-2 were 59.4 dBA Leq. (See Appendix N for interval data).

Long-Term Location 3 (LT-3) was along the San Gabriel River Trail, approximately 480 feet west of the project site and 2,400 feet south of I-210. The noise environment was characterized by distant traffic noise on I-210, aircraft over-flights, and occasional cyclists passing on the trail. Noise levels measured 63.9 dBA CNEL with average daytime hourly noise levels of 53.4 dBA at LT-3. Table 3.12-9, *LT-3 Long-Term Noise Measurements*, shows the hourly noise levels measured.

Long-Term Location 4 (LT-4) was along at the southernmost part of the San Gabriel River Trail measured, approximately 220 feet west of the project site and 1,700 feet north of the Santa Fe Dam Recreation Area visitor center. The noise environment was characterized by aircraft over-flights and cyclists passing by. Noise levels measured 60.9 dBA CNEL and average daytime hourly noise levels of 51.0 dBA at LT-4. Table 3.12-810, *LT-4 Long-Term Noise Measurements*, shows the hourly noise levels measured.

Table 3.12-8 LT-1 Long-Term Noise Measurements

December 10–11, 2025: 73.2 dBA CNEL					
Time	**L_{eq} (dBA)**	**L_{max} (dBA)**	**Time**	**L_{eq} (dBA)**	**L_{max} (dBA)**
10:00	62.6	74.5	22:00	67.6	79.8
11:00	59.3	73.0	23:00	66.7	79.4
12:00	53.8	68.3	0:00	65.5	82.1
13:00	54.6	72.1	1:00	65.4	80.3
14:00	54.7	75.2	2:00	63.6	69.4
15:00	55.8	74.4	3:00	65.8	77.1
16:00	59.3	78.0	4:00	66.7	78.5
17:00	63.2	79.5	5:00	68.5	76.9
18:00	64.2	77.7	6:00	68.9	78.9
19:00	65.3	76.8	7:00	67.6	81.4
20:00	67.7	79.8	8:00	66.9	79.0
21:00	68.4	77.9	9:00	64.4	75.7

Source: Appendix N

Table 3.12-9 LT-3 Long-Term Noise Measurement

December 10–11, 2025, 2025: 63.9 dBA CNEL					
Time	**L_{eq} (dBA)**	**L_{max} (dBA)**	**Time**	**L_{eq} (dBA)**	**L_{max} (dBA)**
10:00	45.6	57.1	22:00	57.8	66.6
11:00	44.3	55.8	23:00	56.7	64.0
12:00	43.3	58.8	0:00	56.5	67.2
13:00	44.6	57.8	1:00	56.6	72.1
14:00	44.2	61.3	2:00	55.8	61.0
15:00	44.3	58.3	3:00	57.1	70.4
16:00	50.4	72.1	4:00	57.9	66.1
17:00	54.1	69.5	5:00	58.1	69.1
18:00	57.3	70.5	6:00	59.6	67.7
19:00	56.9	68.3	7:00	58.2	68.6
20:00	58.1	70.4	8:00	58.7	81.1
21:00	58.9	67.6	9:00	52.5	66.6

Source: Appendix N.

Table 3.12-10 LT-4 Long-Term Noise Measurement

December 10–11, 2025, 2025: 60.9 dBA CNEL					
Time	**L_{eq} (dBA)**	**L_{max} (dBA)**	**Time**	**L_{eq} (dBA)**	**L_{max} (dBA)**
10:00	46.6	61.6	22:00	54.9	69.4
11:00	44.7	57.3	23:00	53.1	61.9
12:00	43.7	61.0	0:00	53.6	58.9
13:00	44.6	62.3	1:00	53.4	66.0
14:00	44.1	56.8	2:00	53.6	59.5
15:00	43.0	57.8	3:00	53.8	59.1
16:00	50.5	77.7	4:00	55.4	61.4
17:00	51.1	67.4	5:00	54.6	61.5
18:00	55.0	75.8	6:00	56.3	63.2
19:00	54.5	65.5	7:00	55.2	66.3
20:00	54.9	76.1	8:00	55.3	74.0
21:00	55.5	61.3	9:00	49.7	58.7

Source: Appendix N.

EXISTING TRAFFIC NOISE

Noise from motor vehicles is generated by engine vibrations, the interaction between tires and the road, and the exhaust system. Reducing the average motor vehicle speed reduces the noise exposure of receptors adjacent to the roadway. Given the prevalence of mobile-source noise in the project area, it is necessary to determine the noise currently generated by vehicles traveling through the project area. Average daily traffic volumes were based on the existing daily traffic volumes calculated using peak hour intersection movements provided by Linscott, Law & Greenspan, Engineers (LLG 2025).

The traffic noise levels for this project were estimated using a version of the FHWA Highway Traffic Noise Prediction Model. The FHWA model determines a predicted noise level through a series of adjustments to a reference sound level. These adjustments account for traffic flows, speed, truck mix, varying distances from the roadway, and length of exposed roadway. Vehicle speeds on each roadway were assumed to be the posted speed limit, and no reduction in speed was assigned due to congested traffic flows. Current roadway characteristics, such as the number of lanes and speed limits, were determined from field observations and according to roadway classification.

Traffic noise levels for existing conditions at 100 feet from the roadway centerline, including distances to the 70 dBA, 65 dBA, and 60 dBA CNEL contours, along analyzed roadways are presented in Table 3.12-11, *Existing Roadway Traffic Noise Levels*. Standards for Analysis.

Table 3.12-11 Existing Roadway Traffic Noise Levels

Roadway	Segment		Daily Traffic Volumes	Noise Level at 100 Feet (dBA CNEL)	Distance to Noise Contour (feet)		
	From	To			70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Live Oak Ave	Arrow Hwy	I-605	16,020	69	58	126	272
Live Oak Ave	I-605	Maine Ave	18,040	74	61	131	283
Arrow Hwy	I-605	Live Oak Ave	18,090	64	61	132	284
Arrow Hwy	Live Oak Ave	Azusa Canyon Rd	35,420	74	99	214	461
Arrow Hwy	Azusa Canyon Rd	Irwindale Ave	24,060	77	77	165	356
Arrow Hwy	Irwindale Ave	Vincent Ave	15,830	57	58	125	269
Arrow Hwy	Vincent Ave	Azusa Ave	16,020	74	56	121	262
Arrow Hwy	Azusa Ave	the East	16,330	77	57	123	265
First Street	the West	Martin Rd	230	76	1	3	7
First Street	Martin Rd	Irwindale Brew Yard Dwy	1,920	74	6	13	28
First Street	Irwindale Brew Yard Dwy	Irwindale Ave	2,510	70	7	15	33
Irwindale Ave	Foothill Blvd	I-210 WB Off-Ramp	24,870	60	66	141	304
Irwindale Ave	I-210 WB Off-Ramp	I-210 EB Off-Ramp	25,180	54	66	142	307
Irwindale Ave	I-210 EB Off-Ramp	Jardin de Roca	20,710	67	56	120	260
Irwindale Ave	Jardin de Roca	First Street	19,410	63	54	115	249
Irwindale Ave	First Street	Gladstone St	18,930	60	53	113	244
Irwindale Ave	Gladstone St	Arrow Hwy	16,660	67	50	108	233
Irwindale Ave	Arrow Hwy	Cypress St	13,830	67	35	76	163
Irwindale Ave	Cypress St	the South	18,870	68	43	93	201
Vincent Ave	Arrow Hwy	the South	9,960	72	18	39	84
Azusa Ave	Azusa Ave	the South	11,510	74	45	97	210

Source: FHWA Highway Traffic Noise Prediction Model based on traffic volumes provided by LLG (LLG 2025); Calculations in Appendix P.

Significance Criteria

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to noise if it 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 groundborne vibration or groundborne noise levels.

c) For a project 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.

THRESHOLD GUIDANCE

Construction Noise

Section 9.28.040 of the Municipal Code indicates that project construction noise levels shall not exceed the base exterior noise level standard shown in Table 3.12-6 or the ambient noise level by more than 5 dBA at sensitive residential locations, whichever is greater. Section 9.28.110, of the Noise Ordinance also limits construction activity to the hours of 7:00 am to 7:00 pm, and it cannot violate Section 9.28.040 unless authorized by a building inspector. The City of Irwindale does not have numeric construction noise level standards for non-residential uses and there are no residential uses within 500 feet of the project site. In the absence of specific City construction noise limits for recreational uses, the Irwindale Brew Yard Specific Plan construction noise level threshold for recreational uses of 80 dBA Leq is used. The FTA-recommended criteria, shown in Table 3.12-2, is used to assess the significance of construction noise levels at adjacent commercial receptors.

Stationary Source Noise

Section 9.28.030 of the Municipal Code sets ambient base noise levels for all properties within designated noise zones; however, the code does not categorize recreational uses nor provide a base ambient noise level for recreational uses. In absence of a specified City ambient base noise level for recreational uses and considering that recreational uses are daytime only uses that are considered less sensitive to noise than residential uses, the Irwindale Brew Yard Specific Plan recreational base ambient noise level will be applied to recreational uses in this analysis. Section 9.28.040 limits any noise at a level which exceeds the ambient or the ambient base

level, whichever is greater, by more than 5 dBA when measured at any boundary line of the property from which the noise emanates, based on the land use types shown in Table 3.12-7. Table 3.12-12, *Stationary Source Noise Significance Criteria Threshold Guidance*, shows the ambient base noise level and the adjusted noise threshold, consistent with Section 9.28.030 of the Irwindale Municipal Code, applied to analyzed receptors.

Table 3.12-12 Stationary Source Noise Significance Criteria Threshold Guidance

Receptor	Designated Noise Zone Land Use (Receptor Property)	Daytime Ambient Base Noise Level (dBA)[1]	Measured Ambient Noise Level (dBA)	Applied Adjusted Noise Threshold (dBA)[2]
LT-1	Recreational/Open Space	55	63	68
LT-2	Recreational/Open Space	55	59	64
LT-3	Recreational/Open Space	55	53	60
LT-4	Recreational/Open Space	55	51	60
ST-1	Industrial[3]	70	50	75
ST-2	Commercial	55	64	69
ST-3	Commercial	55	69	74
ST-4	Commercial	55	64	69
SFDNC	Recreational/Open Space	55	50	60

1. Irwindale Brew Yard Specific Plan Table 3-5, Operational Noise Threshold.

2. Measured ambient noise level or the ambient base noise level in Table 3.12-8, whichever is greater, plus 5 dBA, consistent with Section 9.28.030 of the Irwindale Municipal Code.

3 Based on aerial photos, this location is operated by the County Parks and Recreation Department and is actively used as a county yard. Therefore, for ST-1 the industrial threshold criteria is more appropriate and applied as this is an industrial use of the site.

Transportation Noise

A project will normally have a significant effect on the environment related to noise if transportation noise would substantially increase the ambient noise levels for adjoining noise-sensitive areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 dBA to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an exterior environment. Based on this, the following thresholds of significance, similar to those recommended by the Federal Aviation Administration (FAA), are

used to assess traffic noise impacts at sensitive receptor locations. A significant impact would occur if project traffic noise increases would exceed:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL
- 5 dBA in ambient noise environments of less than 60 dBA CNEL

A significant cumulative traffic noise impact occurs when the thresholds above are exceeded under cumulative conditions (with project) and the contribution of the project to future traffic is calculated to be greater than 1.5 dBA to 5 dBA CNEL, based on ambient noise levels at noise-sensitive residential uses. For non-noise sensitive commercial and industrial uses, a significant cumulative traffic noise impact occurs when project traffic noise increases result in daily traffic noise levels that exceed the City's normally unacceptable land use compatibility standard of 75 dBA CNEL for commercial, professional office buildings, and industrial uses.

Vibration

The FTA vibration criteria are used to evaluate vibration structural damage. The potential for construction-related vibration impacts depends on the magnitude of vibration generated by the construction equipment, the frequency of occurrence of the vibration during the construction day, and total duration of construction activities. According to FTA vibration criteria, construction vibration exceeding 0.20 PPV (in/sec) at structures would be considered a significant impact.

METHODOLOGY

The analysis of construction noise from future development projects anticipated under the General Plan utilizes the FHWA Roadway Construction Noise Model (RCNM). The model is based on a representative equipment mix for standard construction activities. Given the variable nature of construction, the worst-case scenario is modeled by combining the Leq contributions from the simultaneous operation of the three loudest pieces of equipment for a given activity. Emissions are modeled from the acoustical center of a hypothetical construction site to the property line of the nearest noise-sensitive receptor. Equipment for grading and site preparation is modeled at spatially averaged distances (i.e., from the acoustical center of the nearest construction activity area to the property line of the nearest receptors) because the area near the center of construction activities versus the center of the overall construction site best represents modeled average construction-related noise levels at the various sensitive receptors for mobile equipment. Building construction and architectural coating are measured from the edge of the proposed buildings to the nearest sensitive receptors. Additionally, paving is measured from the edge of the nearest paving areas to the nearest sensitive receptors.

Future traffic noise levels were calculated for roadway segments forecasted to experience the most substantial increases in traffic volume. Transportation noise levels were modeled using the Federal Highway Administration (FHWA) Traffic Noise Prediction Model, incorporating the provided traffic volumes, posted speeds, vehicle type percentages, number of lanes, and intervening site conditions.

Operational noise was estimated based on SoundPLAN modeling. SoundPLAN models future noise levels by applying industry-accepted propagation algorithms based on International Organization for Standardization (ISO) 9613-2 and ÖAL-28 standards for outdoor sound propagation. The modeling calculations account for classical sound wave divergence (spherical spreading loss with adjustments for source directivity from point sources) plus attenuation (noise reduction) due to air absorption, ground effects, and shielding provided by existing structures (e.g., buildings or solid masonry walls). Additionally, SoundPLAN provides for other correction factors, including noise-level increases due to reflections, source directivity, and source tonality.

The proposed project's operational scenarios were modeled using SoundPLAN computer software. SoundPLAN uses industry-accepted propagation algorithms based on ISO and ÖAL-28 standards for outdoor sound propagation. The modeling calculations account for classical sound wave divergence (spherical spreading loss with adjustments for source directivity from point sources) plus attenuation factors due to air absorption and ground effects. SoundPLAN provides for other correction factors as well, including level increases due to reflections, source directivity, and source tonality.

Groundborne vibration from construction is determined using FTA methodology and reference vibration levels for typical equipment (FTA 2018). Vibration levels are modeled from the nearest disturbance area of the construction site to the building facade of the nearest sensitive receptor.

3.12.3 Applicable Specific Plan Development Standards and Design Guidelines

Irwindale Brew Yard Specific Plan Development Standards and Design Guidelines that are specifically related to noise and vibration are as follows.

DEVELOPMENT STANDARDS

Future development within the Specific Plan area must be in compliance with the operational noise threshold standards established in Specific Plan Table 3-5, Operational Noise Threshold. (reproduced here as Table 3.12-13). These are consistent with the City of Irwindale performance standards outlined in IMC 9.28, Noise Regulation, for surrounding commercial uses.

The noise threshold for recreational uses during construction is 80 dBA Leq. The City and PlaceWorks have carefully evaluated the particular recreational uses near the project site and determined that (a) they are conducive to transient and active use, which in the City's judgment makes the use less noise-sensitive than other uses (including potentially some passive recreational uses), and (b) this particular recreational use is simultaneously somewhat sensitive to, and also a producer of, noise. We understand that the City is therefore making a considered policy determination that this particular recreational use falls within the middle ground of industrial uses (which are less sensitive to noise and therefore have a higher noise threshold under the IMC) and residential uses (which are most sensitive to noise based on the length of time people are likely to spend in this area, plus the particular need for sleep and rest at homes, and therefore have a lower noise threshold). The recreation construction threshold, therefore, was conservatively set at the FTA residential standard of 80 dBA Leq.

Table 3.12-13 Operational Noise Threshold

	Ambient Base Noise Level (dBA)	
	10 pm to 7 am	**7 am to 10 pm**
Commercial	50	55
Industrial	60	70
Recreational/Open Space	50	55

Source: Irwindale Brew Yard Specific Plan, May 2026.

DESIGN GUIDELINES

- Concrete Screen Wall: A solid concrete screen wall may be provided as an alternative to tubular steel fencing along the northern border of the Specific Plan area abutting I-210 and the A Line rail track, and within individual building sites around loading and dock areas, truck yards, and parking lots. A solid wall is preferred over fencing when complete visual screening is necessary or for noise attenuation. Concrete screen walls are designed to be a minimum of 8 feet tall (maximum of 14 feet tall) as measured from yard side of the wall, consisting of painted, decorative concrete tilt-up screen walls.

3.12.4 Project Impact Analysis

a) 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?

Construction Noise

The transport of workers and materials to and from the construction site has the potential to increase noise levels along local access roadways to the project site. Individual construction vehicle passes-by and haul trucks may create momentary and short-lived noise levels. Project hauling would include 1004 daily (two-way) haul trips to fill the northeast pit on the project site. Pit filling haul trucks would access the site from I-210, Irwindale Avenue and First Street. The addition of daily project pit haul truck trips would result in traffic noise levels of 68.2 dBA to 68.8 dBA CNEL along Irwindale Avenue and daily increases of 1.5 dBA to 2.4 dBA. Project pit haul truck trips would result in traffic noise levels of 63.3 dBA to 63.5 dBA CNEL along First Street and daily increases of 10.7 dBA to 20.8 dBA. See Appendix N for traffic modeling inputs and results. Traffic noise increases due to project pit fill haul truck trips would exceed significance thresholds for increase over ambient; however, there are no noise-sensitive uses (residential) along these roadway segments, and daily traffic noise levels would remain below the compatibility standard of 75 dBA CNEL for commercial, professional office buildings, and industrial uses.

Therefore, the proposed project would not result in any significant pit fill haul trip traffic noise impacts, and this impact is considered **less than significant**.

The proposed project includes the construction of two separate planning areas that would be constructed in two phases, commencing in autumn 2026 and achieving full operational capacity by winter 2031. The southeast quarry would be filled (duration approximately 8 months), followed by filling the northwest quarry (duration approximately 4 years and 3 months). Site infrastructure would be constructed after the southeast quarry was filled, followed by construction of Phase 1. The Conceptual Phasing Plan is shown in Figure 2-16. The warehouse structures in Parcels 1 and 2 and the commercial land use development are included in Phase 1. Phase 2 would consist of building construction for the warehouses in Parcel 3 and 4. Each warehouse development would consist of loading docks, truck trailer and automobile parking, vehicular and pedestrian circulation, landscaping, and associated infrastructure improvements.

Noise generated during construction is based on the type of equipment used, the location of the equipment relative to sensitive receptors, and the timing and duration of the noise-generating activities. Noise levels from construction activities are dominated by the loudest

piece of construction equipment. The dominant noise source is typically the engine, although work piece noise (such as dropping of materials) can also be noticeable. For the proposed project, construction noise is dominated by the loudest three pieces of equipment needed for construction of the proposed project. No nighttime work or use of pile-driving equipment is proposed.

The noise produced by each construction phase is determined by combining the Leq contributions from the three loudest pieces of equipment used at a given time while accounting for the ongoing time-variations of noise emissions (commonly referred to as the usage factor). Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on what specific activity is being performed at any given moment.

Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively disregarding other attenuation effects from air absorption, ground effects, and shielding effects provided by intervening structures or existing solid walls), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site (site of each development phase) with different equipment mixes, loads, and power requirements. The expected construction equipment mix and construction activity was based on Table 2-7, *Construction Equipment*, and modeled using the Federal Highway Administration Roadway Construction Model (RCNM).

There are two construction phases associated with the proposed project as shown in Figure 2-16. Phase 1 of the proposed project includes construction of Buildings 1 and 2 of Planning Area 1 and Planning Area 2. Phase 2 would develop Buildings 3 and 4 of Planning Area 1. Figure 2-5 shows the building numbers for Planning Areas 1 and 2. Assuming the nearest off-site receptor to the closest boundary of known project construction activities for Phase 1, construction-related noise levels would be up to 72 dBA Leq at the industrial use to the north. Construction noise levels at receptors further away are estimated to be even less. The results for Phase 1 construction activities are summarized in Table 3.12-14, *Project-Related Construction Noise Levels, Phase 1*.

Table 3.12-14 Project-Related Construction Noise Level, Phase 1

Construction Activity Phase	Noise Levels in dBA Leq				
	RCNM Reference Noise Level	Commercial to the North[1]	Commercial to the East[1]	Commercial to the South[1]	Recreation Area to the West[2]
Distance (feet)	**50**	**420**	**300**	**300**	**550**
Site Preparation	81	63	65	65	60
Grading	84	66	68	68	63
Distance (feet)	**50**	**275**	**250**	**250**	**350**
Building Construction	80	65	66	66	63
Architectural Coating	77	62	63	63	60
Distance (feet)	**50**	**115**	**210**	**120**	**200**
Paving	79	72	67	71	67
Exceeds Standard?		No	No	No	No

Source: FHWA's Roadway Construction Noise Model (RCNM) software.

Notes: Distance measurements were taken using Google Earth (2025) from the area of anticipated construction to the property line of the nearest receptors.

dBA Leq = Energy Average Sound Levels

1. FTA Commercial standard: 85 dBA.

2. Irwindale Brew Yard Specific Plan recreational/open space standard: 80 dBA.

Phase 2 of the proposed project includes the construction of Buildings 3 and 4 of Planning Area 1. It is assumed that Phase 1 Buildings 1 and 2 would be constructed and provide noise shielding to off-site receptors to the south of the project site, and I-210 is directly north of Phase 2 construction and open space beyond that. Assuming the nearest off-site receptor to the closest boundary of project construction activities, construction-related noise levels would be up to 65 dBA Leq at industrial uses to the east. Construction noise levels at receptors further away are estimated to be even less. The results for Phase 2 construction activities are summarized in Table 3.12-15, *Project-Related Construction Noise Levels, Phase 2*.

Table 3.12-15 Project-Related Construction Noise Level, Phase 2

Construction Activity Phase	Noise Levels in dBA Leq			
	RCNM Reference Noise Level	Commercial to the East[1]	Recreation Area to the West[2]	Commercial to the South[1]
Distance (feet)	**50**	**475**	**950**	**2,000**
Site Preparation	81	61	55	49
Grading	84	64	58	52
Distance (feet)	**50**	**315**	**700**	**1,375**
Building Construction	80	64	57	51
Architectural Coating	77	61	54	48
Distance (feet)	**50**	**255**	**615**	**1,200**
Paving	79	65	57	51
Exceeds Standard?		No	No	No

Source: FHWA's RCNM software.

Notes: Distance measurements were taken using Google Earth (2025) from the area of anticipated construction to the property line of the nearest receptors.

dBA Leq = Energy Average Sound Levels

1. FTA Commercial standard: 85 dBA.

2. Irwindale Brew Yard Specific Plan recreational/open space standard: 80 dBA.

Phase 1 and Phase 2 of the proposed project could include overlapping construction phases. Assuming the nearest off-site receptor to the closest boundary of overlapping project construction activities, construction-related noise levels would be up to 73 dBA Leq at industrial uses to the north and east. Overlapping construction noise levels at receptors further away are estimated to be even less. The results for overlapping construction activities are summarized in Table 3.12-16, *Project-Related Construction Noise Levels, Overlapping Phases*.

Table 3.12-16 Project-Related Construction Noise Level, Overlapping Phases

Construction Activity Phase	Noise Levels in dBA Leq			
	Industrial to the North/East[1]	Commercial to the East[2]	Industrial to the South[2]	Recreation Area to the West[2]
Site Preparation	65	65	65	63
Grading	68	68	68	66
Building Construction	68	66	66	66
Architectural Coating	65	63	63	63
Paving	73	67	71	70
Exceeds Standard?	No	No	No	No

Source: FHWA's Roadway Construction Noise Model (RCNM) software.

Notes: Distance measurements were taken using Google Earth (2025) from the area of anticipated construction to the property line of the nearest receptors.

dBA Leq = Energy Average Sound Levels

1. FTA Commercial standard: 85 dBA.

2. Irwindale Brew Yard Specific Plan recreational/open space standard: 80 dBA.

There are no residential receptors within 500 feet of the proposed project to which would apply the City's ambient noise level plus 5 dBA construction noise standard per Section 9.28.040 of the municipal code, and there are no specific construction noise standards for non-residential uses within the code. The nearest sensitive receptor to project construction activities is the San Gabriel River Trail to the west and southwest. This is a designated recreational area for daytime use only. The Irwindale Brew Yard Specific Plan construction noise standard for recreational and open space uses of 80 dBA Leq has been applied to San Gabriel River Trail and Sante Fe Dam Recreation Area receptors, and the FTA construction noise standard for commercial uses have been applied to the surrounding commercial receptors in this analysis.

During Phase 1 paving activities, San Gabriel River Trail receptors would be exposed to periodic noise levels of up to 67 dBA Leq. During Phase 1 paving activities in Planning Area 2, commercial and industrial receptors to the south would be exposed to periodic noise levels of up to 71 dBA Leq. All remaining construction activities attributable to the proposed project during Phase 1 would generate periodic noise levels of up to 68 dBA Leq. Overlapping project construction activities would expose San Gabriel River Trail receptors to periodic noise levels of up to 70 dBA Leq and industrial uses to noise levels of up to 73 dBA Leq. Commercial uses are furthest away from overlapping construction activities and would be exposed to noise levels of up to 68 dBA Leq.

Phase 1, Phase 2, and overlapping phases of project construction activity would be below the Irwindale Brew Yard Specific Plan 80 dBA Leq standard for recreational and open space uses as

well as FTA's 85 dBA Leq standard for commercial uses adjacent to the project site. The proposed project's construction activities would occur within the permitted daytime hours in the City Municipal Code Section 12.08.440. Therefore, the proposed project would not result in any significant construction noise impacts, and this impact is considered **less than significant**.

Significance without Mitigation: Less than significant.

Traffic Noise

A project will normally have a significant effect on the environment related to traffic noise if it substantially increases the ambient noise levels for adjoining areas. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an outdoor environment. Noise levels above 70 dBA CNEL are normally unacceptable at sensitive receptor locations such as residences and schools, and such noise environments in these areas would be considered degraded.

Roadway segment average daily traffic (ADT) volumes were provided by LLG (see Appendix P). To determine the project-related traffic noise increase, the Existing and Future ADT volumes under both the "With Project" and "No Project" scenarios were compared, as shown in Table 3.12-17, *Summary of Traffic Noise Increases*. The analysis shows that the increase in vehicle and heavy truck trips from the proposed project would result in significant increases along First Street from Irwindale Avenue to the west, and along Irwindale Avenue from First Street to Arrow Highway. As detailed in the table, the proposed project would result in traffic noise increases of 8 dBA to 17 dBA along First Street and a 2 dBA increase along Irwindale Avenue. All other roadway segments showed a nominal traffic noise increase attributable to the proposed project.

These project-related increases exceed the thresholds of significance (a 1.5 dBA increase in ambient noise environments greater than 70 dBA CNEL, or a 3 dBA increase in environments less than 60 dBA CNEL); however, they would not exceed applicable land use compatibility noise standards. Future with-project traffic noise levels along First Street would be from 60 dBA to 62 dBA CNEL and from 64 dBA to 68 dBA CNEL along Irwindale Avenue from First Street to Arrow Highway. There are no sensitive receptors along First Street or Irwindale Avenue between First Street and Arrow Highway, and resulting daily traffic noise levels would not exceed the City's normally unacceptable land use compatibility standard of 75 dBA CNEL for commercial, professional office buildings, and industrial uses. Therefore, the proposed project would not result in any significant traffic noise increases, and this impact is considered **less than significant**.

Significance without Mitigation: Less than significant.

Table 3.12-17 Summary of Traffic Noise Increases

Roadway	Segment		Average Daily Traffic Noise Levels, dBA CNEL					
	From	To	Existing	Existing With Project	Project Increase (Existing)	Future No Project	Future With Project	Project Increase (Future)
Live Oak Ave	Arrow Hwy	I-605	67	67	<1	67	67	<1
Live Oak Ave	I-605	Maine Ave	67	68	1	68	69	1
Arrow Hwy	I-605	Live Oak Ave	67	67	<1	68	68	<1
Arrow Hwy	Live Oak Ave	Azusa Canyon Rd	70	70	<1	70	71	<1
Arrow Hwy	Azusa Canyon Rd	Irwindale Ave	68	69	1	69	70	1
Arrow Hwy	Irwindale Ave	Vincent Ave	66	67	<1	67	68	<1
Arrow Hwy	Vincent Ave	Azusa Ave	66	67	<1	67	67	<1
Arrow Hwy	Azusa Ave	the East	66	67	<1	67	67	<1
First Street	the West	Martin Rd	42	60	**17**	42	60	**17**
First Street	Martin Rd	Irwindale Brew Yard Dwy	52	62	**10**	52	62	**10**
First Street	Irwindale Brew Yard Dwy	Irwindale Ave	53	62	**9**	53	62	**8**
Irwindale Ave	Foothill Blvd	I-210 WB Off-Ramp	67	67	<1	67	67	<1
Irwindale Ave	I-210 WB Off-Ramp	I-210 EB Off-Ramp	67	68	1	68	68	1
Irwindale Ave	I-210 EB Off-Ramp	Jardin de Roca	66	67	1	67	68	1
Irwindale Ave	Jardin de Roca	First Street	66	67	1	66	68	1
Irwindale Ave	First Street	Gladstone St	66	68	**2**	66	68	**2**
Irwindale Ave	Gladstone St	Arrow Hwy	66	67	**2**	66	68	**2**
Irwindale Ave	Arrow Hwy	Cypress St	63	64	1	64	64	1
Irwindale Ave	Cypress St	the South	65	65	<1	65	65	<1
Vincent Ave	Arrow Hwy	the South	59	59	<1	60	61	<1
Azusa Ave	Azusa Ave	the South	65	65	<1	65	65	<1

Source: FHWA Highway Noise Prediction Model (FHWA-RD-77-108) in Appendix N. Based on traffic volumes provided by LLG (see Appendix P).

Operational Noise

Proposed project operational activity noise was estimated based on SoundPLAN modeling. The modeling calculations account for classical sound wave divergence (spherical spreading loss with adjustments for source directivity from point sources) plus attenuation (noise reduction) due to air absorption, ground effects, and shielding provided by existing or proposed structures (e.g., buildings or solid masonry walls). SoundPLAN also provides for other correction factors, including noise-level increases due to reflections, source directivity, and source tonality. SoundPLAN noise modeling estimated noise levels at the short- and long-term noise monitoring locations, representing the adjacent receptors to the project site. The model also incorporated noise assumptions associated with loading dock, HVAC, and trailer storage stall activities. Based on observations of typical loading dock activity, the following modeling inputs were assumed to be reasonable.

- Loading dock activities were assumed to be active for 60 percent of each hour with a sound power level of 114.2 dBA.
- Trailer storage stall activities were assumed to be active for 60 percent of each hour with a sound power level of 103.6 dBA.
- HVAC units were assumed to be in the central portion of each structure rooftop. Approximately 20 individual HVAC units were assumed for each structure operating 67 percent of daytime hours with a sound power level of 97.3 dBA each.

The San Gabriel River Trail and Sante Fe Dam Recreation Area are recreational uses and the nearest receptors to the project site that may be considered sensitive. Table 3.12-18, *SoundPLAN Modeled Noise Levels, dBA Leq*, shows predicted operational noise levels associated with the proposed project at noise monitoring locations LT-1 through LT-4, ST-1 through ST-4, and the Sante Fe Dam Recreation Center. Modeled noise contours of operational noise levels associated with the proposed project are projected on the project site and in the greater community, as shown on Figure 3.12-3, *SoundPLAN Modeled Project Noise Contours, Phase 1,* and Figure 3.12-4, *SoundPLAN Modeled Project Noise Contours, Phase 2*.

Table 3.12-18 SoundPLAN Modeled Project Noise Contours

Receptor	Measured, dBA	SoundPLAN, dBA		Difference		Ambient Plus Project		Increase Over Ambient due to Project		Applied Adjusted Noise Threshold (dBA)[1]	Exceeds City's Ambient Base Noise Level
	Ambient	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2	Phase 1	Phase 2		
LT-1	62.8	40.9	49.6	-21.9	-13.2	62.8	63.0	0.0	0.2	68	No
LT-2	59.4	41.6	44.8	-17.8	-14.6	59.5	59.5	0.1	0.1	64	No
LT-3	53.4	44.3	47.9	-9.1	-5.5	53.9	54.5	0.5	1.1	60	No
LT-4	51.0	46.2	47.9	-4.8	-3.1	52.2	52.7	1.2	1.7	60	No
ST-1[2]	49.6	61.0	61.0	11.4	11.4	61.3	61.3	11.7	11.7	75	No
ST-2	63.6	62.9	63.9	-0.7	0.3	66.3	66.8	2.7	3.2	69	No
ST-3	69.1	43.4	44.0	-25.7	-25.1	69.1	69.1	0.0	0.0	74	No
ST-4	63.7	43.0	44.0	-20.7	-19.7	63.7	63.7	0.0	0.0	69	No
Santa Fe Dam Recreation Area	49.6	51.5	51.8	1.9	2.2	53.7	53.8	4.1	4.2	60	No

Notes: See Appendix N for modeling inputs and results.

1. Measured ambient noise level or the ambient base noise level in Table 3.12-8, whichever is greater, plus 5 dBA, consistent with Section 9.28.030 of the Irwindale Municipal Code.

2. Based on aerial photos, this location is operated by the Los Angeles County Parks and Recreation Department and is actively used as a county yard. Therefore, for ST-1 the industrial threshold criteria is more appropriate and applied as this is an industrial use of the site..

Section 9.28.030 of the Irwindale Municipal Code sets ambient base noise levels for all properties in designated noise zones, as shown in Table 3.12-6. Irwindale Brew Yard Specific Plan operational noise thresholds are shown in Table 3.12-7 and are consistent with the City's Municipal Code. Any industrial noise at a level that exceeds the measured ambient or the ambient base noise level, whichever is greater, by more than 5 dBA, would be considered an impact per Section 9.28.040 and Section 9.28.120. The measured ambient or ambient base noise level plus 5 for analyzed receptors is shown in Table 3.12-13. As shown in Table 3.12-18, modeled project noise levels would range from 40.9 dBA Leq to 63.9 dBA Leq at adjacent recreational and commercial receptors under Phase 1 and Phase 2 operational conditions.

San Gabriel River Trail (represented as LT-1 through LT-4) and Los Angeles County Parks and Recreation Department (measured ambient noise level represented as ST-1) and commercial (represented as ST-3 and ST-4) receptors would be exposed to an ambient noise increases of 0. 1 dBA to 4.2 dBA due to full buildout (Phase 1 and Phase 2) of the proposed project. In addition, proposed project operational noise levels would range between 44 dBA and 52 dBA at San Gabriel Trail, Santa Fe Dam Recreation Area, and commercial receptors, as shown in Table 3.12-18. Proposed project operational noise levels would not exceed the City's measured ambient or ambient base noise level plus 5 dBA standards for recreational or commercial uses. Proposed project operational noise would comply with Irwindale Brew Yard Specific Plan Operational Noise Thresholds and Section 9.28.120 of the Municipal Code for San Gabriel River, Trail Santa Fe Dam Recreation Area, and commercial receptors.

Table 3.12-18 also shows proposed project operational noise levels would expose commercial receptors (represented as ST-1 and ST-2) to an ambient noise increase of less than 1 dBA to 11.7 dBA due to full buildout (Phase 1 and Phase 2) of the proposed project. Project operational noise levels would result in an increase of more than 10 dBA over measured ambient noise levels for future proposed commercial uses represented as ST-1. However, there is not an existing commercial receptor at this vacant parcel. In addition, future commercial uses at that parcel would be a noise source. As a result, proposed project operational noise would comply with Irwindale Brew Yard Specific Plan Operational Noise Thresholds and Section 9.28.120 of the municipal code for industrial uses.

Therefore, the proposed project would not result in any significant operational noise increases, and this impact is considered **less than significant**.

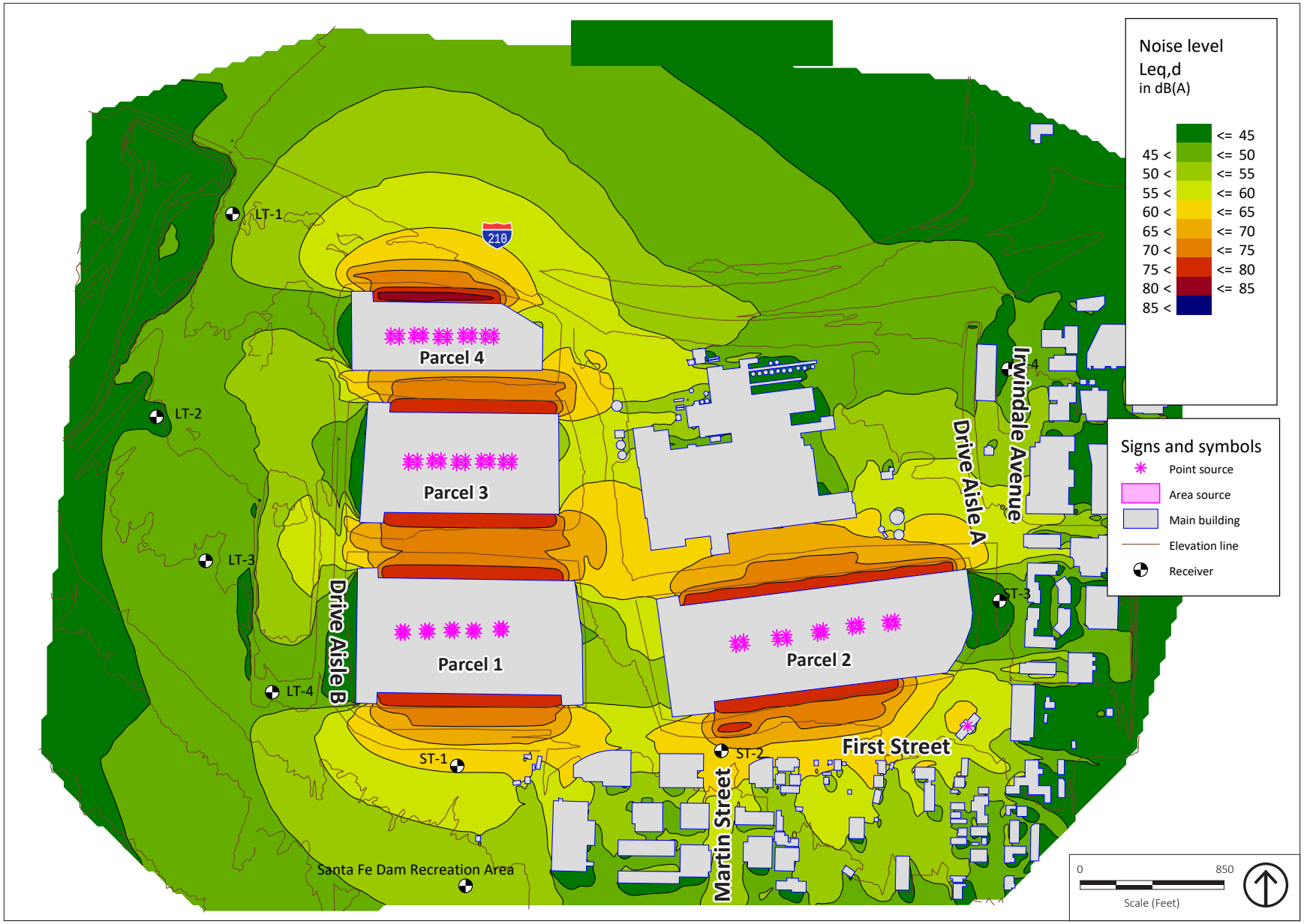
Significance without Mitigation: Less than significant.



Source: PlaceWorks 2025.

Figure 3.12-3
SoundPLAN Modeled Project Noise Contours, Phase 1

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Source: PlaceWorks 2025.

Figure 3.12-4
SoundPLAN Modeled Project Noise Contours, Phase 2

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b) Would the project generate excessive groundborne vibration or groundborne noise levels?

Construction

Construction activities have the potential to generate varying degrees of ground vibration, depending on the construction procedures and equipment. The use of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches levels that can damage structures.

For reference, a vibration level of 0.2 in/sec PPV is used as the limit for nonengineered timber and masonry buildings, which would conservatively apply to the surrounding structures (FTA 2018). Typical construction equipment can generate vibration levels ranging from 0.21 inches per second (in/sec) peak particle velocity (PPV) at 25 feet.

Table 3.12-19, *Project-Related Construction Vibration Damage Levels, Phase 1*, summarizes vibration levels for typical construction equipment at a reference distance of 25 feet and the nearest sensitive receptor. The nearest off-site receptor are the commercial uses to the south, conservatively 120 feet from the nearest construction impact area (paving). The proposed construction activities would not exceed the 0.2 in/sec PPV FTA standard at any identified receptors adjacent to the proposed project.

Table 3.12-19 Project-Related Construction Vibration Damage Levels, Phase 1

Equipment	Levels, PPV (in/sec)				
	FTA Reference at 25 Feet	**Industrial North at 150 Feet**	**Commercial East at 210 Feet**	**Commercial South at 120 feet**	**Recreation West at 200 feet**
Vibratory Roller	0.21	0.014	0.009	0.020	0.009
Clam shovel	0.202	0.014	0.008	0.019	0.009
Hoe Ram	0.089	0.006	0.004	0.008	0.004
Large	0.089	0.006	0.004	0.008	0.004
Caisson Drilling	0.089	0.006	0.004	0.008	0.004
Loaded Trucks	0.076	0.005	0.003	0.007	0.003
Jackhammer	0.035	0.002	0.001	0.003	0.002
Small Bulldozer	0.003	0.000	0.000	0.000	0.000
Exceed 0.2 in/sec PPV Standard?		No	No	No	**No**

Source: FTA 2018; Appendix N.

As shown in Table 3.12-20, *Project-Related Construction Vibration Damage Levels, Phase 2*, the nearest off-site receptors are industrial uses to the east, conservatively 200 feet from the nearest construction impact area (paving). The proposed construction activities would not exceed the 0.2 in/sec PPV FTA standard at any identified receptors adjacent to the proposed project.

Table 3.12-20 Project-Related Construction Vibration Damage Levels, Phase 2

Equipment	Levels, PPV (in/sec)		
	FTA Reference at 25 Feet	Industrial East at 200 Feet	Recreation west at 225 feet
Vibratory Roller	0.21	0.009	0.008
Clam shovel	0.202	0.009	0.007
Hoe Ram	0.089	0.004	0.003
Large Bulldozer	0.089	0.004	0.003
Caisson Drilling	0.089	0.004	0.003
Loaded Trucks	0.076	0.003	0.003
Jackhammer	0.035	0.002	0.001
Small Bulldozer	0.003	0.000	0.000
Exceed 0.2 in/sec PPV Standard?		**No**	**No**

Source: FTA 2018; Appendix N.

As shown in Tables 3.12-19 and 3.12-20, the proposed construction activities would not exceed the 0.2 in/sec PPV FTA standard. Further, the proposed project would be required to comply with the daytime construction hours limited to 7:00 am to 7:00 pm per Municipal Code Section 9.28.110, which limits construction hours. Therefore, the proposed project would not result in any significant construction vibration impacts, and this impact is considered **less than significant**.

Significance without Mitigation: Less than significant.

Operation

Commercial and industrial operations would generate varying degrees of ground vibration, depending on the operational procedures and equipment. Industrial uses would not be immediately adjacent to vibration-sensitive uses and no significant vibration impacts would occur from vibration generated by proposed project uses. The proposed project is not the type of land use that could generate significant vibration. Proposed project operation would not include any substantial long-term vibration sources Therefore, the proposed project would not result in any significant operational vibration impacts, and this impact is considered **less than significant**.

Significance without Mitigation: Less than significant.

c) For a project 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?

Aircraft over-flights were observed during noise monitoring, however, the nearest airports to the project site, are the San Gabriel Valley Airport, approximately 5.4 miles southwest and Bracket Field Airport, approximately 8.4 miles to the southeast. The project site lies outside the extents of airport noise contours. Therefore, due to distance, the proposed project would not expose people residing or working in the project area to excessive noise levels related to aircraft noise. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.12.5 Cumulative Impact Analysis

Noise and vibration are localized occurrences; they decrease rapidly in magnitude as the distance from the source to the receptor increases. Therefore, only those related projects that are in the direct vicinity, approximately 500 feet of the project site would have the potential to be considered in a cumulative context with the proposed project's contribution.

There are existing major transportation and stationary sources of noise identified in the vicinity of the project site. Existing stationary noise sources were identified to and north, east, and south of the project site.

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for noise. The project site is in an area that is developed with industrial uses and that includes recreational uses.

Would the project have a cumulative effect related to noise?

Construction

Cumulative impacts would only occur if other projects are being constructed in the vicinity of the project site at the same time as the proposed project. Table 3-2, *Cumulative Projects within Two Miles of the Proposed Project*, shows that the nearest construction site to the project site is at 230 Irwindale Avenue, approximately 1,340 feet from the nearest proposed project boundary line. In addition, several intervening buildings shield the sites from one another. With the distance separating the two sites and the intervening buildings, construction noise would not result in a cumulative impact. Furthermore, the proposed project construction activities and

future development in the project area would be required to comply with applicable City's noise standards related to construction noise. Development projects that exceed the noise and vibration thresholds would be required to implement appropriate mitigation measures. The proposed project would result in a less than significant impact to construction noise and vibration when combined with other projects within the vicinity. Therefore, cumulative construction noise and vibration would be less than significant.

Operation

Operation of the proposed project would not exceed the City's noise standards. There are other nearby sources of stationary noise in the project area that would contribute to the ambient noise environment near the project site. To specifically estimate the proposed project's contribution to traffic noise, existing noise levels were compared to those projected with completion of the proposed project. As demonstrated previously, the proposed project's contribution to increases in traffic noise levels would not result in an impact. Therefore, cumulative operational noise impacts would be less than significant.

3.12.6 References

Caltrans (California Department of Transportation). 1995, June. Traffic Noise Attenuation as a Function of Ground and Vegetation. Final Report. FHWA/CA/TL-95/23.

Caltrans. 2009, November. Technical Noise Supplement.

Caltrans. 2013, September. Technical Noise Supplement: A Technical Supplement to the Traffic Noise Analysis Protocol. Sacramento, CA.

Caltrans. 2020, April. Transportation and Construction Vibration Guidance Manual.

FHWA (Federal Highway Administration). 1978, December. FHWA Highway Traffic Noise Prediction Model. FHWA-RD-77-108. US Department of Transportation.

FHWA. 2000, April. Highway Traffic Noise in the United States: Problem and Response. US Department of Transportation, p. 3.

FHWA. 2001. Highway Noise Barrier Design Handbook. US Department of Transportation.

FHWA, Office of Environment and Planning. 2006, January. FHWA Roadway Construction Noise Model. US Department of Transportation.

FHWA, Office of Environment and Planning, Noise and Air Quality Branch. 2011, December. Highway Traffic Noise Analysis and Abatement Policy and Guidance. US Department of Transportation.

FTA (Federal Transit Administration). 2018, September. Transit Noise and Vibration Impact Assessment Manual. US Department of Transportation.

LCI (Governor's Office of Land Use and Climate Innovation). 2017. Guidelines for the Preparation and Content of the Noise Element of the General Plan. Appendix D of *General Plan Guidelines and Technical Advisories*.

3.13 PUBLIC SERVICES

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the proposed project to impact public services, including fire protection, police protection services, school services, and libraries. The analysis in this section is based in part on the service provider letter responses in Appendix O of this DEIR. Park services are addressed in Chapter 5, *Other CEQA Considerations*. Public and private utilities and service systems, including water, wastewater, and solid waste services and systems, are addressed in Section 3.16, *Utilities and Service Systems*.

During the Notice of Preparation (NOP) comment period (March 6, 2024, through April 12, 2024), several commenters raised issues related to public services, which were considered during preparation of this analysis. The Los Angeles County Sheriff's Department (LASD), in a letter dated March 12, 2024, noted that it provides patrol services to the Santa Fe Dam Recreational Area adjacent to the project site and requested that the DEIR identify and address project features relevant to law enforcement services and public safety. Specifically, the Sheriff's Department requested discussion of proposed hours of operation, on-site signage, perimeter security measures such as anti-climb fencing, exterior lighting plans, security measures, whether outdoor alcohol sales would occur, transportation access and circulation for vehicles and pedestrians, and incorporation of Crime Prevention Through Environmental Design (CPTED) principles. These comments have been taken into consideration, during the City's development review and permitting process, building and site plans would be reviewed by the Irwindale Police Department (IPD) to evaluate safety and security considerations, including lighting, access, and emergency response features. During this time, the requested information from LASD would be reviewed by the IPD. Therefore, these comments have been addressed.

3.13.1 Fire Protection

The information in this section is based partly on a written service questionnaire response by the Los Angeles County Fire Department (LACoFD), dated January 21, 2026. A copy of this response is included in Appendix O of this DEIR.

REGULATORY FRAMEWORK

Federal

International Fire Code

The International Fire Code is a model code regulating minimum fire-safety requirements for new and existing buildings, facilities, storage, and processes. The code includes specialized, technical, fire- and life-safety regulations, with topics addressing fire-department access, fire

hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, use and storage of hazardous materials, protection of emergency responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings.

State

California Fire Code

The California Fire Code (CFC) (Title 24, California Code of Regulations, Part 9) is based on the 2021 International Fire Code and includes amendments from the State of California fully integrated into the code. The California Fire Code has fire safety–related building standards that are referenced in other parts of Title 24 of the California Code of Regulations. Fire access road requirements are set forth in CFC Section 503; water supply requirements for fire flow are set forth in CFC Appendix B; and fire hydrant spacing requirements are in CFC Appendix C. The current 2025 CFC took effect on January 1, 2026; the CFC is updated on a three-year cycle.

California Health and Safety Code Sections 13000 et seq.

Sections 13000 et seq. of the California Health and Safety Code include regulations for building standards (also in the California Building Standards Code), fire-protection and notification systems, fire-protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire-suppression training.

Regional

Los Angeles County Fire District Facilities Master Plan

The Los Angeles County Fire District Facilities Master Plan was prepared as a collaborative effort between the LA County Fire District and the LA County Chief Executive Office. The process consisted of two phases; evaluating the current capacity, condition, and functionality of the Fire District's facilities and then projecting future capacity deficits utilizing Southern California Association of Governments (SCAG) population growth projections and methodologies developed in the first phase.

While all facilities were included in the study, particular attention was given to fire stations, as they are the most critical component of frontline service delivery, responding to hundreds of 911 incidents throughout the district every day (LACoFD 2020).

County of Los Angeles Fire Code

The Los Angeles County Fire Code (Title 32 of the Los Angeles County Code) incorporates the California Fire Code by reference, as amended by ordinance, and includes local amendments

specific to Los Angeles County. Title 32 incorporates the 2022 California Fire Code (24 CCR Part 9) by reference with certain county-adopted changes.

Local

City of Irwindale Municipal Code

The City of Irwindale Municipal Code identifies land use categories, development standards, and other general provisions that ensure consistency between the City's General Plan and proposed development projects. The following provisions from the City's municipal code focus on public services impacts associated with new development projects and are relevant to the proposed project:

> **Chapter 15.12. Fire Code.** The 2023 edition of the Los Angeles County Fire Code (Title 32 of the Los Angeles County Code), Los Angeles County Ordinance No. 2023-0008, which incorporates and amends the 2022 California Fire Code, including all appendixes thereto and changes made by the County of Los Angeles, is adopted by the City of Irwindale to be the fire code of the city which prescribes the minimum Fire Code requirements for fire and life-safety issues.

EXISTING CONDITIONS

The Los Angeles County Fire District (LACoFD) provides fire suppression services to the City of Irwindale. LACoFD covers 2,306 square miles and includes 174 stations and 59 cities, including the City of Irwindale (LACoFD 2020). The Los Angeles County Fire District maintains a single fire station in Irwindale, Station No. 48, near the Civic Center. Fire Station No. 48 is approximately one mile south of the project site at 15546 E Arrow Highway. According to LACoFD, the estimated response time to the project site from Station No. 48 is approximately four minutes, which is consistent with the department's five-minute response time goal for the first arriving units. The fire stations most likely to serve the project site include:

- **Station No. 48** at 15546 Arrow Highway, Irwindale, approximately one mile south of the project site, is equipped with Engine 48 and Engine 548.
- **Station No. 32** at 605 N Angeleno Avenue, Azusa, approximately 1.4 miles east of the project site, is equipped with Engine 32, Squad 32, Water Tender 32, Urban Search and Rescue Cache 2, Engine 532A, Squad 532, and Engine 532.
- **Station No. 44** at 1105 Highland Avenue, Duarte, approximately 1.4 miles northwest of the project site, is equipped with Paramedic Ambulance Unit Engine 44, Engine 244, Patrol 44, and Engine 444.

- **Station No. 152** at 807 Cypress Street, Covina, approximately 2.3 miles southeast of the project site, is equipped with Engine 152 and Emergency Squad Unit 152.

STANDARDS FOR ANALYSIS

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to public services if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

   - Fire protection

APPLICABLE SPECIFIC PLAN DEVELOPMENT STANDARDS AND DESIGN GUIDELINES

Development Standards

There are no Irwindale Brew Yard Specific Plan development standards pertaining to fire protection.

Design Guidelines

There are no Irwindale Brew Yard Specific Plan design guidelines pertaining to fire protection.

PROJECT IMPACT ANALYSIS

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

Fire protection and emergency medical services for the project site would be provided by LACoFD. Development of the proposed project would introduce new industrial and commercial uses that could increase the frequency of calls for fire protection and emergency medical services relative to existing conditions.

The project site would be primarily served by LACoFD Fire Station No. 48 at 15546 Arrow Highway in Irwindale, approximately one mile south of the project site. LACoFD has indicated that the estimated response time to the project site from Station No. 48 is approximately four (4) minutes, which is consistent with applicable service standards. The LACoFD and Land Development Unit reviewed the Tentative Parcel Map and Fire Access Plan for the proposed project and cleared both for public hearing on April 7, 2026 (EPIC-LA No. FLDU2023002178). LACoFD determined that the proposed fire access system complies with applicable County Fire Code requirements, subject to additional review of fire protection features during the building permit process. A copy of the LACoFD's conditions for project approval is also included in Appendix O2.

All buildings constructed as part of the proposed project would be required to comply with the California Building Standards Code, the California Fire Code as adopted by Los Angeles County, and applicable provisions of the Los Angeles County Fire Code. These requirements include the installation of appropriate fire suppression systems and implementation of preventative fire and life safety measures. During future development review and permitting, LACoFD would review building and fire plans to ensure adequate emergency vehicle access, fire hydrant placement, and fire flow capacity. Existing fire hydrants serve the project site and surrounding parcels; however, the proposed project would be required to install additional fire protection infrastructure, including fire hydrants and associated water system improvements, as necessary to meet applicable Fire Code requirements and LACoFD fire flow and access standards. The precise number and placement of hydrants would be finalized during the building permit review process with the City.

LACoFD's April 2026 review identified its specific needs to adequately serve the proposed project. Based on compliance with the conditions outlined (related to specific design details to be reviewed at the building permit stage), implementation of the proposed project would not cause significant environmental impacts, affects service ratios or response times that would result in environmental impacts. Therefore, impacts related to fire protection would be **less than significant**.

Significance without Mitigation: Less than significant.

CUMULATIVE IMPACT ANALYSIS

Would the project have a cumulative effect related to fire protection?

The geographic area considered for cumulative fire protection impacts is the area served by the same LACoFD stations that serve the project site, including the City of Irwindale and adjacent portions of surrounding jurisdictions that may rely on shared emergency response resources. Fire protection and emergency medical services within the City are provided as part of LACoFD's

countywide service system, including Fire Station No. 48 and surrounding stations that may respond depending on the nature and location of an emergency.

Cumulative development within the City of Irwindale and surrounding areas would add residents, employees, visitors, and structures to the LACoFD service area, thereby incrementally increasing demand for fire protection and emergency medical services and potentially requiring additional LACoFD staffing, stations, and equipment. According to the Southern California Association of Governments' (SCAG) Connect SoCal 2024 growth forecasts, employment in the City of Irwindale is projected to increase by approximately 14 percent (about 2,700 jobs) between 2019 and 2050 (SCAG 2024). This employment growth, combined with other reasonably foreseeable development, would incrementally increase demand for fire protection services within the LACoFD service area.

LACoFD addresses both existing and future fire protection needs through long-range capital and operational planning. The LACoFD Facilities Master Plan identifies existing and future fire station development, apparatus, and staffing needs based on SCAG growth projections; service demand trends; response time objectives; and hazard conditions, including wildfire risk. The Facilities Master Plan is intended to guide the phased provision of fire protection facilities and resources as development and service demands occur throughout Los Angeles County, including within the City of Irwindale (LACoFD 2020).

Future development projects within the LACoFD service area, including the proposed Specific Plan, would contribute to funding for fire protection services through property taxes, sales taxes, and other applicable development-related revenues, portions of which are used to support LACoFD operations, staffing, equipment, and facility improvements identified through countywide planning efforts. As discussed above, LACoFD's long-range facilities and operational planning are based on projected regional growth, including SCAG growth forecasts, such that anticipated cumulative development in the service area is already factored into planning for future fire protection service needs. Therefore, cumulative impacts to fire protection services would be less than significant, and the proposed project's contribution to cumulative fire protection impacts would not be cumulatively considerable.

Significance without Mitigation: Less than significant.

3.13.2 Police Protection

The information in this section is based partly on a written service questionnaire response by the Irwindale Police Department, dated January 5, 2026. A copy of this response is included in Appendix O of this DEIR.

REGULATORY FRAMEWORK

Local

City of Irwindale Municipal Code

The City of Irwindale Municipal Code identifies land use categories, development standards, and other general provisions that ensure consistency between the City's General Plan and proposed development projects. The following provision from the City's Municipal Code focuses on public services impacts associated with new development projects and is relevant to the proposed project:

> **Chapter 3.50. Development Impact Fee.** It is the purpose and intent of this section to implement a unified development impact fee program to fund the acquisition, design, and construction of certain public facilities necessary to serve new development within the city. The public facilities to be funded by the Development Impact Fees are in the following categories: Administrative facilities; Transportation facilities; Library facilities; Storm drain facilities; Police facilities; Sewer facilities; and Parks and Recreation facilities.

EXISTING CONDITIONS

The project site is served by the Irwindale Police Department (IPD), which provides police services throughout the City of Irwindale from its headquarters at 5050 Irwindale Avenue. The IPD police station is approximately 1.2 miles south of the project site. IPD has a reported response time of up to five minutes for most areas within the City (Irwindale 2024).

The City contracts with the Los Angeles County Sheriff's Department (LASD) for additional services. The LASD is the primary law enforcement agency for Los Angeles County and provides general law enforcement services to unincorporated areas and 42 contract cities throughout the county. LASD has nearly 18,000 budgeted sworn and professional staff and serves communities across more than 4,000 square miles (LASD 2025).

Through a mutual aid agreement with LASD, IPD receives special weapons team services, specialized equipment, and other law enforcement support as needed. IPD also contracts with the West Covina Police Department and the Baldwin Park Police Department for jail facility services, and with the Foothill Air Support Team, hosted by the Pasadena Police Department, for air support services (Irwindale 2024).

In addition, LASD provides patrol services to the Santa Fe Dam Recreational Area adjacent to the project site.

STANDARDS FOR ANALYSIS

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to public services if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

   - Police protection

APPLICABLE SPECIFIC PLAN DEVELOPMENT STANDARDS AND DESIGN GUIDELINES

Development Standards

There are no Irwindale Brew Yard Specific Plan development standards that directly regulate police services. However, the following development standards relate to on-site safety, security, and crime deterrence in the Irwindale Brew Yard Specific Plan area.

- The location and design of walls, fences, and gates within the Specific Plan area shall be determined in conjunction with individual implementing projects. Walls and fences may be provided along site perimeters, around loading docks and truck yards, and between parking, service, and building areas to enhance security and control access.

- Chain-link fencing is prohibited within the Specific Plan area, except during construction. Permanent fencing shall consist of tubular steel fencing, masonry walls, or a combination thereof, consistent with the walls and fences standards in Chapter 3.

- Loading docks, truck courts, outdoor storage areas, and service areas shall be visually screened from Irwindale Avenue and First Street by walls, fencing, landscaping, berms, or a combination of these features to reduce opportunities for unauthorized access and improve site security.

Design Guidelines

The Irwindale Brew Yard Specific Plan includes the following design guidelines related to safety and security:

- Outdoor lighting shall be designed to enhance pedestrian and vehicular safety while minimizing glare and light spillover onto adjacent properties. Lighting shall be downward-directed and utilize cutoff fixtures where appropriate.
- Illuminate parking areas, loading docks, pedestrian walkways, building entrances, and internal circulation routes to levels necessary for safe operation and security. Dimmers, motion sensors, and automatic shut-off features between dawn and dusk are permitted.
- Lighting fixtures shall be the minimum height necessary to maintain safety and security. Along pedestrian walkways, low-mounted or bollard-style fixtures are encouraged to reinforce pedestrian scale.
- Site design shall incorporate principles of safety through design, including clear visibility of building entrances, parking areas, and circulation routes; avoidance of hidden or dead-end spaces; and landscaping that maintains sightlines and limits concealment opportunities.
- Access control features, including clear wayfinding, defined site entrances, and perimeter fencing where appropriate, shall be incorporated to guide visitors and vehicles and reduce unauthorized access.

PROJECT IMPACT ANALYSIS

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

Police protection for the project site would be provided by the IPD, which provides law enforcement services throughout the City of Irwindale from its headquarters at 5050 Irwindale Avenue. The IPD police station is approximately 1.2 miles south of the project site, and the department reports typical response times of up to five minutes for most areas within the City (Irwindale 2024).

Development of the proposed project would introduce new industrial and commercial uses and associated employees, which could increase the frequency of police service calls compared to existing conditions. According to IPD, anticipated service demands associated with the proposed uses would primarily include building and vehicle alarms, theft-related incidents (including property theft or employee-related theft), and response to potential industrial accidents or injuries. The proposed project would incorporate site design features that promote safety and deter criminal activity, including controlled site access points, internal circulation designed to

maintain visibility, perimeter fencing and walls where appropriate, and security lighting for parking areas, loading areas, pedestrian pathways, and building entrances. These features are consistent with crime prevention through environmental design principles.

During the City's development review and permitting process, building and site plans would be reviewed by the IPD to evaluate safety and security considerations, including lighting, access, and emergency response features (Hofford 2026). The IPD has recommended incorporation of modern, high-resolution video surveillance systems with a minimum 30-day retention period as well as coordination regarding business hours and workforce levels to further support site security. In addition, IPD maintains mutual aid agreements with LASD, which provides specialized services such as special weapons teams and additional equipment when necessary.

No police stations are located on the project site, and no police facilities are proposed as part of the project. The IPD has indicated that existing staffing levels and facilities are adequate to serve the proposed project. While the IPD noted that incremental increases in Irwindale's daytime population may, over time, contribute to cumulative service demands, the proposed project would not, by itself, result in service deficiencies or require new or expanded police protection facilities. Therefore, impacts related to police protection would be **less than significant**.

Significance without Mitigation: Less than significant.

CUMULATIVE IMPACT ANALYSIS

Would the project have a cumulative effect related to police protection?

The area considered for cumulative impacts is the IPD's service area, which consists of the City of Irwindale. The IPD has indicated that implementation of the proposed Irwindale Brew Yard Specific Plan, in combination with other planned development in the City, would incrementally increase demand for police services associated with growth in Irwindale's daytime business population; however, the proposed project would not, by itself, substantially impair IPD's ability to provide police services within its service area (Hofford 2026).

As noted by the IPD, increases in business and employment activity may cumulatively contribute to more diluted police services over time, which most typically manifests as increased response times, but such effects would be addressed through internal City planning and service-level adjustments.

According to the SCAG Connect SoCal 2024 growth forecasts, employment in the City of Irwindale is projected to increase by approximately 14 percent (about 2,700 jobs) between 2019 and 2050 (SCAG 2024). Other reasonably foreseeable projects within the IPD service area would add employees, visitors, and structures, thereby incrementally increasing demand for police

services and thus requiring additional IPD staff, stations, and equipment. Future projects would pay sales taxes, property taxes, and development impact fees; parts of each would be allocated for police operations and police facilities. Cumulative impacts would be less than significant after payments of such taxes and fees, and project impacts would not be cumulatively considerable.

Significance without Mitigation: Less than significant.

3.13.3 Schools

REGULATORY FRAMEWORK

State

California State Assembly Bill 2926: School Facilities Act of 1986

To assist in providing school facilities to serve students generated by new development, Assembly Bill (AB) 2926 was enacted in 1986 and authorizes a levy of impact fees on new residential and commercial/industrial development. The bill was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the Government Code. Under this statute, payment of impact fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities

Leroy F. Greene School Facilities Act of 1998 (Senate Bill (SB) 50)

Senate Bill (SB) 50, passed in 1998, provides a comprehensive school facilities financing and reform program and enables a statewide bond issue to be placed on the ballot. Under the provisions of SB 50, school districts are authorized to collect fees to offset the costs associated with increasing school capacity as a result of development and related population increases. The funding goes to acquiring school sites, constructing new school facilities, and modernizing existing school facilities. SB 50 establishes a process for determining the amount of fees developers would be charged to mitigate the impact of development on school districts from increased enrollment. According to Section 65996 of the California Government Code, development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation."

Under this legislation, there are three levels of developer fees that may be imposed upon new development by the governing school district. Level I fees are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level II fees require the developer to provide one-half of the costs of accommodating students in new schools, and the state provides the remaining half. To qualify for Level II fees, the governing board of the school district must adopt a School Facilities Needs Analysis and meet

other prerequisites in accordance with Section 65995.6 of the California Government Code. Level III fees apply if the state runs out of bond funds, allowing the governing school district to impose 100 percent of the cost of school facility or mitigation, minus any local dedicated school monies, on the developer.

EXISTING CONDITIONS

The project site is in the Baldwin Park Unified School District and Azusa Unified School District. There is only one public school in the City of Irwindale, Merwin Elementary School, which is approximately two miles south of the project site. However, Merwin Elementary School is in the Covina-Valley Unified School District. Under existing conditions, the project site places no demand on the public-school system because the project site is vacant except for a storage building and training facility.

STANDARDS FOR ANALYSIS

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to public services if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

   - Schools

APPLICABLE SPECIFIC PLAN DEVELOPMENT STANDARDS AND DESIGN GUIDELINES

Development Standards

There are no Irwindale Brew Yard Specific Plan development standards pertaining to schools.

Design Guidelines

There are no Irwindale Brew Yard Specific Plan design guidelines pertaining to schools.

PROJECT IMPACT ANALYSIS

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

The project site is in the service area of local public school districts; however, the proposed project consists entirely of nonresidential industrial and commercial uses. No residential uses are proposed, and the proposed project would not directly generate new students or create a direct demand for public school services.

Although the proposed project would generate employment opportunities during both construction and operation of the proposed project, any indirect population growth associated with job creation has been accounted for in regional and local planning efforts, including the City's Housing Element and regional growth forecasts prepared by SCAG. Accordingly, the proposed project would not result in unanticipated population growth or student enrollment increases requiring new or expanded school facilities.

In addition, the project applicant would be required to pay statutory school impact fees in accordance with Senate Bill 50 (Government Code Sections 65995 et seq.), which are deemed full and complete mitigation for school facility impacts. No schools are located on the project site, and no schools are proposed as part of the proposed project. Therefore, impacts related to schools would be **less than significant**.

Significance without Mitigation: Less than significant.

CUMULATIVE IMPACT ANALYSIS

Would the project have a cumulative effect related to schools?

The proposed project would not include residential uses and would not directly generate new students. Although cumulative employment growth associated with the proposed project and other development could indirectly contribute to population growth, regional employment and housing growth are accounted for in forecasts prepared by the Southern California Association of Governments and in the City's adopted Housing Element.

The Regional Housing Needs Assessment (RHNA) allocates housing growth based on these forecasts, ensuring that housing associated with employment growth, and any related increases in student enrollment, are anticipated and planned for at the regional and local level. The City's

certified Housing Element update further implements these RHNA allocations and identifies adequate sites and policies to accommodate projected housing growth through the planning horizon. In addition, the proposed project and future development would be required to pay statutory school impact fees pursuant to Senate Bill 50 (Government Code Sections 65995 et seq.), which are deemed full and complete mitigation for school facility impacts under CEQA.

Accordingly, cumulative development, including the proposed project, would not require new or expanded school facilities that would result in a significant environmental impact. Cumulative impacts would be less than significant, and project impacts would not be cumulatively considerable.

3.13.4 Other Public Facilities

REGULATORY FRAMEWORK

Local

City of Irwindale Municipal Code

The City of Irwindale Municipal Code identifies land use categories, development standards, and other general provisions that ensure consistency between the City's General Plan and proposed development projects. The following provisions from the City's municipal code focus on public services impacts associated with new development projects and are relevant to the proposed project:

> **Chapter 3.50. Development Impact Fee.** It is the purpose and intent of this section to implement a unified development impact fee program to fund the acquisition, design, and construction of certain public facilities necessary to serve new development within the city. The public facilities to be funded by the development impact fees are in the following categories: Administrative facilities; Transportation facilities; Library facilities; Storm drain facilities; Police facilities; Sewer facilities; and Parks and Recreation facilities.[1]

EXISTING CONDITIONS

The Irwindale Public Library, owned and operated by the City of Irwindale, is at 16053 Calle De Paseo. The new Irwindale Public Library is under construction and is anticipated to be

[1] Storm drain and sewer infrastructure are separately evaluated in Section 3.16, *Utilities and Service Systems*, including analysis of wastewater conveyance infrastructure and stormwater drainage facilities associated with the proposed project.

completed in Summer 2026. The new library will increase circulation by 10,000 items, totaling approximately 32,000 items. The existing site use places no demand on the City's public library system.

STANDARDS FOR ANALYSIS

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to public services if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

   - Other public facilities

APPLICABLE SPECIFIC PLAN DEVELOPMENT STANDARDS AND DESIGN GUIDELINES

Development Standards

There are no Irwindale Brew Yard Specific Plan development standards pertaining to other public facilities.

Design Guidelines

There are no Irwindale Brew Yard Specific Plan design guidelines pertaining to other public facilities.

PROJECT IMPACT ANALYSIS

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

Demand for public libraries, parks, and similar community services is generally based on the resident population rather than employment. Because the proposed project does not include

residential uses and would not result in direct or unanticipated population growth, it would not create a demand for new or expanded library facilities or other similar public services.

Library services in the area are provided by existing public library systems and are funded primarily through local tax revenues, including property and sales taxes. The proposed project would not require modification of existing library facilities, parks and recreation facilities, or construction of new public facilities. No libraries or other public service facilities are located on the project site or proposed as part of the project. Therefore, impacts related to other public services would be **less than significant**.

Significance without Mitigation: Less than significant.

CUMULATIVE IMPACT ANALYSIS

Would the project have a cumulative effect related to other public facilities?

Other public services, such as libraries and similar community facilities, are also primarily driven by residential population rather than employment. As described above, cumulative development in the project area does not include substantial residential uses beyond those anticipated under the City's adopted Housing Element and applicable regional growth forecasts. As a result, cumulative development would not directly increase demand for new or expanded library facilities or other similar public services.

Public library services are provided through existing facilities and are funded primarily through general tax revenues, including property and sales taxes. Cumulative development, including the proposed project, would contribute to these revenue sources and support the continued operation and maintenance of existing facilities. No library, parks and recreation, or other public service facilities are located on the project site, and none are presently proposed as part of cumulative development.

Accordingly, cumulative development would not require the construction of new or physically altered public service facilities that could result in a significant environmental impact. Cumulative impacts related to other public facilities would be less than significant, and the proposed project's contribution would not be cumulatively considerable.

3.13.5 References

Durbin, Ronald M. (Chief, Forestry Division). 2026, January 21. Questionnaire Response regarding the Irwindale Brew Yard Specific Plan (FFER2025005307). County of Los Angeles Fire Department.

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SCAG (Southern California Association of Governments). 2024. Connect SoCal 2024 The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf.

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3.14 TRANSPORTATION

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the Irwindale Brew Yard Specific Plan to result in transportation impacts in the City of Irwindale and its surroundings. The analysis in this section is based in part on the following technical report(s):

- *Traffic Impact Study, Irwindale Brew Yard Specific Plan*, LLG, April 30, 2026
- *Irwindale Brew Yard Specific Plan – Supplemental Analysis (memorandum)*, September 30, 2025. Complete copies of these studies are in the technical appendices to this Draft EIR as Appendix B.

During the Notice of Preparation (NOP) public review period (March 6, 2024, through April 5, 2024) the following transportation-related comments were received. These letters are included in their entirety in Appendix A:

- **Los Angeles County Metropolitan Transportation Authority (Metro):** This letter requests that the EIR address potential project-related construction and operational impacts to both the Metro A line and to freight operations (Southern California Regional Rail Authority (SCRRA) and BNSF freight rail service) related to construction and operation. METRO also recommends that potential safety and traffic impacts related to the at-grade rail crossing at First Street and S. Motor Avenue be addressed. Mitigation measures are recommended in the letter.
- **California Department of Transportation (CALTRANS):** Encourages the City to implement multi-modal and complete streets transportation elements and to evaluate Transportation Demand Management strategies. Provides links to Caltrans guidelines, including VMT-focused *Transportation Impact Study Guide.* Caltrans recommends a queuing analysis with signal timing for potentially impacted ramps on Freeway 605 and I-210 interchanges to address development traffic concerns.

3.14.1 Regulatory Framework

FEDERAL

Federal Highway Administration

The Federal Highway Administration (FHWA) is involved in railroad grade crossing safety issues, setting standards and providing guidelines for the assessment of safety at a railroad grade crossing and for correct grade crossing design. These FHWA standards and guidelines include the appropriate use and placement of traffic control devices at and on the approaches to a

railroad grade crossing, and the effective integration of grade crossing signals with the other signs, signals and markings on the approaching roadways to ensure the safety of motorists, bicyclists and pedestrians.

FHWA also administers the distribution of Section 130 funds, which are funds authorized in United States Code Title 23, Section 130, and again in the Infrastructure Investment and Jobs Act (IIJA) 2021. Section 130 funds are specifically designated for eliminating hazards at public highway-railroad grade crossings.

Interstate Commerce Commission Termination Act of 1995

The Interstate Commerce Commission Termination Act (ICCTA) abolished the Interstate Commerce Commission and transferred authority over railroads to the Surface Transportation Board (STB). Under 49 U.S.C. § 10501(b), the STB has exclusive federal jurisdiction over:

- Railroad transportation.
- Construction, acquisition, operation, abandonment, and modification of rail lines and facilities.

This jurisdiction expressly preempts most state and local regulation. ICCTA preemption applies to:

- Zoning
- Land use permits
- Building permits
- Environmental review requirements
- Conditional use approvals

If these local requirements would manage, govern, or interfere with rail operations, they are generally preempted. Local governments cannot require discretionary approvals for:

- Adding, removing, or reconfiguring rail tracks
- Constructing rail yards, sidings, spurs, or intermodal facilities
- Changing rail line alignments or operational characteristics

Local governments cannot regulate or block:

- Rail line abandonment
- Line discontinuance
- Removal of tracks

These actions require STB approval, not local approval. Local concerns may be raised only through the STB process.

STATE

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law. The legislature found that with the adoption of SB 375, the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT) and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by Assembly Bill (AB) 32. Additionally, AB 1358, described below, requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users.

SB 743 started a process that fundamentally changes transportation impact analysis as part of California Environmental Quality Act (CEQA) compliance. These changes include the elimination of auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts in many parts of California (if not statewide). As part of the new CEQA Guidelines, the new criteria "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (California Public Resources Code Section 21099[b][1]). On January 20, 2016, the Governor's Office of Planning and Research released proposed revisions to its CEQA Guidelines for the implementation of SB 743, with alternative metrics and thresholds based on VMT. The guidelines were certified by the Secretary of the Natural Resources Agency in December 2018, and automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, is no longer considered a significant impact on the environment. Since July 1, 2020, lead agencies are required to consider VMT as the metric for determining transportation impacts under CEQA.

Assembly Bill 1358: The California Complete Streets Act

The California Complete Streets Act (AB 1358) of 2008 was signed into law on September 30, 2008. Beginning January 1, 2011, AB 1358 requires circulation elements to address the transportation system from a multimodal perspective. The bill states that streets, roads, and highways must "meet the needs of all users in a manner suitable to the rural, suburban, or urban context of the general plan." Essentially, this bill requires a circulation element to plan for all modes of transportation where appropriate, including walking, biking, car travel, and transit.

The Complete Streets Act also requires circulation elements to consider the multiple users of the transportation system, including children, adults, seniors, and the disabled. AB 1358 tasked the Office of Planning and Research to release guidelines for compliance. OPR updated the General Plan Guidelines with a section titled **"**Complete Streets and the Circulation Element" to

help cities and counties plan for balanced multimodal transportation networks that safely accommodate pedestrians, bicyclists, transit users, and motorists alike.

AB 98

AB 98, signed into law on September 29, 2024, and subsequently amended by SB 415, establishes statewide environmental, design, siting, and operational standards for new or expanded logistics use facilities (warehouse and distribution centers) to reduce adverse community and environmental impacts—especially near sensitive land uses (e.g., homes, schools, daycare centers, parks). The law was adopted in response to rapid logistics/warehouse expansion in California that has led to increased truck traffic, air pollution, noise/light impacts, and community concerns.

AB 98 also requires cities and counties to revise their general plan circulation elements to identify and adopt designated truck routes that avoid residential/sensitive areas while prioritizing efficient freight mobility. The law became effective January 1, 2026 for most provisions, while general plans, including truck route designations, must be updated by specified deadlines that are more imminent for warehouse concentrated regions (particularly the Inland Empire). Irwindale's Circulation Element is subject to the January 1, 2028 deadline.

Note that the City of Irwindale already has designated truck routes (described in this chapter). Also, since the local entitlement process (project application) for the Brew Yard Specific Plan commenced before the legislation, this project is not subject to AB 98 standards.

Sustainable Communities and Climate Protection Act

The Sustainable Communities and Climate Protection Act (SB 375) was signed into law on September 30, 2008. The SB 375 regulation provides incentives for cities and developers to bring housing and jobs closer together and to improve public transit. The goal behind SB 375 is to reduce automobile commuting trips and length of automobile trips, thus helping to meet the statewide targets for reducing GHG emissions set by the California Global Warming Solutions Act of 2006 (AB 32). SB 375 requires each metropolitan planning organization to add a broader vision for growth, called a "sustainable communities strategy" (SCS), to its regional transportation plan. The SCS must lay out a plan to meet the region's transportation, housing, economic, and environmental needs in a way that enables the area to lower greenhouse gas emissions. The SCS should integrate transportation, land use, and housing policies to plan for achievement of the regional emissions target.

REGIONAL

Southern California Association of Governments

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

Regional Transportation Plan/Sustainable Communities Strategy

On April 4, 2024, the Southern California Association of Governments (SCAG) Regional Council unanimously adopted *Connect SoCal 2024: The 2024–2050 Regional Transportation Plan / Sustainable Communities Strategy* (2024–2050 RTP/SCS or Connect SoCal 2024), along with the Final Program Environmental Impact Report (PEIR) certified for the Plan under the California Environmental Quality Act (CEQA). The 2024–2050 RTP/SCS updates and builds on the long-range visioning and policy framework established in prior cycles, including the 2020–2045 Connect SoCal Plan, and reflects four years of technical analysis, robust stakeholder engagement, and extensive regional and local collaboration.

Connect SoCal 2024 is a long-range planning document that outlines strategic investments, land use coordination, transportation policies, and equity-focused actions to improve mobility, strengthen communities, protect the environment, and support the regional economy through 2050. It continues SCAG's integrated approach to aligning transportation and land use planning to serve a growing six-county region encompassing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties.

The Plan establishes a coordinated framework for transportation and land use decisions intended to reduce greenhouse gas emissions consistent with state requirements under Senate Bill 375. In May 2025, the California Air Resources Board (CARB) accepted SCAG's determination that the Connect SoCal 2024 Sustainable Communities Strategy meets the region's greenhouse gas reduction targets, enabling continued eligibility for key state transportation funding programs.

Connect SoCal 2024 advances a "core vision" focused on maintaining and better managing the transportation network for moving people and goods, expanding multimodal mobility choices, and concentrating housing, jobs, and transit access in a way that supports sustainability, equity,

and resilience across the region. The Plan also incorporates updated performance measures and continues efforts to reduce vehicle miles traveled (VMT) and greenhouse gas emissions per capita over the planning horizon, aligning with federal air quality conformity requirements and state planning targets.

An Amendment to the Plan (Amendment 1) was adopted in September 2024 to update the list of regionally significant transportation projects and reflect changes in project priorities, schedules, and descriptions.

LOCAL

City of Irwindale Active Transportation Plan

The purpose of the Irwindale Active Transportation Plan (ATP) is to guide the development of pedestrian and bicycle infrastructure and programs in Irwindale. The ATP ultimately supports and implements a fully integrated network accommodating all transportation modes, with a special focus on improving pedestrian connections to key destinations citywide. The ATP also includes design guidelines for pedestrian and bicycle facilities to ensure that development of the bicycle and pedestrian network uses national best practices and reflects the City's unique history and character. Policies from the ATP that apply to the proposed project include:

- **Policy A.7.** Encourage the provision of secure bicycle parking at employment centers, commercial centers, recreational amenities, and civic amenities.
- **Policy D.4.2.** Encourage new development to include pedestrian-oriented improvements.
- **Policy D.4.3.** Consider requiring new development to provide sidewalks in Pedestrian Priority Areas (Irwindale 2021).

The ATP includes a City-wide plan for future pedestrian and bicycle improvements. Proposed bicycle facilities include high priority Class IV separated bikeways along Irwindale Avenue between the Metro A (previously L/Gold) Line Irwindale Station and First Street and along First Street adjacent to the Specific Plan area.

City of Irwindale Municipal Code

The City adopted a comprehensive new Zoning Code effective May 9, 2025, that reorganized development standards and updated regulations, including parking, to best implement the City's 2020 General Plan and reflect current best practices and state planning mandates. The updated code replaces older Title 17 provisions with a new structure, including updated off-street parking and loading standards. It also creates objective standards for residential and commercial districts and modifies some zoning districts.

The land development standards, including off-site parking, loading standards, and design standards, would not apply to the project site upon adoption of the Brew Yard Specific Plan which details these requirements and would supersede the zoning requirements.

Municipal Code Trip Reduction and Travel Demand Measures

The City of Irwindale Municipal Code (IMC) Chapter 17.41, Trip Reduction and Travel Demand Measures, sets forth requirements for non-residential land use development projects to provide transportation demand and trip reduction measures. Project applicants are required to make provision for the applicable transportation demand management (TDM) and trip reduction measures prior to approval of the development project, and all facilities constructed or otherwise required to be provided are to be maintained in a state of good repair.

The IMC Section 17.41.030(B) requires the following measures, based on increasing square-footage of non-residential development:

1. Nonresidential development of twenty-five thousand square feet or more shall provide the following to the satisfaction of the city:

    a. A bulletin board, display case or kiosk displaying transportation information located where the greatest number of employees are likely to see it. Information in the area shall include, but is not limited to, the following:

        i. Current maps, routes and schedules for public transit routes serving the site;

        ii. Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operators;

        iii. Ridesharing promotional material supplied by commuter-oriented organizations;

        iv. Bicycle route and facility information, including regional/local bicycle maps and bicycle safety information;

        v. A listing of facilities available at the site for carpoolers, vanpoolers, bicyclists, transit riders and pedestrians.

2. Nonresidential development of fifty thousand square feet or more shall comply with subsection (B)(1) of this section, and shall provide all of the following measures to the satisfaction of the city:

    a. Not less than ten percent of employee parking area(s) shall be located as close as is practical to the employee entrance(s) and shall be reserved for use by potential carpool/vanpool vehicles, without displacing handicapped and customer parking needs.

This preferential carpool/vanpool parking area shall be identified on the site plan upon application for a building permit, to the satisfaction of the city. A statement that preferential carpool/vanpool spaces for employees are available and a description of the method for obtaining access to such spaces must be included on the required transportation information board. Spaces will be signed/striped as demand warrants; provided that at all times at least one space for projects fifty thousand square feet to one hundred thousand square feet and two spaces for projects over one hundred thousand square feet will be signed/striped for carpool/vanpool vehicles.

b. Preferential parking spaces reserved for vanpools must be accessible to vanpool vehicles. When located within a parking structure, a minimum vertical interior clearance of seven feet two inches shall be provided for such spaces and accessways to be used by such vehicles. Adequate turning radii and parking space dimensions shall also be included in vanpool parking areas.

c. Bicycle racks or other secure bicycle parking shall be provided to accommodate four bicycles per the first fifty thousand square feet of nonresidential development and one bicycle per each additional fifty thousand square feet of nonresidential development. Calculations which result in a fraction of 0.5 or higher shall be rounded up to the nearest whole number.

3. Nonresidential development of one hundred thousand square feet or more shall comply with subsections (B)(1) and (2) of this section, and shall provide all of the following measures to the satisfaction of the city:

   a. A safe and convenient zone in which vanpool and carpool vehicles may deliver or board their passengers;

   b. Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

   c. If determined necessary by the city to mitigate the project impact, bus stop improvements must be provided. The city will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances must be designed to provide safe and efficient access to nearby transit stations/stops;

   d. Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

3.14.2 Existing Conditions

VEHICULAR NETWORK AND SITE ACCESS

Roadway Classification

The City of Irwindale utilizes the roadway categories recognized by regional, state and federal transportation agencies. There are four general categories in the roadway hierarchy, ranging from freeways with the highest capacity to two-lane undivided roadways with the lowest capacity. The roadway categories are summarized as follows:

- **Freeways** are limited-access and high speed travel ways included in the state and federal highway systems. Their purpose is to carry regional through-traffic. Access is provided by interchanges with typical spacing of one mile or greater. No local access is provided to adjacent land uses.

- **Arterial roadways** are major streets that primarily serve regional, subregional, and intra-City through-traffic and provide access to abutting properties as a secondary function. Arterials are generally designed with four to six travel lanes and their major intersections are signalized. Within the City of Irwindale, there are two categories of arterials: major (four to six lanes with landscaped median within a 100-foot right-of-way) and secondary (typically four-lane undivided streets within an 80-foot right-of-way).

- **Collector roadways** connect local streets to freeways and major or secondary arterials and are typically designed with two through travel lanes and may accommodate on-street parking with a 40-foot roadway width within a 60-foot right-of-way.

- **Local roadways** provide access to individual parcels and are not intended for use as a through-street or a link between higher capacity facilities such as collector or arterial roadways. Local streets are typically designed with two through travel lanes and on-street parking with a 40-foot roadway width within a 60-foot right-of-way.

Regional Circulation

Regional highway access is provided by the Foothill Freeway (I-210) and the San Gabriel River Freeway (I-605), as shown in Figure 3.14-1, *Vicinity Map & Study Intersections*. The I-210 is a major east-west freeway located north of the project site and connects the foothill communities from the westerly terminus in Sylmar to the easterly terminus in Redlands. In the vicinity of the project site, four mixed-flow main-line lanes and one High Occupancy Vehicle lane are provided in each direction. Full access interchanges (i.e., eastbound and westbound on- and off-ramps) are provided at Irwindale Avenue, Vernon Avenue, and Azusa Avenue.

The I-605 is a north-south freeway located west of the project site. The I-605 freeway connects from the I-210 freeway at its northerly terminus to the I-405 freeway and SR-22 freeway at its southerly terminus. In the project site area, four mixed-flow mainline lanes are provided in each direction. Partial access interchanges are provided at Arrow Highway and Live Oak Avenue, with the Arrow Highway interchange providing a southbound off-ramp and northbound on-ramps and the Live Oak Avenue interchange providing a southbound on-ramp and northbound off-ramps.

Local Access

The project site is accessed from Irwindale Avenue along its eastern boundary and First Street along the site's southern boundary. Along the project site's frontage, Irwindale Avenue consists of a 15-foot landscaped median with a turn lane, two travel lanes in each direction, and a landscaped setback with an unpaved sidewalk. There are no existing driveways into the project site along Irwindale Avenue. Existing site access is provided at one driveway from First Street, a four-lane local street.

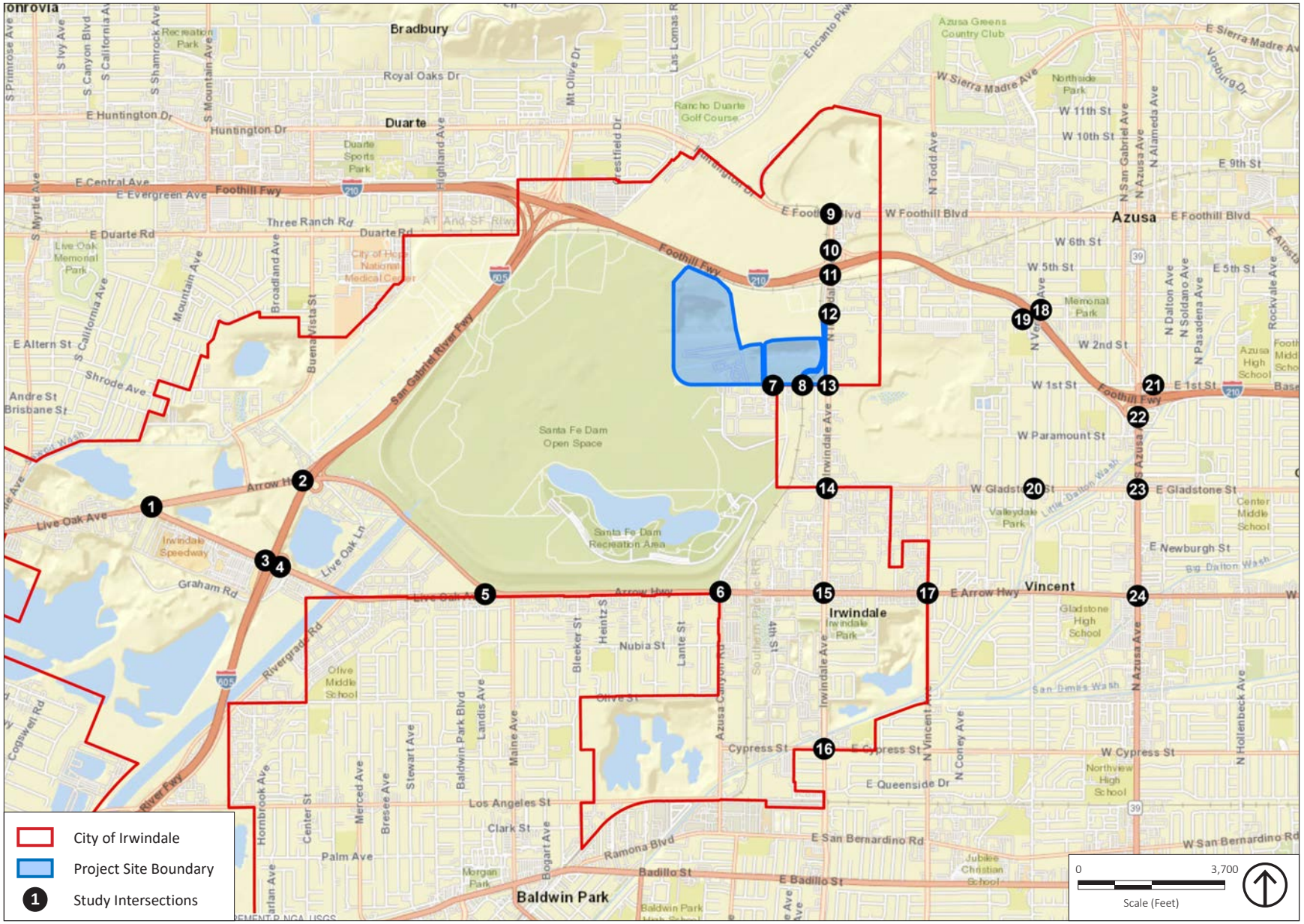
Designated Truck Routes

"Truck traffic routes" have been established within the City to accommodate vehicles that exceed three tons of maximum gross weight. The City's Municipal Code, Section 10.40.020, does not permit the movement or parking of such heavy vehicles (with the exception of public transportation buses) on any streets other than the streets designated as "truck traffic routes." Figure 3.14-2, *Designated Truck Routes in Irwindale,* and Table 3.14-1, *Major Designated Truck Routes in Irwindale,* identify the designated truck routes in the City. Irwindale Avenue is a designated truck route between Arrow Highway and Foothill Boulevard, which includes the frontage of the project site.

Table 3.14-1 Major Designated Truck Routes in Irwindale

Truck Route	Truck Route	Truck Route
Irwindale Avenue	Peck Road	Lower Azusa Road
Arrow Highway	Vincent Avenue	Foothill Boulevard
Live Oak Avenue	Cypress Street	Myrtle Avenue
Los Angeles	Azusa Canyon Road	Azusa Canyon Road
Longden Avenue	Rivergrade Road	

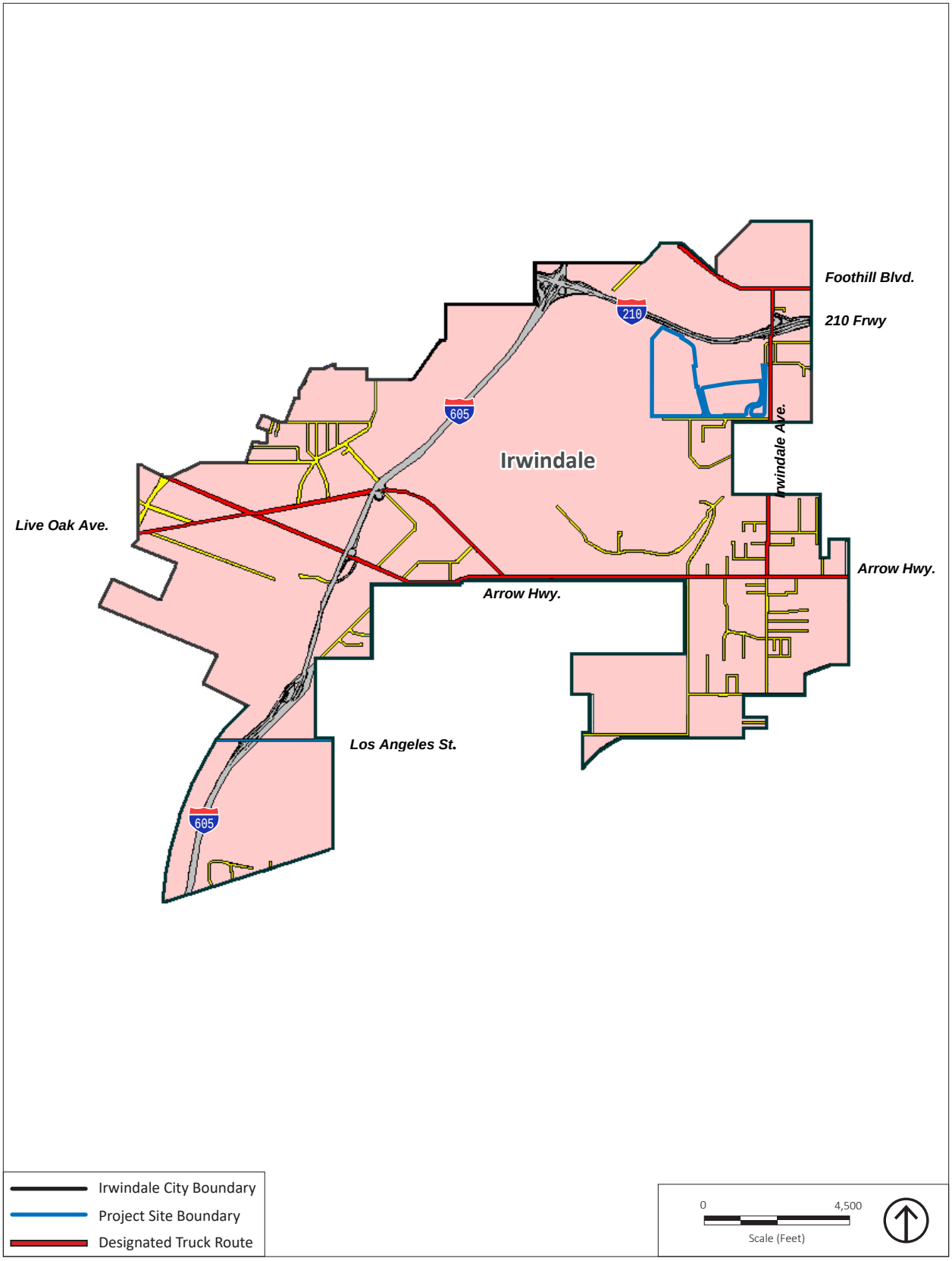
Source: Irwindale 2020.



Source: LLG 2024.

Figure 3.14-1
Vicinity Map & Study Intersections

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Source: General Plan, City of Irwindale 2020.

Figure 3.14-2
Designated Truck Routes in Irwindale

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ACTIVE TRANSPORTATION NETWORK

Active transportation generally encompasses walking, biking, and other active transportation modes. A review of the pedestrian and bicycle infrastructure in the vicinity of the project site is provided below.

Bicycle and Pedestrian Systems

Pedestrian Network

Pedestrian infrastructure consists of facilities such as sidewalks, crosswalks, pedestrian signals, curb access ramps, Americans with Disabilities Act (ADA)-compliant tactile warning strips, and curb extensions, among other things. The City of Irwindale Active Transportation Plan found that there are noticeable gaps in pedestrian infrastructure throughout the City, including inconsistent placement of sidewalks, curbs, and pedestrian amenities.

In the Specific Plan area, sidewalks are not provided on the west side of Irwindale Avenue from south of Foothill Boulevard to First Street, and approximately five-foot-wide sidewalks adjacent to the vehicular travel lanes are provided along the east side of Irwindale Avenue. Additionally, sidewalks are not provided on the north side of First Street from the westerly terminus to Irwindale Avenue. Other roadways with missing sidewalks or sidewalks on only one side of the roadway include portions of Arrow Highway, portions of Live Oak Avenue, Jardine de Roca, and Irwindale Road.

Where sidewalks and pedestrian-crossing facilities are provided, most the crossings are striped with standard “parallel bar” crosswalks. At signalized intersections, pedestrian signals activated by push-buttons are provided across at least one leg. In addition, the majority of existing sidewalk curb ramps are improved with ADA-compliant tactile dome pads.

The City’s Active Transportation Plan identifies a number of pedestrian improvements in the vicinity of the Specific Plan, including pedestrian improvements along Irwindale Avenue north of First Street and along First Street adjacent to the Specific Plan area. Recommended pedestrian improvements in the City are shown in Figure 3.14-3, *Proposed Pedestrian Improvements.*

Bicycle Network

Caltrans uses the following bicycle facility class definitions:

- **Class 1: Bicycle Path** (Off-Street Path). A fully separated facility for the exclusive use of bicycles and pedestrians.
- **Class II: Bicycle Lane** (On-Street, Striped). A striped, on-street lane designated for bicycles, located within the roadway.

- **Class III: Bicycle Route** (Shared Roadway). A shared roadway where bicycles and motor vehicles use the same travel lane.
- **Class IV: Separated Bikeway/Protected Bike Lane**. An on-street bikeway physically separated from motor vehicle traffic.

Currently, the San Gabriel River Bicycle Path, a Class I facility, is provided west and south of the project site. A connection to the San Gabriel River Bicycle Path is provided at the southerly terminus of Peckham Road. The City's Active Transportation Plan identifies proposed bicycle facilities throughout the City, including high priority Class IV separated bikeways along Irwindale Avenue between the Metro A (previously L/Gold) Line Irwindale Station and First Street and along First Street adjacent to the Specific Plan area. Proposed bicycle facilities within the City are shown in Figure 3.14-4, *Proposed Bicycle Improvements.*

Transit Network

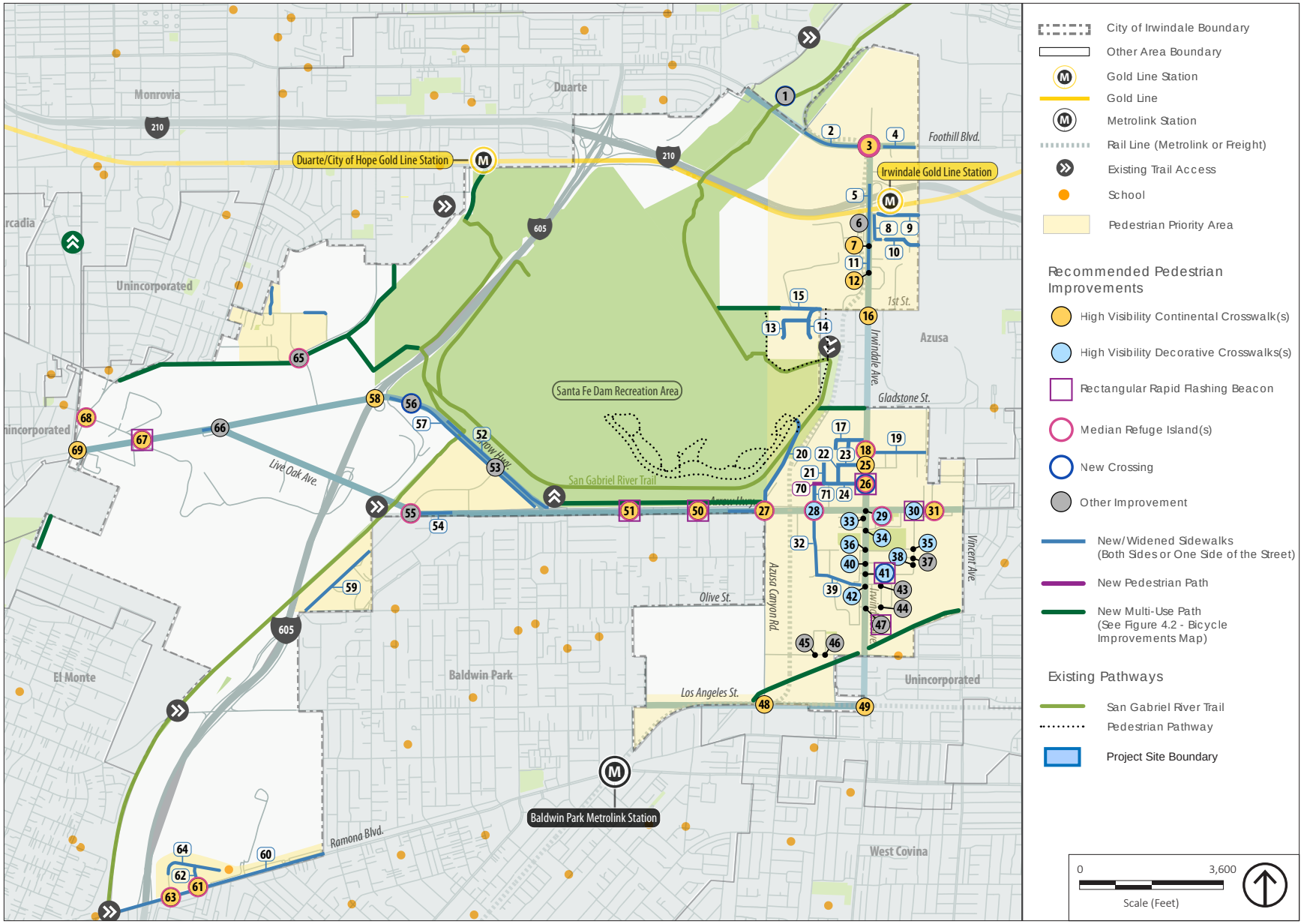
Public transit services are provided within the project study area by Foothill Transit and Los Angeles County Metropolitan Transportation Authority (LA Metro). Existing public transit routes in the vicinity of the project site are shown in Figure 3.14-5, *Existing Transit Routes.* Table 3-1, Existing Transit Routes, of the Transportation Study (Appendix P1), a total of five public transit bus routes provide service in the vicinity of the project site. Each line provides service every 15 to 30 minutes during the morning and evening peak commute hours.

Regular bus transit service is provided along Irwindale Avenue adjacent to the Specific Plan area by Foothill Transit Line 185. The nearest bus transit stop is provided on the southwest and southeast corners of the Irwindale Avenue/McKinley Street intersection approximately 0.1 mile (or a three-minute walk) south of the Irwindale Avenue/First Street intersection.

As summarized in Table 3-1 in Appendix P1, public light rail transit is provided by the LA Metro A Line (previously L/Gold). The Irwindale Station is located approximately 0.5 mile north of the Irwindale Avenue/First Street intersection. Light rail transit service is provided every seven to eight minutes during the morning and evening peak commute hours.

RAIL: FREIGHT

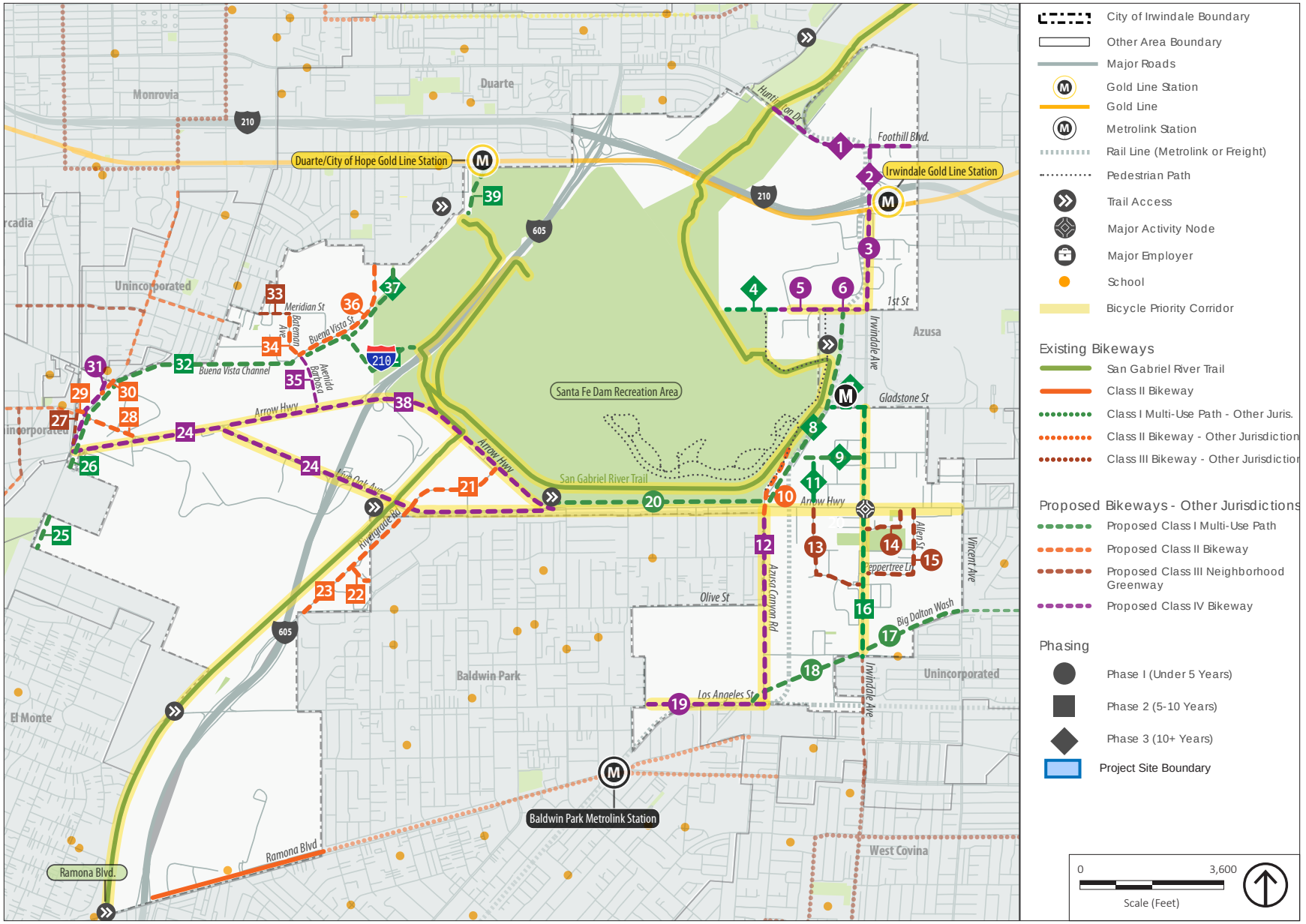
The project site is adjacent to Metro-owned right-of-way that is maintained by the Southern California Regional Rail Authority (SCRRA) for BNSF freight rail service. The rail service operates in both directions and trains may operate 24 hours a day, seven days a week, adjacent to the project. See Figure 2-23, *Brew Yard Railroad Spurs*, for railroad and spur location relative to project site.



Source: Irwindale Active Transporation Plan, PlaceWorks 2021.

Figure 3.14-3
Proposed Pedestrian Improvements

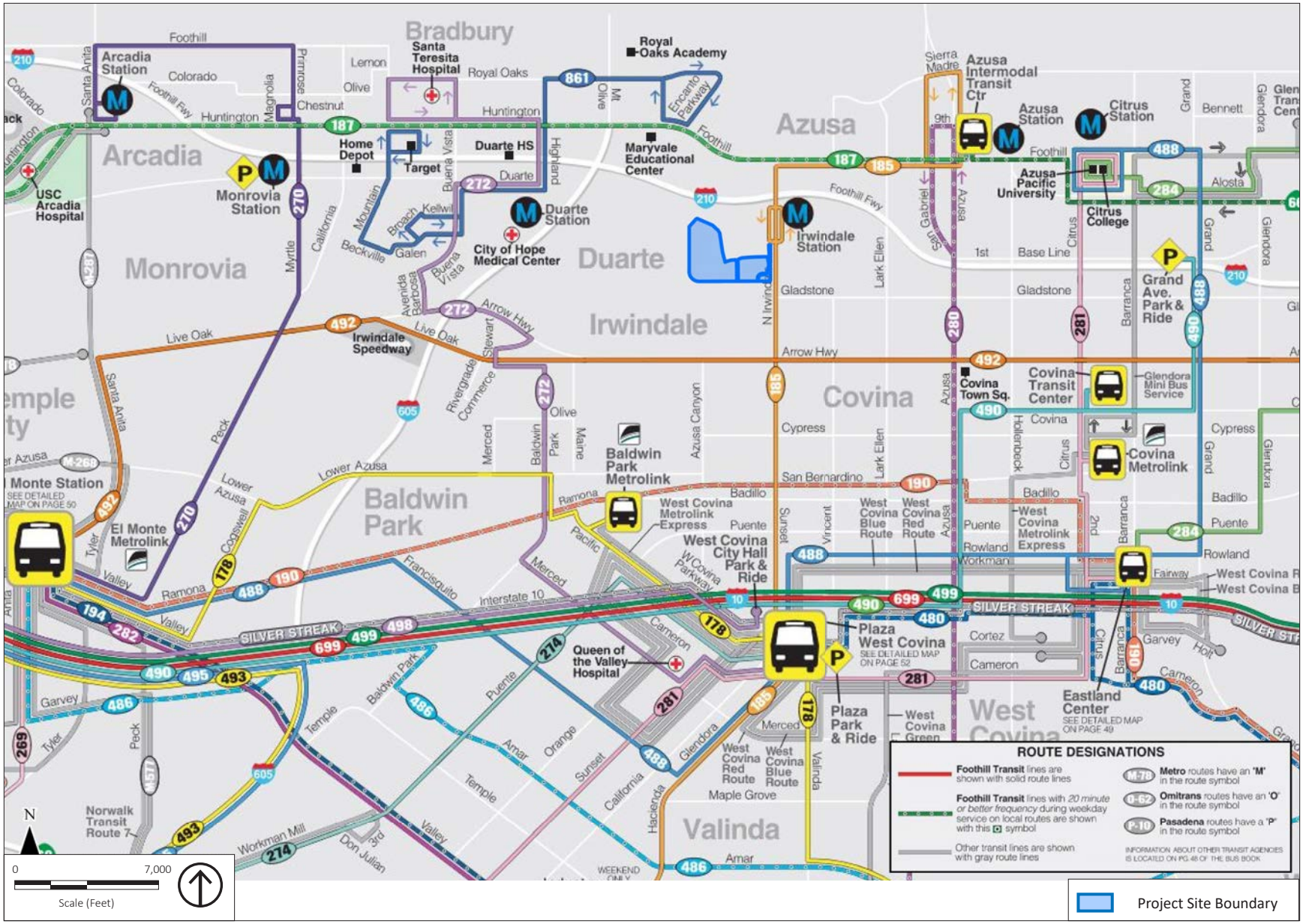
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Source: Irwindale Active Transporation Plan, PlaceWorks 2021.

Figure 3.14-4
Proposed Bicycle Improvements

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Source: Irwindale Active Transporation Plan, PlaceWorks 2021.

Figure 3.14-5
Existing Transit Routes

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3.14.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to transportation if it would:

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, 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).

d) Result in inadequate emergency access.

City of Irwindale VMT Significance Thresholds

1. Project Impact: A significant impact would occur if the VMT rate for the plan would exceed a level of 15 percent below the applicable baseline VMT rate.

2. Cumulative Project Effect: A significant impact would occur if the project increases total regional VMT compared to cumulative no project conditions.

3. A significant impact would occur if the project is inconsistent with the RTP/SCS (SCAG Regional Transportation Plan/Sustainable Communities Strategy).

The baseline VMT rate is defined as the City of Irwindale average VMT rate per applicable service population (service population is defined as employee and/or resident population). The baseline VMT is subject to change pending updates to the SCAG RTP model.

The Specific Plan is proposed to include industrial warehousing and commercial land uses only; therefore, the applicable service population for the project-level VMT analysis of the Specific Plan is employees. Consistent with the recommendations provided in the Technical Advisory and the City's Guidelines, the VMT metric utilized in the project-level analysis is home-based work (HBW) VMT per employee.

The applicable City of Irwindale average HBW VMT per employee has been derived from the unmodified SCAG Activity Based Model (ABM) scenarios for years 2016 and 2045,and interpolated to reflect year 2024 conditions. The baseline HBW VMT per employee and relevant

thresholds for determining project-level impacts are provided in Table 3.14-2, *Thresholds of Significance*. The calculation and interpolation of the thresholds is summarized in the Transportation Impact Study (Appendix P1), Appendix Table C-1.

Table 3.14-2 THRESHOLDS OF SIGNIFICANCE

Year	Baseline HBW VMT/EMP	Threshold[1]
2024 (Existing)	28.99	24.64

Source, LLG, 2024

1. Threshold represents 15.0% below the baseline VMT/Emp.

Consistent with the City's Guidelines, the VMT metric utilized in the cumulative VMT analysis is the citywide boundary VMT per applicable service population. Since boundary VMT reflects all vehicle travel into, out of, and through the City, the applicable service population consists of both residents and employees (collectively referred to as "service population" [SP]).

3.14.4 Applicable Specific Plan Development Standards and Design Guidelines

The circulation plan for the Irwindale Brew Yard Specific Plan provides a roadway network to meet the vehicular and nonvehicular needs of employees and visitors and for the transportation of goods to and from the project area.

DEVELOPMENT STANDARDS

Vehicular Circulation Network

The proposed vehicular circulation network is shown on Figure 2-6, *Conceptual Circulation Plan*. Figure 2-7, *Typical Roadway Cross-Sections*, details the proposed right-of-way improvements for Irwindale Avenue and First Street. Proposed access to Planning Areas 1 and 2 are described in the project description, Section 2.6.2 *Circulation.* Parking would be provided in accordance with the parking ratios outlined in Specific Plan Chapter 3, Development Regulations.

Nonvehicular Circulation Network

The existing network of public sidewalks in the Specific Plan vicinity would serve the project site. New public sidewalks would be installed as part of the Specific Plan along the west side of Irwindale Avenue and the north side of First Street. The proposed roadway cross-sections (A-A and B-B) for Irwindale Avenue and First Street are depicted in Figure 2-7, *Typical Roadway. Cross-Sections.* Within the Specific Plan area, sidewalks are planned along the primary private drive aisles for pedestrian access between the proposed buildings and the existing street network (see Figure 2-6). Bicycle parking standards are provided in the Specific Plan, Table 3-4,

Parking Standards, and require 5 percent of occupant parking or per CALGreen standards, whichever is greater.

DESIGN GUIDELINES

Specific Plan, Chapter 4, *Design Guidelines,* provides requirements for parking, including parking lot landscape and conceptual landscaped roadway elevations. This chapter also include lighting and security requirements for public rights-of-way that shall adhere to applicable City of Irwindale requirements.

3.14.5 Project Impact Analysis

METHODOLOGY

LOS Analysis

As a result of SB 743 and the revisions to the CEQA Guidelines, Level of Service (LOS) may no longer be used to identify transportation impacts in CEQA. However, as part of a project's discretionary review and approval process, the City has the authority to require additional local transportation network analyses and site access studies outside of the CEQA process. Specifically, the City of Irwindale requires an operational analysis of intersections in the vicinity of a proposed project to evaluate site access and circulation constraints that may be caused or worsened by project-generated traffic.

A total of 24 study intersections were reviewed for compliance with the City of Irwindale's adopted LOS standards (see Figure 3.14-1 for study intersection locations). The intersections were evaluated using the City-approved ICU and HCM methodologies to determine the weekday AM and PM peak hour LOS under existing and future (year 2030) without- and with-project conditions. Based on application of the City's LOS standards, 10 of the 24 study intersections are either calculated to operate at a deficient LOS due to the addition of Specific Plan traffic or are calculated to exceed the City's thresholds for further deteriorating an already deficient LOS. The traffic study details the intersection improvements recommended (see Appendix P1).

VMT Analysis

The Brew Yard Specific Plan was evaluated using the current SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) travel demand forecast model to determine if it would have a significant impact on VMT. The current SCAG travel demand model available as of the preparation of this study is the 2016-2045 Activity-Based Model (ABM), which includes a baseline year of 2016 and a future cumulative year of 2045 (assuming full buildout of the RTP/SCS).

The level of project-generated daily VMT was determined by converting the Specific Plan's development totals into corresponding socioeconomic data and entering it into the traffic area zone (TAZ) in which the project is located. The modified model was then run to generate a "With Project" VMT forecast. The "Without Project" VMT forecast obtained from the unmodified model outputs is subtracted from the "With Project" forecast to determine the VMT expected to be generated by the proposed project. The VMT methodology used in the project-level analysis is the Production-Attraction (PA) VMT method, which accounts for trips generated by specific population groups (e.g., employees, residents) based on trip purpose (home-based trips to/from work, home-based trips to/from other locations, non-home-based trips to/from other locations, etc.).

The project's effect on cumulative VMT was determined by comparing the future cumulative VMT "Without Project" obtained from the unmodified model outputs to the future cumulative VMT "With Project" obtained from the modified model outputs. The VMT methodology utilized in the cumulative analysis is the boundary VMT method assessed at the Citywide scale, which accounts for all vehicle travel into, out of, and through the City, including the portions of trips which begin and end outside of the City.

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, and pedestrian facilities?

Construction

Roadways

The EIR Project Description, Section 2.7, *Quarry Filling, Construction and Phasing,* describes the detailed construction activities including required vehicle trips to implement the proposed project. The potential impact of construction trips, including up to 502 haul trucks per day (1,004 one-way trips) during the peak material import phase for the northwest quarry pit to occur over a period of approximately four years and eight months, was evaluated in the transportation study (Appendix P1).

The haul trucks will access the project site via I-210 and Irwindale Avenue. As shown in Figure 3.14-2, Irwindale Avenue is a designated truck route in the City's General Plan. The analysis also includes the projected number of workers for the construction phase as well as their anticipated commute peak hour travel. As shown in Table 8-2 of the Transportation Impact Study, peak hour trips, including Passenger Car Equivalent (PCE) adjustments for the haul trucks would be the highest during the northwest quarry filling phase of the project. As a result of the material hauling and construction worker trips expected to occur during this phase, 292 PCE-adjusted trips (146 PCE-adjusted inbound trips and 146 PCE-adjusted outbound trips) are expected during the weekday AM peak hour. During the weekday PM peak hour, 312 PCE-adjusted trips

(146 PCE-adjusted inbound trips and 166 PCE-adjusted outbound trips) are expected. On a daily basis, 2,801 PCE-adjusted trips are expected (1,401 PCE-adjusted inbound trips and 1,400 PCE-adjusted outbound trips) on a typical weekday.

Full buildout of the Specific Plan is expected to generate 1,656 PCE-adjusted trips during the weekday AM peak hour and 2,238 PCE-adjusted trips during the weekday PM peak hour. On a daily basis, full buildout of the Specific Plan is expected to generate 14,845 PCE-adjusted trips. Since the construction trip generation forecast is lower than the trips forecast to be generated by the Specific Plan after full buildout and occupancy, construction activities are expected to have less of an effect on intersection operations within the study area compared to full buildout of the Specific Plan.

It is recommended that the project applicant submit a detailed Construction Staging and Traffic Management Plan (CSTMP) to the City for review and approval prior to the start of any infrastructure or building construction activity. The requirements for the CSTMP, recommended as a project Condition of Approval, are listed below under *Summary of Potential Conflicts with Transportation Programs, Plans, or Ordinances.*

Pedestrian and Bicycle Construction activities would not conflict with any plans, programs, or ordinances related to bicycle and pedestrian transportation. Moreover, implementation of the construction management practices under the required CSTMP would reduce the effects of project construction on the surrounding community, including pedestrians and bicyclists. Notably, the CSTMP is to include the following measure: Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers. Should any temporary closure of an existing sidewalk be required, appropriate pedestrian detours will be established and signed as such to maintain public pedestrian circulation. The project applicant will submit all necessary permit applications prior to commencing construction activities which might encroach on the public right-of-way.

Rail (Transit and Freight)

In its response to the Notice of Preparation (summarized in introduction), Metro expressed concerns that both project construction and operation could pose safety hazards, disrupt transit service, or damage Metro's infrastructure. Their letter included several recommended measures to ensure that the project does not adversely affect their services (see Appendix A2, *NOP Letters.*

Metro requires projects within 100 feet of the Metro right of way (ROW) to have construction drawings reviewed prior to permit issuance. The closest Brew Yard Specific Plan structure to the Metro ROW would be 170 feet away. A proposed parking lot would be approximately 60 feet from the Metro ROW. Additionally, Metro outlined recommendations regarding potential project impacts to Metro's overhead catenary systems wires and support structures, including

review of the proposed project's construction plans, including any crane placement. No construction work is proposed proximate to the Overhead Catenary System (OCS) setback.

While the measure proposed by Meto do not fall within the applicable significance threshold, it is recommended that the measures be included as a condition of approval for the proposed project. These measures would ensure that project construction activities would not adversely impact Metro transit or BNSF freight infrastructure or service. A full list of the measures are included below under *Summary of Potential Conflicts with Transportation Programs, Plans, or Ordinances.*

Operations

Roadways

The City's General Plan Infrastructure Element promotes the continued development and enhancement of existing streets and intersections in the city. Policies strive to ensure that new development projects implement a fair share of infrastructure improvements to offset potential adverse impacts associated with additional traffic. The goal of these policies is to improve safe and efficient circulation in the City. As described in Section 3.14.1 regarding Senate Bill 743, roadway level of service is no longer under the purview of CEQA and therefore is not addressed in this EIR. However, the City of Irwindale still implements LOS standards under its local regulatory land use and public works authority. The full Traffic Impact Assessment in Appendix P1 provides this analysis, as summarized in the Methodology section, above. The proposed project would also comply with the City's roadway and intersections design and engineering standards. The project would be consistent with programs, plans, policies, and ordinances governing roadways.

Pedestrian and Bicycle

The existing network of public sidewalks in the Specific Plan vicinity would serve the project site. The proposed roadway cross-sections (A-A and B-B) for Irwindale Avenue and First Street are depicted in Figure 2-11, *Typical Roadway Cross-Sections.* New public sidewalks would be installed as part of the Specific Plan along the west side of Irwindale Avenue and the north side of First Street. As shown in Figure 2-9 and in keeping with the City's 2019 Active Transportation Plan, project improvements would include a Class IV Bicycle Lane along Irwindale Avenue. Proposed improvements along First Street would include the addition of a 12-foot easement on the north side of the street (outside of the right-of-way) to accommodate an 8-foot Class 1 multi-use path and 2 feet of shoulder per the City's ATP (see Figure 2-11). Within the Specific Plan area, sidewalks are planned along the primary private drive aisles for pedestrian access between the proposed buildings and the existing street network.

The Transportation Impact Study (Appendix P1) reviews the project for consistency with the goals and policies in the Active Transportation Plan and the City's General Plan and concludes that implementation of the Specific Plan would not conflict with or prevent the City from implementing any of the policies or programs set forth in these plans. The potential increase in active transportation and transit usage in the vicinity of the Specific Plan area is determined to not result in adverse impacts. Pedestrian and bicycle improvements would be constructed according to current design standards and are therefore not expected to decrease safety on these facilities. Rather, the Specific Plan is expected to increase performance and safety by closing existing gaps in the pedestrian network adjacent to the site.

Rail: Transit and Freight

Metro commented on a potential increase in project-related traffic volumes at the at-grade rail crossing at the intersection of West First Street and South Motor Avenue and noted that this crossing is regulated by the California Public Utilities Commission (CPUC). The existing single track rail crossing on First Street is oriented in a north-south direction and there are currently gate arms across First Street that are activated when a train utilized the crossing. The CPUC would be the responsible agency for any modification to the at-grade crossing. No modification to this crossing is proposed, and no comments from the CPUC were received by the City during the scoping period or otherwise prior to release of this Draft EIR.

Based on train count data contained in the United States Department of Transportation (DOT) Crossing Inventory Form, the existing rail crossing currently accommodates an average of three train movements during a typical 24-hour day. The proposed project would not generate an increase in the number of trains utilizing the rail crossing. Moreover, based on the traffic study (Appendix P), vehicle queues at the adjacent study intersections (Irwindale Brew Yard Driveway/First Street and Irwindale Avenue/First Street) are not anticipated to extend to the rail crossing.

Operations of the proposed project would not conflict with Transportation Program, Plans or Ordinances, and this impact would be **less than significant.**

Summary of Potential Conflicts with Transportation Programs, Plans or Ordinances

Construction

The proposed project would comply with applicable plans and regulations for construction-related impacts and would not conflict with any transportation programs, plans or ordinances.

Significance without Mitigation: Less than significant.

As described above, based on the impact review, however, recommendations have been made to minimize the potential construction-related disruption that could result from project construction activities. The following Conditions of Approval are recommended.

Recommended Conditions of Approvals (COA)

COA-01, Construction Staging and Traffic Management Plan (CSTMP). The project applicant shall submit a detailed Construction Staging and Traffic Management Plan (CSTMP) to the City for review and approval prior to the start of any infrastructure or building construction activity. The CSTMP should include but not be limited to the following features, as determined appropriate by the City.

- Provide advanced notification to adjacent property owners and occupants, as well as any nearby schools, of upcoming construction activities, including durations and daily hours of construction. Provide a posted sign on the project site with hotline information for adjacent property owners to call and address specific issues or activities that may potentially cause problems at on-and-off-site locations.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses.
- Coordinate with public transit agencies to provide advanced notifications of any temporary transit stop relocations and durations and follow all safety required procedures required by the concerned agency.
- Limit any potential roadway lane closure/s to off-peak travel periods including nights, to the extent feasible.
- Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation.
- To the extent feasible, store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated lane closure area), that area must comply with City and/or State-approved detour/traffic control plans.
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers. Should any temporary closure of an existing sidewalk be required, appropriate pedestrian detours will be established and signed as such so as to maintain public pedestrian circulation. The project applicant will submit all necessary permit applications prior to commencing construction activities which might encroach on public right-of-way.

- Identify the routes that construction vehicles would utilize for haul routes and the delivery of construction materials (i.e., lumber, tiles, piping, windows, etc.), to access the project site, traffic controls and detours, and proposed construction phasing plan for the project.
- Require the applicant to keep all haul routes adjacent to the project site clean and free of debris including, but not limited to, gravel and dirt as a result of its operations.
- Schedule delivery of construction materials, inert debris material, and hauling/transport of oversize loads to off-peak travel periods, to the extent possible; including night work to be scheduled to minimize traffic impact.
- Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed.
- Haul trucks entering or exiting public streets shall at all times yield to public traffic.
- Construction-related parking and staging of vehicles shall occur on-site to the extent possible.
- Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times.
- Prohibit parking by construction workers on nearby streets and direct construction workers to available/designated parking areas within and adjacent to the project site.
- The construction zone traffic control plans detailed in the CSTMP shall meet standards established in the current *California Manual on Uniform Traffic Control Devices (MUTCD)* as well as City of Irwindale requirements. The traffic control plans should be prepared by either a Civil or Traffic Engineer licensed by the State of California, and submitted to the City of Irwindale Public Works Department for review and approval prior to the commencement of project construction.
- Repaving of all frontage roads prior to issuance of Certification of Occupancy.

COA-02, Measures to Minimize Metro Transit Conflicts. The applicant shall implement the following.

- Submit engineering drawings to Metro for approval prior to issuance of building permit.
- Maintain a minimum five-foot setback from Metro ROW.

- Schedule a pre-construction meeting with Metro and project construction personnel no later than two months before project construction to coordinate measures to ensure that the Metro Station is not adversely impacted (access, visibility, structural integrity).
- Construct a protection barrier to prevent objects, material, or debris from falling onto the Metro ROW.
- Notify Metro of any changes to construction activity that could impact use of the Metro ROW.

COA-03, Measures Related to Proposed Project's Freight Rail Adjacency. The applicant shall implement the following.

- Submit engineering drawings and calculations, as well as construction work plans and methods, including any crane placement and radius, to evaluate any impacts to the freight train infrastructure in relationship to the project. Before issuance of any building permit for the project, the Applicant shall obtain SCRRA's approval of final construction drawings.
  - Where the project property is immediately adjacent to Metrolink ROW (owned by Metro), all project structures shall be set back five a minimum of five feet from property line to allow adequate space for property maintenance.
  - The applicant shall obtain specific Right-of-Entry temporary access permits for any work performed on the project's structures or property requiring access to the railroad ROW. Where feasible, the applicant shall maintain fencing and walls at or near property lines from the private property side.
  - The applicant shall permit Metro and SCRRA staff to monitor construction activity to ascertain any impact to the Metro ROW. During construction, the applicant shall construct a protection barrier to prevent objects, material, or debris from falling onto the Metro ROW. The Applicant shall notify Metro and SCRRA of any changes to the construction/building plans that may or may not impact the Metro ROW.

Operations

As analyzed above, long-term operations would not conflict with any plans, programs or ordinances including activities related to roadways, bicycle and pedestrian transportation, and rail.

Significance without Mitigation: Less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

In accordance with SB 743, CEQA Guidelines Section 15064.3 shifts the transportation analysis from LOS to the vehicles miles traveled (VMT) metric. Since automobile delay and congestion are no longer considered significant environmental impacts, VMT has been determined to be the appropriate measure for transportation-related impacts under CEQA. The VMT methodology used to analyze the proposed project is summarized under the previous *Methodology* heading.

Project-Generated VMT Analysis

The Specific Plan's HBW VMT per employee was forecast using the SCAG ABM. The project-generated HBW VMT per employee was interpolated between years 2016 and 2045 to reflect year 2024 existing conditions. The calculation and interpolation of the project-generated HBW VMT per employee is summarized in Appendix Table C-2 of the Transportation Impact Study, Appendix P1.

The Specific Plan is forecast to generate 30.47 HBW VMT per employee. With application of the 4.14 percent reduction in commute VMT (i.e., home-based trips to/from work) expected due to Specific Plan–required measures to: 1) promote employer's commute trip reduction program (equivalent to CAPCOA Measure T-7) and 2) to provide end-of-trip bicycle facilities (equivalent to CAPCOA Measure T-10), the Specific Plan is calculated to generate 29.21 HBW VMT per employee (i.e., 30.47 VMT/Emp * (1 – 0.0414) = 29.21 VMT/Emp), which exceeds the threshold of 24.64 HBW VMT per employee. The proposed project is therefore determined to result in a significant project-level VMT impact. Mitigation measures would be required to reduce the VMT impact to less than significant levels. The project-generated VMT per employee with application of the TDM program, impact threshold, and percent reduction required under project conditions are summarized in Table 3.14-3, *Project-Level VMT Impact Analysis.*

Table 3.14-3 Project-Level VMT Impact Analysis

Project-Generated HBW VMT/EMP With PDF	Threshold	Required Reduction[1]
29.21	24.64	15.65%

1. (Project VMT/Emp – Threshold VMT/Emp) / Project VMT/Emp

Significance without Mitigation: Significant.

Impact TRA-1: The project-level VMT impact of the proposed project would be significant.

Mitigation Measures

The CAPCOA 2021 Handbook was reviewed to identify any additional Transportation Demand Management (TDM) measures that would mitigate the HBW VMT per employee impact. The measures were reviewed for applicability to the proposed Specific Plan based on land use type, location, and feasibility of implementation. The TDM strategies which have been determined to be applicable to the proposed project as VMT mitigation measures are listed below. Detailed information provided by CAPCOA regarding the measure description and implementation requirements is provided below, followed by the anticipated implementation at the Specific Plan site.

Mitigation Measure TRA-1 (based on CAPCOA Measure T-8)**:** Provide Ridesharing Program: A ridesharing program shall be implemented by individual tenants or operators and promoted through a multifaceted approach, identified in the ridesharing program proposed by the project applicant, which measures may include, but not necessarily be limited to, the following features.

- Designating a certain percentage of desirable parking spaces for ridesharing vehicles.
- Designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles.
- Providing an app or website for coordinating rides.
- The individual tenants and operators of future development projects resulting from the Specific Plan shall designate preferential parking spaces for carpool/vanpool vehicles. Similarly, safe and convenient loading zones for carpool/vanpool passengers shall be required.
- All tenants of future development projects within the Specific Plan shall provide an app, website, or other convenient means of digital ride coordination if a project-wide system is not otherwise provided, as described below. To boost the potential for identifying ride matches, it is recommended that one single app or website be deployed for all tenants at the Specific Plan site. One single ride matching app or website will also allow future tenants to pool resources for the development and operation of the service. Designated employee transportation coordinators should include information regarding the app or website in the required commute trip reduction marketing materials.

Mitigation Measure TRA-2 (based on CAPCOA Measure T-9)**:** Implement Subsidized or Discounted Transit Program

According to CAPCOA, this measure reflects the provision of subsidized or discounted, or free transit passes being offered to employees. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT. Projects implementing this strategy should be within 1.0 mile of high-quality transit service, 0.5 mile of local or less frequent transit service, or along a designated shuttle route providing last-mile connections to rail service. **Note:** within approximately 0.5 miles of the LA Metro A Line Irwindale Station, the light rail transit service, provided approximately every seven to eight minutes during the morning and evening peak commute hours, qualifies as high-quality transit service to the project site.

- The individual tenants and operators of future development projects resulting from the Specific Plan shall offer free transit passes to all employees on a monthly basis. Employees who accept the offer shall be provided a monthly transit pass to the transit service of their choice (e.g., Metro, Foothill Transit, etc.) at no cost to themselves (i.e., a 100% subsidy). The transit passes may either be obtained by the future employers and provided to employees, or the employee may be fully reimbursed for the cost of the transit pass. The transit pass subsidy program should be regularly marketed to employees by designated employee transportation coordinators as well as in the required commute trip reduction marketing materials (MM T-7, above).

Mitigation Measures TRA-3 or TRA-4. Applicant shall implement ONE of the following two measures.

Each of the following two measures target employee commute behaviors by providing a price signal for employees to consider other travel modes for their work commute: the first measure actively charges all employees to park, and the second measure reimburses employees who do not park. Based on the information in the CAPCOA 2021 Handbook, it is understood that the measures are considered mutually exclusive and that only one of the measures should be applied to a proposed project at a time. This restriction reflects the fact that both measures target the same underlying travel behaviors through differing approaches, and prevents double-counting the effectiveness of associating a monetary value with parking. The following two measures are recommended to be implemented in the Specific Plan area, with each future employer required to implement either one of the two measures.

TRA-3 (based on CAPCOA Measures T-12), **Price Workplace Parking**

According to CAPCOA, this measure reflects on-site pricing at workplaces. Because free employee parking is a common benefit, charging employees to park on-site increases the cost of choosing to drive to work. This is expected to reduce single-occupancy

vehicle commute trips, resulting in decreased VMT. Implementation of priced workplace parking may be achieved by any of the following strategies:

- Explicitly charging for employee parking.
- Implementing above-market rate pricing.
- Validating parking only for invited guests, or not providing parking validation at all.
- Not providing employee parking and transportation allowances.

This practice is most effective for locations similar to the proposed project that have other transportation options that are available, convenient, and have competitive travel times (e.g., the LA Metro A Line)

- This measure shall require secured parking for each development within the Specific Plan area in order to ensure that employees of future developments that are charging for workplace parking do not encroach into nearby developments that are not charging for workplace parking. Likewise, on-street parking along First Street and on the roadways south of First Street should be monitored to ensure employees from future developments are not encroaching into adjacent public streets. Should parking encroachment be observed on the adjacent public streets, the Cities of Irwindale and/or Azusa may implement timed on-street parking or a parking permit district to limit the supply of nearby free parking.
- It is recommended that the cost of parking per day be set equivalent to the daily fare for transit to and from the Specific Plan area. As stated in Section 3.14.2, light-rail and bus transit service is provided in the vicinity of the Specific Plan area by LA Metro and Foothill Transit. The cost per trip for both services is $1.75 per one-way trip, resulting in a daily transit fare cost of $3.50. Therefore, the recommended daily cost for parking within the Specific Plan is recommended to be $3.50 per day.
- In conjunction with Measure TRA-1, Provide Ridesharing Program, it is recommended that discounted or free daily parking be provided for carpool and vanpool vehicles to encourage higher passenger occupancy rates in the vehicle trips which do occur.

TRA-4 (based on CAPCOA Measures T-13)**, Implement Employee Parking Cash-Out**

According to CAPCOA, this measure requires project employers to offer employees parking cash-out. Cash-out is when employers provide employees with a choice of forgoing their current subsidized or free parking for a cash payment. This encourages employees to use other modes of travel instead of single occupancy vehicles. This mode

shift results in people driving less and thereby reduces VMT. Successful implementation of this strategy requires no free parking (e.g., permitted or market-rate parking only) in the surrounding area in order to prevent spill-over parking and the continued use of single occupancy vehicles.

- This measure shall require secured parking for each development within the Specific Plan area in order to ensure that employees of future developments which offer parking cash-outs do not encroach into other nearby developments and continue driving to and from work. Likewise, on-street parking along First Street and in the roadways south of First Street should be monitored to ensure employees from future developments are not encroaching into adjacent public streets. Should parking encroachment be observed on the adjacent public streets, the Cities of Irwindale and/or Azusa may implement timed on-street parking or a parking permit district to limit the supply of nearby free parking.
- The value of the cash-out incentive should be consistent with the requirements of the California parking cash-out law (California Health and Safety Code § 43845), which sets a range of $50 to $350 per month, adjusted by the California Consumer Price Index. While future developments in the Specific Plan area are not expected to be required to comply with the parking cash-out law, adherence to the parameters of the law is required in order to achieve the VMT reductions associated with this strategy.
- Cash-out incentives should be provided to all participating employees, including employees also utilizing the transit subsidy program to obtain free transit passes.

TRA-5 Document Employees' Transportation Mode to Work

Property owner and/or their designee shall require tenants to provide information regarding their employees' transportation to and from work, within one (1) year but no earlier than nine (9) months of the issuance of the tenant's Occupancy Permit or when building occupancy reaches 85%, whichever occurs first. Each property tenant shall be required to provide the information to the Public Works/Engineering and Community Development Departments. Employee data may be collected by a survey, employee interview or other selected method and shall include the following information: 1) transportation mode(s) used to commute to work, 2) number of days mode used per week, 3) distance of round trip, and 4) city of origin. The results of the data collection shall be tabulated in a clear format. The results shall be submitted to the Public Works/Engineering and Community Development Departments within thirty (30) days of data tabulation. Non-compliance may be subject to enforcement action, including but not limited to penalties.

When taken together, the measures described above represent a comprehensive and complimentary VMT mitigation program which includes elements to either disincentivize single-occupant vehicle travel (through charging for workplace parking) and/or incentivize alternate travel modes (through providing full transit fare subsidies and parking cash-out) and higher occupancy vehicle trips (through providing a ridesharing program). The Specific Plan is well located to encourage the use of the Metro A (previously L/Gold) Line to commute to and from the area. By setting the daily price of parking equal to the daily transit fare cost, in combination with fully subsidized transit fares, a cost-free travel option is provided for future employees. Further, waiving or reducing the cost of parking for rideshare vehicles encourages higher passenger occupancy rates in those vehicle trips which do still occur. Alternately, cash-out programs in combination with fully subsidized transit fares improve the competitiveness of alternate travel modes other than single occupancy vehicles.

Implementation of TRA-1, Provide Ridesharing Program; TRA-2, Implement Subsidized or Discounted Transit Program; and either TRA-3, Price Workplace Parking, or TRA-4, Implement Employee Parking Cash-Out as described above are expected to result in a quantifiable reduction in commute VMT of 19.98 percent pursuant to the methodology provided in the CAPCOA 2021 Handbook*(Calculation worksheets are included in Appendix C of the Traffic Impact Study, DEIR Appendix P1).*

After application of the 19.98% reduction in commute VMT (i.e., home-based trips to/from work) expected to occur due to the recommended mitigation measures the proposed project is calculated to generate 23.37 HBW VMT per employee (i.e., 29.21 VMT/Emp * (1 – 0.1998) = 23.37 VMT/Emp), which falls below the threshold of 24.64 HBW VMT per employee. It is anticipated, therefore, that with application of the recommended mitigation measures, the proposed project would have a less than significant project-level VMT impact. The project-generated VMT per employee with application of the VMT mitigation measures and impact threshold are summarized in Table 3.14-4 *VMT Impact After Implementation of Mitigation Measures.*

Table 3.14-4 VMT Impact After Implementation of Mitigation Measures

TAZ	HBW VMT/EMP WITH PDF	VMT MITIGATION	HBW VMT/EMP WITH PDF AND MITIGATION	THRESHOLD	REQUIRED REDUCTION [1]
Year 2024	29.21	-19.98%	23.37	24.64	-

1 (Project VMT/Emp – Threshold VMT/Emp) / Project VMT/Emp

Significance with Mitigation: Although application of the 19.98% reduction in commute VMT (i.e., home-based trips to/from work) is expected to fully offset and reduce the project's VMT

impact to a less than significant, the effectiveness of the recommended mitigation measures cannot be guaranteed to achieve the targeted reduction in commute VMT. Therefore, it is conservatively concluded that the project-level VMT impact would remain potentially significant.

Cumulative VMT Analysis

Consistent with the direction provided in the City's Guidelines, the cumulative citywide boundary VMT per service population "With Project" was compared to the citywide boundary VMT per service population "Without Project." The citywide boundary VMT per service population was forecast using the SCAG ABM. The following model scenarios were utilized:

- Baseline Cumulative Year 2045 Conditions
- Cumulative Year 2045 With Project Conditions

The citywide boundary VMT per service population for each condition is shown in Table 3-14-5, *Cumulative VMT Impact Analysis*.

Table 3.14-5 Cumulative VMT Impact Analysis

Condition	Citywide Boundary VMT	Service Population	Boundary VMT/SP
Cumulative Year 2045 Without Project	568,436	22,132	25.68
Cumulative Year 2045 With Project	581,153	24,714	23.52

As shown in Table 3.14-4, the cumulative citywide boundary VMT per service population without the proposed Specific Plan is forecast to be 25.68 boundary VMT per service population, while the boundary VMT per service population with the proposed Specific Plan is forecast to be 23.52 boundary VMT per service population. Since the boundary VMT per service population decreases with the addition of the proposed Specific Plan, it is determined that the Specific Plan will have a less than significant cumulative VMT impact.

As stated in the City's thresholds, regardless of the findings of the cumulative VMT impact, a significant impact would occur if a land use plan is inconsistent with the current RTP/SCS. The current RTP/SCS for the SCAG region, known as Connect SoCal, utilizes land use, development, transportation, green resource area, and growth data provided by each of the 197 local jurisdictions in the region, including the City of Irwindale. As shown in the current Connect SoCal Data/Map Book for the City of Irwindale (SCAG 2023), the Specific Plan area is designated as Industrial in the current RTP/SCS, corresponding to the City of Irwindale's General Plan land use designation of Industrial/Business Park and zoning of M2: Heavy Manufacturing, which is consistent with the land uses proposed by the Specific Plan. Since the Specific Plan is consistent

with the current RTP/SCS, the Specific Plan would have a less than significant cumulative VMT impact.

Significance without Mitigation: Less than significant.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

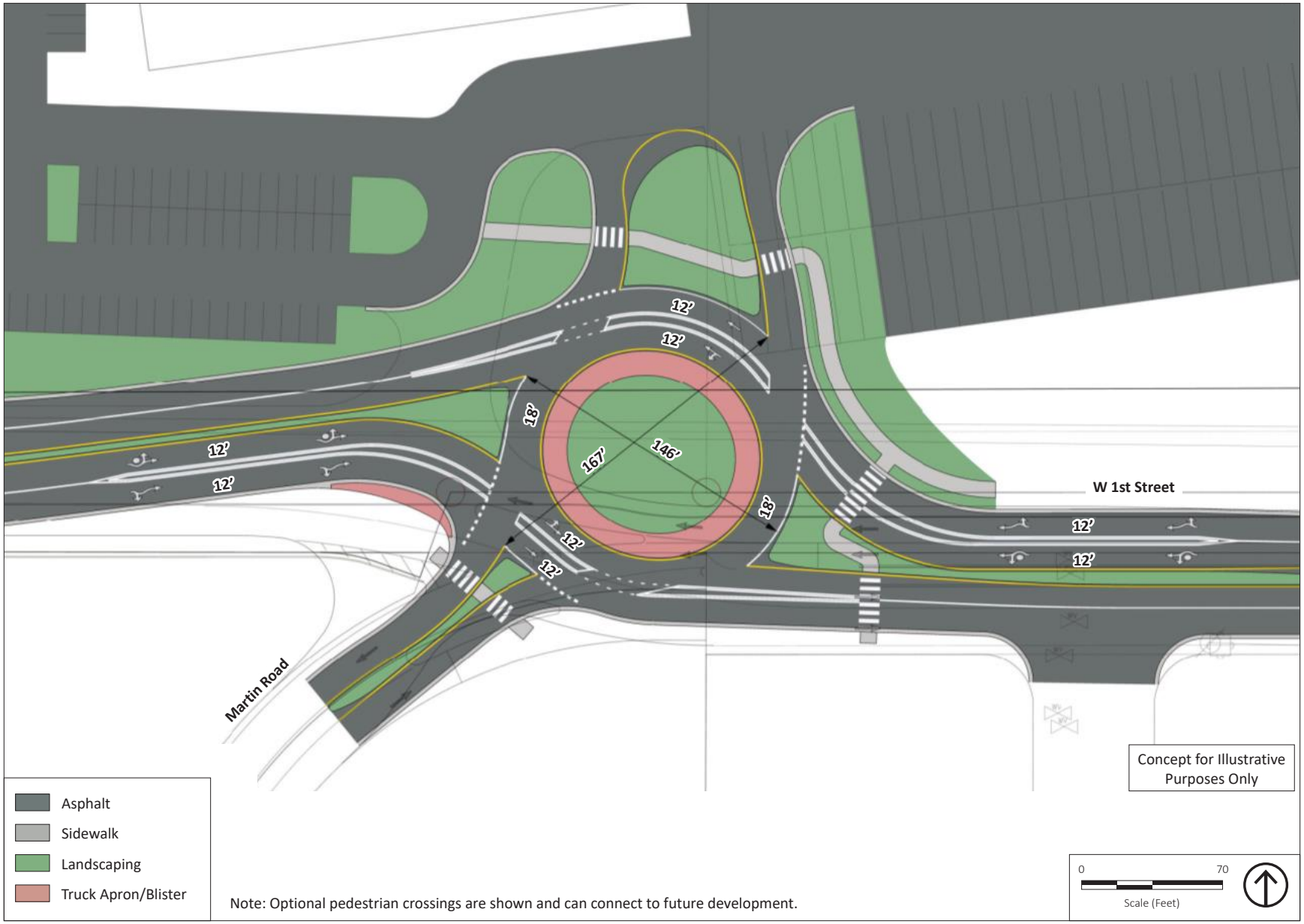
The Conceptual Circulation Plan is shown in Figure 2-6. Vehicular access to the project site is proposed at two access points along First Street. The easternmost access point (Drive Aisle A) would provide direct access to Planning Area 2, accommodated by the existing Irwindale Brew Yard driveway on the north side of First Street, and would service the commercial components of the Specific Plan. The westernmost access point (Drive Aisle C) would provide access to Planning Area 1, accommodated by the existing intersection of First Street and Martin Road, and serve as the ingress/egress point for truck movements from the industrial site. A future roundabout intersection is proposed to replace the current stop-controlled intersection to accommodate access to and from Planning Area 1 via the north and west legs of the intersection. Improvements to the existing ingress/egress point from Irwindale Avenue would allow direct site access to Planning Area 2; these improvements would be made with future development through the reciprocal access and parking agreement.

The City and Los Angeles County Fire Department (LACoFD) have adopted design standards that preclude the construction of any unsafe roadway, circulation, or access design features. Design and construction of the proposed access and circulation improvements would be required to adhere to the City's engineering standards and LACoFD's design standards, which are imposed on development projects during the City's development review and building plan check process.

Proposed First Street/Martin Road Roundabout

The intersection of First Street and Martin Road is located west of Irwindale Avenue. First Street is an east-west four-lane collector with a two-way left-turn lane, and Martin Road is a north-south two-lane local road which becomes a dead-end approximately 700 feet south of the intersection. The existing three-leg intersection currently operates as a two-way stop-controlled intersection.

Given the unique intersection geometry and traffic volumes, roundabout design options were evaluated for this intersection. The selected option, shown in Figure 3.14-6, *Irwindale Brew Yard Proposed Roundabout,* includes two through-lanes in the eastbound direction and a single-lane on northbound and southbound approaches. Two westbound through-lanes are provided, with no dedicated right-turn lane. The selected concept would best accommodate the predicted traffic with shorter queue lengths and is expected to have less potential to interfere with the existing, operating railroad track approximately 750 feet east of the intersection.



Source: Kimley-Horn 2024.

Figure 3.14-6
Irwindale Brew Yard Proposed Roundabout – Concept 2

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Caltrans Safety Review

Caltrans' *Local Development Review (LDR) Safety Review Practitioner's Guidance* (February 2024) was reviewed, and analyses relevant to the Specific Plan were conducted (see Traffic Impact Study, Appendix P1). The project site does not take direct access to/from a State facility; however, it is in the vicinity of the I-210 and I-605 and would generate trips at nearby ramp intersections. Note that in its response to the NOP, Caltrans also recommended queuing analysis with signal timing for potentially impacted ramps on I-605 and I-210 interchanges to address development traffic concerns.

An analysis of the Specific Plan's effect on off-ramp queuing at the I-605 interchanges with Arrow Highway and Live Oak Avenue (Study Intersections 2, 3, and 4) and at the I-210 interchanges with Irwindale Avenue, Vernon Avenue, and Azusa Avenue (Study Intersections 10, 11, 18, 19, 21, and 22) is included in the Traffic Impact Study, Appendix P1 of this Draft EIR. It was determined that the Specific Plan is not expected to cause or contribute to vehicle queuing that extends back into the I-210 or I-605 main-line lanes. Therefore, the Specific Plan would have a less than significant safety impact on the State Highway System, and this impact is **less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project result in inadequate emergency access?

Implementation of the Specific Plan would introduce new on-site vehicular access and circulation improvements, as discussed above. To address emergency and fire access needs, the improvements would be required to be designed and constructed in accordance with all applicable City and LACoFD design standards for emergency access (e.g., minimum street width and turning radius). For example, the proposed fire lanes would be designed to meet the minimum width requirements of LACoFD to allow for the adequate circulation of emergency vehicles.

Development accommodated by the Specific Plan would be required to incorporate all applicable design and safety requirements of the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and LACoFD. Compliance with these standards is ensured through the City's and LACoFD's development review and building plan check process. During the development review and building plan check process, the City would coordinate with LACoFD to ensure that the necessary fire prevention and emergency response features are incorporated into development accommodated by the Specific Plan and that adequate circulation and access (adequate turning radii for fire trucks, road surfacing requirements, minimum road widths, vertical clearance, gate access, etc.) are provided in the traffic and circulation components. All site and building improvements would be subject to review and approval by the City and LACoFD.

Off-site improvements required within the right-of-way of First Street and Irwindale Avenue would require temporary road or lane closures. However, any minor road closure would be temporary and would only be necessary during the construction activities associated with these improvements. Measures to limit disruption to traffic circulation and ensure advanced communication of construction activities and any on- or off-site access issues are included in the requirements for the CSTMP, as described in Section 3.14.5(a). All proposed road closures would also be subject to review and approval by the City. Upon completion of the improvements, all road conditions would be restored to pre-existing physical conditions or better per the City's direction. Based on the preceding, impacts to emergency access would be **less than significant.**

Significance without Mitigation: Less than significant.

3.14.6 Cumulative Impact Analysis

Would the project have a cumulative effect related to transportation?

As demonstrated above, implementation of the Specific Plan would be consistent with adopted policies, plans, and programs regarding circulation, including roadway and pedestrian and bicycle facilities. Construction and operation of development accommodated by the Specific Plan would comply and/or be consistent with the Irwindale General Plan, the City's Public Works Construction Standards, the City's ATP, and the Municipal Code.

All development projects in the City that require discretionary review would be subject to the transportation impact requirements and CEQA review. For example, as with the Specific Plan, other development projects would be required to analyze their potential transportation impacts and demonstrate their consistency with applicable transportation goals and policies of the City's General Plan. As with the Specific Plan, other development projects would similarly be required to comply with all applicable existing regulations, procedures, and policies that are intended to address transportation impacts.

The Cumulative VMT analysis conducted for the Brew Yard Specific Plan is detailed above in Section 3.14.5. Since the project would be consistent with the SCAG RTP/SCS and because the cumulative, citywide boundary VMT is forecast to decrease with the Specific Plan in comparison to the cumulative condition without the Specific Plan, the cumulative VMT impact would be less than significant.

Additionally, access to the project site would be designed per City standards and would not combine with other area traffic impacts to result in a significant cumulative impact on circulation or create hazardous conditions. Therefore, cumulative transportation-related impacts would be **less than significant.**

3.14.7 References

Irwindale, City of. 2020. City of Irwindale General Plan Update. https://www.irwindaleca.gov/DocumentCenter/View/38/General-Plan?bidId=.

Irwindale. 2021, January. *Irwindale Active Transportation Plan.* Prepared by PlaceWorks. https://www.irwindaleca.gov/DocumentCenter/View/6532/IrwindaleActiveTransportationPlan-012021?bidId=.

Kimley Horn. 2024, September 9. Traffic Memorandum for the Irwindale Brew Yard Project (Roundabout design).

LLG. 2025, February 6. Traffic Impact Study, Irwindale Brew Yard Specific Plan. Appendix P1.

SCAG (Southern California Association of Governments). 2023, November. "Local Data Exchange (LDX) Process Data/Map Book for the City of Irwindale." In *Connect SoCal: The 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy*. Draft Plan Release.

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3.15 TRIBAL CULTURAL RESOURCES

Tribal cultural resources (TCRs) include landscapes, sacred places, or objects with cultural value to a California Native American tribe. This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of proposed project to impact tribal cultural resources. Other potential impacts to cultural resources (i.e., prehistoric, historic, and disturbance of human remains) are evaluated in Section 3.4, Cultural Resources.

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

- *Cultural and Paleontological Resources Assessment for the Irwindale Brew Yard Specific Plan Project, City of Irwindale, Los Angeles County, California*, Cogstone Resource Management, January 2026
- Tribal Consultation correspondence pursuant to AB 52 and SB 18

This information is provided as appendices to this DEIR; portions that contain confidential information have been removed. Complete copies of these studies are included in the Technical Appendices to this Draft EIR as Appendices G1 and G2, respectively.

During the NOP comment period (March 6, 2024, through April 12, 2024), one comment letter was received from the Native American Heritage Commission (NAHC) in response to the Notice of Preparation (NOP) related to cultural resources review procedures and tribal consultation pursuant to Assembly Bill 52 and Senate Bill 18. These comments have been addressed in Section 3.15.2, *Existing Conditions*, of this chapter. NOP and scoping meeting comments are included as Appendix A to this DEIR.

3.15.1 Regulatory Framework

FEDERAL

National Historic Preservation Act

The National Historic Preservation Act (NHPA) establishes the National Register of Historic Places (NRHP) and coordinates public and private efforts to identify, evaluate, and protect significant historic and archaeological resources. Section 106 of the NHPA requires federal agencies to consider the effects of undertakings on historic properties, including properties of significance to federally recognized tribes, and to provide the Advisory Council on Historic Preservation an opportunity to comment.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) protects archaeological resources on federal and tribal lands. It prohibits the unauthorized excavation or removal of archaeological resources and establishes permitting requirements for research to ensure that culturally significant materials are properly handled and curated.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) requires federal agencies and federally funded institutions to return certain Native American cultural items, including human remains, funerary objects, sacred objects, and objects of cultural patrimony, to lineal descendants or culturally affiliated tribes. It establishes procedures for the discovery and treatment of such items on federal and tribal lands.

American Indian Religious Freedom Act and Native American Graves Protection and Repatriation Act

The American Indian Religious Freedom Act recognizes that Native American religious practices, sacred sites, and sacred objects have not been properly protected under other statutes. It establishes as national policy that traditional practices and beliefs, sites (including right of access), and the use of sacred objects shall be protected and preserved.

STATE

California Environmental Quality Act

CEQA requires lead agencies to determine whether a project may cause a substantial adverse change in the significance of a tribal cultural resource (Public Resources Code [PRC] Sections 21083.2 and 21084.1). If so, feasible mitigation measures must be implemented to avoid or substantially lessen the impact.

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is the state's authoritative guide for identifying and protecting historical resources, including those that may also qualify as TCRs. A resource is significant if it meets one or more criteria for listing, which include association with events, persons, distinctive characteristics, or the potential to yield important information.

State Laws Pertaining to Human Remains

Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 require that if human remains are discovered, no further disturbance shall occur until the County Coroner determines the origin and disposition. If the remains are determined to be Native American, the

NAHC must be notified within 24 hours and a "most likely descendant" identified to make treatment recommendations.

Senate Bill 18

Senate Bill (SB) 18 requires local governments to consult with California Native American tribes identified by the NAHC before adopting or amending general plans or specific plans to protect traditional tribal cultural places.

Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3.

Consultation with Native Americans

AB 52 formalizes the lead agency and tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or EIR. Assembly Bill 52 also requires each lead agency to maintain and annually update a list of California Native American tribes that have requested notification within its jurisdiction.

Tribal Cultural Resources

Section 4 of AB 52 adds Sections 21074 (a) and (b) to the PRC to address tribal cultural resources and cultural landscapes. Section 21074 (a) defines tribal cultural resources as one of the following:

1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

    A. Included or determined to be eligible for inclusion in the California Register of Historical Resources.

    B. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in

> subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Section 1 (a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

3.15.2 Existing Conditions

SACRED LANDS FILE SEARCH RESULTS

The NAHC was contacted on February 29, 2024, to request a search of the Sacred Lands File and to obtain a list of potentially interested Native American tribes. The purpose of the search was to determine whether Native American sacred lands or other culturally sensitive resources are present within or near the project site.

In a letter dated April 16, 2024, the NAHC responded that the Sacred Lands File search was negative, indicating that no Native American sacred lands are recorded within the project site. The NAHC also provided a list of 13 potentially interested tribal groups and recommended that the Gabrieleño Band of Mission Indians–Kizh Nation be contacted for additional information due to previous requests to consult on future development in the project area.

TRIBAL CONSULTATION

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

On June 5, 2024, the City of Irwindale sent consultation letters to 11 California Native American tribes that had previously submitted general consultation requests pursuant to Assembly Bill 52.

These tribes included the Gabrieleño Band of Mission Indians–Kizh Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, Gabrielino-Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Soboba Band of Luiseno Indians, Santa Rosa Band of Cahuilla Indians, and Gabrielino/Tongva Nation. Of the tribes contacted, one tribe, Gabrieleño Band of Mission Indians–Kizh Nation, requested consultation regarding the proposed project. Consultation was completed on December 19, 2025.

3.15.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the State CEQA Guidelines, Section XVIII, states that the Proposed Project would result in a significant impact related to tribal cultural resources if it would:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

   i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

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

3.15.4 Applicable Specific Plan Development Standards and Design Guidelines

DEVELOPMENT STANDARDS

There are no development standards in the Specific Plan pertaining to TCRs.

DESIGN GUIDELINES

There are no design guidelines in the Specific Plan pertaining to TCRs.

3.15.5 Project Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource , defined in Public Resources Code Section 21074, as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k)?

As discussed in Chapter 3.4, *Cultural Resources*, no historical resources listed in or eligible for listing in the CRHR or included in a local register of historical resources are present in the Specific Plan area. Cultural resources investigations, including records searches and field surveys, determined that historic-age built environment features identified on the project site do not meet the criteria for listing in the CRHR or the NRHP.

In addition, a Sacred Lands File search conducted by the NAHC was negative, indicating that no Native American sacred lands are recorded within the project site. Pursuant to SB18 and AB52, the City of Irwindale initiated consultation with California Native American tribes traditionally and culturally affiliated with the project area. One tribe, the Gabrieleño Band of Mission Indians–Kizh Nation, requested consultation. Through the consultation process, no tribal cultural resources were identified within the project site that are listed in or eligible for listing in the CRHR or included in a local register of historical resources.

Based on the results of the Sacred Lands File search, cultural resources investigations, and SB18/AB52 consultation, no tribal cultural resources, as defined in Public Resources Code Section 21074, have been identified in the Specific Plan area. As discussed, there are no known tribal cultural resources listed or eligible for listing in the National Register, California Register, or in a local register of historical resources on the Project Site or within 0.25 mile. Thus, operational impacts would be **less than significant**.

Significance without Mitigation: Less than Significant.

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

The Sacred Lands File search conducted by the NAHC did not identify any known tribal cultural resources within or immediately adjacent to the project site. However, through consultation, the Gabrieleño Band of Mission Indians–Kizh Nation indicated that the project area is culturally sensitive and of importance to the tribe and that there is the potential for previously unidentified and/or buried tribal cultural resources to be encountered during ground-disturbing activities. Should such resources be determined by the lead agency to be significant, the proposed project could result in potentially significant impacts related to the substantial adverse change in the significance of TCRs. Therefore, impacts related to tribal cultural resources under this threshold are considered **potentially significant**.

Significance without Mitigation: Potentially Significant.

MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

a) The project applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians–Kizh Nation. The monitor shall be retained prior to the commencement of any ground-disturbing activity for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). Ground-disturbing activity shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

b) A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

c) The monitor shall complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered Tribal Cultural Resources (TCR), including but not limited to Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American

(ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the project applicant/lead agency upon written request to the Tribe.

d) On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

MM TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

a) Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh shall recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate; in the Tribe's sole discretion; and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

a) Native American human remains are defined in California Public Resources Code (PRC) Section 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC Section 5097.98, are also to be treated according to this statute.

b) If Native American human remains and/or grave goods are discovered or recognized on the project site, then PRC Section 5097.9 and Health and Safety Code Section 7050.5 shall be followed.

c) Human remains and grave/burial goods shall be treated alike according to PRC Sections 5097.98 (d)(1) and (2).

d) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

e) Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Significance with Mitigation: Implementation of Mitigation Measures TCR-1, TCR-2, TCR-3, and CUL-2 would ensure that any significant TCRs identified through AB 52 consultation or inadvertent discovery are appropriately treated in coordination with Native American tribes. Therefore, impacts would be **less than significant** with mitigation.

3.15.6 Cumulative Impact Analysis

For purposes of TCRs, the cumulative setting encompasses the project site and surrounding area within the City and adjacent jurisdictions, including portions of Azusa, Duarte, and Covina, where reasonably foreseeable development could involve ground-disturbing activities with the potential to affect TCRs. This area reflects a historically modified landscape with long-standing industrial, transportation, and urban development and ongoing infill and redevelopment.

Would the project have a cumulative effect related to tribal cultural resources?

Cumulative impacts to TCRs would occur when the impacts of a proposed project, in conjunction with other cumulative projects in the City, result in multiple and/or cumulative impacts to TCRs in the area. The presence of TCRs is site specific; however, implementation of the proposed project in conjunction with other planned projects in other areas of the City could unearth unknown significant cultural resources, including TCRs. As with the proposed project, other planned development projects in the City would involve ground disturbance and could impact TCR's that could be buried in those project sites.

However, other development projects in the City would be required to undergo discretionary review and would be subject to the same resource protection requirements and CEQA review as the proposed project. For example, other development projects could require the preparation of site-specific cultural resource assessments, which would include some degree of surface-level surveying. As a part of the assessments, a cultural resources records search at the South Central Coastal Information Center and a Sacred Land Files search would be required. Additionally, as with the proposed project, other development projects would similarly be required to comply with all applicable existing regulations, procedures, and policies, including consultation under AB 52, that address accidental discoveries of archaeological sites and resources, including TCRs.

The proposed project would implement Mitigation Measures TCR-1, TCR-2, TCR-3 and CUL-2, which require Native American monitoring during ground-disturbing activities, establish procedures for the unanticipated discovery and treatment of tribal cultural resources, and ensure appropriate handling of Native American human remains and associated grave goods in accordance with PRC Section 5097.98 and California Health and Safety Code Section 7050.5. These measures would ensure that any TCRs encountered during construction are promptly identified, evaluated in consultation with the affiliated tribe, and appropriately protected or treated.

Furthermore, as demonstrated above, impacts on TCRs as a result of implementation of the proposed project would be less than significant with mitigation measures.

In consideration of the preceding, because the proposed project and other cumulative projects in the City would be required to implement similar avoidance, monitoring, and treatment measures under CEQA and AB 52, the proposed project's contribution to cumulative impacts related to TCRs would be **less than significant** with mitigation incorporated and would not be cumulatively considerable.

Significance with Mitigation: Less than significant.

3.16 UTILITIES AND SERVICE SYSTEMS

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the proposed Irwindale Brew Yard Specific Plan (proposed project) to impact utilities and services systems. Utilities and services systems include wastewater (sewage) treatment and collection systems, water supply and distribution systems, storm drainage, solid waste collection and disposal, and other public utilities. Potential impacts to hydrology (e.g., flooding) and water quality are provided in Section 3.9, *Hydrology and Water Quality*. Storm drainage, though discussed below, is also addressed in Section 3.9. The regulatory framework and existing conditions for electricity and natural gas facilities can be found in Section 3.5, *Energy*.

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

- *Preliminary Hydrology and Low Impact Development (LID) Plan*, Kimley Horn, March 13, 2026.
- *Water Supply Assessment*, Stetson Engineers, November 2023.
- *Sanitary Sewer Capacity Study*, Kimley Horn, March 2026.
- Will Serve Letters: *Azusa Light and Water*, August 20, 2025; *Southern California Gas Company*, March 6, 2023; *Charter Communications*, December 30, 2022; *Frontier Communications*, April 7, 2023.
- *Draft Operations Plan: Brew Yard Inert Debris Engineered Fill Operation*, Heavy Iron Contracting, December 1, 2025.

Complete copies of these studies are included in the Technical Appendices to this Draft EIR as Appendices L1, L2, Q1, Q2, and C respectively.

During the NOP comment period (March 6, 2024, through April 5, 2024) comments related to utilities and service systems were received from the Local Agency Formation Commission for the County of Los Angeles (LAFCO), and the Los Angeles County Sanitation District (LACSD). No comments related to utilities and service systems were raised at the scoping meeting held on February 23, 2024.

LACSD's comment letter noted the LACSD sewer trunk and wastewater treatment plant that would service the proposed project; provided information on the remaining capacity for both; included an estimate of wastewater generated by the proposed project; detailed their connection fee requirements; and described the basis for forecasting the capacities of their wastewater treatment facilities. Impact 3.16 (a) incorporates the information provided in LACSD's letter. LAFCO requested that they be identified as a responsible agency and that the EIR

examine whether any potential annexations, sphere of influence amendments, or other LAFCO actions are required. Impact 3.16 (c) responds to LAFCO's requests.

3.16.1 Wastewater Treatment and Collection

REGULATORY FRAMEWORK

Federal, state, and local laws, regulations, plans, or guidelines related to wastewater treatment and collection that are applicable to the proposed project are summarized below.

Federal

Clean Water Act and National Pollution Elimination Discharge System

The Federal Clean Water Act requires that wastewater be treated before it is discharged to waters of the United States (US Code Title 33, Sections 1251 et seq.). Requirements for waste discharges from publicly owned treatment works to navigable waters are addressed in National Pollution Elimination Discharge Systems (NPDES) regulations under the Clean Water Act. NPDES permits for such discharges in the project region are issued by the Los Angeles Regional Water Quality Control Board (RWQCB).

NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable connections and/or mass emissions of pollutants in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, etc. Wastewater discharge is regulated under the NPDES permit program for direct discharges into receiving waters and by the National Pretreatment Program for indirect discharges to a wastewater (sewage) treatment plant.

State

State Water Resources Control Board: Statewide General Waste Discharge Requirements

The General Waste Discharge Requirements specify that all federal and state agencies, municipalities, counties, districts, and other public entities that own or operate sanitary sewer systems greater than one mile in length which collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in the State of California need to develop a sewer master plan. The master plan evaluates existing sewer collection systems and provides a framework for undertaking the construction of new and replacement facilities to

maintain proper levels of service. It includes inflow and infiltration studies to analyze flow monitoring and water use data, a capacity assurance plan to analyze the existing system with existing land use and unit flow factors, a condition assessment and sewer system rehabilitation plan, and a financial plan with recommended capital improvements and financial models.

General Pretreatment Regulations for Existing and New Sources of Pollution

The General Pretreatment Regulations establish the responsibilities of federal, state, and local governments; industry; and the public to implement National Pretreatment Standards to control pollutants that pass through or interfere with treatment processes in publicly owned treatment works or that may contaminate sewage sludge. Pretreatment standards are pollutant discharge limits that apply to industrial users.

Regional

A.K. Warren Water Resource Facility NPDES Permit

Wastewater generated by the proposed project would be conveyed to the A.K Warren Water Resource Facility (WRF)[1] for treatment. The A.K Warren WRF is owned and operated by LACSD and provides primary and secondary wastewater treatment. Wastewater discharge requirements for the A.K Warren WRF are detailed in NPDES Permit No. CA0053813. The permit includes the conditions needed to meet minimum applicable technology-based requirements. The permit includes limitations more stringent than applicable federal technology-based requirements where necessary to achieve the required water quality standards.

Los Angeles County Sanitation District's Connection Fees

Capital improvements to the A.K Warren WRF are funded from connection fees charged to new developments, redevelopments, and expansions of existing land uses. The connection fee is a capital facilities fee used to provide additional conveyance, treatment, and disposal facilities (capital facilities) required by new users connecting to the LACSD's sewerage system or by existing users who significantly increase the quantity or strength of their wastewater discharge. The connection fee program ensures that all users pay their fair share for any necessary expansion of the system. Estimated wastewater generation factors used in determining connection fees in LACSD's 22 member districts are in the connection fee ordinance for each respective district, available on LACSD's website. The proposed project is in the LACSD's District 22 service area and would be subject to the connection fee ordinance.

1 The A.K. Warren Water Resource Facility was formerly known as the Joint Water Pollution Control Plant.

Los Angeles County Sanitation District's Wastewater Ordinance

The purpose of LACSD's wastewater ordinance is to establish controls on users of LACSD's sewer system to protect the environment and public health, and to provide for the maximum beneficial use of LACSD's facilities. This ordinance applies to all direct or indirect discharges to any part of LACSD's sewer system. The ordinance regulates sewer construction, provides for the approval of plans for sewer construction, and implements federal and state pollution control regulations.

Local

City of Irwindale Municipal Code

Chapter 3.50, Development Impact Fees. This chapter requires anyone who develops or redevelops land in the city to pay development impact fees. The development impact fee program funds the acquisition, design, and construction of certain public facilities necessary to serve new development in the city.

Chapter 13.04, Sanitary Sewer and Industrial Waste Ordinance. This chapter regulates the discharge, deposit, and disposal of all waste, including any material that may cause pollution of underground or surface waters.

EXISTING CONDITIONS

Wastewater Conveyance

LACSD operates and maintains the regional wastewater collection system—approximately 1,400 miles of sewers, 49 pumping plants, and 11 wastewater treatment plants—that transports and treats about half the wastewater in Los Angeles County. The City of Irwindale operates a local network sewer infrastructure that connects to the LACSD infrastructure (LACSD 2025).

The Specific Plan area is not currently served with sewer; however, the brewery property is served from an existing 18-inch sewer lateral at the northwest corner of Irwindale Avenue and First Street (see Figure 2-13, *Proposed Sanitary Sewer*).

LACSD has sewer mains in Irwindale Avenue that flow south to the 12-inch Irwindale Trunk Sewer and the 15-inch Irwindale Relief Trunk Sewer. Both trunk sewers start at the intersection of Irwindale Avenue and First Street. There is no sewer infrastructure in First Street; however, at the intersection of Irwindale Avenue and First Street is a 15-inch private connection that stubs to the southeast corner of the Specific Plan area.

LACSD's 15-inch diameter trunk sewer has a capacity of 3.8 million gallons per day (mgd) and conveyed a peak flow of 1.6 mgd when last measured in 2016 (see Appendix Q2).

Wastewater Treatment

The Specific Plan area is part of the A.K. Warren WRF tributary area. The A.K. Warren WRF is in the City of Carson, has a capacity of 400 mgd, and currently processes an average flow of 237 mgd (see Appendix Q2). It is LACSD's oldest and largest wastewater treatment plant and serves a population of approximately 3.5 million people.

STANDARDS FOR ANALYSIS

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to public services if it would:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

b) Result in a determination by the wastewater treatment provider that 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.

APPLICABLE SPECIFIC PLAN DEVELOPMENT STANDARDS AND DESIGN GUIDELINES

Development Standards

Chapter 2, Section 2.4.2, Wastewater, of the Specific Plan provides a conceptual wastewater plan that includes both existing and proposed sanitary sewer lines.

Design Guidelines

There are no Specific Plan design guidelines pertaining to wastewater treatment and collection.

PROJECT IMPACT ANALYSIS

a) Would the project require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects?

The proposed project would install a private sewer main in the on-site private drive aisle that runs along the western border of the project site. The proposed private sewer would originate from the northwest part of the project site and be routed to an on-site lift station north of First

Street and west of the proposed commercial parcel. Laterals would extend to each of the proposed buildings. The lift station would discharge to a new 15-inch gravity main in First Street. This gravity main would extend and terminate at a proposed manhole that would be positioned on the existing 15-inch Irwindale Relief Trunk Sewer at the intersection of Irwindale Avenue and First Street. LACSD's 15-inch diameter trunk sewer has a capacity of 3.8 mgd and conveyed a peak flow of 1.6 mgd when last measured in 2016. Therefore, it has a residual capacity of 2.2 mgd (see Appendix Q2).

Approximately 6,650 linear feet of sewer line (5,800 feet of private sewer and 850 feet of public sewer) from 8 to 15 inches in diameter are proposed. The existing brewery property would continue to be served from the 18-inch lateral at the northwest corner of the Irwindale Avenue and First Street intersection (see Figure 2-13).

Construction

Construction impacts associated with the installation of sewer lines on-site would primarily involve trenching to place the lines. The construction-related environmental impacts associated with these improvements are analyzed throughout this DEIR since it is a component of the proposed project. The analysis in this section focuses on off-site construction and whether the City and LACSD would need to expand their sewer systems to handle the demand generated by development accommodated by the proposed project.

Apart from the proposed off-site 15-inch gravity main in First Street and the related connections at the intersection of Irwindale Avenue, no other off-site sewer line construction or upsizing would be required to accommodate the proposed project. However, some construction would occur in the public right-of-way on First Street and the intersection of Irwindale Avenue to make the necessary infrastructure connections to the existing manhole and trunk sewer. Prior to ground disturbance, project contractors would coordinate with the City and LACSD to identify the locations and depth of all sewer lines, and the proposed sewer system improvements would be designed and constructed in accordance with City and LACSD requirements and would require City and LACSD approvals. Additionally, all construction activity would follow the requirements of the project specific Construction and Staging Traffic Management Plan (see Section 3.14, *Transportation*).

Additionally, wastewater generation would not occur during the construction phase of the proposed project. Construction workers would utilize portable restrooms, which would dispose of wastewater off-site and would not contribute to wastewater flows to the City or LACSD's wastewater system. Thus, construction of the proposed project would not require new or expanded wastewater infrastructure, the construction or relocation of which could cause significant environmental effects. Therefore, impacts would be **less than significant**.

Operation

The proposed project includes the development of 3,000,000 square feet (SF) of industrial building space and 12,000 SF of commercial building space with associated circulation improvements, utility infrastructure, and landscaping. The gross site area is 150.1 acres.

The Sanitary Sewer Capacity Study, included as Appendix Q1 of this DEIR, calculates the estimated peak wastewater flow for the proposed project. The study uses the Los Angeles County Public Works peak sewer generation rate of 0.021 cubic feet per second per acre (cfs/acre) for sites that are zoned Heavy Industrial (M-1 through M-4). For the future commercial parcel, the average flow rate was determined using LACSD's sewer generation rate of 325 gallons per day per 1,000 SF (gpd/1,000 SF). A peak factor of 2.5 was utilized, per the Los Angeles County Public Works' Area Study Sewage Flow Coefficients. As shown in Table 3.16-1, the proposed project would generate a peak wastewater flow of 1.792 mgd. The existing 15-inch Irwindale Relief Trunk Sewer has a residual capacity of 2.2 mgd and therefore can accommodate the proposed project.

Table 3.16-1 Estimated Peak Wastewater Flow

Parcel ID[1]	Area (Acres)	Peak Generation Factor (cfs/ac)	Peak Flow (cfs)	Peak Flow (mgd)
Parcel 1	36.836	0.021	0.774	0.500
Parcel 2	43.079	0.021	0.905	0.585
Parcel 3	30.770	0.021	0.646	0.418
Parcel 4	20.659	0.021	0.434	0.280
Parcel ID[1]	**Building SF**	**Average Flow (gpd/1000SF)**	**Average Flow (gpd)**	**Peak Flow (mgd)**
Phase 2 - Future Commercial	12,000	325	3,900	0.010
Total	-	-	-	1.792

Sources: Kimley Horn 2025 (Appendix Q1).

Notes: cfs = cubic feet per second; SF = square feet; ac = acres; mgd=million gallons per day; gpd = gallons per day

1 The acreages for each parcel are shown on Figure 2-7, Site Plan: Planning Area 1, and Figure 2-8, Site Plan: Planning Area 2.

The proposed project would comply with Chapter 3.50, Development Impact Fees, of the Municipal Code and LACSD's connection fee requirements to provide financing for the ongoing maintenance and operation of the sanitary sewer systems, including capital replacement costs.

Based on the preceding, implementation of the proposed project would not require the relocation or construction of new or expanded wastewater conveyance infrastructure. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project result in a determination by the wastewater treatment provider that 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 A.K. Warren WRF is required by federal and State law to meet applicable standards of treatment plant discharge requirements subject to NPDES No. CA0053813. The permit includes the conditions needed to meet minimum applicable technology-based requirements. The NPDES permit regulates the amount and type of pollutants that the system can discharge into receiving waters. The A.K. Warren WRF is operating in compliance with and would continue to operate subject to state waste discharge requirements and federal NPDES permit requirements, as set forth in the NPDES permit and order.

Wastewater from the proposed project does not contain substances of types and amounts prohibited by LACSD discharge limits, and the proposed project would be required to comply with the LACSD's Wastewater Ordinance and Connection Fee Ordinance, which include the payment of a connection fee, the approval of plans for sewer construction by LACSD, and the prohibition of certain discharges to sewer lines. Future development would also need to abide by the requirements of Chapter 3.50 and Chapter 13.04, Sanitary Sewer and Industrial Waste Ordinance, of the City's Municipal Code. These chapters regulate the discharge, deposit, and disposal of all waste, including any material that may cause pollution of underground or surface waters. Thus, project-generated wastewater would not adversely affect LACSD's compliance with NPDES No. CA0053813.

The A.K. Warren WRF has a capacity of 400 mgd and currently processes an average flow of 237 mgd. The WRF has a residual capacity of 163 mgd and can accommodate the proposed project's peak sewer flow of 1.792 mgd. Therefore, LACSD has adequate capacity to serve the proposed project's demand in addition to existing commitments. Therefore, impact would be **less than significant**.

Significance without Mitigation: Less than significant.

CUMULATIVE IMPACT ANALYSIS

The area considered for cumulative impacts to wastewater treatment is the A.K Warren WRF's service area. The area considered for cumulative impacts to sewer systems is LACSD's service area and the City's sewer system service area.

Would the project have a cumulative effect related to wastewater treatment and collection?

Wastewater Collection

Future growth in the City would increase wastewater generation and flow. These include increases in residential, commercial, and industrial effluent. All future development in the City would pay development impact fees, per Chapter 3.50 of the Municipal Code, to fund future sewer infrastructure expansions needed to accommodate the growth. Additionally, projects within LACSD's larger service area would be reviewed on a project-by-project basis to verify that existing capacity exists to convey the wastewater generated by the new development and whether construction of new sewer lines would cause significant environmental effects. Through the use of connection fees and agreements, LACSD is able to maintain and expand its wastewater collection system as necessary and is able to ensure that new developments pay their fair-share costs associated with increased demand. Therefore, cumulative impacts on wastewater collection would be **less than significant**.

Wastewater Treatment

The proposed project's wastewater effluent is directed to the A.K. Warren WRF operated by LACSD. Future development in Irwindale with effluent directed to the A.K. Warren WRF would comply with Chapter 13.04 of the Irwindale Municipal Code and LACSD's Wastewater Ordinance to ensure that the WRF continues to operate in compliance with its NPDES permit. Furthermore, future development would also comply with the LACSD's connection fee requirements to fund future capital improvement programs. Accordingly, cumulative impacts on wastewater treatment would be **less than significant**.

Significance with Mitigation: Less than significant.

3.16.2 Water Supply and Distribution

REGULATORY FRAMEWORK

Federal, State, and local laws, regulations, plans, or guidelines related to water supply and distribution that are applicable to the proposed project are summarized below.

Federal

Safe Drinking Water Act

The Safe Drinking Water Act, the principal federal law intended to ensure safe drinking water to the public, was enacted in 1974 and has been amended several times since then. It authorizes

the United States Environmental Protection Agency (EPA) to set national standards for drinking water, called the National Primary Drinking Water Regulations, to protect against both naturally occurring and human-made contaminants. These standards set enforceable maximum contaminant levels in drinking water and require all water providers in the United States to treat water to remove contaminants, except for private wells serving fewer than 25 people. In California, the State Water Resources Control Board (SWRCB) conducts most enforcement activities. If a water system does not meet standards, it is the water supplier's responsibility to notify its customers.

America's Water Infrastructure Act of 2018

America's Water Infrastructure Act was signed into law on October 23, 2018, and authorizes federal funding for water infrastructure projects; expands water storage capabilities; assists local communities in complying with the Safe Drinking Water Act and Clean Water Act; reduces flooding risks for rural, western, and coastal communities; and addresses significant water infrastructure needs in tribal communities. Additionally, the act requires that drinking water systems that serve more than 3,300 people develop or update risk assessments and emergency response plans, which must be certified by the EPA within a deadline specified by America's Water Infrastructure Act.

State

California Water Code

The California Water Code states that the water resources of the State must be put to beneficial use and that waste or unreasonable use of water should be prevented. The code is divided into several sections that include provisions regarding water quality, formation of irrigation districts and water districts, safe drinking water, and water supply and infrastructure improvements. The California Water Code also addresses water shortage emergencies, drought planning, conservation mandates, potable water reuse, appropriation of water, and water rights.

California Health and Safety Code: California Safe Drinking Water Act

The California Health and Safety Code addresses water issues primarily through the California Safe Drinking Water Act. The Act establishes a regulatory program enforced by the SWRCB to ensure the safety of public drinking water systems. The SWRCB adopts primary and secondary drinking water standards, and the Office of Environmental Health Hazard Assessment develops public health goals. Public water systems are required to test their water for contaminants and notify customers if standards are exceeded or certain notification levels are met. The Health and Safety Code also establishes accreditation procedures for environmental laboratories, programs to certify operators of water treatment plants and water distribution systems, and the Drinking Water State Revolving Fund to assist small water systems serving disadvantaged communities.

Sustainable Groundwater Management Act of 2014

On September 16, 2014, a three-bill legislative package was signed into law, collectively known as the Sustainable Groundwater Management Act (SGMA). The governor's signing message states a central feature of these bills is the recognition that groundwater management in California is best accomplished locally. Under the roadmap laid out by the legislation, local and regional authorities in medium- and high-priority groundwater basins must form groundwater sustainability agencies that oversee the preparation and implementation of groundwater sustainability plans.

California Urban Water Management Planning Act

The Urban Water Management Planning Act requires urban water suppliers to prepare an urban water management plan (UWMP) if they provide water for municipal purposes to more than 3,000 customers or provide more than 3,000 acre-feet per year of water. The intent of the UWMP is to assist water supply agencies in water resource planning given their existing and anticipated future demands. The UWMP must include a water supply and demand assessment that compares total water supply available to the water supplier with the total projected water use over a 20-year period. It is also mandatory that UWMPs be updated every five years.

Senate Bill 610

Senate Bill (SB) 610 amended State law to ensure better coordination between local water supply and land use decisions and confirm that there is an adequate water supply for new development. Specific projects are required to prepare a water supply assessment (WSA). The WSA consists of information regarding existing and forecast water demands and available water supplies for the new development. The following projects that are subject to the California Environmental Quality Act (CEQA) are required to prepare a WSA.

- Residential developments consisting of more than 500 dwelling units.
- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- Commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- Hotel or motel, or both, having more than 500 rooms.
- Industrial, manufacturing, or processing plant or industrial park planned to employ more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.

- Mixed-use project that includes one or more of the projects specified above.
- Projects that would demand an amount of water equivalent to, or greater than, the amount of water required for 500 dwelling units.

California Plumbing Code

The California Plumbing Code was adopted as part of the California Building Code and specifies technical standards of design, materials, workmanship, and maintenance for plumbing systems. The code is updated on a three-year cycle; the latest edition is dated 2025 and effective as of January 1, 2026. Among the topics covered in the code are water fixtures, potable and non-potable water systems, and recycled water systems.

The Water Conservation Act of 2009 (Senate Bill X7-7)

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 a 10 percent reduction in per capita water use by 2015. Effective in 2016, urban retail water suppliers who did not meet the water conservation requirements established by this bill are not eligible for state water grants or loans. SB X7-7 requires that urban water retail suppliers determine baseline water use and set reduction targets according to specified standards; it also requires that agricultural water suppliers prepare plans and implement efficient water management practices.

20x2020 Water Conservation Plan

The 20x2020 Water Conservation Plan of 2010 was a by-product of the Water Conservation Act of 2009. The plan had a threefold effect, establishing: 1) a benchmark of current usage per capita of 2005 baseline data; 2) an intermediate goal for all water providers to meet by 2015; and 3) a 20 percent reduction by 2020 of water usage.

Assembly Bill 1668 and Senate Bill 606

In 2018, the California Legislature enacted two policy bills to establish long-term improvements in water conservation and drought planning to adapt to climate change and longer and more intense droughts in California. The Department of Water Resources (DWR) and SWRCB will develop new standards for:

- Indoor residential water use.
- Outdoor residential water use.

- Commercial, industrial, and institutional water use for landscape irrigation with dedicated meters.
- Water loss.

Urban water suppliers are required to stay within annual water budgets, based on the standards for their service areas, and to calculate and report their urban water use objectives in an annual water use report. For example, the bills define a daily standard for indoor residential use of 55 gallons per person until 2025, when it decreases to 52.5 gallons and further decreases to 50 gallons by 2030. The legislation also includes changes to UWMP preparation requirements.

Mandatory Water Conservation

Following the declaration on July 15, 2014, of a state of emergency due to drought conditions, the SWRCB adopted Resolution No. 2014-0038 for emergency regulation of statewide water conservation efforts. These regulations, which went into effect on August 1, 2014, were intended to reduce outdoor urban water use and persuade all California households to voluntarily reduce their water consumption by 20 percent. Water companies with 3,000 or more service connections were required to report monthly water consumption to the SWRCB.

In October of 2023, AB 1572 was signed into law by the governor, prohibiting the irrigation of nonfunctional turf at commercial, industrial, and institutional sites (with exceptions for areas irrigated with recycled water or harvested rainwater). The irrigation prohibitions become effective in stages between 2027 and 2031, beginning with state and local government facilities. Under the law, urban water suppliers must adopt the same irrigation prohibitions into their local regulations.

Water Conservation in Landscaping Act of 2006 (AB 1881)

The Water Conservation in Landscaping Act of 2006 (AB 1881) required the DWR to update the State Model Water Efficient Landscape Ordinance by 2009. The State's model ordinance was issued on October 8, 2009. Under AB 1881, cities and counties were required to adopt an updated model landscape water conservation ordinance by January 31, 2010, or to adopt a different ordinance that is at least as effective in conserving water as the updated model ordinance. It also required reporting on the implementation and enforcement of local ordinances, with required reports due by December 31, 2015.

2015 Update of the State Model Water Efficient Landscape Ordinance

To improve water savings in the landscaping sector, DWR updated the State Model Water Efficient Landscape Ordinance (MWELO) in accordance with Executive Order B-29-15. The model ordinance promotes efficient landscapes in new developments and retrofitted landscapes. The executive order called for revising the model ordinance to increase water efficiency standards for new and retrofitted landscapes through more efficient irrigation

systems, greywater usage, and on-site stormwater capture and by limiting the portion of landscapes that can be covered in turf.

New development projects that include landscaped areas of 500 square feet or more—including residential, commercial, industrial, and institutional projects that require a permit, plan check, or design review—are subject to the model ordinance. The previous landscape size threshold for new development projects ranged from 2,500 square feet to 5,000 square feet.

California Green Building Standards Code

The nonresidential provisions of the 2025 California Green Building Standards (CALGreen) Code outline planning, design, and development methods that include environmentally responsible site selection, building design, building siting, and development to protect, restore, and enhance the environmental quality of the site and respect the integrity of adjacent properties. The code also establishes the means of conserving water used indoors, outdoors, and in wastewater conveyance; outlines means of achieving material conservation and resource efficiency; and outlines means of reducing the quantity of air contaminants.

Regional

Azusa Light and Water Urban Water Management Plan

ALW is required to prepare an Urban Water Management Plan (UWMP) for its service areas pursuant to Water Code Sections 10610 through 10656. All urban water suppliers prepare, adopt, and file a UWMP with the DWR every five years. The ALW's 2020 UWMP outlines current water demands, sources, and supply reliability for ALW's service area by forecasting water use based on climate, demographics, and land use changes. The plan also details the water shortage contingency plan used in case of shortage emergencies.

Local

City of Irwindale Municipal Code

Chapter 3.16, Utilities Tax. This chapter describes mandated taxes for electricity, gas, and water utility services.

Chapter 8.22, Section 8.22.120, Model water efficient landscaping ordinance requirements (MWELO). This chapter requires property owners or their building or landscape designers, including anyone requiring a building or planning permit, plan check, or landscape design review from the city of Irwindale, who are constructing a new project with a landscape area greater than five hundred square feet, to comply with the California MWELO.

Chapter 15.10, Green Building Standards Code. This chapter adopts by reference the CALGreen Code. CALGreen applies to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure in California unless otherwise indicated in the code.

Chapter 15.16, Plumbing Code. This chapter adopts by reference the Los Angeles County Plumbing Code, which incorporates and amends the California Plumbing Code.

Chapter 15.30, Water Efficient Landscape Requirements and Guidelines. The purpose of this chapter is to establish a local ordinance that is acceptable under AB 1881 as being at least as effective as the State Model Water Efficient Landscape Ordinance in the context of conditions in the city.

EXISTING CONDITIONS

Water Distribution System

The western portion of the Specific Plan area is currently under Cal American Water's jurisdiction, which does not have infrastructure in the area. The eastern portion of the Specific Plan is in the ALW service area, and ALW currently serves the existing brewery property with a main line that crosses I-210. Azusa Light and Water has existing water lines in Irwindale Avenue and First Street (see Figure 2-12, *Conceptual Water Plan*).

Water Supply

ALW is a retail water supplier in Los Angeles County that serves Azusa; portions of Covina, Glendora, Irwindale, and West Covina; and unincorporated areas of Los Angeles County. ALW encompasses an area of approximately 14.2 square miles in the San Gabriel Valley. It primarily serves residential customers, with some commercial and industrial use. ALW provides water to a population of approximately 110,044 throughout its service area.

ALW's water supply sources include groundwater pumped from the Main San Gabriel Basin (Main Basin), surface water diverted from the San Gabriel River, untreated imported water purchased from the San Gabriel Valley Municipal Water District (SGVMWD), and treated imported water purchased from the Metropolitan Water District of Southern California. ALW owns adjudicated groundwater rights to the Main Basin and San Gabriel River surface water rights. It owns and operates 11 active groundwater wells in the Main Basin with a total capacity of 23,750 gallons per minute (gpm). Azusa Light and Water provides surface water supplies from the San Gabriel River through either the Azusa-Duarte Tunnel or the Azusa Conduit. It owns and operates the Canyon Filtration Plant, which has a capacity of 10,100 acre-feet per year (AFY) to treat San Gabriel River surface water. Water purchased from SGVMWD is delivered through SGVMWD's Devil Canyon-Azusa Pipeline. Water purchased from the Metropolitan Water District through SGVMWD is delivered through the 3,300-gpm USG-8 connection (see Appendix L2).

Every urban water supplier is required to assess its reliability to provide water service to its customers under normal, dry, and multiple dry water years. As shown in Table 3.16-2, AWL will be able to meet projected demands between 2025 and 2040 during normal years, single dry years, and multiple dry years.

Table 3.16-2 Normal, Single Dry, and Multiple Dry Year Supply and Demand (in acre-feet per year)

	2025	2030	2035	2040	2045
Normal Year					
Demand Totals	18,552	18,853	19,160	19,472	19,788
Supply Totals	38,450	38,450	38,450	38,450	38,450
Surplus	19,898	19,597	19,290	18,978	18,662
Single Dry Year					
Demand Totals	19,715	20,036	20,362	20,693	21,029
Supply Totals	25,677	25,677	25,677	25,677	25,677
Surplus	5,962	5,641	5,315	4,984	4,648
Multiple Dry Year					
Year 1					
Demand Totals	19,978	20,303	20,633	20,968	21,309
Supply Totals	30,826	30,826	30,826	30,826	30,826
Surplus	10,848	10,523	10,193	9,858	9,517
Year 2					
Demand Totals	21,252	21,598	21,949	22,306	22,669
Supply Totals	29,596	29,596	29,596	29,596	29,596
Surplus	8,344	7,998	7,647	7,290	6,927

Table 3.16-2 Normal, Single Dry, and Multiple Dry Year Supply and Demand (in acre-feet per year)

	2025	2030	2035	2040	2045
Year 3					
Demand Totals	21,230	21,575	21,926	22,283	22,645
Supply Totals	27,136	27,136	27,136	27,136	27,136
Surplus	5,906	5,561	5,210	4,853	4,491
Year 4					
Demand Totals	20,154	20,481	20,815	21,153	21,497
Supply Totals	23,447	23,447	23,447	23,447	23,447
Surplus	3,293	2,966	2,632	2,294	1,950
Year 5					
Demand Totals	17,559	17,845	18,135	18,430	18,729
Supply Totals	23,447	23,447	23,447	23,447	23,447
Surplus	5,888	5,602	5,312	5,017	4,718

Source: ALW, 2020 Urban Water Management Plan.

STANDARDS FOR ANALYSIS

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to public services if it would:

c) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

d) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

APPLICABLE SPECIFIC PLAN DEVELOPMENT STANDARDS AND DESIGN GUIDELINES

Development Standards

Chapter 2, Section 2.4.1, Water, of the Specific Plan includes a description of the Infrastructure Plan and provides a conceptual water plan that includes both existing and proposed water lines.

Design Guidelines

The Specific Plan's design guidelines are developed primarily between two elements, architecture and landscape. The guidelines encourage sustainable design solutions that reduce energy consumption, use water efficiently, and minimize waste.

Section 4.4, Landscape Design, of the Specific Plan includes general landscaping requirements and recommendations, including water quality features and the use of plant materials that are water-wise such as native and drought-tolerant plants. This section encourages sustainable design solutions that use water efficiently. Section 4.4 also includes a preliminary plant palette, and use of plant material that is not listed in the palette is permitted subject to approval by the Community Development Director, provided it is consistent with the core elements of Chapter 4.

PROJECT IMPACT ANALYSIS

c) Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?

The entire Specific Plan area would be annexed and served by ALW. The project Applicant would pay a water system annexation fee and submit a formal application to LAFCO for review and approval. The proposed project would include separate domestic water connections to each new industrial parcel. Fire service to the industrial parcels would be provided by a looped fire main across the parcels. The proposed domestic and fire water lines would connect to the existing ALW water main in First Street (see Figure 2-12).

Construction

Construction impacts associated with the installation of water lines on-site would primarily involve trenching to place the lines. The construction-related environmental impacts associated with these improvements are analyzed throughout this DEIR since it is a component of the proposed project (i.e., buildout of the Specific Plan). The analysis in this section focuses on off-site construction and whether ALW would need to expand its water system to handle the demand generated by the proposed project. Prior to ground disturbance, construction

contractors would coordinate with ALW to identify the locations and depth of all underground pipelines. ALW would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Construction would occur within City streets and in previously disturbed areas. The proposed water system improvements would also be designed and constructed in accordance with City and ALW requirements and would require City and ALW approval. Additionally, water needed for construction activities would occur intermittently throughout the construction period and would be temporary in nature, and required water for construction is generally trucked in. Construction activities associated with construction of this infrastructure (both on-site and off-site) have been accounted for in the analysis of construction equipment and activities described throughout this EIR.

Therefore, construction associated with the Specific Plan would not require or result in the relocation or construction of new or expanded water infrastructure that could cause significant environmental effects. Impacts would be **less than significant.**

Operation

Water service to the project area would be provided by ALW for domestic and fire protection uses. Prior to the issuance of building permits, the Los Angeles County Fire Department (LACoFD) would be required to grant approval of the final building design, including all fire prevention and suppression systems, which would ensure the proposed project is developed pursuant to Fire Code requirements. On-site water connections would be constructed as necessary to comply with the fire flow set for the proposed project by LACoFD during the plan check process. Additionally, during the engineering design and plan check process, the City and ALW would assess the infrastructure needs of the proposed project to ensure that adequate water infrastructure is available.

The proposed project would meet CALGreen requirements regarding water efficiency and conservation. Proposed development would also abide by the requirements of Irwindale Municipal Code Chapter 3.16, Utilities Tax; Chapter 15.10, Green Building Standards Code; Chapter 15.16, Plumbing Code; and Chapter 15.30, Water Efficient Landscape Requirements and Guidelines.

Therefore, implementation of the on-site water system improvements would not cause significant environmental effects, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

d) 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

Construction activities associated with the proposed project, including filling the former quarries pursuant to the Operations Plan, would result in a temporary increase in water demand. Water use would be associated with earthwork and soil compaction, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, water line testing and flushing, and other related short-term activities. The only water used during fill operations would be for dust control and moisture conditioning. The amount of water used during construction would vary depending on weather, soil conditions, the size of the area under construction, and the specific activities being performed.

These activities would occur intermittently throughout the construction period and would be temporary in nature, and required water would usually be trucked in. This short-term and intermittent water use during construction is not expected to be substantial when compared to operational water demands. Additionally, as concluded in ALW's 2020 UWMP, projected water demand for ALW's service area would be met by available supplies during a normal year, single dry year, and multiple dry year hydrological conditions through 2045. Therefore, the proposed project's construction impacts on water supply would be **less than significant**.

Operation

Development of the proposed project would include 3,000,000 SF of industrial building space and 12,000 SF of commercial building space with associated circulation improvements, utility infrastructure, and landscaping. The layout of the proposed landscaped areas is still under design, and the square footage for these areas has not yet been calculated. However, pursuant to Irwindale Municipal Code Subsection 17.17.030(B), the minimum required amount of landscaping required for commercial and industrial projects is 10 percent of the entire project lot area. The Specific Plan area is 150 acres (or 6,534,000 SF), and the total landscaped area has been estimated at 653,400 SF.

As detailed in the water supply assessment for the proposed project, included as Appendix L2 of this DEIR, the water demand for the industrial warehouse and distribution buildings was estimated by multiplying the total size of the buildings (in square feet) by a water demand factor derived from the June 2022 Supplement to the WSA (originally prepared in December 2021) for the proposed Speedway Commerce Center II project in Fontana Water Company's service area. The estimated water demand for the proposed Speedway Commerce Center II project (consisting of seven industrial warehouse and office buildings with a total building size of 1,275,240 SF) was based on a water demand factor of approximately 2,840 gpd per acre (or 0.065 gpd/SF) of building size for similarly sized industrial buildings in Fontana Water Company's service area. As shown in Table 3.16-3, the estimated water demand for the industrial uses is estimated at approximately 218.4 AFY.

The water demand for the commercial buildings was estimated by multiplying the total size of the buildings (in SF) by a water demand factor of 0.12 gpd/SF/day, derived from the Los Angeles Department of Water and Power's Water Supply Assessment for the Academy Square Project, and the Los Angeles Bureau of Engineering Permit Manual's Sewer Generation Factors. As shown in Table 3.16-3, the estimated water demand for the commercial uses is approximately 1.6 AFY.

As shown in Table 3.16-3, the proposed project would have a total indoor water demand of 220.6 AFY. It should be noted that the indoor water demand as calculated in the WSA is less than the wastewater generation conservatively calculated in the Sanitary Sewer Capacity Study. This is because the Sewer Area Study accounts for peak flows and incorporates a factor of safety to ensure sewer lines are adequately designed to convey the most conservative sewer flow.

Table 3.16-3 Projected Water Demands

Land Use	Area (SF)	Outdoor Water Demand (AFY)	Indoor Water Demand Rate (gpd/SF)	Indoor Water Demand Rate (gpd)	Indoor Water Demand Rate (AFY)
Industrial	3,000,000	-	0.065	195,000	218.4
Commercial	12,000	-	0.12	1,440	1.6
Landscaping	653,400	53.5	-	-	-

Sources: Stetson Engineering 2023 (Appendix L2).

The WSA estimated the landscape irrigation demand using the Water Budget Workbook for New and Rehabilitated Non-Residential Landscapes from DWR, and

- An average reference evapotranspiration (ETo) of 50.2 inches per year based on the average Eto in the vicinity of the project site.[2]
- A plant factor (PF) of 0.6 based on different landscaped areas consisting of turf, trees, shrubs, and groundcover.[3]
- An irrigation efficiency (IE) of 0.7.[4]

The total estimated outdoor water demand is 53.5 AFY. Therefore, the total water demand for the proposed project is 274.1 AFY.

2 https://cimis.water.ca.org.gov/default.aspx.

3 The PF is a factor (generally from 0 to 1) for each type of irrigated plant and is based on the water requirements for the plant. Plants with a lower PF (0 to 0.3) require less water than plants with a higher PF (0.7 to 1.0). The PF for turf is approximately 0.7. The PF for medium water use trees, shrubs and groundcover is approximately 0.5.

4 IE is a factor (generally from 0 to 1) which represents irrigation efficiency. Irrigation systems which are well designed and operated can have an efficiency range of 0.8 to 0.9. Irrigation systems which are poorly designed and operated may have efficiencies less than 0.5.

To provide 274.1 AFY to the Specific Plan area, ALW would need to produce water supplies that account for water losses in its distribution system. Pursuant to water loss audits prepared by ALW (pursuant to the California Water Code), ALW's water system losses have averaged approximately 14.6 percent from calendar year 2017 to calendar year 2021. Accounting for this average water loss, ALW would need to produce approximately 314.1 AFY of water to supply 274.1 AFY to the proposed project. The proposed project's water demand falls within the residual water supplies available to ALW for normal, single-dry, and multiple-dry year over the next 20 years, as shown in Table 3.16-2. Therefore, available water supplies are sufficient to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be **less than significant.**

Significance without Mitigation: Less than significant.

CUMULATIVE IMPACT ANALYSIS

The geographic context for the cumulative impact analysis on water supply and distribution is ALW's service area.

Would the project have a cumulative effect related to water supply and distribution?

Water Supply

ALW is required to prepare and update its UWMP every five years to plan and provide water supplies to serve existing and projected demands over a 20-year horizon. The 2020 UWMP prepared by ALW accounts for existing development within the service area as well as projected growth through the year 2045. As noted in Impact 3.16(d), ALW has enough residual water supply to accommodate the proposed project in conjunction with cumulative projects in its service area through 2045 as accounted for in the 2020 UWMP. Therefore, ALW would be able to reliably provide water to its customers from 2020 through the year 2045.

Additionally, under the provisions of SB 610, ALW is required to prepare a comprehensive water supply assessment for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that meets certain thresholds. The types of projects that are subject to the requirements of SB 610 tend to be larger projects that may or may not have been included in the growth projections of ALW's 2020 UWMP. The water supply assessment for such projects would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed.

Compliance with regulatory requirements that promote water conservation, such as ALW's Water Shortage Contingency Plan, the requirements of CALGreen, and the State and City's MWELO Ordinance, and implementation of other water saving strategies would assist in

ensuring that adequate water supply is available on a cumulative basis. Therefore, it is anticipated that ALW would be able to supply the demands of the proposed project and future growth through 2045 and beyond; cumulative impacts on the water supply would be **less than significant**.

Water Infrastructure

Cumulative impacts associated with the water distribution system include projects listed in Table 3-1, *Cumulative Projects within Two Miles of the Proposed Project Site*, that would connect to the existing ALW water conveyance system. However, as with the proposed project, new development projects would be subject to LACoFD, ALW, and the City's review to ensure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. Furthermore, individual projects would be subject to City requirements regarding infrastructure improvements needed to meet respective water demands, fire flow, and pressure requirements. Los Angeles County Fire Department, ALW, and the City would conduct ongoing evaluations to ensure facilities are adequate. Therefore, cumulative impacts on the water infrastructure system would be **less than significant**.

Significance with Mitigation: Less than significant.

3.16.3 Storm Drainage Systems

REGULATORY FRAMEWORK

Federal, state, and local laws, regulations, plans, or guidelines related to storm drainage systems that are applicable to the proposed project are summarized below.

Federal

National Pollution Discharge Elimination System

The Clean Water Act mandates permits for stormwater discharges, and requirements for stormwater discharges are regulated under the NPDES program. In California, the NPDES permit program is administered by the State Water Resources Control Board through the nine regional boards. The planning area is in the jurisdiction of the Los Angeles RWQCB (Region 4).

State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Act (Water Code secs. 13000, et seq.) passed in California in 1969 and was amended in 2013. It is the basic water quality control law for California. Under

this act, the SWRCB has authority over state water rights and water quality policy. The act divided the state into nine regional basins, each under the jurisdiction of a RWQCB to oversee water quality on a day-to-day basis at the local and regional levels. RWQCBs engage in various water quality functions in their respective regions and regulate all pollutant or nuisance discharges that may affect either surface water or groundwater. The City of Irwindale is under the jurisdiction of the Los Angeles RWQCB.

State Water Resources Control Board General Construction Permit

The SWRCB adopted the revised Statewide Construction General Permit on September 8, 2022 (Order WQ 2022-0057-DWQ), which became effective on September 1, 2023. Under the terms of the permit, applicants must file permit registration documents with the SWRCB prior to the start of construction. These documents include a Notice of Intent, risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement.

Applicants must demonstrate conformance with applicable best management practices (BMP) and prepare a SWPPP containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. The SWPPP must also contain a weekly visual monitoring program and BMP inspections prior to, during, and after qualifying precipitation events. Water quality monitoring is required, with a schedule based on the risk level of the site.

SWRCB General Industrial Permit

The Statewide General Permit for Storm Water Discharges Associated with Industrial Activities, Order No. 2014-0057-DWQ and amended by 2015-0122-DWQ (2018) implements the federally required stormwater regulations in California for stormwater associated with industrial activities that discharge to waters of the United States. This regulation covers facilities that are required by federal regulations or by the RWQCBs to obtain an NPDES permit. Dischargers are required to eliminate nonstormwater discharges, develop SWPPPs that include BMPs, monitor stormwater runoff, and submit all compliance documents via the SWRCB's SMARTS program.

SWRCB Trash Amendment

On April 7, 2015, the SWRCB adopted an amendment to "Water Quality Control Plan for Ocean Waters of California" to control trash. In addition, "Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California" added "Part 1, Trash Provisions." Together, they are collectively referred to as the "Trash Amendments." The Trash Amendments provide

statewide consistency for the RWQCBs in their regulatory approach to protect aquatic life and public health beneficial uses, reduce environmental issues associated with trash in State waters, and focus limited resources on high-trash-generating areas.

The Trash Amendments apply to all Phase I and II permittees under the NPDES municipal separate storm sewer systems (MS4) permits. Compliance with the Trash Amendment requires municipalities to install certified trash treatment control systems on all catch basins no later than December 2, 2030.

Regional

Los Angeles RWQCB (MS4) Permit for the Coastal Watershed of Los Angeles and Ventura Counties

On July 23, 2021, the Los Angeles RWQCB adopted a Regional Phase I Municipal Separate Stormwater Sewer System (MS4) Permit for discharges within the coastal watersheds of Los Angeles and Ventura counties (Order No. R4-2021-0105, NPDES No. CAS004004). The municipal discharges of stormwater and nonstorm water by the City are subject to waste discharge requirements in this MS4 permit.

Los Angeles County Department of Public Works Hydrology Manual

The Los Angeles County Department of Public Works' hydrology manual establishes hydrologic design procedures and contains charts, graphs, and tables necessary to conduct a hydrologic study in the county of Los Angeles. The manual contains procedures and standards developed and revised by the Water Resources Division based on historical rainfall and runoff data collected in the county. The hydrologic techniques in the manual apply to the design of local storm drains, retention and detention basins, pump stations, and major channel projects. Standards in the manual govern all hydrology calculations under the County's jurisdiction.

Local

City of Irwindale Municipal Code

Chapter 8.28, Stormwater and Runoff Pollution Control. The provisions of this section contain requirements for construction activities and new development/redevelopment projects to ensure that they comply with the current NPDES permit and the provisions to lessen water quality impacts of development by using smart growth practices and integrating low impact development (LID) design principles.

EXISTING CONDITIONS

Under existing conditions, the two former quarries self-retain as sump sites[5] and the existing brewery property discharges stormwater into the southeast quarry basin. Historically and prior to mining activities, the industrial portion of the site generally surface-drained from the northeast to the southwest through three box culverts (2 feet by 5 feet each) that run underneath the railroad and eventually into the Santa Fe Dam basin. The commercial portion of the project site, located in the southeast corner near Irwindale Avenue and First Street, drains to the adjacent streets. The Specific Plan area generally slopes from north to south and east to west.

An existing culvert near the northwest corner of the site discharges runoff from I-210 and the property immediately north of the freeway into the site. This runoff is conveyed from east to west near the northern property line and eventually discharged through a railroad culvert at the northwest corner of the property into the Santa Fe Dam basin. The northwest corner of the Specific Plan area sheet flows west, bypassing off-site runoff from the north side, and discharges into the northwest culvert. From there, it is directed to the Santa Fe Dam basin (see Figure 3.9-1, *Existing Site Hydrology*).

There are no known LID stormwater water quality treatment devices on-site under existing conditions.

STANDARDS FOR ANALYSIS

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to public services if it would:

e) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

5 A sump site is a low-lying pit, basin, or tank designed to collect, hold, and facilitate the removal of unwanted water, sewage, stormwater, or industrial liquids.

APPLICABLE SPECIFIC PLAN DEVELOPMENT STANDARDS AND DESIGN GUIDELINES

DEVELOPMENT STANDARDS

Chapter 2, Grading and Drainage, of the Specific Plan notes that the proposed development would follow LID guidelines as described in the County of Los Angeles Department of Public Works' Low Impact Development Standards Manual (LID Manual).

DESIGN GUIDELINES

There are no Specific Plan design guidelines pertaining to storm drainage.

PROJECT IMPACT ANALYSIS

e) Would the project require or result in the relocation or construction of new or expanded storm water drainage facilities, the construction or relocation of which could cause significant environmental effects?

Under proposed conditions, runoff from the industrial portion of the Specific Plan area would primarily flow to on-site catch basins with filter inserts and be conveyed through storm drains to on-site water quality and detention systems (see Figure 2-14, *Proposed Low Impact Development (LID) Drainage Plan*). The proposed private storm drain system would be installed beneath the planned private road and include backbone storm drain main lines that span the project site east to west and north to south. The storm drain main lines beneath the private road would vary from 36 to 60 inches in diameter. These backbone storm drain main lines have been sized to accommodate the expected stormwater peak flow rates for a 25-year storm event. Overflows from the water quality and detention systems would be conveyed through storm drains that converge at a proposed headwall at the southwest corner, adjacent to the existing railroad. From there, the runoff would flow to the existing box culverts and ultimately drain to the Santa Fe Dam basin. For the commercial parcel, surface drainage would be directed away from the new building towards several low points across the site. The total runoff would be conveyed via underground storm pipes to the proposed underground basins. The flow from these two basins would be piped to bubbler catch basins and then discharged toward the adjacent street (see Figure 2-14).

The water quality and detention systems would capture and infiltrate the designated water quality design capture volume and detain peak flow rates for the 25-year design storm event, reducing the proposed peak flow to the historical condition flow rate. Runoff from the brewery property would be routed to a proposed underground infiltration basin tank on the brewery property. The tank would be designed to capture and treat for water quality and manage peak

flows. The overflow structure from this tank would be routed underground to the proposed project's backbone storm drain network.

Construction

Construction activities associated with the installation of stormwater drains would primarily involve grading and trenching. The construction-related environmental impacts associated with these improvements are analyzed throughout this Draft EIR because construction is a component of the proposed project.

During construction a SWPPP and erosion plan would be prepared and implemented to limit the amount of stormwater runoff entering storm drains during the construction phases of the proposed project. Construction BMPs would be followed to reduce the amount of stormwater diverted to City stormwater drains. Thus, construction of the proposed project would not require new or expanded wastewater infrastructure, the construction or relocation of which could cause significant environmental effects. Impacts would **be less than significant**.

Operation

The proposed project would increase impervious areas on the Specific Plan area from 15.38 acres under existing conditions to 135.11 acres under proposed conditions, which would increase the amount of runoff. The Preliminary Hydrology and Low Impact Development (LID) Plan (see Appendix L1) analyzes the pre-development drainage condition and the post-development drainage condition to mitigate impacts from the proposed project and comply with the Los Angeles County Hydrology Manual.

Before the Specific Plan area was used as a quarry, the site generally surface-drained from the northeast to the southwest through the three box culverts in the southwestern corner of the site. The existing culvert boxes were sized to accommodate the Specific Plan area and the existing brewery property for a total area of 19.54 acres. The historical pre-development condition peak flow for the 25-year storm event was calculated at approximately 319 cubic feet per second (cfs). Based on an on-site investigation of the box culverts, which included field measurements, it was determined that the box culverts have a capacity of 225 cfs (see Appendix L1). The more conservative value of 225 cfs was utilized to determine the maximum allowable peak runoff value for the proposed project. The existing 25-year storm event peak flow from the commercial portion of the project site is 12.73 cfs.

The Los Angeles County Hydrology Manual requires the analysis of the 25-year design storm event for urban projects, and Table 3.9-3 shows the mitigated and unmitigated flows from this storm event (Q25) under proposed conditions. Peak flows would be mitigated by the six infiltration/detention basins shown in Figure 2-14, which would comprise an underground, 96-inch corrugated metal pipe (CMP) infiltration system. A CMP infiltration system uses large

pipes buried underground to collect, store, and slowly release rainwater into the surrounding soil.

The volume of storage in the underground CMP infiltration systems and the size of the outflow orifice and weir structures[6] are intended to restrict peak flows in the proposed condition to levels equal to or less than the allowable flows defined for each Drainage Management Area. Based on the basin routing for the 25-year storm event, the highest routed (mitigated) on-site outflows from the underground detention system result in proposed flows that are less than or equal to existing flows.

Additionally, development in accordance with the proposed project must be operated in accordance with the MS4 Permit (Order No. R4-2021-0105, NPDES No. CAS004004) and Chapter 8.28 of the Irwindale Municipal Code. Therefore, impacts would **be less than significant**.

Significance without Mitigation: Less than significant.

CUMULATIVE IMPACT ANALYSIS

The geographic context for the cumulative impact analysis on stormwater drainage is the Lower San Gabriel watershed.

Would the project have a cumulative effect related to stormwater drainage systems?

Cumulative projects in the Lower San Gabriel watershed could increase impervious areas and thus increase local runoff volumes at those project sites. However, cumulative projects in the region would be required to capture and infiltrate runoff in accordance with the NPDES MS4 permit. Compliance with the MS4 permit would ensure projects retain a specified volume of stormwater runoff from a design storm event on-site, and the County's LID Standards Manual provides guidance on how projects can meet these on-site retention requirements using stormwater quality control measures. Projects in the region would also be required to limit post-development runoff discharges per the requirements of Los Angeles County Hydrology Manual and the Los Angeles County Hydraulic Design Manual. These measures minimize the potential for exceeding the capacity of existing or planned stormwater drainage systems. Therefore, cumulative impacts to stormwater drainage systems would be **less than significant.**

Significance with Mitigation: Less than significant.

6 An outflow orifice is a precisely sized opening (circular or rectangular) that controls the slow release of stormwater from a detention basin, primarily managing frequent, small storm events and helping the basin drain completely after a storm. A weir structure is an engineered barrier or dam over which water flows, designed to manage larger, less frequent storm flows and provide an emergency overflow path when the water level exceeds the capacity of the lower outlets.

3.16.4 Solid Waste

REGULATORY FRAMEWORK

Federal, state, and local laws, regulations, plans, or guidelines related to solid waste that are applicable to the proposed project are summarized below.

Federal

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act of 1976 (Title 40 of the Code of Federal Regulations), Part 258, contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design (liners, leachate collection, run-off control, etc.), groundwater monitoring, and closure of landfills.

State

Assembly Bill 939

Assembly Bill (AB) 939 (California Integrated Solid Waste Management Act of 1989; Public Resources Code Section 40050 et seq.) established an integrated waste-management system that focused on source reduction, recycling, composting, and land disposal of waste. AB 939 required every California city and county to divert 50 percent of its waste from landfills by the year 2000. Compliance with AB 939 is measured in part by comparing solid waste disposal rates for a jurisdiction with target disposal rates; actual rates at or below target rates are consistent with AB 939. AB 939 also requires California counties to show 15 years of disposal capacity for all jurisdictions in the county or show a plan to transform or divert its waste. Additionally, signed in 2002, SB 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills. The model ordinance was adopted by CalRecycle on March 16, 2004

Assembly Bill 341

AB 341 (Chapter 476, Statutes of 2011) increased the statewide solid waste diversion goal to 75 percent by 2020. AB 341, which was passed in 2011 and took effect July 1, 2012, mandates recycling for businesses producing four or more cubic yards of solid waste per week or multi-family residential dwellings of five or more units. Under AB 341, businesses and multifamily

dwellings of five or more units must separate recyclables from trash and either subscribe to recycling services, self-haul their recyclables, or contract with a permitted private recycler.

Assembly Bill 1327

The California Solid Waste Reuse and the Recycling Access Act of 1991 (AB 1327) is codified in Public Resources Code Sections 42900 to 42911. As amended, AB 1327 requires each local jurisdiction to adopt an ordinance requiring commercial, industrial, institutional, and residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. The size of these storage areas is determined by the appropriate jurisdictions' ordinance.

Organic Waste Methane Emissions Reduction Act (Senate Bill 1383)

In September 2016, SB 1383 was signed into law establishing methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants in various sectors of California's economy. SB 1383 establishes goals to reduce the landfill disposal of organics by achieving a 50 percent reduction in the 2014 level of statewide disposal of organic waste by 2020 and a 75 percent reduction by 2025. SB 1383 grants CalRecycle the regulatory authority to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food must be recovered for human consumption by 2025.

As of January 2022, SB 1383 affects all generators of organic waste, including businesses, institutions, and non-profit organizations; multi-family property owners or managers of buildings with five or more units; residents in single-family homes, apartments, and condos; public and private schools; and government agencies, such as State agencies and park districts. All generators must be provided with curbside organics service.

Assembly Bill 1826

Assembly Bill 1826 currently requires businesses and multifamily complexes that generate two or more cubic yards of solid waste, recycling, and organic waste combined per week to start recycling organic waste. Single-family dwellings are not required to have a food waste diversion program. This requirement was instated by CalRecycle to meet the target set by SB 1383.

California Solid Waste Reuse and Recycling Access Act

The California Solid Waste Reuse and Recycling Access Act requires development projects to set aside areas for collecting and loading recyclable materials. This act required CalRecycle to develop a model ordinance for adoption by any local agency to provide adequate areas for the collection and loading of recyclable materials as part of development projects. Local agencies

are required to adopt a model or an ordinance of their own that establishes standards, including space allocation, for the collection and loading of recyclable materials.

California Green Building Standards Code

Sections 4.408 and 5.408 of CALGreen pertain to construction waste reduction disposal and recycling. The requirements mandate that, in the absence of a more stringent local ordinance, a minimum of 65 percent of the nonhazardous construction and demolition waste generated during most new construction must be recycled or salvaged. CALGreen requires developers to prepare and submit a waste management plan for on-site sorting of construction debris, which is submitted to the City for approval, or use a waste management company with verifiable documentation. The waste management plan must:

- Identify the materials to be diverted from disposal by recycling, reuse on the project, or salvage for future use or sale.
- Specify if materials will be sorted on-site or mixed for transportation to a diversion facility.
- Identify the diversion facility where the material collected can be taken.
- Identify construction methods employed to reduce the amount of waste generated.
- Specify that the amount of materials diverted shall be calculated by weight or volume, but not by both.

The California Building Standards Commission adopts updates to CALGreen as part of Title 24 of the California Code of Regulations.

Regional

County of Los Angeles Countywide Integrated Waste Management Plan

The County Integrated Waste Management Plan comprises the solid waste reduction planning documents produced by the County and its cities. To assess compliance with AB 939, a Disposal Reporting System was established to measure the amount of disposal from each jurisdiction. Comparing current disposal rates to base year solid waste generation determines whether each jurisdiction complies with the diversion mandate. Additionally, the siting element is a long-term planning document that describes how the County and the cities in the county plan to manage the disposal of their solid waste for a 15-year planning period. The siting element contains goals and policies on a variety of solid waste management issues.

Local

City of Irwindale Municipal Code

Chapter 8.20, Solid Waste Collection and Salvage of Recyclable Material, regulates the collection of solid waste from commercial/industrial and residential premises and encourages recycling of solid waste materials. As part of Section 8.20.312, Construction and demolition debris-recycling program: Waste Diversion Plan, and in conjunction with the California Green Building Code, developers and contractors must submit a Waste Diversion Plan for grading and construction.

Chapter 15.10, Green Building Standards Code, adopts by reference the most current CALGreen Code. CALGreen applies to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure in California, unless otherwise indicated in the code.

EXISTING CONDITIONS

Solid Waste Collection

The City has an exclusive franchise agreement with Athens Services to provide a two-bin collection system, which requires the businesses to separate their organic waste (food, green waste) into a green bin and mixed waste (trash and recyclables) into a black bin. Separate recycling bins are also available for the businesses. Athens Services currently transports all of Irwindale's commercial waste to a materials recovery facility, where organic waste and recyclable materials are sorted and diverted from local landfills.

Solid Waste Disposal

In 2019, approximately 90 percent of the municipal solid waste landfilled from the City was disposed of at the Mid-Valley Sanitary Landfill, San Timoteo Sanitary Landfill, Azusa Land Reclamation Landfill, Olinda Alpha Landfill, and El Sobrante Landfill (CalRecycle 2025a). Waste Management Inc. (WM) owns and operates the Azusa Land Reclamation Landfill and the El Sobrante Landfill. WM stated that the Azusa Land Reclamation Landfill does not accept municipal solid waste (Kingsbury 2023). The County of San Bernardino owns and operates the Mid-Valley Sanitary Landfill and the San Timoteo Sanitary Landfill.

Capacity and disposal data for the El Sobrante Landfill and Olinda Alpha Landfill are shown in Table 3.16-4. As shown in the table, the two landfills have a remaining disposal capacity of approximately 138 million tons and a residual daily throughput of 7,530 tons per day. The El Sobrante Landfill has a disposal capacity beyond the 15-year horizon, as required by AB 939.

Table 3.16-4 Landfill Capacity

Landfill	Current Remaining Capacity (tons)[1]	Maximum Daily Disposal Capacity (tons/day)	Average Daily Disposal, 2024 (tons/day)[2]	Residual Daily Disposal Capacity (tons/day)	Estimated Close Date
El Sobrante Landfill	121,083,583	16,054	10,858	5,196	2051
Olinda Alpha Landfill	17,500,000	8,000	5,666	2,334	2036
Total	138,583,583	24,054	16,524	7,530	-

Sources: ORCR 2016; CalRecycle 2025b, 2025c, 2025d.

1 A volume-to-weight conversion rate of 2,000 lbs/cubic yard (1 ton/cubic yard) for "Compacted–MSW Large Landfill with Best Management Practices" is used according to U.S. Environmental Protection Agency Office of Resource Conservation and Recovery's 2016 volume-to-weight conversion factors.

2 Average daily disposal is calculated based on 300 operating days per year.

STANDARDS FOR ANALYSIS

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to public services if it would:

f) 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.

g) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

APPLICABLE SPECIFIC PLAN DEVELOPMENT STANDARDS AND DESIGN GUIDELINES

Development Standards

The Specific Plan does not outline specific development standards for solid waste in Chapter 3, Development Standards. However, Chapter 2, Section 2.5.2, Solid Waste, explains that the entire Specific Plan area would be serviced in accordance with citywide services and modified as needed. The City is responsible for obtaining a service agreement with an operator to provide mixed waste collection and organic recycling services.

Design Guidelines

The Specific Plan's design guidelines are developed primarily between two elements—architecture and landscape. The guidelines encourage sustainable design solutions that reduce energy consumption, use water efficiently, and minimize waste. The guidelines also aim to create simple building designs that result in efficient use of materials and resources while maintaining a high level of design integrity.

PROJECT IMPACT ANALYSIS

f) 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?

Construction

The Specific Plan area includes two former quarries in the northwestern and southeastern portions of the Specific Plan area. The northwestern quarry is approximately 52 acres at the surface grade and would require approximately 6 million cubic yards to fill. The southeastern quarry is approximately 25 acres at the surface grade and would require approximately 2 million cubic yards to fill.

The proposed project includes filling and rough grading both pits pursuant to the Inert Debris Engineering Fill Operation Plan (IDEFO) (see Appendix C). Fill operations would include importing fill material that would consist of clean dirt, brick, rock, fully cured asphaltic material, concrete, and other inert materials (e.g., glass). Imported fill would be inspected in accordance with the Fill Operation Plan. Following initial inspection, loads would be directed to processing/placement areas based on the nature of the import. Trucks would be unloaded under the direction of the trained and supervised spreading area crews. Following spreading, the loads are inspected for non-compliant materials. Any suspect material would be staged into roll-off bins and exported for legal off-site disposal on a frequent basis. Rejected loads (excess vegetation, trash, etc.) that are not unloaded would be logged at the inspection station. License numbers of reject loads would be documented by the inspection station, and the truckers would not be allowed to offload their trucks.

An excavator (with grapple attachment) would recover rejected steel, which would then be placed in high-side end dumps for off-site recycling. The exception is steel (primarily rebar) that is obtained during processing of rebar-containing concrete. This material would be recycled subject to the price of recycled steel, availability of trucking, and other factors. The operation would remove rejected imports within 7 days from the date of receipt.

Construction of the proposed structures and infrastructure improvements associated with the proposed project would result in solid waste associated primarily with grading and grubbing activities, and the removal of organic and other materials potentially detrimental to soil compaction. Construction activities would also generate construction waste, including waste generated by construction employees. The proposed project would result in approximately 920 tons of material hauled away from the project site during construction (see Appendix C). As detailed in Table 3.16-4, the two landfills serving the city have a residual capacity of 138,583,583 tons. Therefore, the proposed project would be adequately served by these landfills.

The proposed project would be constructed in accordance with CALGreen, which requires recycling a minimum of 65 percent of the nonhazardous construction and demolition debris (by weight or volume). CALGreen also mandates the preparation of a solid waste management plan, which would be implemented for construction activities. A Waste Diversion Plan would also developed and implemented in accordance with Chapter 8.20 of the City's municipal code.

Therefore, fill operations, construction, and decommissioning associated with the proposed project would not generate solid waste in excess of state and local standards nor exceed the capacity of local infrastructure, and impacts from construction waste would be **less than significant**.

Operation

Operation of the proposed project is estimated to generate 188,052 pounds per day (ppd) of solid waste based on CalRecycle's standard waste generation rates, shown in Table 3.16-5.

Table 3.16-5 Estimated Solid Waste Generation

Land Use	Buildout (SF)	Solid Waste Generation Rate (lb/SF/day)[1]	Solid Waste Generation (ppd)
Warehouse	3,000,000 (maximum)	0.00625	187,500
Commercial	12,000 (maximum)	0.0460	552
Total	3,12,000	-	188,052

Source: CalRecycle 2019e.

Notes: ppd = pounds per day; SF = square feet; lb = pounds

1 The most conservative solid waste generation rate for industrial, manufacturing, and warehouse use has been used.

As detailed in Table 3.16-4, the two landfills serving the city have a residual daily capacity of 7,530 tons per day (or 15.06 million ppd). The proposed project's estimated 188,052 ppd

equates to 1.25 percent of available capacity of the two landfills serving the project area; therefore, the proposed project would be adequately served by these landfills.

Solid waste facilities would be able to accommodate project-generated solid waste. The proposed project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

g) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Construction and operation phases of the proposed project would be implemented in accordance with all applicable federal, state, and local laws and regulations governing solid waste disposal. For example, the proposed project would comply with the following federal, state, and local laws and regulations that govern solid waste disposal:

- The Resource Conservation and Recovery Act of 1976 and the Solid Waste Disposal Act of 1965, which govern solid waste disposal.
- AB 939 (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.), which required diversion of 50 percent of waste from landfills and required each county to provide landfill capacity for a 15-year period.
- AB 1327 (California Solid Waste Reuse and Recycling Access Act of 1991), which requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.
- AB 1826, which mandates that businesses that generate two or more cubic yards of solid waste, recycling, and organic waste combined per week to start recycling organic waste.
- AB 341, which mandates separating recyclables from trash and either subscribing to recycling services, self-hauling their recyclables, or contracting with a permitted private recycler.
- SB 1383 established goals to reduce the landfill disposal of organics by achieving a 50 percent reduction in the 2014 level of statewide disposal of organic waste by 2020 and a 75 percent reduction by 2025. SB 1383 grants CalRecycle the regulatory authority to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food must be recovered for human consumption by 2025.

- Chapter 8.20 and Chapter 5.10 of the City's Municipal Code, which govern solid waste collection and salvage of recyclable material and adopt the California Green Building Standards Code by reference.

In addition, as shown in Impact 3.16 (f) above, the proposed project's solid waste can be adequately accommodated in landfills serving the project area. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

CUMULATIVE IMPACT ANALYSIS

The area considered for cumulative impacts is the area serviced by the El Sobrante and Olinda Alpha landfills.

Would the project have a cumulative effect related to utilities and service systems?

The El Sobrante and Olinda Alpha landfills have a total remaining disposal capacity of approximately 139 million tons. The El Sobrante landfill has a disposal capacity beyond the 15-year horizon, as required by AB 939 to account for future demand and ensure adequate capacity. Additionally, all cumulative projects would divert construction waste per CALGreen requirements and abide by the requirements of SB 1383 and AB 341 as applicable. Thus, there is sufficient landfill capacity in the region for the cumulative increase in solid waste disposal and cumulative impacts would **be less than significant**.

Significance without Mitigation: Less than significant.

3.16.5 Other Utilities

REGULATORY FRAMEWORK

The regulatory framework for electricity and natural gas facilities can be found in Section 3.5, *Energy*. There are no federal, State, or local laws, regulations, plans, or guidelines related to telecommunications that are applicable to the proposed project.

EXISTING CONDITIONS

The existing conditions for electricity and natural gas facilities can be found in Section 3.5, *Energy*. Communication services are offered regionally by franchised telecommunications providers such as Charter Communications, Frontier Communications, AT&T, and Spectrum.

STANDARDS FOR ANALYSIS

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to public services if it would:

h) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

APPLICABLE SPECIFIC PLAN DEVELOPMENT STANDARDS AND DESIGN GUIDELINES

Development Standards

The Specific Plan does not specify development standards for electricity, gas, and communication systems (dry utilities) in Chapter 3, Development Standards. However, Chapter 2, Section 2.4.4, Dry Utilities, states that gas services to the Specific Plan area would be provided by the Southern California Gas Company if needed. Electrical service would be supplied by Southern California Edison (SCE).

Design Guidelines

The Specific Plan's design guidelines are developed primarily between two elements—architecture and landscape. The guidelines encourage sustainable design solutions that reduce energy consumption, use water efficiently, and minimize waste.

PROJECT IMPACT ANALYSIS

h) Would the project require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

SCE provides electricity to the Specific Plan area and maintains aboveground power lines. Existing aboveground electrical lines are on the western side of Irwindale Avenue and along the northern perimeter of the Specific Plan area.

Gas services to the Specific Plan area would be provided by the SoCalGas, if required.

All dry utilities, per Section 2.4.4, Dry Utilities, in the Specific Plan, would be installed underground. Within the Specific Plan area, the final locations of lateral connections, transformers, switches, pull boxes, and dry utility manholes would be determined at the time of

building permit submittal in each planning area in conjunction with development implementation.

Electricity

Construction

Construction activities would require electricity use to power the construction equipment. The electricity use during construction would vary during different phases of construction; most of the construction equipment during grading would be gas or diesel powered, and later construction phases would require electricity-powered equipment such as nail guns for interior construction and sprayers for architectural coatings. Overall, the use of electricity would be temporary and would fluctuate according to the phase of construction. It is anticipated that most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities. Electrical energy would be available for use during construction from the existing power lines and connections available adjacent to the Specific Plan area, potentially including temporary power poles. Therefore, impacts would be **less than significant**.

Operation

Electricity service to the Specific Plan area would be provided by SCE through connections to existing off-site electrical lines. Implementation of the proposed project would result in a net increase in electricity use of 16,699,027 kilowatt-hours per year, or 16 GWh/year (see Section 3.5, *Energy*, Table 3.5-3, *Operation-Related Electricity Consumption*). While the proposed project would increase energy demand at the site compared to existing conditions, all development would be required to comply with the latest applicable Building Energy Efficiency Standards and CALGreen.

Total electricity consumption in SCE's service area is forecast to increase by approximately 18,080 GWh between 2025 and 2035 (CEC 2025). SCE forecasts that it will have sufficient electricity supplies to meet demands in its service area, and the proposed project's net increase in electricity demand accounts for less than 1 percent of SCE's total demand. Therefore, project development would not require SCE to obtain new or expanded electricity supplies; impacts would **be less than significant.**

Significance without Mitigation: Less than significant.

Natural Gas

The proposed project's operation would generate an estimated net increase in natural gas demand of 60,951,850 kBTU per year, or 609,518 therms per year (see Section 3.5, *Energy*, Table 3.5-4, *Operational-Related Electricity Consumption*). Total gas consumption in SoCalGas's

service area is forecast to increase by approximately 199 million therms between 2025 and 2035 (CEC 2023). The natural gas demand from the proposed project would represent less than 1 percent of the overall demand in SoCalGas's service area. Additionally, SoCalGas has issued a Will Serve Letter for the proposed project (see Appendix Q2).

The proposed project would not result in a substantial increase in natural gas demand, and SoCalGas would not need to expand its supply and transmission facilities in order to handle the demand generated by the proposed project. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

Telecommunications

Infrastructure supporting telecommunications services would be provided and installed on-site. Concealed wireless telecommunications facilities would be installed pursuant to the requirements of the Section 17.12.260 of the Irwindale Municipal Code. Installation of telecommunication infrastructure would result in physical impacts to the surface and subsurface of the project site. These impacts are part of the project's construction phase and are evaluated throughout this Draft EIR. Frontier Communications and Charter Communications would provide telecommunication service to the proposed project, and both have issued Will Serve Letters (see Appendix Q2). Therefore, no significant expansion or construction of the telecommunications network is anticipated, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

CUMULATIVE IMPACT ANALYSIS

The geographic context for the cumulative impact analysis for electricity and natural gas are the service areas for SCE and SoCalGas, respectively. The geographic context for the cumulative impact analysis for telecommunications is the service areas for Frontier Communications and Charter Communications.

Would the project have a cumulative effect related to dry utilities?

Like the proposed project, each cumulative project could increase electricity and natural gas demands. The California Energy Commission's electricity demand forecasts are based on climate zones; economic and demographic growth forecasts from Moody's Analytics, IHS Global Insight, and the California Department of Finance; forecast electricity rates; effects of reasonably foreseeable energy efficiency and energy conservation efforts; anticipated partial electrification of portions of the transportation sector, including increasing adoption of light-duty plug-in electric vehicles; demand response measures, such as electricity rates that increase during high-demand times of day; and effects of climate change (CEC 2016). Natural gas demand forecasts are based on economic outlook, California Public Utilities Commission–mandated energy

efficiency standards and programs, renewable electricity goals, and conservation savings linked to Advanced Metering Infrastructure. It is anticipated that electricity and natural gas demands by most other projects would be accounted for in the above-referenced demand forecasts. Future development would also install infrastructure supporting telecommunications services pursuant to the requirements of the Irwindale Municipal Code.

Given the already urbanized character of the City, new conveyance facilities would not significantly alter land use patterns to the extent that construction of new electrical, natural gas, or telecommunications facilities would be warranted. Additionally, other projects would be subject to independent CEQA review, including analysis of impacts to electricity, natural gas, and telecommunication facilities. Implementation of all feasible mitigation measures would be required for any significant impacts identified. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.16.6 References

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4. ALTERNATIVES TO THE PROPOSED PROJECT

4.1 PURPOSE AND SCOPE

The California Environmental Quality Act (CEQA) requires that an environmental impact report include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives" (CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the proposed project.

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternative's analysis in an EIR. Key provisions are:

- "[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (15126.6[b])
- "The specific alternative of 'no project' shall also be evaluated along with its impact." (15126.6[e][1])
- "The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." (15126.6[e][2])
- "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project." (15126.6[f])
- "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)" (15126.6[f][1]).

- "Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." (15126.6[f][2][A])
- "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." (15126.6[f][3])

For each project alternative, the analysis will:

- Describe the alternative.
- Analyze the impact of the alternative as compared to the proposed project.
- Identify the impacts of the project that would be avoided or lessened by the alternative.
- Assess whether the alternative would meet most of the basic project objectives.
- Evaluate the comparative merits of the alternative and the project.

According to Section 15126.6(d) of the CEQA Guidelines, "[i]f an alternative would cause…significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."

4.2 FACTORS CONSIDERED WHEN DEVELOPING ALTERNATIVES

This section describes the basis for determining the range of CEQA alternatives and identifies the specific alternatives that are analyzed in this Draft Environmental Impact Report (DEIR). The primary factors considered when determining feasible alternatives to the proposed project are the identified project objectives and the significant impacts that have been identified for the proposed project.

4.2.1 Project Objectives

Chapter 2, Section 2.5, *Statement of Project Objectives*, lists the objectives that have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts. The following objectives support the proposed project's underlying purpose of expanding industrial/commercial business opportunities in the City and make productive economic use of a reclaimed property that previously operated as a sand and gravel quarry:

- Create a comprehensive master plan for the re-use of a reclaimed sand and gravel quarry project site that complements operations at the adjacent Irwindale Brew Yard.

- Provide economic opportunities and job growth in the City of Irwindale by increasing the City's available range of industrial, commercial, and employment-generating uses.
- Provide a master-planned, job-producing development near the I-210 freeway to accommodate uses that benefit from access to the regional transportation system.
- Provide modern, economically efficient buildings that can accommodate industrial, manufacturing and assembly, warehouse distribution, logistics, and fulfillment center uses.
- Provide neighborhood-serving commercial uses to benefit employees and visitors of the on-site uses and commuters traveling along Irwindale Avenue.
- Ensure that infrastructure plans for water, sewer, drainage, and roads are adequately designed and maintained for the Specific Plan area.
- Provide guidelines and standards for architecture, walls, fencing, signage, lighting, and entry treatments to provide a well-defined identity for the Specific Plan development.

4.2.2 Significant Impacts

Apart from the No Project Alternative, alternatives to a project should be evaluated because of their ability to feasibly attain most of the basic objectives of the project and avoid or lessen the project's identified significant impacts.

SIGNIFICANT AND UNAVOIDABLE IMPACTS

The following impacts were found to be significant and unavoidable even with implementation of Mitigation Measures.

Air Quality

- **Impact AQ-1:** Impacts associated with regional construction emissions would result in inconsistency with the 2022 Air Quality Management Plan (AQMP).
- **Impact AQ-2:** Impacts associated with regional operation emissions would result in inconsistency with the 2022 AQMP.
- **Impact AQ-3:** Impacts associated with regional operation emissions due to the overlap of Phase I operations and Phase II construction would result in inconsistency with the 2022 AQMP.
- **Impact AQ-4:** Impacts associated with regional construction emissions would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment.

- **Impact AQ-5:** Impacts associated with regional operational emissions would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment.

Greenhouse Gas Emissions

- **Impact GHG-1:** The proposed project's construction and operation GHG emissions would exceed South Coast AQMD's numeric threshold of 3,000 MTCO2e/yr and would therefore have a significant impact on the environment.
- **Impact GHG-2:** The proposed project's construction and operation GHG emissions would exceed South Coast AQMD's numeric threshold and would therefore conflict with the 2022 CARB Scoping Plan.
- **Impact GHG-3:** The proposed project's construction and operation GHG emissions would exceed the numeric threshold of 3,000 MTCO2e/yr and would therefore result in a cumulative effect related to GHG emissions.

Transportation

- **Impact TRA-1:** The project-level VMT impact of the proposed project would be potentially significant and unavoidable since the projected VMT reductions for mitigation measures cannot be guaranteed.

LESS-THAN-SIGNIFICANT IMPACTS WITH MITIGATION

Specific impacts within the following categories were determined to be significant before mitigation, but were found to be less than significant with implementation of Mitigation Measures.

- Biological Resources
- Cultural Resources
- Geology and Soils
- Tribal Cultural Resources

4.3 ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines section 15126.6(c) requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. CEQA Guidelines section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. Following is a discussion of alternatives considered and rejected, along with the reasons that alternative was not included in the analysis.

4.3.1 Alternative Development Area

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR (CEQA Guidelines Section 15126.6[f][2][A]). Key factors in evaluating the feasibility of potential offsite locations for EIR project alternatives include:

- If it is in the same jurisdiction.
- Whether development as proposed would require a General Plan Amendment.
- Whether the project applicant could reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). (CEQA Guidelines Section 15126.6[f][1])

As shown in Table 3.0-1, *Cumulative Projects within Two Miles of the Proposed Project*; Figure 3.0-1, *City of Irwindale Cumulative Projects within Two Miles of the Proposed Project*; and Figure 3.0-2, *Cumulative Projects within Two Miles of the Proposed Project in Surrounding Jurisdictions*, the project area is characterized by high development activity. All six approved or pending projects within the City of Irwindale are, as with the proposed project, industrial warehousing developments. Limited opportunities for new projects remain in the City, and the applicant does not own or have options on other properties within the City of Irwindale area or surrounding area.

Moreover, the proposed project site's location is key to the project objectives identified above, including proximate access to Interstate 210 (I-210) and on- and off-ramps, as well as the proposed project's underlying objective of achieving the re-use of a reclaimed sand and gravel quarry that complements operations at the adjacent Irwindale Brew Yard.

For these reasons, an alternate project site was not evaluated as a feasible project alternative.

4.3.2 Alternative Land Use

The following alternative land uses for the project site were reviewed for their potential to reduce or eliminate the significant impacts associated with the project as proposed while attaining most of the project's basic objectives. Under the City's General Plan, the Specific Plan area is designated Industrial/Business Park, which provides for industrial and employment-generating uses, including manufacturing, logistics, warehousing, and related commercial activities.

- **Office.** According to a recent report regarding the economic viability of office real estate by CBRE Group, office vacancy rates continue to rise in the Greater Los Angeles Region, reaching 25.1 percent in the 4th quarter of 2025, driven by 1.4 million square feet of negative net absorption.[1] The availability rate for the same period was 29.6 percent (CBRE 2026b).[2] The proposed project includes 12,000 square feet of commercial use, which permits administration, medical, and professional office, and 40,000 square feet of office space that serves the industrial/warehouse portion of the Specific Plan area. With limited market demand for office space, an all-office space alternative or substantial increase in office space use, would not be economically viable, and this alternative was rejected for further analysis.

- **Retail.** According to the 2026 US Retail Estate Market Outlook for the Greater Los Angeles Region, it is projected that in 2026 investors will prioritize second-generation retail space and upscale redevelopment over new construction and construction costs for new retail centers will rise due to competing residential construction demand. Additionally, consolidations among big-box retailers have resulted in increased retail space vacancies (CBRE 2026a). The proposed project already includes 12,000 square feet of commercial use which permits retail use. Since the demand for retail space is low, an all-retail alternative or an alternative with a substantial increase in retail uses, would not be economically viable, and this alternative was rejected for further analysis.

- **Housing**. The City of Irwindale was given a total Regional Housing Needs Allocation (RHNA) of 119 dwelling units for the sixth cycle RHNA projection period, which starts on June 30, 2021, and ends on August 31, 2029. The City's 2021-2029 Housing Element demonstrates that the City has sites to accommodate the City's RHNA, including housing at all income levels. The project site is not included on the list of sites identified in the Housing Element as necessary to accommodate the City's RHNA allocation. Through housing production since the beginning of the RHNA projection period (July 1, 2021), available lots for single-family residential development, anticipated production of accessory dwelling units, and capacity identified on candidate sites for rezoning to accommodate future residential development, Irwindale can fully accommodate its sixth Cycle RHNA and potentially provide an overall buffer of 112 percent. Additionally, the City specifically screened for housing sites that are between 0.5 and 10 acres since sites of this size are more desirable for lower income housing needs (Irwindale 2025). Therefore, the City does not require additional sites,

1 Negative net absorption occurs when the total amount of space vacated by tenants exceeds the amount of new space leased during a specific period.
2 The availability rate is the total percentage of space in a building or market that is currently being marketed for lease, including space that is vacant and space that is still occupied but will become vacant soon.

especially sites as large as the proposed project site, for housing, and a housing alternative was rejected for further analysis.

- **Mixed Use.** As noted above there is limited market demand for retail and office use in the Greater Los Angeles Region and the City has ample sites to accommodate its 2021-2029 RHNA. Additionally, the City's 2021-2029 Housing Element includes a program for the completion of the Arrow Highway Specific Plan (AWSP). The AWSP would include new mixed-use zoning along both sides of Arrow Highway between Vincent Avenue and Azusa Canyon Road, an area the City wants to establish as a hub for mixed-use development. Therefore, a mixed-use alternative was rejected for further analysis.

4.3.3 Existing General Plan

Under the Existing General Plan alternative, the site would be developed consistent with the existing land use designation for the Specific Plan area, Industrial/Business Park. The Industrial/Business Park designation provides for industrial and employment-generating uses, including manufacturing, logistics, warehousing, and related commercial activities. The Industrial/Business Park allows a maximum floor to area ratio (FAR) of 1.0 (Irwindale 2008). The site is zoned M-2 (Heavy Industrial) for which the zoning ordinance describes a large variety of different allowed manufacturing-type uses. There are no specified height limits established for the Industrial/Business Park land use designation; however, the height limits for the M-2 zone are 50 feet (60 feet if abutting the freeway), and 40 feet if the parcel is within 250 feet of a Residential Zoned Property.

With an FAR of 1.0, the Industrial/Business Park land use designation would allow over 6.58 M square feet (SF) of industrial and employment-generating uses, on the approximately 151-acre site—more than double the 3.0 M SF that would be developed pursuant to the Brew Yard Specific Plan. Moreover, the existing General Plan would not limit building heights in comparison to the proposed project's 70-foot maximum and 45-foot maximum for the commercial area.

Although the uses under the proposed project would be allowed under the Existing General Plan alternative, this alternative would not require a Specific Plan and would not offer many of the advantages of a Specific Plan. The Specific Plan establishes customized land use regulations and design standards that would supersede the zoning for the project site. It also creates predictable development phases and requirements by phase (infrastructure, etc.). Under the Specific Plan there is an integrated circulation plan and utility master planning. A Development Agreement associated with the Specific Plan entitlement would further define required improvements and funding responsibilities.

Development under the Existing General Plan alternative would also provide less certainty with respect to potential land uses and development phasing. Numerous different uses are

permitted under the site's existing M-2 zoning, whereas the Brew Yard Specific Plan limits permitted uses to those shown in Table 2-5, *Permitted, Conditional, and Ancillary Uses*, of this DEIR.

Due to the increased land use intensity that could be developed under the Existing General Plan alternative, an increase in building square footage could result in increased environmental impacts, including air quality pollutants and greenhouse gases. Depending on the ultimate land uses, VMT/service population may be similar as the proposed project, but mitigation to reduce vehicle trips would be more difficult to coordinate and perhaps less effective. Therefore, this alternative would have a greater impact on air quality and GHG, and potentially similar impacts for transportation. This alternative would not be expected to reduce the significant impacts associated with the proposed project.

Based on the employee generation factors used to analyze the proposed project (see Chapter 5, *Other CEQA Considerations*), the Existing General Plan alternative could generate up to 5,254 employees (1,252 SF/emp). This total is not within the SCAG 2035 employee projection for the City, which would accommodate a total of 4,472 employees beyond the 2023 employee estimate. Although an increase in jobs associated with this alternative would increase city revenue and result in more funds for infrastructure improvements, the job market within the City may not be able to accommodate the increase number of jobs associated with this alternative. Population and Housing impacts, therefore, could result in an additional significant, unavoidable project impact.

4.3.4 Lease of the Northwest Pit by the Los Angeles County Department of Public Works

In the County of Los Angeles Public Works Department (LACDPW) response to the proposed project's Notice of Preparation (letter dated March 21, 2024, see Appendix A2) they requested that the EIR evaluate an alternative to the proposed project which includes LACPW filling the Miller pit (southeast quarry) with sediment from Los Angeles County Flood Control District facilities in exchange for a permanent or long-term lease on the northwest pit for their use as a flood facility sediment disposal site. Sediment from dams and flood control channels are different than engineered fill and consist primarily of mud that is not suitable for load-bearing structures, roads, and underground infrastructure. Therefore, filling the southeast pit with these sediments would preclude the proposed project's industrial park uses on that portion of the site (approximately 225 acres). LACDPW's proposal would also preclude development of the northwest pit area, at least 52 acres. Under this alternative, the applicant would be unable to develop approximately 77 acres (at a minimum) of the Specific Plan area. The proposed project includes industrial uses on 143.9 acres, and this alternative would reduce that area by 50 percent. Therefore, this alternative was rejected for further analysis.

4.4 ALTERNATIVES SELECTED FOR ANALYSIS

The following alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the objectives of the proposed project and that may avoid or substantially lessen any of the significant impacts of the proposed project. These alternatives are more fully described in Table 4-1, *Alternatives Description and Statistical Comparison*, and analyzed in the following sections.

- **No Project/No Development**: Under this alternative, implementation of the Brew Yard Inert Debris Engineered Fill (IDEFO) Operation Plan would not be implemented and the proposed project would not be developed. The large expanses of disturbed and paved land, rail corridors, utility infrastructure associated with historic industrial and logistics-related uses, and the two former quarry pits would remain on the project site (see Figure 2-3, *Project Site Boundary/Aerial*).
- **Reduced Intensity Alternative**: This alternative includes the same land uses as the proposed project but assumes that the industrial/warehousing square footage is reduced sufficiently to eliminate the significant operational air quality impact of the proposed project. It would accommodate up to 655,000 square feet (SF) of warehousing and industrial use (an approximate 78 percent reduction), and 12,000 SF of commercial uses. Additionally, this alternative assumes that the northwest pit would not be filled to eliminate the significant construction air quality impact. The northwest pit would be fenced off and access to the pit would be prohibited.

- **Importing Fill by Rail Alternative:** This alternative includes filling the two former quarries on the project site. The northwestern quarry would require approximately 6 million cubic yards to fill, and the southeastern quarry would require approximately 2 million cubic yards to fill. No export of materials is anticipated during the pit-filling process. Filling activities would begin in the southeast pit with transfer of approximately 2 million cubic yards of material from the northwest pit to the southeast pit. Filling of the northwest pit would begin concurrently with filling of the southeast pit and require approximately 8 million cubic yards of material. Unlike the southeast pit, fill material for the northwest pit would be imported from off-site locations throughout Los Angeles County. For the proposed project, all fill material was assumed to be hauled exclusively by trucks requiring 1,004 haul trips over 1,120 working days.

  For the Importing Fill by Rail alternative, all imported soil would be hauled by rail. Rail-hauling activities were assumed to occur 365 days per year over a period of approximately 2.5 years, or approximately 913 total working days, with two trainloads of soil, or four 1-way train trips, delivered to the site per day. It is assumed that the trains would consist of one diesel locomotive and 50 railcars travelling at 35 miles per hour, and that each load would be hauled an average distance of 45 miles. Four- or six-axle line haul freight locomotives would be used.

The Burlington Northern Sante Fe Railway (BNSF) runs along the western portion of the Specific Plan area (see Figure 2-23, *Brew Yard Railroad Spurs*). Based on current operations, the BNSF along the western portion of the site averages 2 deliveries per week. The Union Pacific Railroad (UPRR) Azusa Industrial Lead runs along the eastern boundary of the project site and provides service to the brewery. The UPRR Azusa Industrial Lead that runs along the eastern boundary of the project site averages four deliveries to the brewery per week. Under this alternative, and the proposed project, the BNSF and UPRR deliveries would not cease. This alternative assumes that import material would be transported on-site via the BNSF tracks along the site's western boundary.

Once at the site, soil would be unloaded from the bottom dump rail cars onto a conveyor and would then be hauled on-site in a manner identical to the truck hauling scenario associated with the proposed project. There would be fugitive dust emissions associated with unloading the rail cars.

An EIR must identify an "environmentally superior" alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is required to identify an environmentally superior alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. The impacts found significant and unavoidable have been used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. For the proposed project, air quality, greenhouse gases, and transportation impacts were determined to be significant and unavoidable. Section 4.6 identifies the Environmentally Superior Alternative.

The proposed project is analyzed in detail in Chapter 3 of this DEIR.

Table 4-1 Alternatives Description and Statistical Comparison

Alternative Name	Land Use	Acres	Square Footage	Permitted Uses	Environmental Reason to Review
Proposed Project	Industrial/Business Park	143.9	3,000,000 (maximum)	As shown in Table 2-5 of this DEIR	Proposed Project
	Commercial	6.2	12,000 (maximum)		
	Total	**151.1**	**3,012,000**		
No Project/No Development	Vacant/Undeveloped	**151.1**	0	NA	Required by CEQA
Reduced Intensity Alternative	Industrial/Business Park	33.3	655,000	As shown in Table 2-5 of this DEIR	Potential to reduce significant impacts related to: o Air Quality (Construction and Operations) o Greenhouse Gas Emissions (Construction and Operations) o Transportation (VMT)
	Commercial	6.2	12,000		
	Vacant, open space, or landscaped	59.6	-		
	Northwest pit	52.0	-		
	Total	**151.1**	**667,000**		
Importing Fill by Rail Alternative	Industrial/Business Park	143.9	3,000,000 (maximum)	As shown in Table 2-5 of this DEIR	Potential to reduce significant impacts related to: o Air Quality (Construction) o Greenhouse Gas Emissions (Construction)
	Commercial	6.2	12,000 (maximum)		
	Total	**151.1**	**3,012,000**		

4.4.1 Statistical Impact Comparison

The statistical data comparing the proposed project to the Non Project/No Development alternative, the Reduced Intensity Alternative, and the Importing Fill by Rails Alternative are based on the following technical reports:

- Brew Yard Specific Plan Rail Hauling Alternative AQ, GHG, HRA & Energy Assessment, Urban Crossroads, May 5, 2026. (Appendix R1).
- Irwindale Brew Yard Specific Plan EIR Support, LLG Engineering, March 12, 2026. (Appendix R2)
- Noise Modeling Data, PlaceWorks, June 2026. (Appendix N)

Table 4-2, *Trip Generation Comparison: Operational Phase*, shows projected daily morning and evening peak hour trips for each alternative. Trip generation is based on rates obtained from the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*, 12th edition.

Table 4-3, *VMT Comparison: Operational Phase*, shows the projected daily vehicle miles traveled (VMT) for each alternative.

Table 4-2 Trip Generation Comparison: Operational Phase

	Daily (trips)	Morning Peak Hour (trips)	Evening Peak Hour (trips)
Proposed Project	14,845	1,656	2,238
No Project/No Development	0	0	0
Reduced Intensity Alternative	3,758	392	550
Importing Fill by Rail Alternative	14,845	1,656	2,238

Source: Urban CrossroadsLGC, 2026.

Notes: The forecast of vehicle trips includes a conversion of truck trips to passenger car equivalents based on the estimated number and size (i.e., 2-axle, 3-axle, 4 or more-axle) of truck trips.

Table 4-3 VMT Comparison – Operational Phase

	VMT/Employee	Truck VMT
Proposed Project	29.21	42,693
No Project/No Development	0	0
Reduced Intensity Alternative	28.14	9,337
Importing Fill by Rail Alternative	29.21	42,693

Source: Urban Crossroads LLGGC, 2026.

Notes: Daily VMT/EMP = Home-Based Work Daily VMT per Employee. The project site is situated within TAZ 22281100. The baseline HBW Daily VMT/EMP in the TAZ is 28.99. Since the Reduced Intensity Alternative is forecast to generate approximately 25.31% of the daily trips as the Proposed Project, the corresponding HBW Daily VMT/EMP for the Reduced Intensity Alternative is calculated to be 29.36 (i.e., 28.99 + 25.31% * [30.47-28.99] = 29.36).

This alternative would implement the same Specific Plan–required VMT reduction measures as the proposed project. With application of the 4.14 percent reduction in commute VMT (i.e., home-based trips to/from work) expected due to Specific Plan–required measures to: 1) promote employer's commute trip reduction program (equivalent to CAPCOA Measure T-7) and 2) to provide end-of-trip bicycle facilities (equivalent to CAPCOA Measure T-10), this alternative is calculated to generate 28.14 HBW VMT per employee (i.e., 29.36 VMT/Emp * (1 – 0.0414) = 28.14 VMT/Emp), which exceeds the threshold of 24.64 HBW VMT per employee.

Since the 19.89% reduction in commute VMT due to mitigation measures TRA-1 through TRA-5 cannot be guaranteed, this reduction is not shown in Table 4-3.

An assumed truck trip length of 39.9 miles provided by the South Coast Air Quality Management District (SCAQMD) was used in calculating Daily Truck VMT.

Table 4-4, *Comparison of Truck Hauling and Rail Hauling Emissions*, presents a comparison of criteria pollutant emissions that would result from hauling imported by truck versus train. The emissions associated with train hauling include fugitive dust emissions associated with unloading the rail cars.

Table 4-4 Comparison of Truck Hauling and Rail Hauling Emissions (Lbs/Day)

Scenario	ROG	NOX	CO	SO2	PM10	PM2.5
Truck Hauling	1.08	88.69	33.56	0.46	19.50	5.98
Rail Hauling	10.58	302.63	73.16	59.02	146.35	27.75
Difference	-9.49	-213.94	-39.60	-58.55	-126.85	-21.77
Percent Reduction	-89.7%	-70.7%	-54.1%	-99.2%	-86.7%	-78.4%

Source: Urban Crossroads, 2026.

Notes: Lbs/Day = pounds per day; ROG = Reactive Organic Compounds; NOX= Nitrogen Oxides; SO2 = Sulfur Dioxide; CO = Carbon Monoxide; PM10 = Coarse Suspended Particulate Matter; PM2.5 = Fine Suspended Particulate Matter.

Table 4-5, *Comparison of Truck Hauling and Rail Hauling DPM*, presents the Deisel Particulate Matter (DPM) emissions that would be associated with truck hauling and rail hauling.

Table 4-5 Comparison of Truck Hauling and Rail Hauling DPM (Lbs/Day)

Scenario	DPM
Truck Hauling	0.89
Rail Hauling	6.91
Difference	-6.02
Percent Reduction	-87.2%

Source: Urban Crossroads, 2026.

Notes: Lbs/Day = pounds per day.

Table 4-6, *Comparison of Truck Hauling and Rail Hauling Fuel Consumption*, presents a comparison of the fuel consumption that would result from truck hauling and train hauling.

Table 4-6 Comparison of Truck Hauling and Rail Hauling Energy Consumption

Scenario	Fuel Consumption (gal)
Truck Hauling	3,502,658
Rail Hauling	1,137,756.84
Difference	2,364,901.16

Source: Urban Crossroads, 2026.

Notes: gal = Gallons.

Table 4-7, *Comparison of Truck Hauling and Rail Hauling GHG Emissions*, presents a comparison of the GHG emissions that would result from truck hauling and train hauling.

Table 4-7 Comparison of Truck Hauling and Rail Hauling GHG Emissions (MT/Yr)

Scenario	Total CO2E
Truck Hauling	35,523.14
Rail Hauling	12,385.18
Difference	23,137.96

Source: Urban Crossroads 2026.

Notes: MT/Yr = Metric Ton per year; CO2e = Carbon-Dioxide Equivalent.

4.4.2 Environmental Impact Comparison

Table 4-8, *Project Alternatives: Environmental Impact Comparison,* assesses the relative impact for each project alternative in comparison to the proposed project. All of the environmental categories evaluated for the proposed project in this DEIR are compared. A determination is provided whether the impact is “less than” (LT), “greater than” (GT), or “similar to” (S) the respective environmental impact for the proposed project.

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
Aesthetics	Under the No Project/No Development alternative, no new development would occur on the project site. Under this alternative, the large expanses of disturbed and paved land, rail corridors, utility infrastructure associated with historic industrial and logistics-related uses, and the two former quarry pits would remain. The aesthetic improvements under the proposed project's Specific Plan, including landscaping and comprehensive Design Guidelines, would not occur (see Figure 2.11, *Architectural Design*, Figure 2-14, *Landscaped Roadway Elevations – Drive Aisles*, and Figure 2-15, *Typical Parking Lot Landscape and Building Entry*). In addition, off-site improvements to First Street and Irwindale Avenue would not occur (see Figure 2-13, *Landscaped Roadway Elevations – First Street and Irwindale Avenue*). In comparison to the proposed project, the site would remain vacant, unimproved, and potentially not maintained. Uncontrolled vegetation may result in unsightly weeds. The No Project/No Development alternative, therefore, would have a greater impact on aesthetics compared to the proposed project.	The Reduced Intensity Alternative would accommodate up to 667,000 square feet of building space. Compared to the proposed project, the Reduced Intensity Alternative includes less square footage for warehouse/industrial use and the same square footage of commercial use when compared to the proposed project. This alternative also assumed that the northwest pit would not be filled. Assuming a floor area ratio (FAR) similar to the proposed project, the warehouse/industrial use would require approximately 33 acres under this alternative. Since the northwest pit is 52 acres at the surface grade, up to 66 acres would remain vacant, landscaped, or open space (151–33–52=66) when compared to the proposed project. It is unlikely that the improvements included in the proposed project's Specific Plan could be amortized for the limited warehouse/industrial use under this alternative, including project site improvements, filling southeast pit, and public improvements (roadway and infrastructure tie-in improvements). Moreover, this alternative would have approximately 66 additional acres requiring improvements and maintenance, or landscaping. Aesthetic impacts under this	Since the proposed development for this alternative would be identical to the proposed project, impacts to aesthetics upon implementation would be the same as for the proposed project. Aesthetic impacts related to construction would be similar. Material haul by truck would be eliminated and two train trips/day would deliver material to the site. It is assumed that material delivered to the site by train would not be stockpiled but transferred quickly to fill the quarry pits.

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
		alternative, therefore, would be greater than the proposed project's aesthetic impacts.	
	GT	**GT**	**S**
Agriculture and Forestry	The Specific Plan area does not contain important farmland designated by the Department of Conservation, nor does the site contain existing agricultural uses. Additionally, it is not zoned for forest uses, nor does it contain forest land. Both the proposed project and No Project/No Development Alternative would have no impact on agricultural and forestry resources.	The Specific Plan area does not contain important farmland designated by the Department of Conservation, nor does the site contain existing agricultural uses. Additionally, it is not zoned for forest uses, nor does it contain forest land. Both the proposed project and Reduced Intensity Alternative would have no impact on agricultural and forestry resources.	The Specific Plan area does not contain important farmland designated by the Department of Conservation, nor does the site contain existing agricultural uses. Additionally, it is not zoned for forest uses, nor does it contain forest land. Both the proposed project and the Import Fill by Rail Alternative would have no impact on agricultural and forestry resources.
	S	**S**	**S**
Air Quality	Under the No Project/No Development Alternative, no new site development would occur. The project site would continue to exist as undeveloped land and would not generate any construction or operational criteria air pollutant emissions. The No Project/No Development alternative, therefore, would have a lesser impact compared to the proposed project.	The Reduced Intensity Alternative was defined by the maximum warehouse/industrial square footage that could be accommodated onsite and result in a less than significant operational Air Quality impact, and filling of just one pit, which would result in a less than significant construction Air Quality impact. The Reduced Intensity Alternative would result in the development of 655,000 square feet of warehouse/industrial use. The smaller-scale development would reduce trips from 14,845 trips per day to 3,785 trips per day, for a reduction of approximately 75 percent	Table 4-4 presents a comparison of criteria pollutant emissions that would result from truck hauling and train hauling. As shown in the table, truck hauling would result in lower pollutant emissions compared to soil hauling by rail. Additionally, Table 4-5 presents the DPM emissions that would be associated with truck hauling and rail hauling. As shown in Table 4-5, the truck hauling scenario would result in lower DPM emissions compared to the rail hauling scenario. As such, the truck hauling scenario would be expected to result

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
		compared to the proposed project. Furthermore, daily truck VMT would be reduced from 42,693 total miles travelled per day to 9,337 miles. Thus, criteria air pollutant emissions during construction and operation (which are primarily associated with truck emissions) would be reduced to a level below the South Coast AQMD thresholds for all criteria pollutants. Therefore, impacts under this alternative would be less than the proposed project, and development under this alternative would result in a less than significant impact overall.	in lower health risk for nearby receptors compared to the rail hauling scenario. Therefore, this alternative would increase air quality impacts when compared to the proposed project and the air quality impacts during construction and operations would remain significant and unavoidable.
	LT*	**LT***	**GT**
Biological Resources	Under the No Project/No Development Alternative, no new site development would occur. The proposed project would result in permanent impacts to Goodding's willow riparian woodland and forest and jurisdictional riparian habitat. This alternative would not impact these biological resources. Therefore, biological impacts under this alternative would be less than the proposed project.	The Reduced Intensity Alternative would substantially reduce the building square footage developed at the project site and would leave the northwest pit unfilled. Since the development footprint and ground disturbing activities would be reduced in comparison to the proposed project, potential impacts to candidate, sensitive, or special-status species may also be reduced. The reduced footprint of development could also result in a reduced impact to Goodding's willow riparian woodland and forest and jurisdictional riparian habitat since these areas, either within the northwest pit or in the	Since the proposed development for this alternative would be identical to the proposed project, impacts to biological resources for the operational phase would remain the same. However, during construction, this alternative would include four one-way train trips per day for 913 total working days. This would increase indirect impacts to biological resources from lighting and fugitive dust. Operations associated with the Import Fill by Rail Alternative would be 73 dBA Leq at 50 feet (see Appendix N for rail calculations). The 65 dBA noise contour for a single train

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
		northwest portion of the site, could be left undeveloped. Implementation of the biological resources mitigation would still be required to reduce impacts to less than significant.	event would extend 315 feet from the center of the tracks and the 60 dBA contour would extend approximately 995 feet. The Santa Fe Dam Recreation resource area is within 100 feet from the center of the tracks and would be within the 60 dBA noise contour of rail events. Hauling imported fill by rail would increase noise impacts to biological resources during construction when compared to the noise generated from haul trucks traveling on surface streets. However, warning rail horns, although intermittent, are very loud, up to 110 dBA Lmax at 100 feet. Therefore, this alternative would increase impacts to biological resources during the construction phase when compared to the proposed project.
	LT	**LT**	**GT**
Cultural Resources	Under this alternative, no demolition, grading, or redevelopment activities would occur and there would be no potential to encounter or disturb archaeological resources or demolish buildings of historic significance. The potential impact of buried resources under the proposed project would be reduced to less than significant with mitigation.	Under the Reduced Intensity Alternative, warehouse/industrial development would be limited to 655,000 square feet. Since the development footprint and ground disturbing activities would be reduced in comparison to the proposed project, potential impacts to cultural resources may also be reduced. Implementation of the archaeological	Since the proposed development for this alternative would be identical to the proposed project, operational impacts to cultural resources would remain the same. The construction footprint and extent of grading and excavation would be the same as the proposed project. Therefore, impacts to

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
	This alternative would avoid these additional ground-disturbing activities and would not require the implementation of Mitigation Measures. Potential archaeological impacts under this alternative would be less than the proposed project.	resources mitigation would still be required to reduce impacts to less than significant.	cultural resources during construction would remain the same.
	LT	**LT**	**S**
Energy	Under the No Project/No Development Alternative, no development would occur at the project site. Since there would be no construction or operating land uses at the site, there would be no energy consumption. Impacts to energy would be reduced in comparison to the proposed project.	The Reduced Intensity Alternative would reduce development at the site in comparison to the proposed project and energy consumption would be approximately proportional in the reduction of the overall building square footage (a reduction of 78 percent). Construction and operational energy impacts would be reduced. Therefore, impacts under this alternative would be less than the proposed project.	Table 4-6 shows that the rail hauling scenario would result in a 65 percent reduction in fuel consumption compared to the truck hauling scenario. Therefore, this alternative would decrease energy impacts when compared to the proposed project.
	LT	**LT**	**LT**
Geology and Soils	The No Project/No Development Alternative would not modify existing conditions for geologic and soil resources at the site. No grading would occur, and topography would not be altered. This alternative would not fill the two on-site quarry pits that could be potentially geologically unstable in the long run. Without approved geologic and drainage improvements, the undeveloped portion of the	The development footprint for Reduced Intensity Alternative would be substantially smaller than for the proposed project. This alternative would likely result in a large portion of the site remaining vacant, and only one of the two quarry pits being filled. Without approved geologic and drainage improvements, the undeveloped portion of the site might result in erosion, landslides, and slope stability issues.	Since the modification to the project site would be identical to the proposed project, impacts to geology and soils would also be the same as the proposed project.

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
	site might result in erosion, landslides, and slope stability issues. Since this alternative would not introduce new visitors to the project site that could be exposed to seismic ground shaking or other geologic hazards associated with the former pits, geologic and soils impacts would be reduced relative to the proposed project. Furthermore, under this alternative there is no potential to impact any existing paleontological resources. Overall, relative to the proposed project, geologic impacts would be different but similar in terms of overall significance.	This alternative would result in a reduced number of employees at the project site. Therefore, this alternative would reduce exposure of people to seismic ground shaking or other geologic hazards. Additionally, the reduced development footprint would reduce impacts associated with paleontological resources during grading activities. Overall, relative to the proposed project, geologic impacts would be different but similar in terms of overall significance.	
	S	**S**	**S**
Greenhouse Gas Emissions	Under the No Project/No Development Alternative, no new site development would occur. The vacant, undeveloped condition would continue and the site would not generate any construction or operational GHG emissions. Impacts would be reduced compared to the proposed project.	The Reduced Intensity Alternative would result in the development of 655,000 square feet of warehouse/industrial use, and 12,000 square feet of commercial uses. This alternative would result in smaller scale development on the project site and would also reduce trips from 14,845 trips per day to 3,758 trips per day for a reduction of 75 percent. Thus, GHG emissions during construction and operation would be reduced; however, they would remain above the South Coast AQMD brightline threshold of 3,000 $MTCO_2e$/year.	Table 4-7 presents a comparison of the GHG emissions that would result from truck hauling and train hauling. As shown in Table 4-7, the train hauling scenario would reduce GHG emissions compared to the truck hauling scenario. Therefore, this alternative would decrease GHG impacts when compared to the proposed project. However, while the rail alternative would result in reduced GHG emissions, the overall construction and operational GHG emissions would remain significant and unavoidable.

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
		Therefore, impacts under this alternative would be less than the proposed project but would remain significant and unavoidable.	Construction GHG emissions account for a small portion of the overall GHG emissions, and when amortized over 30 years, the GHG emission reduction associated with the rail alternative would amount to approximately 1.7 percent of the overall emissions.
	LT*	**LT**	**LT**
Hazards and Hazardous Materials	The No Project/No Development alternative would leave the site in its current condition. The site would remain vacant and no new land uses would be introduced. The potential hazards, including hazardous construction materials, and operational impacts would not be introduced. As with existing conditions, access to the site would be prohibited to limit potential accidents related to the pits. There would be no potential for the project site to interfere with an emergency response or evacuation plan. As with the proposed project, the No Project/No Development alternative would not result in a wildland fire impact. Potential hazard impacts would be reduced in comparison to the proposed project.	The substantial reduction in building square footage under the Reduced Intensity Alternative would result in a reduction in the potential hazardous materials onsite for construction and operation. As with existing conditions, access to the northwest site would be prohibited to limit potential accidents related to the pit. The less intense use and related traffic reduction would also reduce the potential to interfere with an emergency plan or emergency evacuation. Overall, hazards and hazardous materials impacts would be reduced in comparison to the proposed project. As with the proposed project, compliance with regulatory requirements would result in less than significant hazard impacts.	Since the proposed development for this alternative would be identical to the proposed project, impacts to hazards and hazardous materials during the operational phase would remain the same. However, this alternative would eliminate the need for 1,004 truck haul trips over 1,120 working days which would reduce the risk of interfering with emergency evacuation or the implementation of an emergency response plan. Therefore this alternative would reduce impacts when compared to the proposed project.
	LT	**LT**	**LT**

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
Hydrology and Water Quality	Baseline water quality conditions, groundwater supplies, drainage patterns, and runoff amounts would not change under the No Project/No Development alternative. This alternative would not introduce new sources of water pollutants to the project area. However, this alternative would not include improvements associated with new low-impact development, source control, site design, and treatment control best management practices (BMPs) to minimize runoff and water pollution. These BMPs are required measures that would occur under the proposed project and have a beneficial impact on stormwater quality. Overall, hydrology and water quality impacts would be slightly greater under this alternative but, as with the proposed project, would be less than significant.	As with the proposed project, the Reduced Intensity alternative would comply with the requirements of the Statewide Construction General Permit and the Porter-Cologne Water Quality Act as it relates to jurisdictional waters, and fill operations would require waste discharge requirements from the Los Angeles Regional Water Quality Control Board. Additionally, runoff during the operational phase would be regulated by the Los Angeles County MS4 permit. Peak flow rates would also be regulated and managed similar to the proposed project. However, since the northwest pit would not be filled, without approved geologic and drainage improvements, the undeveloped pit could result in erosion and new low-impact development, source control, site design, and treatment control best management practices (BMPs) to minimize runoff and water pollution that would be located in the northwest portion of the project site under the project would not be achieved. Therefore, hydrology and water quality impacts, would be greater than the proposed project.	Since the proposed development for this alternative would be identical to the proposed project, impacts to hydrology and water quality during the operational phase would remain the same. During construction, as with the proposed project, the Reduced Intensity alternative would comply with the requirements of the Statewide Construction General Permit and the Porter-Cologne Water Quality Act as it relates to jurisdictional waters, and fill operations would require waste discharge requirements from the Los Angeles Regional Water Quality Control Board. Therefore, impacts during constriction would also be similar to the proposed project.
	GT	**GT**	**S**

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
Land Use and Planning	The No Project/No Development alternative would leave the site in its current condition. The site would remain vacant and no new land uses would be introduced. It would not divide an established community. This alternative would not require a General Plan Amendment, but it would not achieve many of the General Plan's goals. It would not promote economic development—it would not provide jobs or create revenue. It would not promote property maintenance or infrastructure improvements. Additionally, it would not promote the goals of the current Regional Transportation Plan/Sustainable Communities Strategy. Overall, this impact would increase Land Use and Planning impacts in comparison to the proposed project.	As with the proposed project, the Reduced Intensity alternative would require a General Plan Amendment to allow for the adoption of a Specific Plan. The warehouse/industrial square footage is significantly reduced under this alternative (to achieve a less than significant Air Quality impact) and the economic viability of this alternative has not been established. It is possible that development impact fees, connection fees, and other funding mechanisms would be insufficient to fund the site and public improvements associated with the proposed project. It would create fewer jobs and revenue, and may be difficult to properly maintain the large portion of the site that would not be developed. Similarly, it would be more difficult for this alternative to achieve many of the goals of the General Plan. Overall, this project would result in greater Land Use and Planning impacts. Like the proposed project, however, with a General Plan Amendment, it is anticipated that these impacts would be less than significant.	Since the proposed development for this alternative would be identical to the proposed project, impacts to land use and planning would remain the same.
	GT	**GT**	**S**

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
Mineral Resources	Based on the *Mineral Resource Impact Evaluation Report* (Appendix M), including an economic feasibility analysis, it would not be economically viable to mine remaining mineral resources at the project site. The sensitivity analysis evaluated five scenarios including conservative assumptions. Nevertheless, in comparison to the proposed project, the No Project/No Development alternative would leave the site in its current condition and would not preclude future mining in the event conditions changed making mineral extraction at the site more viable. Therefore, the No Project/No Development alternative would reduce mineral resource impacts in comparison to the proposed project.	The *Mineral Resource Impact Evaluation* (Appendix M) for the project site concluded that a future mining operation at the site would not be economically viable. In comparison to the proposed project, this alternative would leave the northwest pit and additional acreage in its current condition. If conditions substantially changed from the assumptions in the economic feasibility study, this alternative would not preclude future mining in areas that remained undeveloped. Therefore, this alternative could potentially reduce mineral resource impacts in comparison to the proposed project.	Based on the *Mineral Resource Impact Evaluation* (Appendix M) for the project site, future mining at the site would not be economically viable. Since the Import Fill by Rail Alternative development and footprint would be the same as the proposed project, the impact to mineral resources would also be the same.
	LT	**LT**	**S**
Noise	The No Project/No Development alternative would leave the site in its current condition. The current deliveries via the BNSF and UPRR railways would continue, similar to the proposed project. The No Project/No Development alternative would not generate any new construction or operation-related noise. Therefore, impacts would be reduced relative to the proposed project.	The substantial reduction in warehouse/industrial square footage and filling only one of the two quarry pits on-site under this alternative would reduce both construction-related and operation-related noise. Transportation-generated noise during operations would also be substantially reduced since daily trips would be approximately ¼ of the proposed project trips (see Table 4-2).	Under the Import Fill by Rail Alternative, imported material would be transported onsite via the BNSF tracks along the site's western boundary. There would be two train events per day, or four one-way train trips per day, consisting of one diesel locomotive, and 50 railcars travelling at 35 miles per hour. Assuming one rail trip per hour, rail operations associated with the Import Fill by Rail Alternative would be 73 dBA Leq at 50 feet, see Appendix N for rail calculations. The

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
		As with the proposed project, noise impacts would be less than significant and not require Mitigation Measures.	65 dBA noise contour for a single train event would extend 315 feet from the center of the tracks and the 60 dBA contour would extend approximately 995 feet. The nearest section of San Gabriel River Trail is approximately 285 feet from the center of the tracks and the Santa Fe Dam Recreation resource area is within 100 feet. Only the portion of the San Gabriel River Trail closest to the project site would be within the 65 dBA noise contour; however, both the San Gabriel River Trail and Santa Fe Dam Recreation resource areas would be within the 60 dBA noise contour of rail events. In addition, there are existing noise sensitive receptors along the 40 to 50 miles of rail line the import fill would travel to the project site. Most of these sensitive receptors are shielded by existing sound walls or front the rail line at further setback distances. Under this alternative, existing sensitive receptors would be exposed to four new rail events per day for the duration of the import fill by rail phase of construction, approximately 2.5 years or up to 913 consecutive days, to complete 3,650 new rail trips. Hauling imported fill by rail would decrease noise impacts during construction when compared to the noise generated from haul trucks traveling on surface streets. Haul

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
			trucks would also expose more receptors than rail, and receptors adjacent to railways typically have existing noise walls mitigating rail noise. However, warning rail horns, although intermittent, are very loud, up to 110 dBA Lmax at 100 feet. Therefore, relative to the proposed project, construction noise impacts would be different but similar in terms of overall significance and noise sensitive receptor exposure to pit-filling activities as with haul trucks. Operational noise impacts would be the same for this alternative and the proposed project.
	LT	**LT**	**S**
Population and Housing	Under the No Project/No Development alternative the site would remain vacant. There would be no development or infrastructure improvements that could directly or indirectly induce unplanned population growth. Also, as with the proposed project, the No Project/No Development alternative would not displace housing. As with the proposed project, this alternative would not impact Population and Housing.	Based on the employee generation factors used to analyze the proposed project (see Chapter 5, *Impacts Determined Not to Be Significant*), the Reduced Intensity Project would generate approximately 565 employees (at 1,252 SF/emp). As with the proposed project, this alternative would not displace housing and the employee projection is within the SCAG projections. This alternative, would, therefore, not impact population and housing.	Since the proposed development for this alternative would be identical to the proposed project, impacts to population and housing would remain the same.
	S	**S**	**S**

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
Public Services	Under the No Project/No Development alternative the site would remain vacant. There would be no development or infrastructure improvements. This alternative would not generate population, employees, or visitors/customers that could affect public services. This alternative, therefore, would result in no impact to fire, police, school and library services. Similarly, it would not affect parks. This alternative would reduce impacts in comparison to the proposed project.	The demand for public services for the Reduced Intensity Alternative would be substantially reduced in comparison to the proposed project, and therefore would reduce the need for public services. Also, with the proposed project, this alternative would not directly generate an increased demand for school or library services. Therefore, this alternative would reduce impacts to public services when compared to the proposed project.	Since the proposed development for this alternative would be identical to the proposed project, impacts to public services would remain the same.
	LT	**LT**	**S**
Recreation	As with the proposed project, the No Project/No Development alternative would not generate demand for parks and recreational facilities, and this alternative would not include any recreational facilities that could impact the environment.	As with the proposed project, the Reduced Intensity alternative would not generate demand for parks and recreational facilities, and this alternative would not include any recreational facilities that could impact the environment. This alternative would not impact Recreation.	Since the proposed development for this alternative would be identical to the proposed project, impacts to recreation would remain the same.
	S	**S**	**S**
Transportation	The No Project/No Development alternative would not generate any vehicle trips and would not conflict with CEQA Guidelines Section 15064.3(b), which outlines the criteria to determine project-related transportation impacts. In accordance with the criteria, if a project has no impact on VMT, the impact is	As shown in Tables 4-2 and 4-3, this alternative would decrease total vehicle trips and VMT in comparison to the proposed project and result in a VMT per employee rate of 28.14. This alternative would implement the same Mitigation Measures as the proposed project; however, since the 19.98 percent reduction due	Since the proposed development for this alternative would be identical to the proposed project, impacts to transportation would remain the same. This alternative would have a significant but unavoidable impact to project lever VMT.

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
	considered less than significant. Implementation of this alternative would not increase roadway hazards and would not affect emergency access. It would not, however, provide the benefits of the roadway and access improvements of the proposed project. These improvements include new public sidewalks and a bike path installed as part of the Specific Plan along the west side of Irwindale Avenue and the north side of First Street. Overall, relative to the proposed project, transportation impacts would be different but since this alternative would eliminate the proposed project's significant and unavoidable VMT impact, this alternative would reduce transportation impacts when compared to the proposed project.	to mitigation measures TRA-1 through TRA-5 cannot be guaranteed, and the VMT threshold of significance is 24.64, the VMT impact associated with this alternative would remain significant and unavoidable. This alternative would comply with the City's and Los Angeles County Fire Departments' roadway design standards, and would not result in an increase in roadway hazards or inadequate emergency access. It is assumed that this alternative would include the same off-site roadway improvement as the proposed project. Therefore, this alternative would reduce the overall transportation impacts when compared to the proposed project but would not eliminate the significant and unavoidable project level VMT impact.	
	LT*	**LT**	**S**
Tribal Cultural Resources	No grading or ground disturbance would occur under the No Project/No Development alternative. There would be no potential for disturbance to any tribal cultural resource (TCR) if present in the project site or immediately adjacent area. This alternative would reduce potential impacts to TCRs in comparison to the proposed project, and no mitigation would be required.	Under the Reduced Intensity Alternative, much of the site would likely remain undisturbed. However, the construction of off-site utility improvements to serve the uses under this alternative would still be required. Since the development footprint and ground disturbing would be reduced in comparison to the proposed project, potential TCR impacts would also be reduced.	Since the proposed development for this alternative would be identical to the proposed project, impacts to tribal cultural resources would remain the same.

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
	LT	**LT**	**S**
Utilities and Service Systems	Due to the increase in land use intensity under the proposed project, upgrades to existing utilities and service systems would be required, such as upgrading water, wastewater, and storm drainpipes and fixtures to tie into off-site connections. These improvements would not occur under the No Project/No Development alternative. This alternative would also eliminate the ongoing increased need for services and resources (including water supply and treatment, wastewater treatment, natural gas, and electricity) in comparison to the proposed project. Therefore, the No Project/No Development alternative would reduce impacts to utility services compared to the proposed project.	This alternative would reduce building square footage by approximately 78 percent and would substantially reduce demand for utility and service systems. Therefore, impacts associated with this alternative would be reduced in comparison to the proposed project.	Since the proposed development for this alternative would be identical to the proposed project, impacts to utilities and service systems would remain the same.
	LT	**LT**	**S**
Wildfire	No grading or ground disturbance would occur under the No Project/No Development alternative. This alternative would not impair emergency response or evacuation response. The site is not within or adjacent to a high or very high Fire Hazard Safety Zone (FHSZ). Although located adjacent to the Santa Fe Dam Recreation Area, an area that could be indirectly exposed to wildfire hazards	Although the Reduced Intensity Alternative would entail a smaller development footprint, the exposure to potential wildland fires and required protection measures would be the same as the proposed project. The site is not within or adjacent to a high or very high Fire Hazard Safety Zone (FHSZ). Although located adjacent to the Santa Fe Dam Recreation Area, an area that could be indirectly exposed to	Since the proposed development for this alternative would be identical to the proposed project, impacts to wildfire would remain the same.

Table 4-8 Project Alternatives: Environmental Impact Comparison

Impact	No Project/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
	originating from nearby vegetated areas, the project site itself it is an urbanized area. Like the proposed project, there would be no potential wildfire impacts.	wildfire hazards originating from nearby vegetated areas, the project site itself is an urbanized area. This impact would be similar and less than significant upon compliance with regulatory requirements.	
	S	**S**	**S**

Notes: A threshold comparison marked with a "*" (e.g. LT*) indicates a significant and unavoidable impact associated with the proposed project that is no longer significant and unavoidable for the alternative being considered.

4.5 SUMMARY OF ALTERNATIVES EVALUATION

Table 4-9, *Comparison of Project Alternative Impacts*, compares the impact of each alternative to impacts of the proposed project. The impacts of each alternative are classified as having a reduced (↓), similar or comparable to (=), or greater (↑) level of impact when compared to the proposed project.

Table 4-9 Comparison of Project Alternative Impacts

Environmental Topic	Proposed Project	No Project Alternative/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
3.1 Aesthetics	LTS	↑	↑	=
3.2 Agriculture and Forestry Resources	NI	=	=	=
3.3 Air Quality	S/U	↓	↓	↑
3.4 Biological Resources	LTS/M	↓	↓	↑
3.5 Cultural Resources	LTS/M	↓	↓	=
3.6 Energy	LTS	↓	↓	↓
3.7 Geology and Soils	LTS/M	=	=	=
3.8 Greenhouse Gas Emissions	S/U	↓	↓	↓
3.9 Hazards and Hazardous Materials	LTS/M	↓	↓	↓
3.10 Hydrology and Water Quality	LTS	↑	↑	=
3.11 Land Use and Planning	LTS	↑	↑	=
3.12 Mineral Resources	LTS	↓	↓	=
3.13 Noise	LTS	↓	↓	=
3.14 Population and Housing	NI	=	=	=
3.15 Public Services	LTS	↓	↓	=
3.16 Recreation	NI	=	=	=
3.17 Transportation	S/U	↓	↓	=
3.18 Tribal Cultural Resources	LTS/M	↓	↓	=

Table 4-9 Comparison of Project Alternative Impacts

Environmental Topic	Proposed Project	No Project Alternative/No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
3.19 Utilities and Service Systems	LTS	↓	↓	=
3.20 Wildfire	LTS	=	=	=

Notes:

The impacts listed in this column represent the highest significance determination for each respective topic.

NI No Impact
LTS Less than Significant
LTS/M Less than Significant with Mitigation
S/U Significant and Unavoidable

↓ Reduced impact in comparison to the proposed project
= Similar impact in comparison to the proposed project
↑ Greater impact in comparison to the proposed project

Table 4-10, *Ability to Meet Proposed Project Objectives*, identifies the ability of each of the project alternatives to meet the proposed project's objectives.

Table 4-10 Ability to Meet Proposed Project Objectives

Objective	Proposed Project	No Project Alternative/ No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
Create a comprehensive master plan for the re-use of a reclaimed sand and gravel quarry project site that complements operations at the adjacent Irwindale Brew Yard.	Yes	No	Yes	Yes
Provide economic opportunities and job growth in the City of Irwindale by increasing the City's available range of industrial, commercial, and employment-generating uses.	Yes	No	Yes	Yes
Provide a master-planned, job-producing development near the I-210 freeway to accommodate uses that benefit from access to the regional transportation system.	Yes	No	Yes	Yes
Provide modern, economically efficient buildings that can accommodate industrial, manufacturing and assembly, warehouse	Yes	No	Yes	Yes

Table 4-10 Ability to Meet Proposed Project Objectives

Objective	Proposed Project	No Project Alternative/ No Development	Reduced Intensity Alternative	Import Fill by Rail Alternative
distribution, logistics, and fulfillment center uses.				
Provide neighborhood-serving commercial uses to benefit employees and visitors of the on-site uses and commuters traveling along Irwindale Avenue.	Yes	No	Yes	Yes
Ensure that infrastructure plans for water, sewer, drainage, and roads are adequately designed and maintained for the Specific Plan area.	Yes	No	Yes	Yes
Provide guidelines and standards for architecture, walls, fencing, signage, lighting, and entry treatments to provide a well-defined identity for the Specific Plan development.	Yes	No	Yes	Yes

4.5.1 Summary of No Project/No Development Alternative

This alternative would result in similar impacts to 5 impact categories, reduce or eliminate impacts to 12 environmental impacts, and increase impacts to 3 categories. Impacts would be similar for agricultural and forestry resources; geology and soils; population and housing; recreation; and wildfire. This alternative would reduce impacts for air quality; biological resources; cultural resources; energy; greenhouse gases; hazards and hazardous; mineral resources; noise; public services; transportation; tribal cultural resources; and utilities. The significant and unavoidable project-related impacts for air quality, greenhouse gas emissions and transportation would be eliminated under the No Project alternative. Because the beneficial improvements under the proposed project for aesthetics; hydrology and water quality; and land use and planning would not occur, the impacts to these categories would be considered greater than the proposed project. Overall, impacts under this alternative would be decreased in comparison to the proposed project.

The No Project/No Development alternative, as shown in Table 4-10, would not meet any of the proposed project's objectives.

4.5.2 Reduce Intensity Alternative

This alternative would result in similar impacts to 5 impact categories, reduce or eliminate impacts to 12 environmental impacts, and increase impacts to 3 categories. Impacts would be similar for agriculture and forestry resources; geology and soils; population and housing; recreation; and wildfire. This alternative would reduce impacts for air quality; biological resources; cultural resources; energy; greenhouse gas emissions; hazards and hazardous materials; mineral resources; noise; public service; transportation; tribal cultural resources; and utilities and service systems. The significant and unavoidable project-related impacts for air quality would be eliminated under this alternative. Because the beneficial improvements under the proposed project for aesthetics, hydrology and water quality, and land use and planning would not occur under this alternative, the impacts to these categories would be considered greater than the proposed project. Overall, impacts under this alternative would be reduced in comparison to the proposed project.

The Reduced Intensity alternative would include a substantial reduction in building square footage and the filling of just one pit when compared to the proposed project. It would offer uses that are identical to the proposed project, and it is assumed that a Specific Plan would be approved and implemented (Objectives Nos. 1, 2, 3, and 5). Along with City and service providers' requirements and review, the Specific Plan would ensure that infrastructure plans (water, sewer, drainage, and roads) are adequately designed (Objective No. 6). The Specific Plan would also provide detailed guidelines and standards for modern and economically efficient buildings, including architecture, walls, fencing, signage, lighting, and entry treatment requirements per the Specific Plan (Objectives No. 4 and 7).

Although this alternative could partially achieve the project objectives, it would fall short of the proposed project in fully meeting many of the objectives. For example, it would not as effectively generate economic opportunities or jobs. Moreover, since much of the site would remain vacant or underutilized, it would be challenging to design a successful, comprehensive, master plan. Moreover, it may or may not be economically viable. There is no certainty that the substantial reduction of the industrial/warehousing use under this alternative could generate the revenue required to finance the required infrastructure and amenities outlined in the Specific Plan.

4.5.3 Import Fill by Rail Alternative

This alternative would result in similar impacts to 15 impact categories, reduce impacts to 3 environmental impacts, and increase impacts to 2 categories. Impacts would be similar for aesthetics; agriculture and forestry resources; cultural resources; geology and soils; hydrology and water quality; land use and planning; mineral resources; noise; population and housing; public service; recreation; transportation; tribal cultural resources; utilities and service systems;

and wildfire. This alternative would reduce impacts for energy; greenhouse gas emissions; and hazards and hazardous materials. No significant and unavoidable project-related impacts would be eliminated under this alternative. This alternative would increase impacts to air quality and biological resources. Overall, impacts under this alternative would be slightly reduced in comparison to the proposed project.

The Import Fill by Rail alternative would offer uses that are identical to the proposed project, and the same level of development. It is assumed that a Specific Plan would be approved and implemented (Objectives Nos. 1, 2, 3, and 5). Along with City and service providers' requirements and review, the Specific Plan would ensure that infrastructure plans (water, sewer, drainage, and roads) are adequately designed (Objective No. 6). The Specific Plan would also provide detailed guidelines and standards for modern and economically efficient buildings including architecture, walls, fencing, signage, lighting, and entry treatment requirements per the Specific Plan (Objectives No. 4 and 7).

4.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be selected and the reasons for such a selection be disclosed. In cases where the "No Project" alternative is environmentally superior to the proposed project, the EIR shall also identify an environmentally superior alternative among the other alternatives.

In this case, the No Project/No Development alternative would be considered the environmentally superior alternative. As summarized in Table 4-9, the No Project/No Development alternative would reduce 12 environmental impacts and eliminate the significant, unavoidable impacts of the proposed project (air quality, greenhouse gases, and transportation). The Reduced Intensity alternative is identified as "environmentally superior" to the proposed project. This alternative would reduce 12 environmental impacts and only increase 3 impacts (aesthetics, hydrology and water quality, and land use and planning). It would eliminate the significant air quality impact of the proposed project.

4.7 REFERENCES

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Irwindale. 2025, July 22. 2021-2029 Housing Element. https://www.irwindaleca.gov/DocumentCenter/View/11947.

RailPros. March 21, 2024. Removal of Industrial Spur Tracks @ Brew Yard Development, Irwindale, CA.

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5. OTHER CEQA CONSIDERATIONS

This chapter provides a discussion of the effects of the proposed project based on the analyses presented in Sections 3.1 through 3.16 of this Draft Environmental Impact Report (EIR). The topics covered in this chapter include significant and unavoidable impacts, significant irreversible changes to the environment, growth-inducing effects, and effects found not to be significant. A more detailed analysis of the effects that the proposed project would have on the environment, and proposed mitigation measures to minimize significant impacts, are provided in Chapter 3, *Environmental Analysis*, of this Draft EIR and are incorporated into this chapter by reference.

5.1 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(a) requires that "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short- and long-term effects." CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Table ES-X, *Summary of Significant Environmental Impacts and Mitigation Measures*, in the *Executive Summary* of this Draft EIR summarizes the significant impacts, mitigation measures, and levels of significance with and without mitigation.

Though Mitigation Measures, where feasible, would reduce the level of impact of the proposed project, the following impacts would remain significant and unavoidable:

Air Quality

- **Impact AQ-1:** The proposed project has the potential to result in or cause National Ambient Air Quality Standards or California Ambient Air Quality Standards violations. Construction-source emissions would exceed the applicable regional significance threshold for volatile organic compounds (VOC), nitrogen oxides (NO_X). Mitigation Measures AQ-1 through AQ-5, which relate to construction measures that include providing electrical hook-ups; maintaining equipment maintenance records; placing signs; using offroad equipment that is compliant with Environmental Protection Agency/California Air Resources Board Tier 4 Final offroad emissions standards; prohibiting grading on days with a certain Air Quality Index forecast; reducing the use of paints and solvents; identifying a community liaison; and providing documentation demonstrating that information on transit and ridesharing programs and services would reduce emissions from VOC and NOx. However, VOC and NOx would continue to exceed their respective South Coast Air Quality Management District

(AQMD) thresholds. Therefore, impacts associated with regional construction emissions could result in inconsistency with the 2022 Air Quality Management Plans (AQMP).

- **Impact AQ-2:** The proposed project has the potential to result in or cause NAAQS or CAAQS violations due to operational-source emissions that would exceed the applicable South Coast AQMD regional thresholds for VOC, NOx, Carbon monoxide (CO), and coarse inhalable particulate matter (PM_{10}). Mitigation Measure AQ-6 through AQ-13 that include providing conduits for future charging facilities; providing information related to South Coast AQMD's Carl Moyer Program, other programs that promote truck retrofits or "clean" vehicles, and energy management systems; placing signs; maintaining solar panels properly; marking exit and entry points; maintaining fleet records; training for managers and employees; assigning a compliance officer; installing EV chargers and energy star-rated HVAC equipment; and designing buildings to exceed the 2019 Title 24 building envelope energy efficiency standards by at least 50 percent would reduce these emissions. However, VOC, Nox, and CO would continue to exceed their respective South Coast Air Quality Management District (AQMD) thresholds. Therefore, impacts associated with regional operational emissions could result in inconsistency with the 2022 AQMP.

Greenhouse Gas Emissions (GHG)

- **Impact GHG-1:** The proposed project's construction and operation GHG emissions would exceed the South Coast AQMD's numeric threshold of 3,000 MTCO2e/yr. Mitigation measures AQ-1 through AQ-13 would reduce GHG emission. However, with mitigation construction and operation of the proposed project would generate approximately 43,726 $MTCO_2e$/yr at buildout and still exceed South Coast AQMD's threshold.

- **Impact GHG-2:** The proposed project's construction and operation GHG emissions would exceed the South Coast AQMD's numeric threshold and would therefore conflict with the 2022 CARB Scoping Plan. Even with the implementation of Mitigation Measures AQ-1 through AQ-13, the proposed project's construction and operation GHG emissions would still exceed the South Coast AQMD's numeric threshold and would therefore conflict with the California Air Resource Board's (CARB's) 2022 Scoping Plan.

Transportation

- **Impact TRA-**1: The project-level VMT impact would be significant and unavoidable. Although implementation of mitigation measures TRA-1 through TRA-5 would reduce the project's VM/employee to 23.37, which falls below the significance threshold of 29.21, the effectiveness of the recommended mitigation measures cannot be guaranteed to achieve the targeted reduction in commute VMT. The proposed project's VMT/employee would be 29.21, which is above the significance threshold.

5.2 SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss whether "Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely." The discussion shall consider primary and secondary impacts that generally commit future generations to similar uses, irreversible damage from environmental accidents, and irretrievable commitments of resources.

The following are the significant irreversible changes that would be caused by the proposed project, should it be implemented:

- Construction activities associated with the proposed project would entail the commitment of nonrenewable and/or slowly renewable energy resources; human resources; and natural resources such as asphalt, metal, water, and fossil fuels. Operational activities would also require the use of electricity, liquid fuels such as gasoline and diesel, and water. The commitment of resources required for the construction and operation of the proposed project would limit the availability of such resources for future generations or for other uses during the life of the proposed project.

- An increased commitment of social services and public maintenance services (e.g., police, fire, sewer, and water services) would also be required. The energy and social service commitments would be long-term obligations in view of the low likelihood of returning the land to its existing condition once it has been developed.

- Regional construction and operational emissions associated with the proposed project would continue to contribute to emissions of VOC and NOx that exceed the South Coast AQMD regional threshold and would cumulatively contribute to the O_3 nonattainment designation of the SoCAB. Emissions of NOx that exceed the South Coast AQMD regional significance thresholds would also cumulatively contribute to the coarse and fine inhalable particulate matter (PM_{10} and $PM_{2.5}$) nonattainment designations of the SoCAB. Additionally, the proposed project would be not consistent with the AQMP due to operational-source emissions exceeding the applicable South Coast AQMD regional thresholds for VOC, NOx, CO, and PM_{10}.

- The proposed project's construction and operation GHG emissions would exceed the South Coast AQMD's numeric threshold of 3,000 MTCO2e/yr. Construction and operation GHG emissions would exceed the South Coast AQMD's numeric threshold and would conflict with the 2022 CARB Scoping Plan.

- As evaluated in Chapter 3.8, hazardous materials would be used in connection with the proposed project that are typical to those used in other industrial and commercial

developments. Operation of the proposed project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning products, paints, and those used for maintenance of landscaping. Construction of the proposed project would also involve the temporary use of potentially hazardous materials, including fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners. However, all potentially hazardous materials used during construction and operation would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations, including the operations plan and other environmental compliance measures detailed in Chapter 3.8. Any associated risk would be reduced to a less than significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

- Development of the project site would preclude the extraction of remaining onsite mineral resources (aggregate) as a result of the Inert Debris Engineered Fill Operation and subsequent construction of the industrial and commercial project. As described in Section 3.11, *Mineral Resources*, and analyzed in the *Mineral Resource Impact Evaluation Report,* Appendix M, the remaining reserves at the site could not be extracted in a manner that would be economically feasible under reasonable market and regulatory conditions. Accordingly, the site does not contain mineral resources of statewide or regional significance as defined by CEQA.

Given the low likelihood that the land would revert to lower intensity uses or to its current form, the proposed project would generally commit future generations to these environmental changes and to the use of the project site with the proposed industrial uses authorized by the Specific Plan. The commitment of resources to the proposed project is not unusual or inconsistent with projects of this type and scope. However, once these commitments are made, it is improbable that the proposed project would revert to its current condition. Thus, the proposed project would result in significant irreversible changes to the environment. In sum, although irreversible environmental changes would result from the proposed project, such changes would be less than significant, with the exception of the significant and unavoidable impacts to AQ and GHG,; are consistent with land use planning goals of the City; are typical for other comparable development within the region and not unique to the proposed project; and are justified in light of the benefits of the proposed project outlined below.

In addition to identification of a project's significant unavoidable impacts, CEQA Guidelines Section 15126.2(c) requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts. The reasons why the proposed project has been proposed are based on the project objectives in Chapter 2, Section 2.5, *Statement of Project Objectives*.

As discussed in Chapter 2, the proposed project's underlying purpose is to expand industrial/commercial business opportunities in the City and make productive economic use of a reclaimed property that previously operated as a sand and gravel quarry.

As further described Chapter 2, the project is proposed in order to, among other things, achieve the project's underlying purpose and the following objectives:

- Create a comprehensive master plan for the re-use of a reclaimed sand and gravel quarry project site that complements operations at the adjacent Irwindale Brew Yard.
- Provide economic opportunities and job growth in the City of Irwindale by increasing the City's available range of industrial, commercial, and employment-generating uses.
- Provide a master-planned, job-producing development near the I-210 freeway to accommodate uses that benefit from access to the regional transportation system.
- Provide modern, economically efficient buildings that can accommodate industrial, manufacturing and assembly, warehouse distribution, logistics, and fulfillment center uses.
- Provide neighborhood-serving commercial uses to benefit employees and visitors of the on-site uses and commuters traveling along Irwindale Avenue.
- Ensure that infrastructure plans for water, sewer, drainage, and roads are adequately designed and maintained for the Specific Plan area.
- Provide guidelines and standards for architecture, walls, fencing, signage, lighting, and entry treatments to provide a well-defined identity for the Specific Plan development.

The proposed project's important long-term policy, planning, economic, and environmental objectives stand in contrast to the significant adverse impacts identified above (all of which have been mitigated to the extent feasible as further described in this EIR). The proposed project's furtherance of each of these objectives provides independently sufficient explanation as to why the proposed project is being proposed notwithstanding the significant effects described throughout this EIR and summarized above.

5.3 GROWTH-INDUCING EFFECTS

Section 15126.2(e) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical factors may include the removal of obstacles to population growth, such as through a major expansion of a wastewater plant.

This section evaluates the proposed project's potential to create such growth inducements. As CEQA Guidelines Section 15126.2(e) requires, "It must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment." Negative impacts associated with growth inducement occur only where the projected growth would cause significant adverse environmental impacts.

Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?

Buildout of the proposed project would involve the installation of utility connections to existing infrastructure facilities and improvements to First Street. The proposed project would include the installation separate domestic water connections and the development of a new private sewer, on-site lift station, and new gravity main that would connect into the existing 15-inch trunk sewer at the intersection of Irwindale Avenue and First Street. Approximately 6,650 linear feet of sewer line (5,800 feet of private sewer and 850 feet of public sewer) from 8 to 15 inches in diameter are proposed. However, these improvements would not foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment since these improvements would be limited to serving project-related demand and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a city or regional level.

Would this project result in the need to expand one or more public services to maintain desired levels of service?

As described in Chapter 3.13, *Public Services*, public service agencies were consulted during preparation of this DEIR, including Los Angeles County Fire Department and Irwindale Police Department. None of the service providers indicated that buildout of the proposed project would necessitate the immediate expansion of their services and facilities to maintain adequate and desired levels of service. Because no housing is proposed as part of the proposed project, no new residents would be added to the project area because of project buildout. Therefore, there would be no direct impacts to school and library services in the area. Overall, no future expansion of public services would be required to maintain existing levels of service.

Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

Implementation of the proposed project would create varying levels of temporary construction employment opportunities as the project area builds out. This would be an indirect economic effect of this project that would not significantly affect the environment. Implementation of the proposed project would generate short-term design, engineering, and construction jobs during project construction. Construction-related jobs would not result in a significant population

increase because they would likely be filled by workers in the region. Construction would occur intermittently over the project phases. Construction would not result in a significant increase in population because the construction phases would be temporary.

Long-term operation of the proposed project would create approximately 2,406 employees. As the number of employees in the proposed project plan area grows, these employees would seek shopping, entertainment, auto maintenance, and other economic opportunities in the surrounding area. This could encourage new businesses and/or the expansion of existing businesses to address these needs. Actual growth would depend on future market demand, and development opportunities and constraints. However, new neighborhood-serving commercial uses developed to serve future employees would likely generate additional employment opportunities. Because employment projects are within the Southern California Association of Governments' (SCAG) assumptions planned for the area (see Section 3.4.2), the proposed project would have a less than significant direct and indirect impact..

Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

The proposed project would require the approval of discretionary actions; however, the proposed project would not set a precedent for future projects with similar characteristics. The proposed project would require Planning Commission recommendation to the City Council for approval, and City Council approval of the following entitlements:

- General Plan Amendment
- Zone Change
- Zone Ordinance Amendment and Adoption of Specific Plan
- Tentative Parcel Map
- Development Agreement

The proposed project would not change the existing protocol for project approval and would not set a precedent that would make it more likely for other projects to gain approval of similar applications.

Moreover, no changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, fire codes) are proposed or required to implement the proposed project. Therefore, the proposed project would not involve a precedent-setting action that would encourage and/or facilitate other activities that could significantly affect the environment.

Additionally, the proposed project includes mitigation measures that would be implemented as part of the proposed project to reduce impacts to air quality, biological resources, cultural

resources, GHG emissions, geology and soils, transportation, and tribal cultural resources as follows:

- **Air Quality and GHG Emissions**: Mitigation Measures AQ-1 through AQ-5 relate to construction measures that include providing electrical hook-ups; maintaining equipment maintenance records; placing signs; using offroad equipment that is compliant with Environmental Protection Agency/California Air Resources Board Tier 4 Final offroad emissions standards; prohibiting grading on days with a certain Air Quality Index forecast; reducing the use of paints and solvents; identifying a community liaison; and providing documentation demonstrating that information on transit and ridesharing programs and services shall be provided to construction employees.

  Mitigation Measures AQ-6 through AQ-13 relate to measures during the operational phase of the project including providing conduits for future charging facilities; providing information related to South Coast AQMD's Carl Moyer Program, other programs that promote truck retrofits or "clean" vehicles, and energy management systems; placing signs; maintaining solar panels properly; marking exit and entry points; maintaining fleet records; training for managers and employees; assigning a compliance officer; installing EV chargers and energy star-rated HVAC equipment; and designing buildings to exceed the 2019 Title 24 building envelope energy efficiency standards by at least 50 percent.

  Mitigation Measures AQ-1 through AQ-13 are also proposed to mitigate GHG emission impacts to less than significant.
- **Biological Resources**: Mitigation Measures BIO-1 through BIO-8 relate to construction measures that include conducting preconstruction and take avoidance surveys; halting construction activity in the vicinity of maternity roosts, night roosts, and hibernacula; consulting with the California Department of Fish and Wildlife; providing on-site or off-site habitat preservation, enhancement, restoration, and/or creation; and/or implementation of a protection and relocation plan for burrowing owls.
- **Cultural Resources**: Mitigation Measures CUL-1 and CUL-2 relate to construction measures that include retaining a qualified archeologist and halting construction if an unanticipated cultural resource is encountered.
- **Geology and Soils:** Mitigation Measures GEO-1 through GEO-6 relate to retaining a tribal monitor; preparing a monitoring agreement; performing daily monitoring during ground disturbing activities; halting all construction if tribal cultural resources are discovered; and following requirements related to native American remains that may be discovered during construction.
- **Transportation:** Mitigation Measures TRA-1 through TRA-5 relate to the provision of a ridesharing program; implementing a subsidized or discounted transit program; charging for workplace parkin; implementing an employee parking cash-out program; and documenting employee's transportation mode to work.

- **Tribal Cultural Resources:** Mitigation Measures TCR-1 through TCR-3 relate to construction measures that include retaining a qualified archeologist and halting construction if an unanticipated cultural resource is encountered.

These mitigation measures would not disturb environmental resources that have not already been addressed as part of this DEIR and would not generate erosion, dust or other air pollutants, noise, lighting, runoff, hazardous materials, or truck or passenger vehicle trips that would significantly affect the environment. Mitigation measures that include infrastructure improvements are included in the respective assessments for the proposed project.

The proposed project would be consistent with SCAG's growth forecast for the City of Irwindale and with policies to reduce urban sprawl, would efficiently utilize existing infrastructure, and would promote productive use within previously developed but under-utilized areas of the City. Furthermore, the proposed project would not extend roadway or utility infrastructure to undeveloped areas, reduce impediments to urban growth, or open undeveloped areas to urban growth. Therefore, project growth-inducing impacts would be less than significant.

5.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

California Environmental Quality Act (CEQA) Guidelines Section 15128, "Effects Not Found to Be Significant," allows environmental issues for which there is no likelihood of significant impact to be "scoped out" and not analyzed further in the EIR.

5.4.1 Agriculture and Forestry Resources

a)	**Would the convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

CEQA considers impacts to three categories of important farmland: Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. According to the California Department of Conservation Important Farmland Finder, there are no important farmlands in the Specific Plan area (DOC 2022). There are also no existing agricultural uses in the Specific Plan area. Therefore, the proposed project and any zoning district changes proposed under the Irwindale Brew Yard Specific Plan would have no impact on important farmlands nor convert any farmland to nonagricultural use. Therefore, there would be **no impacts** from the proposed project.

Significance without Mitigation: No Impact.

b) Would the project conflict with existing zoning for agricultural use, with a designated Agricultural Opportunity Area, or with a Williamson Act contract?

See response to Impact 5.4.1 (a), above. The California Department of Conservation Division of Land Resource Protection maintains updated maps showing lands bearing Williamson Act contracts. According to the California Williamson Act Enrollment Finder, there are no lands within all of Irwindale under Williamson Act contracts (DOC 2023). Additionally, the Specific Plan area is not zoned for agricultural use (Irwindale 2018). Therefore, the proposed project, and any zoning district changes would not conflict with existing agricultural zoning or impact any Williamson Act lands. Therefore, there would be **no impacts** from the proposed project.

Significance without Mitigation: No Impact.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The current and proposed zoning for the Specific Plan area does not include any zoning for forest land, timberland, or timberland production. Therefore, there would be **no impacts** from the proposed project.

Significance without Mitigation: No Impact.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

See response to Threshold 5.4.1 (c), above. There would be **no impacts** from the proposed project.

Significance without Mitigation: No Impact.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use?

See response to Threshold 5.4.1 (a) through (c), above. There would be **no impacts** from the proposed project.

Significance without Mitigation: No Impact.

5.4.2 Population and Housing

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The project, an Industrial/Business park, is proposed to serve the region. At buildout, a total of 2,406 employees is anticipated for the proposed project. SCAG forecast that the City of Irwindale would have 18,900 jobs in 2019 increasing to 19,600 jobs by 2035 (SCAG 2024). However, as of 2023, the City has only 15,128 jobs (US Census Bureau 2025). The new jobs generated by the proposed project would provide additional employment opportunities for residents in the area and, with an anticipated opening year of 2031, would be accommodated within SCAG's 2035 projection.[1]

Additionally, population growth typically occurs when there is an expansion of residential development, and therefore an increase of new residents. As the Regional Housing Needs Assessment (RHNA) calculated for 2021-2029 has accounted for the housing need in Irwindale and the surrounding cities based on SCAG's population and job forecasts, any new growth in population associated with the jobs generated by the proposed project would not exceed housing assumptions from the RHNA. The proposed project would not increase the number of residential units available or designate new land uses that may generate an increased population. Therefore, there would be **no impacts** from the proposed project.

Significance without Mitigation: No Impact.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

There currently is no housing in the Specific Plan area. Therefore, the proposed project would not displace people or housing. **No impact** would occur.

Significance without Mitigation: No Impact.

1 Considering the US Census Bureau 2023 jobs of 15,128 and SCAG's 20235 projection of 19,600, the net increase is 4,472.

5.4.3 Recreation

a)	**Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

Typically, the demand for parks is created by the development of new housing and other actions that generate additional population. The proposed project would not construct any type of residential use or other land use that would generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. In addition, new employment opportunities that would be generated by the proposed project (during both construction and operations) may be filled, in part, by employees already residing in the vicinity of the Specific Plan area who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the proposed project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks and recreational facilities. Therefore, the proposed project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park. There would be **no impacts** from the proposed project.

Significance without Mitigation: No Impact.

b)	**Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

See response to Impact 5.4.3(a) above. The proposed project would not construct any new on- or off-site recreational facilities, nor would it expand existing off-site recreational facilities. Therefore, the proposed project would not require the construction or expansion of additional recreational facilities that would have an adverse impact on the environment, and **no impacts** would occur.

Significance without Mitigation: No Impact.

5.4.4 Wildfire

If located in or near state responsibility areas or land classified as very high fire hazard severity zones (FHSZ), would the proposed project pose a potentially significant impact with respect to wildfire.

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The proposed project would not conflict with adopted emergency response or evacuation plans. Los Angeles County adopted an All-Hazards Mitigation Plan in May 2020. The plan aims to identify the county's top hazards; assess the risks to the residents, buildings and critical facilities; and develop mitigation strategies to reduce the risk of exposure and allow a swift and organized recovery should a disaster occur. The All-Hazards Mitigation Plan does not identify specific evacuation routes in the City of Irwindale (County of Los Angeles 2025). There are procedures in place overseen by the City that would guide emergency response, and the project would not impair or interfere with such efforts during construction or operation.

The surrounding roadways would continue to provide emergency access to the project site and surrounding properties during and after construction. To avoid traffic congestion, the project would be maintained in accordance with applicable standards associated with vehicular access to avoid hinderances to emergency access and evacuation. Implementation of operational activities would not impair application of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

b) 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 east of a wildland area and the western edge of the project site is classified as moderate FHSZ by CAL FIRE (CAL FIRE 2025). The project site is not in or near a State Responsibility Area but is in a Local Responsibility Area. The nearest very high FHSZ is approximately 1.4 miles north of the project site on the opposite side of Foothill Freeway. The Foothill Freeway abuts the northern edge of the project site and would serve as a fire break separating the project from the high FHSZ area.

Given the project site's adjacency to the Santa Fe Dam Recreation Area, the proposed project could be indirectly exposed to wildfire hazards originating from nearby vegetated areas, even where the project site itself is not currently mapped as a very high FHSZ. Compliance with applicable state and local fire safety regulations and Los Angeles County Fire Department (LACFD) requirements would reduce wildfire-related risk to people and structures to a level considered acceptable by the LACFD and other applicable fire-protection and regulatory agencies charged with enforcing fire and life-safety standards.

Additionally, development of the proposed project would not increase the potential risk as the project site has been previously developed with quarry and industrial uses (such as surface

parking). The project applicant will continue to work with the Los Angeles County Fire Department and abide by all fire code regulations to ensure proper implementation of fire risk planning and mitigation. Therefore, the proposed project would not exacerbate wildfire risks or expose the proposed project's occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire within such an area, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environments?

The project site is not in a high FHSZ or very high FHSZ but is adjacent to a wildland area. As described in Section 3.16, *Utilities and Service Systems*, the proposed project would not require the construction of new or expanded electricity, natural gas, or telecommunication facilities. All dry utilities for the proposed project would be installed underground, and a substation may be required as part of the new development. The proposed project would include fire protection infrastructure required by the Los Angeles County Fire Department, such as fire sprinklers and fire hydrants. All the proposed fire protection infrastructure would enhance fire protection services on-site and not exacerbate fire risk. The proposed project would not require the installation or maintenance of infrastructure that may exacerbate fire risk. Therefore, impacts would **be less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The project site is not in a 100-year or 500-year floodplain (FEMA 2008). As described in Section 3.6, *Geology and Soils*, although a portion of the project site is earthquake-induced landslide zones generally along the perimeter of the two pits, the seismically induced landslide hazards would be mitigated once the quarries are filled. In addition, the proposed project would include filling and rough grading both pits on the project site pursuant to the Inert Debris Engineered Fill Operation (IDEFO) Operations Plan. When the reclamation of the two pits is completed, the existing slopes at the site would no longer remain. In the absence of significant ground slopes, the potential for landslides is considered negligible. Based on the proposed project's location and surrounding terrain, and distance from the nearest steeper slope areas, the project site would not be susceptible to downslope or downstream flooding or landslides as a result of

runoff, post-fire slope instability, or drainage changes. The project site is also not in a very high FHSZ. Impacts would therefore be **less than significant**.

Significance without Mitigation: Less than significant.

5.5 REFERENCES

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City of IRWINDALE

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