Public Review Initial Study/
Mitigated Negative Declaration

14005 Live Oak Avenue Project

September 2024

Lead Agency:

City of Irwindale
5050 Irwindale Avenue
Irwindale, California 91706
Brandi Jones, Senior Planner
626.430.2260

Consultant:

Kimley-Horn and Associates, Inc.
660 South Figueroa Street, Suite 2050
Los Angeles, California 90017
Heidi Rous, CPP, Project Manager
213.261.4040

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1.0 INTRODUCTION

1.1 Statutory Authority and Requirements

An application for the proposed 14005 Live Oak Avenue Project (Project) has been submitted to the City of Irwindale (City) Community Development Department for discretionary review. The City of Irwindale, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and that preparation of an Initial Study is required.

This Initial Study evaluates the potential environmental effects that could result from the construction and operation of the Project. This Initial Study has been prepared in accordance with CEQA (California Public Resources Code [PRC] Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.).

Based on the analysis provided within this Initial Study, the City has concluded that, with incorporation of the identified mitigation as agreed to by the Applicant, the Project would not result in significant impacts on the environment and, therefore, that the preparation of an Initial Study/Mitigated Negative Declaration (IS/MND) is intended as an informational document and is ultimately required to be adopted by the decision-making body prior to Project approval by the City.

1.2 Summary of Findings

Pursuant to State CEQA Guidelines Section 15367, the City, as Lead Agency, has the authority for environmental review and adoption of the environmental documentation, in accordance with CEQA. This Initial Study has evaluated the environmental issues outlined in **Section 4: Evaluation of Environmental Impacts**. It provides decision-makers and the public with information concerning the Project's potential environmental effects and recommended mitigation measures, if any.

Based on the Environmental Checklist Form and supporting environmental analysis, the Project would have no impact or a less than significant impact concerning all environmental issue areas, except the following, for which the Project would have a less than significant impact with mitigation incorporated:

- Biological Resources
- Cultural Resources
- Geology and Soils
- Tribal Cultural Resources

As set forth in State CEQA Guidelines Section 15070, an Initial Study leading to a Mitigated Negative Declaration (IS/MND) can be prepared when the Initial Study identifies potentially significant effects, but Project revisions would avoid or mitigate the effects to a point where clearly no significant effects would occur, and there is no substantial evidence, in light of the whole record before the agency, that the Project as revised may have a significant effect on the environment.

1.3 Initial Study Public Review Process

The Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration has been provided to the Clerk of the County of Los Angeles and mailed to responsible and trustee agencies concerned with the Project and other public agencies with jurisdiction by law over resources affected by the Project. The NOI will also be published in the newspaper and posted at these four (4) designated locations: Irwindale City Hall, Irwindale Community Development Department, Irwindale Public Library, and the Irwindale Post Office. It will also be sent to any individual and/or agency that has requested CEQA related notification. A 20-day

public review period has been established for the IS/MND in accordance with State CEQA Guidelines Section 15073. During the public review period, the IS/MND, including the Technical Appendices, was made available for review on the City website, at https://www.irwindaleca.gov/621/14005-Live-Oak-Avenue.

In reviewing the IS/MND, affected public agencies and the interested public should focus on the document's adequacy in identifying and analyzing the potential environmental impacts and the ways in which the Project's potentially significant effects can be avoided or mitigated.

Written comments on this IS/MND may be sent to:

Brandi Jones, Senior Planner
City of Irwindale, Community Development Department
Planning Division
5050 Irwindale Avenue
Irwindale, CA 91706
Email: bjones@irwindaleca.gov

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised. If so, further documentation may be required. If not or if the issues raised do not provide substantial evidence that the Project would have a significant effect on the environment, the IS/MND will be considered for adoption and the Project for approval.

1.4 Incorporation by Reference

Pursuant to State CEQA Guidelines Section 15150, an IS/MND may incorporate by reference all, or portions of, another document which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the IS/MND's text.

The references outlined below, which were utilized during preparation of this Initial Study, are available for review on the City's website, at:

- https://www.irwindaleca.gov/DocumentCenter/View/38/General-Plan?bidId=
- https://www.irwindaleca.gov/DocumentCenter/View/6529/General-Plan-Final-EIR-Combined-03082021
- https://library.municode.com/ca/irwindale/codes/code_of_ordinances

Irwindale General Plan. The City adopted the comprehensive Irwindale General Plan (General Plan) in 2008. The General Plan outlines the City's goals, plans, and objectives for land use within the City's jurisdiction. The General Plan was used throughout this IS/MND as a source of baseline data and City policy requirements.

Irwindale General Plan Final Environmental Impact Report. The Irwindale General Plan Final Environmental Impact Report (General Plan EIR) (SCH No. 2005071047) was certified in December 2006. The General Plan EIR analyzed the potential environmental impacts that would result from implementation of the General Plan. The General Plan EIR was used throughout this IS/MND as a source of baseline data and mitigation requirements.

Irwindale Municipal Code. The Irwindale Municipal Code (IMC) regulates municipal affairs within the City's jurisdiction including, without limitation, the building and zoning regulations (i.e., IMC Title 15,

Buildings and Construction, and Title 17, *Zoning*). IMC Titles 15 and 17 are the primary tools for implementing the General Plan and coordinating and controlling the development and use of real property throughout the City. The IMC is referenced throughout this IS/MND to establish the Project's baseline regulatory requirements.

1.5 Report Organization

This document is organized into the following sections:

Section 1.0: Introduction provides a Project introduction and overview, cites the State CEQA Guidelines to which the proposed Project is subject, and summarizes the Initial Study's conclusions.

Section 2.0: Project Description details the Project's location, environmental setting, background and history, characteristics, discretionary actions, construction program, phasing, agreements, and required permits and approvals. This Section also identifies the Initial Study's intended uses, including a list of anticipated permits and other approvals.

Section 3.0: Lead Agency Determination provides the determination of the Project and an overview of potential impacts that may or may not result from Project implementation.

Section 4.0: Evaluation of Environmental Impacts provides an analysis of environmental impacts identified in the environmental checklist.

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2.0 PROJECT DESCRIPTION

2.1 Location

The Project site is located in the central eastern portion of the City of Irwindale (referred to throughout this document as, "City" or "Irwindale") in the County of Los Angeles ("County"). The City is approximately 20 miles east of downtown Los Angeles and is neighbored by the cities of West Covina, Baldwin Park, Azusa, Duarte, El Monte, Monrovia, and unincorporated areas of Los Angeles County; see **Figure 2-1: Regional Vicinity Map**. The Project site is located at 14005 Live Oak Avenue at the northeastern corner of the Live Oak Avenue/Stewart Avenue intersection and is bound by vacant land currently undergoing grading to the east, Live Oak Avenue and the City of Baldwin Park to the south, Stewart Avenue to the west, and Rivergrade Road to the north (see **Figure 2-2: Local Vicinity Map**). The Project site is comprised of 5.13 gross acres (4.86 net acres, Assessor's Parcel Number 8535-001-033), with 0.27 acres designated as street dedication.

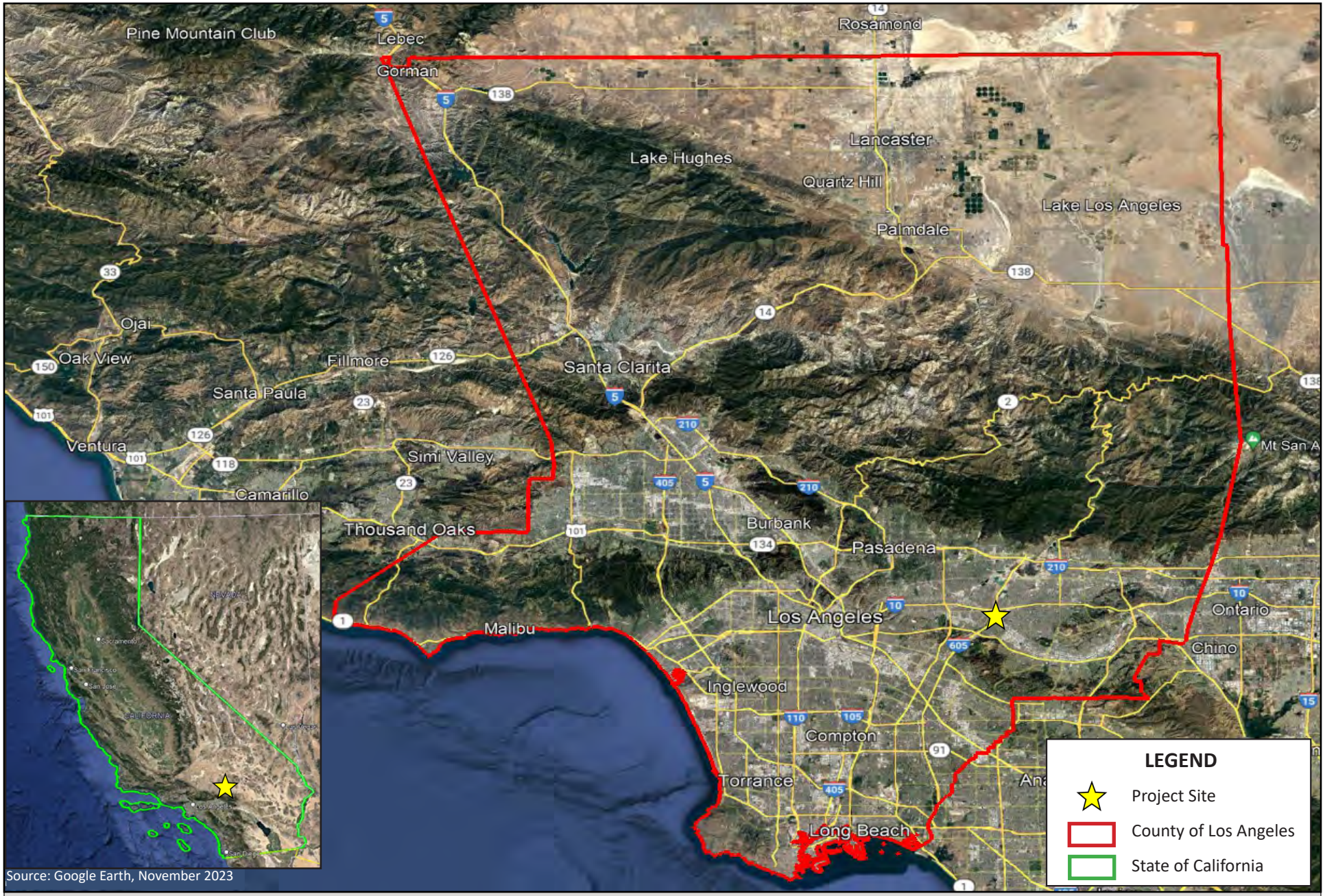
Regional access to the Project site is provided via the Interstate 605 freeway (I-605) located approximately 0.6-miles to the west. The Interstate 210 (I-210), Interstate 10 (I-10), and State Route 39 (SR-39) freeways also provide regional access to the Project site and are approximately 1.8 miles north, 2.5 miles south, and 3.4 miles east of the Project site, respectively. Local access to the Project site is provided via Live Oak Avenue to the east and Rivergrade Road to the north.

2.2 Environmental Setting

2.2.1 On-Site Conditions

The Project site is relatively flat and currently fully developed with one existing two-story concrete industrial office building totaling 56,000 square feet and a surface parking lot. The Project site also contains ornamental landscaping along the perimeter of the Project site and throughout the parking lot, including approximately 72 ornamental trees. The Project site includes existing utility connections (water, sewer, and electrical).

Access to the Project site is currently served via one driveway off Stewart Avenue and one driveway off Live Oak Avenue, the latter being gated. Pedestrian access is provided by sidewalks along Rivergrade Road, Stewart Avenue, and a portion of Live Oak Avenue. A bus stop is located on the public sidewalk adjacent to the southwestern portion of the Project site on Live Oak Avenue. The bus stop provides services for Foothill Transit lines 272 and 492.



Source: Google Earth, November 2023

Figure 2-1: REGIONAL VICINITY MAP
14005 Live Oak Avenue Project
Initial Study/Mitigated Negative Declaration

NOT TO SCALE

Kimley»Horn

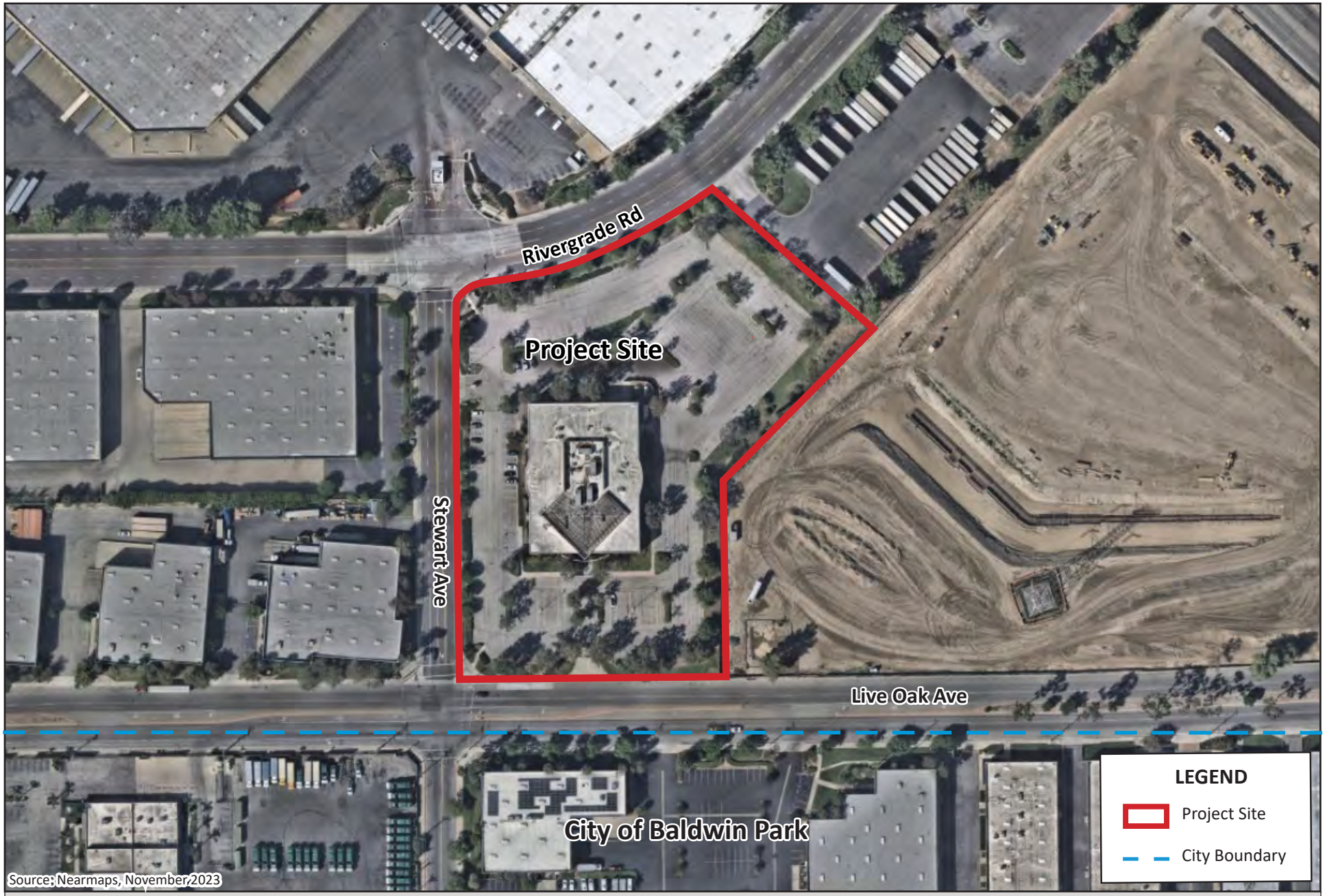


Figure 2-2: LOCAL VICINITY MAP
14005 Live Oak Avenue Project
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NOT TO SCALE

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2.2.2 General Plan and Zoning

The Project site currently has a General Plan land use designation of Industrial/Business Park. The City's General Plan states that the Industrial/Business Park land use designation is intended to accommodate light industry, heavy industry, and distribution uses. The maximum floor area ratio (FAR) is 1.0.

The Project site is zoned M-2 (Heavy Manufacturing). Permitted uses within the M-2 zone includes any use permitted in the M-1 (Light Manufacturing) zone and additional heavy manufacturing uses.

The Project would be developed in accordance with the City of Irwindale's Commercial and Industrial Design Guidelines (Design Guidelines). The purpose of the Design Guidelines is to ensure the successful integration of new and remodeled commercial and industrial projects to create a more 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. Developers are required to follow all provisions of these guidelines as applicable to their specific project. All development plans, landscape plans, and graphic designs shall comply with these guidelines. In addition to these guidelines, all regulations, requirements, standards, and specifications of the City shall also apply and take precedence over the guidelines. As the Project proposes a new industrial building, the Project would be designed in accordance with the City's Design Guidelines.

2.2.3 Surrounding Land Uses

The Project site and its immediate surroundings are primarily highly disturbed and/or developed with industrial uses. The Project site is also approximately 0.25-mile south of the Santa Fe Flood Control Dam and approximately 0.28-mile east of the San Gabriel River. On-site and surrounding land uses and zoning are summarized in **Table 2.2-1: On-site and Surrounding Land Uses** and depicted on **Figure 2-2**.

Table 2.2-1: On-site and Surrounding Land Uses

Description	Existing On-the-Ground	Zoning[1]
Project Site	Industrial office building, parking lot	M-2 (Heavy Manufacturing)
North	Industrial uses, Santa Fe Flood Control Dam	M-2 (Heavy Manufacturing)
South	Industrial uses, City of Baldwin Park	Industrial Commercial (City of Baldwin Park)[2]
East	2200 Arrow Highway project (currently under construction)	M-2 (Heavy Manufacturing)
West	Industrial uses, San Gabriel River	M -2 (Heavy Manufacturing)

Source: Google Earth Pro, 2023.
[1] City of Irwindale. 2022. City of Irwindale – Zoning Map, https://www.arcgis.com/home/webmap/viewer.html?webmap=64e898d544f5415f84a4cb6770bf65ea&extent=-118.031,34.0756,-117.9042,34.1429. Accessed November 21, 2023.
[2] City of Baldwin Park. 2019. Zoning Map, https://www.baldwinpark.com/DocumentCenter/View/682/Zoning-Map-Updated-September-2023-PDF. Accessed on November 21, 2023.

2.3 Project Characteristics

2.3.1 Project Overview

The Applicant proposes to demolish the existing industrial office building and construct a one-story concrete tilt-up warehouse building with a mezzanine totaling 102,500 square feet; see **Figure 2-3: Conceptual Site Plan**. The proposed building would include 6,000 square feet of office space in the southeastern portion of the building (3,000 square feet each on the ground floor and mezzanine), and 96,500 square feet of warehouse space on the ground floor. The Project would have a floor area ratio

(FAR) of 0.48. An outdoor employee break area would be located immediately south of the proposed building adjacent to the office space. The Project would be designed to be achieve Leadership in Energy and Environmental Design (LEED) Gold standards. LEED measures that would be implemented include energy efficient lighting, heating and cooling systems, and control systems and fixtures; and water-efficient fixtures and landscapes. The Project proposes to analyze the new industrial building as 100 percent warehousing and does not include any manufacturing, cold storage or refrigerated space. The Project proposes one (1) electric pump for fire protection services and one (1) emergency diesel generator was modeled for the site.[1]

The proposed building would include twelve (12) dock doors on its northeastern elevation. The dock doors would be used for truck loading and unloading in the truck yard, which is northeast of and adjacent to the proposed building.

Other Project features and improvements are discussed in detail below.

2.3.2 Architectural Design

The building would be designed as a single-story, tilt-up industrial building with a mezzanine. The street-facing portions of the proposed building would have an office-like design and aesthetic, and the building would be up to 49 feet in height; see **Figure 2-4: Conceptual Building Elevations**. Building elements and materials would include tilt-up concrete wall panels, metal canopies, built-up roofing over panelized decks, foam trim, aluminum siding, and aluminum and glass storefronts and entry doors. The proposed building would be designed according to the goals and objectives of the Irwindale Commercial and Industrial Design Guidelines. The final architectural design of the proposed building is subject to review and approval by the City.

2.3.3 Access, Circulation, and Parking

The proposed building would have a main entrance/storefront on the southeastern side of the building that would lead into the office space. Eight (8) smaller entrances with stairs and handrails would be on the northern, western, and southern sides of the building, and five (5) would be on the eastern side to provide access to the truck yard and parking lots.

Vehicular access to the Project site would be provided via two (2) new 40-foot driveways: one (1) each off Rivergrade Road and Live Oak Avenue. The northern driveway off Rivergrade Road would provide full ingress and egress for trucks and employees' vehicles. The southern driveway off Live Oak Avenue would provide ingress and egress for employees' and visitors' vehicles and would allow right-in/right-out access only. Both driveways would connect to an internal drive aisle, which is divided by a manual tube steel swing gate on the central eastern portion of the Project site. The gate would restrict access into the truck yard and parking areas on the northeastern portion of the Project site to employees only. The internal drive aisle would also operate as a fire access lane and provide an unobstructed width of 28 feet. The Project would remove and reconstruct the existing Project site driveways in accordance with applicable engineering standards of the City of Irwindale and would be subject to approval by the Director of Engineering.

The Project would include surface parking on the eastern portion of the Project site. The Project proposes to provide sixty-five (65) parking spaces throughout the parking lots, which would include fifteen (15) compact spaces on the northeastern portion of the Project site; and four (4) handicapped accessible

[1] The emergency generator fuel type is diesel (175-300 HP), assumed for a maximum maintenance and testing of one hour a day or 50 hours per year. The proposed generator has 238 horsepower with a load factor of 0.73.

spaces, thirteen (13) electric vehicle (EV) spaces, and three (3) EV charging station stalls on the central and southeastern portions. The Project would also provide twelve (12) dock positions, one (1) grade door, and thirteen (13) trailer stalls along the northeastern Project site boundary and across from the proposed truck yard. Additionally, the Project would provide four (4) long-term and four (4) short-term bicycle spaces adjacent to the central and southeastern parking lots.

Pedestrian access would be provided via a new meandering concrete sidewalk along the street frontages on Rivergrade Road, Stewart Avenue, and Live Oak Avenue. The existing public sidewalk abutting the Project site would be demolished and replaced with a new sidewalk including curbs, gutters, and landscaping improvements as needed to facilitate Project site access along the Project's frontage, consistent with the City's standards. The Project would also include a 10-foot street easement dedication (totaling 0.27 acres) along Rivergrade Road, Stewart Avenue, and Live Oak Avenue. Additionally, internal walkways leading to the various entrances of the proposed building would be provided on-site and would connect to the new public sidewalk.

The Project would also include security measures such as security lighting, a surveillance camera system, and 24/7 security personnel.

2.3.4 Walls and Fencing

Various fences, walls, and gates would be provided on the eastern portion of the Project site. An eight-foot-tall telescoping/sliding tubular steel gate is proposed at the truck yard entrance off Rivergrade Road. As described above in Section 2.3.3, an eight-foot-tall tube steel swing gate would be located on the central eastern portion of the Project site to restrict access into the truck yard and parking areas on the northeastern portion of the Project site to employees only. Service gates would be manually operated with a Knox box. The gates would remain locked, except during operations and maintenance activities. A six-foot-tall chain link fence would be located on property lines between secure yards. A six-foot-tall steel gate and nine-foot-tall roof would screen the trash enclosure on the central eastern portion of the Project site from view. Tilt-up concrete screen walls of up to 8 feet in height would be installed along both sides of the northern entrance gate, along the northeastern Project site boundary adjacent to the trailer parking stalls, along both sides of the trash enclosure, and along the northern boundary of the central parking area. A 3-foot-two-inch-tall gabion rock seat wall would also be installed along the southern boundary of the employee break area to shield it from street view along Live Oak Avenue.

2.3.5 Lighting and Signage

Site lighting would consist of exterior, wall-mounted light fixtures; interior lighting; lighting for pedestrian walkways; ground-mounted decorative lighting for landscape and architectural features; lighting for the new parking areas and truck yard; lighting for the outdoor employee break area; and security lighting. Lighting design would limit uplight and glare.

The Project site would include wall- or post-mounted directional signage throughout the Project site. A monument sign would be included on the seat wall facing Live Oak Avenue on the southern portion of the Project site. The Project would also include security measures such as security lighting, a surveillance camera system, and 24/7 security personnel.

2.3.6 Landscaping

The Project would include approximately 30,140 square feet of landscaping (approximately 14 percent of the Project site) in the employer/visitor parking lot and along the setbacks and street frontages on Rivergrade Road, Stewart Avenue, and Live Oak Avenue; see **Figure 2-5: Conceptual Landscape Plan**.

Landscaping would include native trees, shrubs, accent succulents, and groundcover, all with low to moderate water needs. Project development would include the removal of all 72 trees on-site. However, the Project would provide a greater number of trees (85) than currently exist. The Project would be equipped with a low flow irrigation system consisting of a weather-based smart controller and low rotors, bubbler, or drip systems. Proposed landscaping would be consistent with the surrounding buildings to comply with the City's design requirements.

2.3.7 Infrastructure Improvements and Utilities and Service Systems

Street Improvements

Off-site improvements in the public right of way would take place on Stewart Avenue (west), Rivergrade Road (north), and Live Oak Avenue (south) and include driveway reconfigurations and mill and overlay half-width street sections.

Water

The Project would connect to the existing domestic water lateral on the western portion of the Project site near Stewart Avenue.

Wastewater

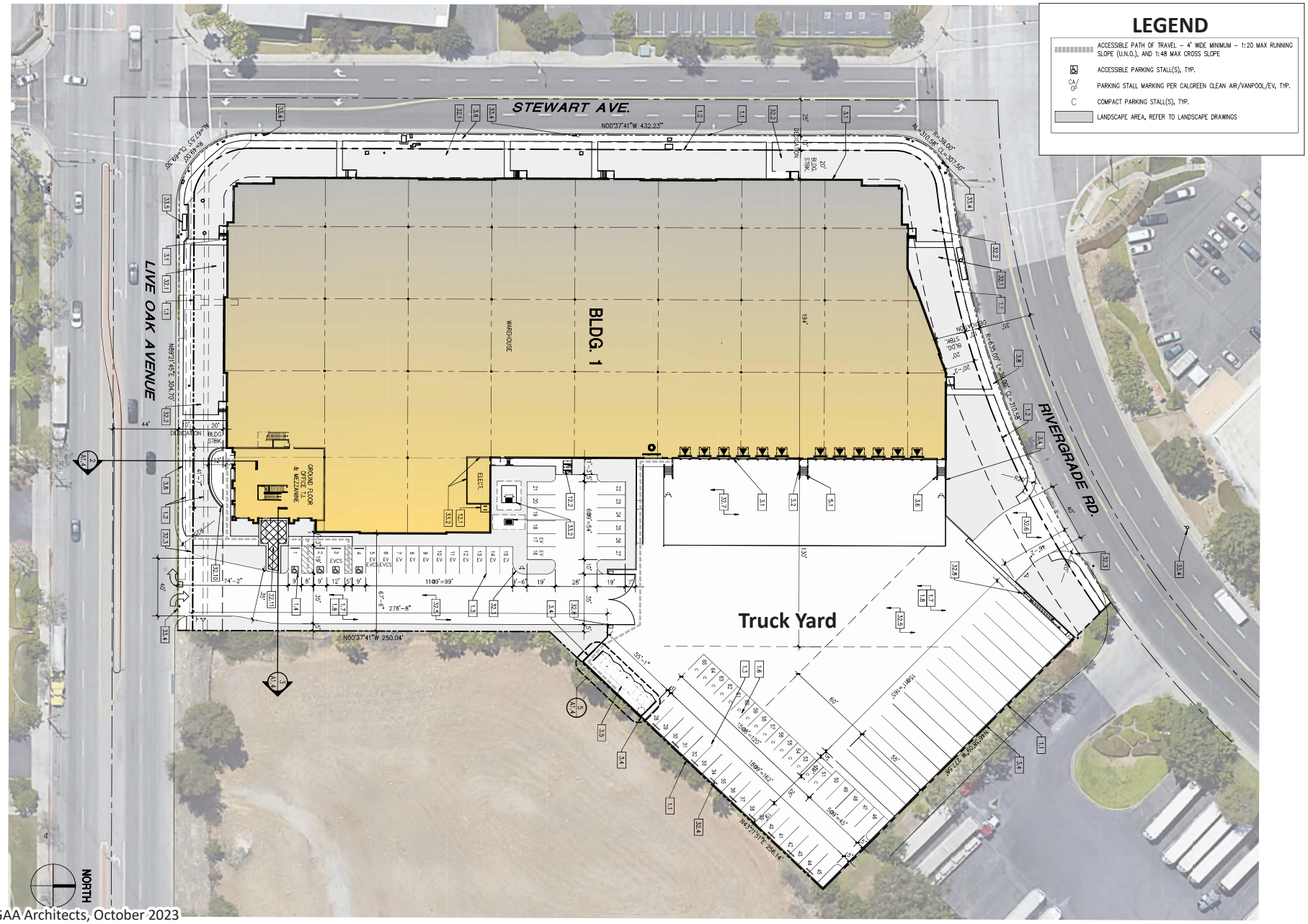
The Project would also connect to a sanitary sewer lateral that would connect to the mainline within Live Oak Avenue.

Drainage

The Project site would include low impact development (LID) infiltration Best Management Practices (BMPs) to accommodate an 85th percentile (1.1-inch), 24-hour storm, consistent with the City's standards. Stormwater runoff from the Project site would be conveyed to eighteen (18) new on-site storm drain inlets and one (1) catch basin that would divert runoff into the on-site storm drain detention system. All the grated inlets would be fitted with inlet filters to reduce sediment and trash loading of the inlets. A pre-treatment chamber would also be included. Upon Project completion, approximately 90 percent of the Project site would be impervious, and the remainder would be pervious. The proposed drainage system improvements would be designed in accordance with City requirements and would require City approval.

Solid Waste

Solid waste generated by the Project would be collected and hauled away by contracted waste haulers (currently Athens Services) and transported to/disposed of at the nearest landfill. The Project would include solid waste enclosures on the central eastern portion of the Project site, which would be shielded by concrete tilt-up walls on either side, a 10-foot-tall enclosure roof, and steel gates.



Source: GAA Architects, October 2023

Figure 2-3: CONCEPTUAL SITE PLAN

14005 Live Oak Avenue Project

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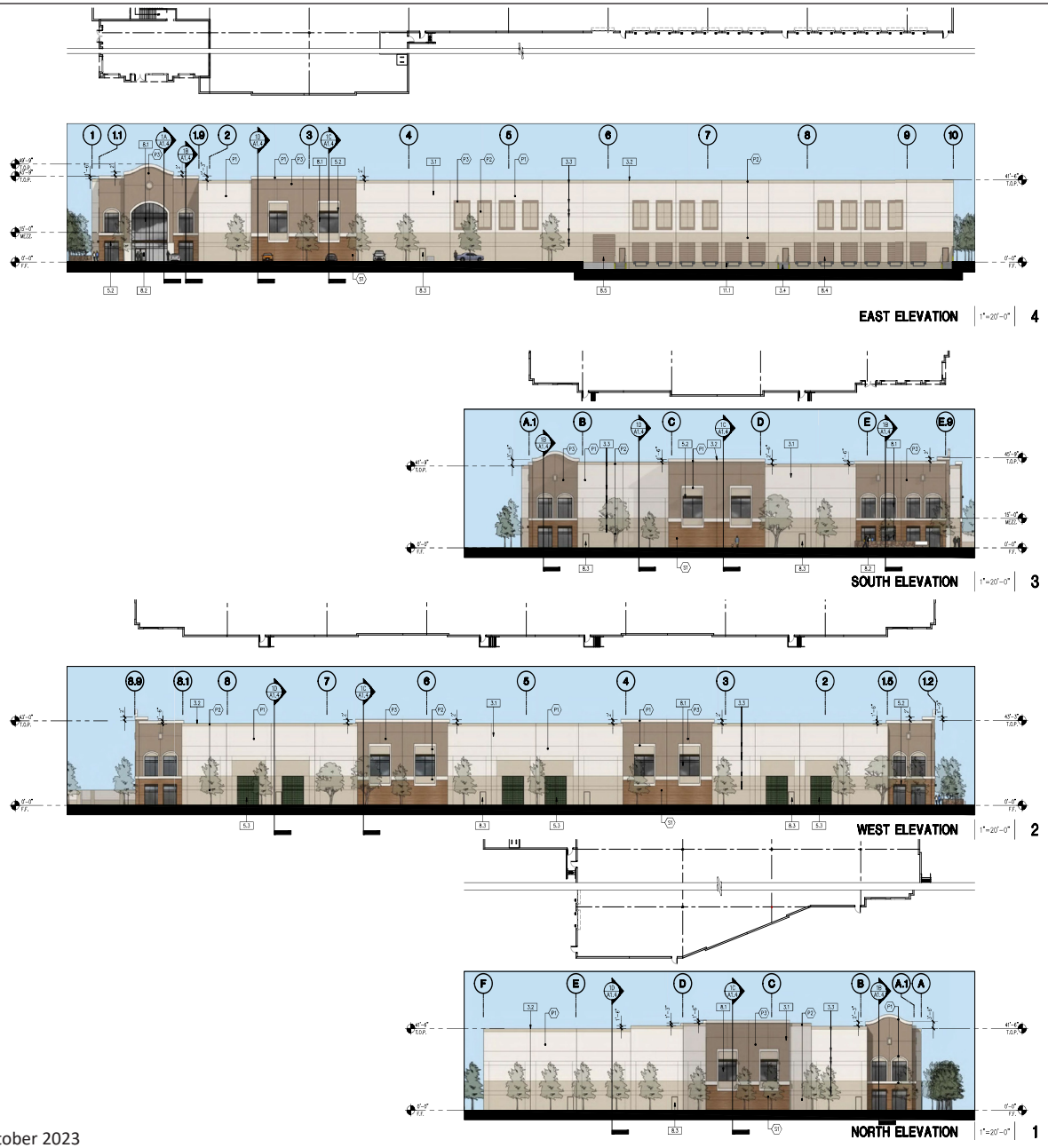

LEGEND

COLOR SCHEDULE / MATERIALS

G1	GLAZING	MEDIUM PERFORMANCE COLOR: GRAY
M1	CANOPY	METAL FINISH: DARK BRONZE
M2	MULLIONS	ALUMINUM FINISH: DARK BRONZE
P1	PAINT 1	SHERWIN WILLIAMS "TOQUE WHITE" SW7003 OR SIMILAR MAIN BUILDING COLOR – LIGHT BEIGE
P2	PAINT 2	SHERWIN WILLIAMS "SHIITAKE" SW9173 OR SIMILAR ACCENT COLOR – MEDIUM BEIGE
P3	PAINT 3	SHERWIN WILLIAMS "TAVERN TAUPE" SW7508 OR SIMILAR ACCENT COLOR – DARK BEIGE
S1	SIDING	WOOD LOOK COMPOSITE SIDING COLOR: FRENCH WALNUT

DOORS TO MATCH ADJACENT BUILDING COLOR

Source: GAA Architects, October 2023

Figure 2-4: CONCEPTUAL BUILDING ELEVATIONS

14005 Live Oak Avenue Project

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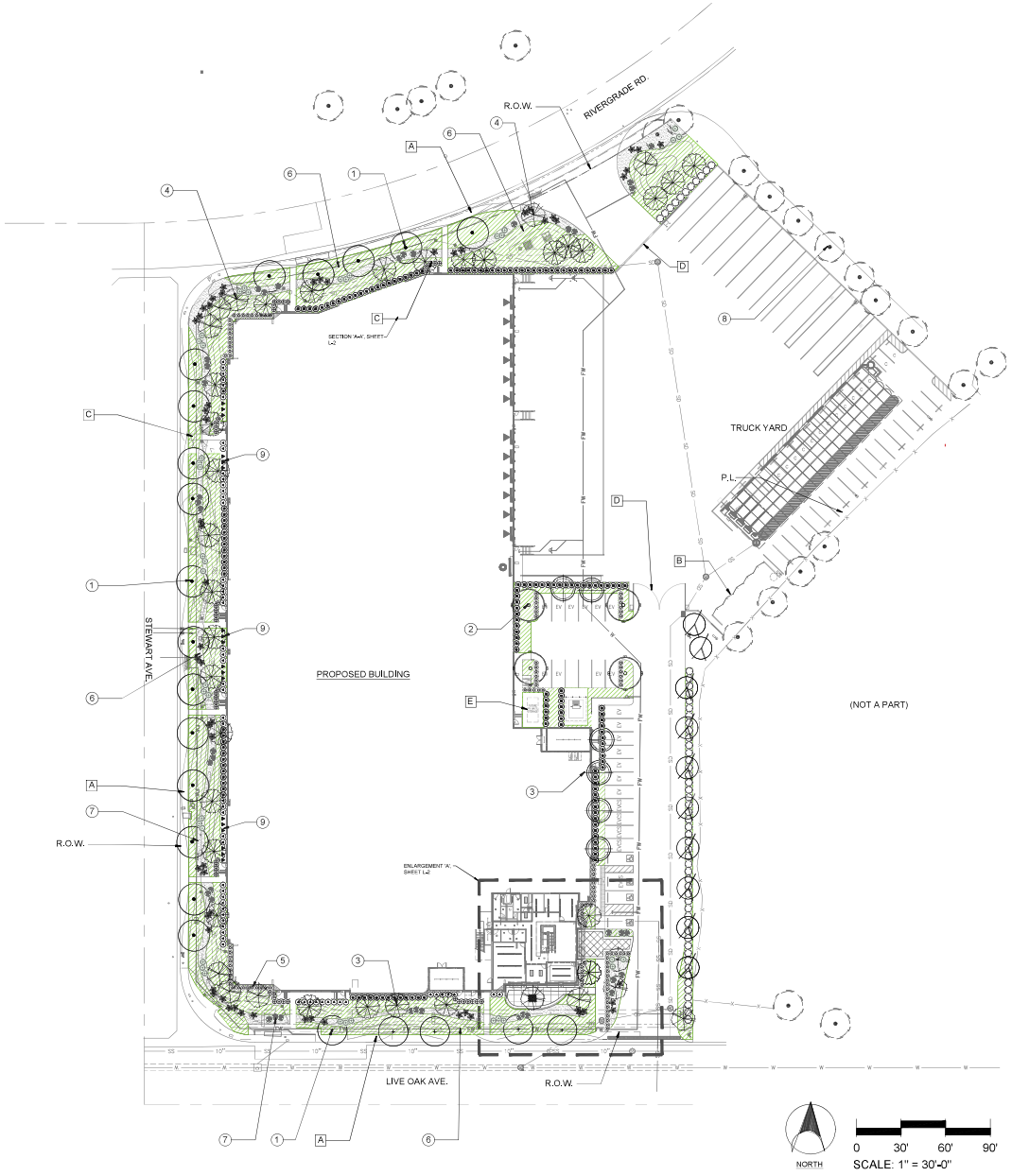

LEGEND

DESIGN KEY NOTES:

1. NEW STREET TREE PER LEGEND
2. PROPOSED NEW PARKING LOT SHADE TREE PER LEGEND
3. VERTICAL TREE ALONG BUILDING PER LEGEND
4. FLOWERING ACCENT TREE AT FOCAL AREAS PER LEGEND
5. FOUNDATION SHRUBS ALONG BUILDING PER LEGEND
6. PROPOSED LANDSCAPE EARTH-BERM ALONG STREET FRONTAGE
7. DECORATIVE ROCK COBBLE ALONG STREET FRONTAGE
8. EXISTING TREES TO REMAIN, PROTECT IN PLACE
9. VINES AT ARCHITECTURAL SCREEN PER LEGEND

REFERENCE KEY NOTES:

- A. SIDEWALK PER CIVIL
- B. TRASH ENCLOSURE PER ARCH
- C. PEDESTRIAN CONC. WALKWAY PER ARCH.
- D. GATE PER ARCH
- E. TRANSFORMER PER CIVIL

GENERAL NOTES:

ROCK RIP-RAP MATERIAL SHALL BE INSTALLED WHERE DRAIN LINES CONNECT TO INFILTRATION AREAS.

ALL UTILITY EQUIPMENT SUCH AS BACKFLOW UNITS, FIRE DETECTOR CHECKS, FIRE CHECK VALVE, AND AIR CONDITIONING UNITS WILL BE SCREENED WITH EVERGREEN PLANT MATERIAL ONCE FINAL LOCATIONS HAVE BEEN DETERMINED.

CONCEPTUAL PLAN NOTE:

THIS IS A CONCEPTUAL LANDSCAPE PLAN. IT IS BASED ON PRELIMINARY INFORMATION WHICH IS NOT FULLY VERIFIED AND MAY BE INCOMPLETE. IT IS MEANT AS A COMPARATIVE AID IN EXAMINING ALTERNATE DEVELOPMENT STRATEGIES AND ANY QUANTITIES INDICATED ARE SUBJECT TO REVISION AS MORE RELIABLE INFORMATION BECOMES AVAILABLE.

IRRIGATION NOTE:

THE PROJECT WILL BE EQUIPPED WITH A LOW FLOW IRRIGATION SYSTEM CONSISTING OF ET WEATHER BASED SMART CONTROLLER, LOW FLOW ROTORS, BUBBLER AND/OR DRIP SYSTEMS USED THROUGHOUT. THE IRRIGATION WATER EFFICIENCY WILL MEET OR SURPASS THE CURRENT STATE MANDATED AB-1881 WATER ORDINANCE.

WUCOLS PLANT FACTOR

THIS PROJECT IS LOCATED IN 'WUCOLS' REGION 14-SOUTH INLAND'.

H = HIGH WATER NEEDS
M = MODERATE WATER NEEDS
L = LOW WATER NEEDS
VL= VERY LOW WATER NEEDS

PLANTING LEGEND

TREES

SYMBOL	TREE NAME	QTY.	WUCOLS
	PROPOSED STREET TREE ALONG LIVE OAK AVENUE PLATANUS ACERIFOLIA 'BLOODSGOOD', LONDON PLANE TREE 24" BOX SIZE, STANDARD TRUNK	5	M
	PROPOSED STREET TREE ALONG STREWART AVE, & RIVERGRADE RD. CUPANIOPSIS ANACARDIOIDES, CARROTWOOD TREE 24" BOX SIZE, STANDARD TRUNK	17	M
	PARKING LOT SHADE TREE OLEA E. 'WILSONII', FRUITLESS OLIVE 24" BOX SIZE, STANDARD TRUNK	4	L
	FLOWERING ACCENT TREES CERCIDIUM F. 'DESERT MUSEUM', PALO VERDE 36" BOX SIZE, MULTI-TRUNK	13	L
	VERTICAL TREE AGAINST BUILDING PODOCARPUS GRACILIOR, FERN PINE 15 GAL. SIZE, COLUMNAR SHAPE	6	M
	VERTICAL TREE AGAINST BUILDING PLATANUS MEXICANA, MEXICAN SYCAMORE 15 GAL. SIZE	30	M
	TYP. PROPERTY LINE TREE ACACIA STENOPHYLLA, SHOE-STRING ACACIA 24" BOX SIZE	10	L

SHRUBS - SHRUBS SHALL BE CHOSEN FROM THE FOLLOWING.

SYMBOL	SHRUB NAME	WUCOLS
	CHONDROPETALUM TECTORUM, CAPE RUSH 5 GAL. SIZE	M
	LEUCOPHYLLUM FRUTESCENS TEXAS RANGER 5 GAL. SIZE	L
	LIGUSTRUM TEXANUM, TEXAS PRIVET 5 GAL. SIZE	M
	OLEA E. 'LITTLE OLLIE', DWARF FRUITLESS OLIVE 5 GAL. SIZE	L
	CALLISTEMON CITRINUS, SCARLET BOTTLEBRUSH 5 GAL. SIZE	L

VINES - VINES SHALL BE CHOSEN FROM THE FOLLOWING.

SYMBOL	VINE NAME	WUCOLS
▲	LONICERA JAPONICA, HONEY SUCKLE 15 GAL. SIZE	M

GROUND COVER AND SHRUB MASSES

SYMBOL	GROUND COVER/SHRUB MASS NAME	WUCOLS
	AGAVE TRUNCATA, ARTICHOKE AGAVE 5 GAL. SIZE @ 36" O.C.	L
	ACHILLEA 'MOONSHINE', MOONSHINE ACHILLEA 1 GAL. SIZE @ 20" O.C.	L
	MUHLENBERGIA RIGENS, DEER GRASS 1 GAL. SIZE @ 42" O.C.	M
	LEYMUS C. 'CANYON PRINCE', CANYON PRINCE 1 GAL. SIZE @ 36" O.C.	L
	CALANDRINIA S. 'SHINING PINK', SHINNING PINK ROCK PURSLANE 5 GAL. SIZE @ 42" O.C.	L
	AGAVE 'BLUE FLAME', BLUE FLAME AGAVE 5 GAL. SIZE 36" O.C.	L
	SENNA ARTEMISIOIDES, FEATHERY CASSIA 5 GAL. SIZE @ 36" O.C.	L
	DIETES BICOLOR, FORTNIGHT LILY 1 GAL. SIZE @ 24" O.C.	M
	LANTANA S. 'MONPUR', PURPLE POTION TRAILING LANTANA 1 GAL. SIZE @ 24" O.C.	L
	ROSMARINUS O. 'HUNTINGTON CARPET', HUNTINGTON CARPET ROSEMARY 1 GAL. SIZE @ 24" O.C.	L
	MUHLENBERGIA C. 'REGAL MIST', REGAL MIST PINK MUHLY 1 GAL. SIZE @ 30" O.C.	L
	SALVIA GREGGII, AUTUMN SAGE 1 GAL. SIZE @ 36" O.C.	L
	CHONDRAPETALUM TECTORUM, CAPE REED 1 GAL. SIZE @ 42" O.C.	M

NOTE: ALL SHRUB PLANTING AREAS TO RECEIVE A 3" LAYER OF SHREDDED WOOD MULCH.

Source: GAA Architects, June 2024

Figure 2-5: CONCEPTUAL LANDSCAPE PLAN
14005 Live Oak Avenue Project
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Kimley»Horn

2.4 Project Construction Activities and Phasing

Project construction is anticipated to occur over one (1) phase, lasting approximately thirteen (13) months, beginning as early as the fall of 2025 and ending in the fall of 2026. Construction would occur consistent with City noise policies, as presented in Sections 9.28.110(A) and 9.28.110(B) of the Irwindale Municipal Code (IMC). Specifically, construction would occur Monday through Saturday from 7:00 a.m. to 7:00 p.m. No construction activities would take place on Sundays or City holidays, consistent with the IMC. Project construction is anticipated to occur in the following sequence:

- Demolition (concrete and asphalt removal),
- Site preparation, and
- Construction.

Demolition for the Project would require removal of approximately 56,000 square feet of building and 131,089 square feet of pavement material. The Project is not anticipated to include soil import or export, except for soil amendments and ornamental materials associated with landscaping. Final grading plans would be approved by the City, as applicable.

2.4.1 Street Closures

Construction activities will necessitate temporary lane closures on streets adjacent to the Project site on an intermittent basis for utility relocations/hookups, delivery of materials, curb/sidewalk construction, and other related activities. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on site for the duration of construction activities. Traffic-lane and right-of-way closures, if required, would be properly permitted by the City and would conform to City standards.

Unless stated otherwise, all construction activities would be performed in accordance with all applicable State and federal laws and City codes and policies with respect to building construction and activities.

2.5 Project Operations

The Project would operate as one (1) speculative warehouse building. Typical operational characteristics would include employees commuting to and from the Project site, delivery of materials and supplies to the Project site, and truck loading and unloading. Truck chassis (both with and without trailers) would access the Project Site to delivery or carry out inventory. To provide a conservative environmental analysis, industrial operations are assumed to occur 24 hours a day, 7 days a week since no limit on industrial operation hours is stated in the IMC.

2.6 Agreements, Permits, and Approvals

The City, as Lead Agency, has discretionary authority over the proposed Project. Other agencies in addition to the City are expected to use this IS/MND in their decision-making process. To implement this Project, at a minimum, the following discretionary permits/approvals must be granted by the City and others:

- Adoption of the Initial Study/Mitigated Negative Declaration;
- Site Plan and Design Review (DA);
- SCAQMD Authority to Construct/Permit to Operate; and
- Issuance of applicable grading and building permits.

2.7 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the proposed Project, involving at least one impact that is a "Potentially Significant Impact" or “Less Than Significant With Mitigation Incorporated,” as indicated by the checklist on the following pages.

	Aesthetics		Agricultural and Forestry Resources		Air Quality
X	Biological Resources	X	Cultural Resources		Energy
X	Geology & Soils		Greenhouse Gas Emissions		Hazards & Hazardous Materials
	Hydrology & Water Quality		Land Use & Planning		Mineral Resources
	Noise		Population & Housing		Public Services
	Recreation		Transportation	X	Tribal Cultural Resources
	Utilities & Service Systems		Wildfire	X	Mandatory Findings of Significance

3.0 LEAD AGENCY DETERMINATION

On the basis of this initial evaluation:

I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	**X**
I find that the proposed Project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed Project MAY have a potentially significant or a potentially significant unless mitigated impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.	

CITY OF IRWINDALE

Brandi Jones
Senior Planner

09/26/2024
Date

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4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

The following environmental analysis is patterned after State CEQA Guidelines Appendix G**.** An explanation is provided for all responses except "No Impact" responses, which are supported by the cited information sources. The responses consider the whole action involved with the proposed Project: on- and off-site, Project- and cumulative-level, direct and indirect, and short-term construction and long-term operational. The explanation of each issue also identifies the significance criteria or threshold, if any, used to evaluate each question, and the mitigation identified, if any, to avoid or reduce the impact to less than significant. To each question, there are four possible responses:

- **No Impact.** The Project would not have any measurable environmental impact.
- **Less Than Significant Impact.** The Project would have the potential to impact the environment, although this impact would be below-established thresholds that are considered to be significant.
- **Less Than Significant With Mitigation Incorporated.** The Project would have the potential to generate impacts, which may be considered as a significant effect on the environment, although mitigation measures or changes to the Project's physical or operational characteristics could reduce these impacts to a less than significant level.
- **Potentially Significant Impact.** The Project could have impacts, which may be considered significant, and therefore additional analysis is required to identify mitigation. A determination that there is a potential for significant effects indicates the need to more fully analyze the Project's impacts and identify mitigation.

4.1 Aesthetics

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) If in a non-urbanized area, 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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Impact Analysis

4.1a Would the project have a substantial adverse effect on a scenic vista?

No Impact. Under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the public's benefit. The Project site is currently developed with an industrial office building and associated surface parking lot. The Project site is within a fully urbanized area of the City dominated by industrial development to the north, west, and south, and an undeveloped vacant lot currently undergoing grading to the east. Overall Project site topography is flat. The City's General Plan does not identify any officially designated scenic vistas within the City boundaries. The closest scenic resource to the Project site is the San Gabriel Mountains approximately three (3) miles to the north. However, existing views of these mountains are entirely obscured from street view along Rivergrade Road and Live Oak Avenue and intermittently obscured from street view along Stewart Avenue by surrounding urban development and trees. There are no prominent features on the Project site from which scenic vistas could be viewed, nor does the Project site contain a scenic vista.

Upon Project development, views of the San Gabriel Mountains would continue to be blocked along Rivergrade Road, Stewart Avenue, and Live Oak Avenue. The Project would not directly obstruct an existing public view of a scenic vista as no scenic vistas are in the Project site vicinity. Therefore, Project development would not result in a substantial adverse effect on a scenic vista. Therefore, the Project would result in no impact, and no mitigation is required.

4.1b Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?

No Impact. There are no State-designated scenic highways in the City.[2] The nearest eligible scenic highway is the segment of SR-39 north of the I-210, located approximately 3.5 miles northeast of the Project site, and the nearest officially designated scenic highway is State Route 2 located approximately 14.7 miles northwest of the Project site. Further, there are no trees, rock outcroppings, or historic buildings on or adjacent to the Project site. Therefore, the Project would not damage scenic resources within a State scenic highway. Therefore, the Project would result in no impact, and no mitigation is required.

4.1c If in a non-urbanized area, 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 in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project site is in an urbanized area of the City; therefore, the applicable threshold with respect to the Project is whether it is consistent with applicable zoning and other regulations governing scenic quality.

The Project site is zoned M-2 (Heavy Manufacturing). Pursuant to IMC Chapter 17.56, the M-2 zone includes any use permitted in the M-1 (Light Manufacturing) zone and additional heavy manufacturing uses. Warehouse uses are a permitted use in the M-2 zone. The maximum permitted floor area ratio (FAR) for all land uses within the Industrial/Business Park General Plan land use designation is 1.0. There is no maximum allowable building height within the M-2 zone.

The Project would include warehousing activities which is an allowed use. The building height is 49 feet and the FAR would be 0.48. Thus, the Project would be consistent with the zoning and General Plan for the Project site, including the land use, FAR, height, and setback requirements, standards, and limits established in the IMC for the M-2 zone. The Project would be subject to review by the City's development review process. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.1d Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. Existing outdoor lighting at and near the Project site is associated with office parking, and street lighting along Live Oak Avenue, Stewart Avenue, and Rivergrade Road, typical of urbanized areas. New lighting sources introduced by the Project may increase ambient nighttime illumination levels.

Construction

Pursuant to IMC Section 9.28.110(B), construction activities would occur Monday through Saturday from 7:00 a.m. to 7:00 p.m. While the majority of construction activities would occur during daylight hours, there is a potential that construction could require the use of artificial lighting, particularly during the winter season when there are fewer daylight hours each day. To the extent artificial light sources are required, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with IMC light intensity requirements. Additionally, as part of the Project, construction lighting

[2] California Department of Transportation. California State Scenic Highway System Map, 2019, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed November 27, 2023.

would be shielded to minimize light spillover. Construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing comprised of a solid material or including screening would be placed along the periphery of the Project site to screen construction activity from street view at off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with Project construction activities would not substantially alter the character of off-site areas surrounding the Project site or adversely impact day or nighttime views in the area. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Operation

The Project would introduce new sources of light and glare that are typically associated with light industrial buildings, including architecture, interior, security, and wayfinding lighting sources. However, all Project lighting would comply with current energy standards and codes, while providing efficient and effective on-site lighting. Nighttime security lighting for the Project would be provided to illuminate building entrances, parking areas, and internal roadways and walkways. The nearest sensitive receptors in the vicinity of the Project site are the single-family residences approximately 445 feet southeast of the Project site. However, all exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses, and security lighting would be designed to prevent light trespass onto adjacent properties. It is not anticipated that the amount of light emanating from the Project would represent a noticeable increase over current light levels.

The Project would include appropriate levels of interior and exterior lighting for security, parking, and architectural highlighting. Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the Project in accordance with IMC lighting regulations that require that operational lighting would be directed downward or on the specific on-site feature to be lit and avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses.

Regarding glare, daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Similar to the existing development on the Project site, sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project site is in front of the driver, in the direction of travel.

The Project site currently contains a surface parking lot and an existing industrial office building constructed of various non-reflective materials. No sources of substantial glare are anticipated with implementation of the Project. Exterior building materials of the warehouse building would use various non-reflective material designed to minimize the transmission of glare from the Project's buildings and would not include polished metals. The Project building would be prohibited from using highly reflective

building materials such as mirrored glass on exterior facades. Parking would be screened from street-level public view by proposed landscaping and trees along Rivergrade Road, Stewart Avenue, and Live Oak Avenue, thereby reducing potential nighttime glare from vehicles.

Based on the above, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.2 Agricultural and Forestry Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

Impact Analysis

4.2a Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

4.2b Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

4.2c 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))?

4.2d Would the project result in the loss of forest land or conversion of forest land to non-forest use?

4.2e Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. According to the California Department of Conservation's California Important Farmland Finder, the Project site is listed as Urban and Built-Up Land and is not mapped as important Farmland.[3] There is also no land under a Williamson Act contract in the City.[4] Furthermore, the Project site is zoned M-2 (Heavy Manufacturing), and properties to the immediate north, east, and west of the Project site in the City of Irwindale and immediately to the south in the City of Baldwin Park are not designated under agricultural, forest land, or timberland zoning.[5,6] Therefore, the Project would result in no impact, and no mitigation is required.

[3] California Department of Conservation (DOC). California Important Farmland Finder, 2022, https://maps.conservation.ca.gov/dlrp/ciff/. Accessed November 21, 2023.

[4] DOC. California Williamson Act Enrollment Finder, 2022, https://maps.conservation.ca.gov/dlrp/WilliamsonAct/. Accessed November 21, 2023.

[5] City of Irwindale. City of Irwindale – Zoning Map, 2022, https://www.arcgis.com/home/webmap/viewer.html?webmap=64e898d544f5415f84a4cb6770bf65ea&extent=-118.031,34.0756,-117.9042,34.1429. Accessed November 21, 2023.

[6] City of Baldwin Park. Zoning Map., 2023, https://www.baldwinpark.com/DocumentCenter/View/682/Zoning-Map-Updated-September-2023-PDF. Accessed November 21, 2023.

4.3 Air Quality

This Section is based on the Air Quality Assessment (Kimley-Horn, March 2024) and Health Risk Assessment (Kimley-Horn, March 2024), which are included in their entirety as **Appendix A: Air Quality Assessment** and **Appendix B: Health Risk Assessment,** respectively.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
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?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Regulatory Setting

Federal

Federal Clean Air Act

Air quality is federally protected by the Federal Clean Air Act (FCAA) and its amendments. Under the FCAA, the United States Environmental Protection Agency (U.S. EPA) developed the primary and secondary National Ambient Air Quality Standards (NAAQS) for the criteria air pollutants including ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter less than 10 microns in diameter (PM10), particulate matter less than 2.5 microns in diameter (PM2.5), and lead. Proposed projects in or near nonattainment areas could be subject to more stringent air-permitting requirements. The FCAA requires each state to prepare a State Implementation Plan (SIP) to demonstrate how it will attain the NAAQS within the federally imposed deadlines.

The U.S. EPA can withhold certain transportation funds from states that fail to comply with the planning requirements of the FCAA. If a state fails to correct these planning deficiencies within two (2) years of federal notification, the U.S. EPA is required to develop a Federal Implementation Plan for the identified nonattainment area or areas. The provisions of 40 Code of Federal Regulations Parts 51 and 93 apply in all nonattainment and maintenance areas for transportation-related criteria pollutants for which the area is designated nonattainment or has a maintenance plan. The U.S. EPA has designated enforcement of air

pollution control regulations to the individual states. Applicable NAAQSs are summarized in **Table 4.3-1: State and National Ambient Air Quality Standards.**

State

California Air Resources Board

The California Air Resources Board (CARB) administers the air quality policy in California. The California Ambient Air Quality Standards (CAAQS) were established in 1969 pursuant to the Mulford-Carrell Act. The CAAQS, included with the NAAQS in **Table 4.3-1**, are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility reducing particulates, hydrogen sulfide, and sulfates.

The California Clean Air Act (CCAA), which was approved in 1988, requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with CAAQS. These AQMPs also serve as the basis for the preparation of the SIP for meeting NAAQS for the State of California. Like the U.S. EPA, CARB also designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a CAAQS for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events such as wildfires, volcanoes, etc. are not considered violations of a CAAQS, and are not used as a basis for designating areas as nonattainment. The applicable CAAQS are summarized in **Table 4.3-1**.

Table 4.3-1: State and National Ambient Air Quality Standards

Pollutant	Averaging Time	State Standards[1]	National Standards[2]
Ozone (O_3) [2, 5, 7]	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm
	1 Hour	0.09 ppm (180 µg/m^3)	NA
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)
	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)
Nitrogen Dioxide (NO_2)	1 Hour	0.18 ppm (339 µg/m^3)	0.10 ppm[11]
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)
Sulfur Dioxide (SO_2) [8]	24 Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)
	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)
	Annual Arithmetic Mean	NA	0.03 ppm (80 µg/m^3)
Particulate Matter (PM10) [1, 3, 6]	24-Hour	50 µg/m^3	150 µg/m^3
	Annual Arithmetic Mean	20 µg/m^3	NA
Fine Particulate Matter (PM2.5) [3, 4, 6, 9]	24-Hour	NA	35 µg/m^3
	Annual Arithmetic Mean	12 µg/m^3	9.0 µg/m^3
Sulfates (SO_{4-2})	24 Hour	25 µg/m^3	NA
Lead (Pb) [10, 11]	30-Day Average	1.5 µg/m^3	NA

Table 4.3-1: State and National Ambient Air Quality Standards			
	Calendar Quarter	NA	1.5 µg/m^3
	Rolling 3-Month Average	NA	0.15 µg/m^3
Hydrogen Sulfide (H_2S)	1 Hour	0.03 ppm (0.15 µg/m^3)	NA
Vinyl Chloride (C_2H_3Cl) [10]	24 Hour	0.01 ppm (26 µg/m^3)	NA

ppm = parts per million; µg/m^3 = micrograms per cubic meter; mg/m^3 = milligrams per cubic meter; – = no information available.

1. California standards for O_3, carbon monoxide (except Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, suspended particulate matter - PM10, and visibility reducing particles are values that are not to be exceeded. The standards for sulfates, Lake Tahoe carbon monoxide, lead, hydrogen sulfide, and vinyl chloride are not to be equaled or exceeded. If the standard is for a 1-hour, 8-hour or 24-hour average (i.e. all standards except for lead and the PM10 annual standard), then some measurements may be excluded. Measurements are excluded that CARB determines would occur less than once per year on the average. The Lake Tahoe carbon monoxide standard is 6.0 ppm, a level one-half the national standard and two-thirds the State standard.
1. National standards shown are the "primary standards" designed to protect public health. National standards other than for O_3, particulates and those based on annual averages are not to be exceeded more than once a year. The 1-hour O_3 standard is attained if, during the most recent three-year period, the average number of days per year with maximum hourly concentrations above the standard is equal to or less than one. The 8-hour O_3 standard is attained when the 3-year average of the 4th highest daily concentrations is 0.070 ppm or less. The 24-hour PM10 standard is attained when the 3-year average of the 99th percentile of monitored concentrations is less than 150 µg/m_3. The 24-hour $PM_{2.5}$ standard is attained when the 3-year average of 98th percentiles is less than 35 µg/m^3.
2. Except for the national particulate standards, annual standards are met if the annual average falls below the standard at every site. The national annual particulate standard for PM10 is met if the 3-year average falls below the standard at every site. The annual $PM_{2.5}$ standard is met if the 3-year average of annual averages spatially-averaged across officially designed clusters of sites falls below the standard.
   NAAQS are set by the U.S. EPA at levels determined to be protective of public health with an adequate margin of safety.
3. On October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm. An area will meet the standard if the fourth-highest maximum daily 8-hour O_3 concentration per year, averaged over three years, is equal to or less than 0.070 ppm. U.S. EPA will make recommendations on attainment designations by October 1, 2016, and issue final designations October 1, 2017. Nonattainment areas will have until 2020 to late 2037 to meet the health standard, with attainment dates varying based on the O_3 level in the area.
4. The national 1-hour O_3 standard was revoked by the U.S. EPA on June 15, 2005.
5. In June 2002, CARB established new annual standards for PM2.5 and PM10.
6. The 8-hour California O_3 standard was approved by the CARB on April 28, 2005 and became effective on May 17, 2006.
7. On June 2, 2010, the U.S. EPA established a new 1-hour SO_2 standard, effective August 23, 2010, which is based on the 3-year average of the annual 99th percentile of 1-hour daily maximum concentrations. The existing 0.030 ppm annual and 0.14 ppm 24-hour SO_2 NAAQS however must continue to be used until one year following U.S. EPA initial designations of the new 1-hour SO_2 NAAQS.
8. In December 2012, U.S. EPA strengthened the annual $PM_{2.5}$ NAAQS from 15.0 to 12.0 µg/m^3. In December 2014, the U.S. EPA issued final area designations for the 2012 primary annual $PM_{2.5}$ NAAQS. Areas designated "unclassifiable/attainment" must continue to take steps to prevent their air quality from deteriorating to unhealthy levels. The effective date of this standard is April 15, 2015.
9. CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure below which there are no adverse health effects determined.
10. National lead standard, rolling 3-month average: final rule signed October 15, 2008. Final designations effective December 31, 2011.

Source: South Coast Air Quality Management District, *Air Quality Management Plan*, 2022; California Air Resources Board, *Ambient Air Quality Standards*, May 6, 2016, and U.S. EPA, NAAQS Table, February 7, 2024.

Regional

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino Counties. The agency's primary responsibility is ensuring that CAAQS and NAAQS are attained and maintained in the South Coast

Air Basin (SCAB). The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The SCAQMD is also the lead agency in charge of developing the AQMP, with input from the Southern California Association of Governments (SCAG) and CARB. The AQMP is a comprehensive plan that includes control strategies for stationary and area sources, as well as for on-road and off-road mobile sources. SCAG has the primary responsibility for providing future growth projections and the development and implementation of transportation control measures. CARB, in coordination with federal agencies, provides the control element for mobile sources.

The 2016 AQMP was adopted by the SCAQMD Governing Board on March 3, 2017. The purpose of the AQMP is to set forth a comprehensive and integrated program that would lead the SCAB into compliance with the federal 24-hour PM2.5 air quality standard, and to provide an update to the SCAQMD's commitments towards meeting the 8-hour O_3 NAAQS. Specifically, the 2016 AQMP covers the following NAAQS: 1979 1-hour O_3 NAAQS, 1997 8-hour O_3 NAAQS, 2006 24-hour PM2.5 NAAQS, 2008 8-hour O_3 NAAQS, and the 2012 annual PM2.5 NAAQS.

The 2022 AQMP, adopted by the SCAQMD Governing Board on December 2, 2022, was developed to address the requirements for meeting the 2015 8-hour O_3 standard. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low nitrous oxide [NO_X] technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other FCAA measures to achieve the 2015 8-hour ozone standard. The 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 – 2045 RTP/SCS) and updated emission inventory methodologies for various source categories.

The SCAQMD has published the CEQA Air Quality Handbook (approved by the SCAQMD Governing Board in 1993 and augmented with guidance for Localized Significance Thresholds [LSTs] in 2008). The SCAQMD guidance helps local government agencies and consultants to develop environmental documents required by CEQA and provides identification of suggested thresholds of significance for criteria pollutants for both construction and operation (see discussion of thresholds below). With the help of the CEQA Air Quality Handbook and associated guidance, local land use planners and consultants are able to analyze and document how proposed and existing projects affect air quality in order to meet the requirements of the CEQA review process. The SCAQMD periodically provides supplemental guidance and updates to the handbook on their website.

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. Under federal law, SCAG is designated as a Metropolitan Planning Organization and under State law as a Regional Transportation Planning Agency and a Council of Governments.

The State and federal attainment status designations for the SCAB are summarized in **Table 4.3-2: South Coast Air Basin Attainment Status**. The SCAB is currently designated as a nonattainment area for the O_3,

PM10, and PM2.5 CAAQS, as well as the 8-hour O_3 and PM2.5 NAAQS. The SCAB is designated as attainment or unclassified for the remaining CAAQS and NAAQS.

Table 4.3-2: South Coast Air Basin Attainment Status

Pollutant	State	Federal
Ozone (O_3) (1 Hour Standard)	Non-Attainment	Non-Attainment (Extreme)
Ozone (O_3) (8 Hour Standard)	Non-Attainment	Non-Attainment (Extreme)
Particulate Matter (PM2.5) (24 Hour Standard)	–	Non-Attainment (Serious)
Particulate Matter (PM2.5) (Annual Standard)	Non-Attainment	Non-Attainment (Serious)
Particulate Matter (PM10) (24 Hour Standard)	Non-Attainment	Attainment (Maintenance)
Particulate Matter (PM10) (Annual Standard)	Non-Attainment	–
Carbon Monoxide (CO) (1 Hour Standard)	Attainment	Attainment (Maintenance)
Carbon Monoxide (CO) (8 Hour Standard)	Attainment	Attainment (Maintenance)
Nitrogen Dioxide (NO_2) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO_2) (Annual Standard)	Attainment	Attainment (Maintenance)
Sulfur Dioxide (SO_2) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide (SO_2) (24 Hour Standard)	Attainment	–
Lead (Pb) (30 Day Standard)	–	Unclassifiable/Attainment
Lead (Pb) (3 Month Standard)	Attainment	–
Sulfates (SO_{4-2}) (24 Hour Standard)	Attainment	–
Hydrogen Sulfide (H_2S) (1 Hour Standard)	Unclassified	–

Source: South Coast Air Quality Management District, *Air Quality Management Plan*, 2022; United States Environmental Protection Agency, *Nonattainment Areas for Criteria Pollutants (Green Book)*, 2022.

The following is a list of SCAQMD rules that are required of construction activities associated with the Project:

- **Rule 402 (Nuisance)** – This rule prohibits the 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. 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 requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM10 suppression techniques are summarized below.

  A. Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.

  B. All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.

  C. All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.

  D. The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.

  E. Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.

- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce reactive organic gas (ROG) emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.

- **Rule 2305 (Warehouse Indirect Source Rule)** - Rule 2305 was adopted by the SCAQMD Governing Board on May 7, 2021, to reduce NO_X and particulate matter emissions associated with warehouses and mobile sources attracted to warehouses. This rule applies to all existing and proposed warehouses over 100,000 square feet located in the SCAQMD. Rule 2305 requires warehouse operators to track annual vehicle miles traveled associated with truck trips to and from the warehouse. These trip miles are used to calculate the warehouses Warehouse Actions and Investments to Reduce Emissions (WAIRE) Points Compliance Obligation. WAIRE Points are earned based on emission reduction measures and warehouse operators are required to submit an annual WAIRE Report which includes truck trip data and emission reduction measures. Reduction strategies listed in the WAIRE menu include acquire zero emission (ZE) or near zero emission (NZE) trucks; require ZE/NZE truck visits; require ZE yard trucks; install on-site ZE charging/fueling infrastructure; install on-site energy systems; and install filtration systems in residences, schools, and other buildings in the adjacent community. Warehouse operators that do not earn a sufficient number of WAIRE points to satisfy the WAIRE Points Compliance Obligation would be required to pay a mitigation fee. Funds from the mitigation fee will be used to incentivize the purchase of cleaner trucks and charging/fueling infrastructure in communities nearby.

Local

City of Irwindale General Plan

The General Plan is a long-range planning document that provides the City a framework for action and the direction in which to focus that action. The following policies focusing on improving air quality are applicable to the proposed Project:

Resource Management Element

Policy 9: The City will continue to cooperate with the other agencies that are charged with improving air and water quality in the region.

Policy 19: The City of Irwindale will consider environmental justice issues as they are related to potential health impact associated with air pollution and ensure that all land use decisions, including enforcement actions, are made in an equitable fashion to protect residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location from the health effects of air pollution.

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.

Policy 21: The City of Irwindale will encourage the applicant for sensitive land uses (e.g., residences, schools, daycare facilities, playgrounds, and medical facilities) to incorporate design features (e.g., pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) in the planning process to minimize the potential pollution impacts on sensitive receptors.

Policy 22: The City of Irwindale will facilitate communications among residents, businesses, and the South Coast Air Quality Management District (SCAQMD) to quickly resolve air pollution nuisance complaints. The City will distribute information to advise residents on how to register a complaint with SCAQMD (SCAQMD‘s “Cut Smog” program).

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.

Policy 26: The City of Irwindale will design traffic plans, including the development of suggested routes for trucks, to minimize truck idling time.

Policy 27: The City of Irwindale will encourage vegetative thinning or mowing for weed abatement activities to minimize wind blown dust.

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.).

Policy 30: The City of Irwindale will provide regional and local air quality information on the City‘s website, including the SCAQMD‘s 1-800-CUT-SMOG number for the public to report air pollution complaints to the SCAQMD.

Background

South Coast Air Quality Management District Thresholds

Mass Emissions Thresholds

The significance criteria established by SCAQMD may be relied upon to make the above determinations. According to the SCAQMD, an air quality impact is considered significant if a Project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality during construction and operational activities of land use development projects, as shown in **Table 4.3-3: South Coast Air Quality Management District Emissions Thresholds**.

Table 4.3-3: South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors (Regional)	Mass Daily Thresholds (pounds per day)	
	Construction	Operations
Reactive Organic Gases (ROG)[1]	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM10)	150	150
Fine Particulates (PM2.5)	55	55

1. VOCs and reactive organic gases (ROGs) are subsets of organic gases that are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. Although they represent slightly different subsets of organic gases, they are used interchangeably for the purposes of this analysis.

Source: South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, April 2019.

Localized Carbon Monoxide

In addition to the daily thresholds listed above, development associated with the Project would also be subject to the CAAQS and NAAQS. These are addressed though an analysis of localized CO impacts. The significance of localized impacts depends on whether ambient CO levels near the Project are above the applicable CAAQS and NAAQS (the more stringent CAAQS are 20 [parts per million] ppm for 1-hour and 9 ppm for 8-hour). The SCAB has been designated as attainment under the 1-hour and 8-hour CAAQS.

Localized Significance Thresholds

In addition to the CO hotspot analysis, the SCAQMD developed LSTs for emissions of NO_2, CO, PM10, and PM2.5 generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project without expecting to cause or substantially contribute to an exceedance of the most stringent CAAQS or NAAQS. LSTs are based on the ambient concentrations of that pollutant within the Project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is applicable for all projects that disturb 5 acres or less on a single day. The City of Irwindale is located within SCAQMD SRA 9 (East San Gabriel Valley). The nearest sensitive receptors are located approximately 445 feet from the Project site (approximately 136 meters). LSTs associated with a 100-meter source-receptor separation distance are provided in **Table 4.3-4: Localized Significance Thresholds for Construction/Operations** to demonstrate that the emissions thresholds increase as acreages increase.

Table 4.3-4: Local Significance Thresholds (Construction/Operations)				
Project Size	**NO_x (lbs per day)**	**CO (lbs per day)**	**PM10 (lbs per day)**	**PM2.5 (lbs per day)**
1 Acre	159 / 159	1,914 / 1,914	34 / 9	9 / 3
2 Acres	200 / 200	2,445 / 2,445	42 / 11	12 / 3
5 Acres	286 / 286	3,680 / 3,680	63 / 16	17 / 5
Note: Based on a receptor distance of 100 meters in SRA 9. Source: South Coast Air Quality Management District, *Localized Significance Threshold Methodology,* July 2008.				

Health Risk Analysis Thresholds

Project health risks are determined by examining the types and levels of air toxics generated and the associated impacts on factors that affect air quality. While the final determination of significance thresholds is within the purview of the lead agency pursuant to the State CEQA Guidelines, the SCAQMD recommends that the following air pollution thresholds be used by lead agencies in determining whether the impacts from the Project are significant. If the lead agency finds that the Project has the potential to exceed the applicable thresholds, the Project should be considered significant. The thresholds for air toxic emissions are as follows.

- **Cancer Risk (Individual):** Emit contaminants resulting in a maximum individual incremental cancer risk equal or greater than of 10 in one million.
- **Non-Cancer Risk:** Emit contaminants that result in a chronic or acute hazard index (HI) equal to or greater than 1.0.

Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incidence rate of 10 persons per million as the maximum acceptable incremental increase in cancer risk due to toxic air contaminant (TAC) exposure. This threshold is an upper-bound incremental probability to determine whether or not a given project has a potentially significant development-specific and cumulative impact and to ensure an individual new source does not contribute a cumulatively significant impact. The 10 in one million standard is a health-protective significance threshold. A risk level of 10 in one million implies a likelihood that up to 10 persons, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. This risk would be an excess cancer that is in addition to any cancer risk borne by a person not exposed to these air toxics.

Sensitive Receptors

SCAQMD defines sensitive receptors as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and the chronically ill. These facilities may include residences, school playgrounds, child-care centers, retirement homes, convalescent homes, and people with illnesses. Sensitive land uses within 1,000 feet of the Project site consist of single-family residential and multi-family communities located within the City of Baldwin Park. The closest sensitive receptor in the City of Irwindale is the Kare Youth League and Chamberlain University located more than 2,741 feet and 3,000 feet away, respectively.

Construction Toxic Air Contaminant and Particulate Matter Health Risks

TACs are airborne substances that can cause short-term (acute) or long-term (chronic or carcinogenic, i.e., cancer causing) adverse human health effects (i.e., injury or illness). TACs include both organic and

inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.

Construction equipment and associated heavy-duty truck traffic generate diesel exhaust, which is a known TAC. Diesel exhaust from construction equipment operating at the site poses a health risk to nearby sensitive receptors.

Under the SCAQMD Air Quality Guidelines, an incremental cancer risk of greater than 10 cases per million for a 70-year exposure duration at the Maximally Exposed Individual (MEI) will result in a significant impact. The 10 in 1 million threshold is based on the latest scientific data, and is designed to protect the most sensitive individuals in the population as each chemical's exposure level includes large margins of safety. In addition to this carcinogen threshold, the California Office of Environmental Health Hazard Assessment (OEHHA) recommends that the non-carcinogenic hazards for TACs at ground level should not exceed a chronic HI of greater than one.

Methodology

The Project's construction and operational emissions were calculated using the California Emissions Estimator Model version 2022.1 (CalEEMod). Details of the modeling assumptions and emission factors are provided in **Appendix A**. For construction, CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. Emissions during construction were forecasted based on the proposed construction schedule and applying the mobile-source and fugitive dust emissions factors derived from CalEEMod.

The Project's construction-related emissions would be generated from off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. The Project's operational-related emissions would be generated by vehicular traffic, area sources (e.g., landscaping maintenance and consumer products), electrical generation, natural gas consumption, water supply and wastewater treatment, yard trucks, generators, and solid waste.

Impact Analysis

4.3a Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. As part of its enforcement responsibilities, the U.S. EPA requires each State with nonattainment areas to prepare and submit a SIP that demonstrates the means to attain the NAAQS. The SIP must integrate federal, State, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the CAAQS and NAAQS. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the SCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the FCAA, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 and 2022 AQMPs (AQMPs). The AQMPs establish a program of rules and regulations directed at reducing air pollutant emissions and achieving CAAQS and NAAQS. The AQMPs are a regional and multi-agency effort including the SCAQMD, the CARB, the SCAG, and the U.S. EPA. The AQMPs' pollutant control strategies are based on the latest

scientific and technical information and planning assumptions, including SCAG's 2020-2045 RTP/SCS, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's AQMPs.

Criteria for determining consistency with the AQMPs are defined by the following indicators:

- **Consistency Criterion No. 1**: The Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2**: The Project will not exceed the assumptions in the AQMP or increments based on the years of the Project build-out phase.

According to the SCAQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and NAAQS.

The violations to which Consistency Criterion No. 1 refers to are CAAQS and NAAQS. As discussed in Threshold 4.3b below, the Project would not exceed construction or operational emissions standards. Therefore, the Project would not contribute to an existing air quality violation. Thus, the Project is consistent with the first criterion.

Concerning Consistency Criterion No. 2, the AQMPs contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is consistent with the land use designation and development density presented in the City's General Plan, and therefore would not exceed the population or job growth projections used by the SCAQMD to develop the AQMPs. Thus, the Project is consistent with the second criterion.

Based on these criteria, the Project would not conflict with or obstruct implementation of the AQMPs. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.3b 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?

Less Than Significant Impact.

Construction Emissions

Project construction would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include O_3-precursor pollutants (i.e., ROG and NO_X) and PM10 and PM2.5. Construction-generated emissions are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water.

Project construction activities are estimated to be completed within 13 months. Construction-generated emissions associated the Project were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. See **Appendix A** for more information regarding the construction assumptions used in this analysis. Predicted maximum daily construction-generated emissions for the Project are summarized in in **Table 4.3-5: Construction-Related Emissions.**

Fugitive dust emissions may have a substantial, temporary impact on local air quality. In addition, fugitive and uncontrolled dust may be a nuisance and potential health hazard to those living and working in the Project vicinity. SCAQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.), are applicable to the Project and were applied in CalEEMod to minimize fugitive dust emissions. Rule 1113 provides specifications on painting practices and regulates the ROG content of paint. The Project would be required to comply with SCAQMD rules and regulations, including SCAQMD Rules 402, 403, and 1113. As shown in **Table 4.3-5**, construction emissions would not exceed SCAQMD threshold for all criteria pollutants. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Table 4.3-5: Construction-Related Emissions

Construction Year	ROG (lb/day)	NOx (lb/day)	CO (lb/day)	SO_2 (lb/day)	PM10 (lb/day)	PM2.5 (lb/day)
2025	5.92	59.81	54.62	0.11	29.50	13.59
2026	16.66	11.52	18.27	0.03	1.34	0.60
Maximum Emissions	*16.66*	*59.81*	*54.62*	*0.11*	*29.50*	*13.59*
SCAQMD Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM10 = Particulate Matter 10 microns in diameter or less; PM2.5 = Particulate Matter 2.5 microns in diameter or less

SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; water exposed surfaces three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied.

Source: CalEEMod version 2022.1.1.21. Refer to **Appendix A** for model outputs.

Operational Emissions

The Project's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, etc.), energy sources, mobile sources (i.e., motor vehicle use), stationary sources (i.e., emergency generators) and off-road equipment. Primary sources of operational criteria pollutants are from motor vehicle use and area sources. Long-term operational emissions attributable to the Project are summarized in **Table 4.3-6: Maximum Daily Project Operational Emissions: Existing and Buildout.**

The Project's operational emissions sources are described below.

- **Area Source Emissions**. Area source emissions would be generated due to on-site equipment, architectural coating, and landscape maintenance equipment.
- **Energy Source Emissions**. Energy source emissions would be generated due to electricity and natural gas usage associated with the Project. Primary uses of electricity and natural gas by the Project would be for miscellaneous warehouse equipment, space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.

- **Mobile Source Emissions**. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, PM10, and PM2.5 are all pollutants of regional concern. NO_X and ROG react with sunlight to form O_3, known as photochemical smog. Additionally, wind currents readily transport PM10 and PM2.5. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

  Project-generated vehicle emissions are based on the trip generation within the Live Oak Irwindale Traffic Impact Analysis (**Appendix L**) and have been incorporated into CalEEMod, as recommended by the SCAQMD. Per the Live Oak Irwindale Traffic Impact Analysis, the Project would generate 174 total daily vehicle trips, which includes 48 daily truck trips. The existing use was modeled as "general office" with the associated ITE rate. The existing use was estimated to generate 607 daily trips.

- **Off-Road Equipment Emissions**. Operational off-road emissions would be generated by off-road cargo handling equipment used during operational activities. Although the Project is a speculative warehouse development and the end user is unknown, it was conservatively assumed that the Project would include six diesel yard truck per the assumptions provided by the Applicant.

- **Emergency Backup Generators**. As the Project warehouse is speculative, it is unknown whether emergency backup generators would be used. Backup generators would only be used in the event of a power failure and would not be part of the Project's normal daily operations. Nonetheless, emissions associated with this equipment were included to be conservative. Emissions from an emergency backup generator for the warehouse building was calculated separately from CalEEMod; refer to **Appendix A**. However, CalEEMod default emissions rates were used. If backup generators are required, the end user would be required to obtain a permit from the SCAQMD prior to installation. Emergency backup generators must meet SCAQMD's Best Available Control Technology (BACT) requirements and comply with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines), which would minimize emissions.

- **Electric Fire Pump**. The Project would utilize one electric fire pump for the purpose of fire protection services. As the fire pump is powered by electricity, emissions associated with the fire pump would be negligible.

As shown in **Table 4.3-6**, net operational (i.e., area, energy, mobile, off-road, and emergency generators) emissions would not exceed SCAQMD thresholds for all criteria pollutants. In addition, pursuant to SCAQMD Rule 2305, all warehouses over 100,000 square feet are required to implement various emission reduction measures related to warehouse operations and mobile sources. Compliance with SCAQMD Rule 2305 would further reduce criteria pollutants, specifically NO_X and particulate matter emissions. Therefore, the Project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Source	Maximum Pounds Per Day[1]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Existing (2024)						
Mobile	2.32	2.29	23.8	0.05	4.92	1.27
Area	1.74	0.02	2.43	<0.005	<0.005	<0.005
Energy	0.02	0.38	0.32	<0.005	0.03	0.03
Total Existing Emissions	**4.08**	**2.67**	**26.6**	**0.06**	**4.95**	**1.30**
Buildout (2026)						
Area	3.20	0.04	4.45	<0.005	0.01	0.01
Energy	0.03	0.53	0.45	<0.005	0.04	0.04
Mobile	0.49	2.68	5.90	0.03	1.84	0.50
Off-Road – Yard Trucks[2,3]	1.79	11.5	27.877	0.05	0.47	0.43
Emergency Generator[2]	1.69	4.71	4.30	0.01	0.25	0.25
Electric Fire Pump[4]	0	0	0	0	0	0
Total Project Emissions	**7.20**	**19.53**	**42.87**	**0.09**	**2.61**	**1.23**
Net Emissions						
Existing Project Site	*4.08*	*2.67*	*26.6*	0.06	*4.95*	*1.30*
Proposed Project	7.20	19.5	42.9	0.09	2.61	1.23
Net Change	+3.12	+16.83	+16.3	+0.03	-2.34	-0.07
SCAQMD Thresholds	***55***	***55***	***550***	***150***	***150***	***55***
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less

1. The highest values between summer and winter results were used as a worst-case scenario.
2. Emissions were calculated with CARB OFFROAD 1.0.2.
3. Emissions were calculated for six-yard trucks operating for five hours per day.
4. Emissions for an electric fire pump do not produce emissions like diesel fire pumps and are considered negligible.

Source: CalEEMod version 2022.1. Refer to **Appendix A** for model outputs.

Cumulative Construction Emissions

The SCAB is designated nonattainment for O_3, PM10, and PM2.5 CAAQS and nonattainment for O_3 and PM2.5 NAAQS. The SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary.[7] The mass-based regional significance thresholds published by the SCAQMD are designed to ensure compliance with both NAAQS and CAAQS and are based on an inventory of projected emissions in the SCAB. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable. As shown in **Table 4.3-5** above, Project construction-related emissions would not exceed the SCAQMD significance thresholds for criteria

[7] South Coast Air Quality Management District (SCAQMD), White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, 2003.

pollutants. Therefore, the Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction.

The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the FCAA mandates. The analysis assumed fugitive dust controls would be utilized during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the SCAB, which would include related projects. Compliance with SCAQMD rules and regulations would further reduce the Project construction-related impacts. Therefore, Project-related construction emissions, combined with those from other projects in the area, would not substantially deteriorate local air quality. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Cumulative Operational Impacts

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

As indicated in **Table 4.3-6**, the Project's net operational emissions would not exceed SCAQMD thresholds. Therefore, the Project's operational emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.3c Would the Project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Localized Construction Significance Analysis

To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific emissions.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, **Table 4.3-7: Equipment-Specific Grading Rates** is used to determine the maximum daily disturbed acreage for comparison to LSTs. The appropriate SRA for the localized significance thresholds is SRA 9 (East San Gabriel Valley) as this area includes the Project. LSTs apply to CO, NO_2, PM10, and PM2.5. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. Project construction is anticipated to disturb a maximum of 2.5 acres out of the total Project acreage of 4.9 acres in a single day. As the LST guidance provides thresholds for projects disturbing 1, 2, and 5 acres in size and the thresholds increase with size of the site, the LSTs for a 2.5-acre threshold were interpolated and utilized for this analysis.

Table 4.3-7: Equipment-Specific Grading Rates					
Construction Phase	**Equipment Type**	**Equipment Quantity**	**Acres Graded per 8-Hour Day**	**Operating Hours per Day**	**Acres Graded per Day**
Grading	Tractors	3	0.5	8	1.5
	Graders	1	0.5	8	0.5
	Dozers	1	0.5	8	0.5
	Scrapers	0	1	8	0
				Total Acres Graded per Day	**2.5**
Source: CalEEMod version 2022.1.1.21. Refer to **Appendix A** for model outputs.					

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptors are the single-family residences located approximately 445 feet (136 meters) to the southeast of the Project site. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, LSTs for receptors located at 136 meters were interpolated in this analysis. **Table 4.3-8: Localized Significance of Emissions** presents the results of localized emissions during each construction phase. **Table 4.3-8** shows that emissions of these pollutants on the peak day of construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Table 4.3-8: Localized Significance of Emissions				
Construction Activity	**Maximum pounds per day**			
	NO_X	**CO**	**PM10**	**PM2.5**
Construction Emissions				
Demolition	22.19	19.92	0.92	0.84
Site Preparation	31.64	30.17	21.02	11.36
Grading	16.27	17.91	7.80	4.08
Infrastructure Improvements	9.85	12.96	0.38	0.35
Building Construction	9.85	12.97	0.38	0.35
Paving	7.11	9.93	0.32	0.29
Architectural Coating	0.86	1.13	0.02	0.02
Maximum Daily Emissions	*31.64*	*30.17*	*21.02*	*11.36*
SCAQMD Localized Screening Threshold (adjusted for 2.5 acres at 136 meters)	***250***	***3,403***	***63***	***16***
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Operational Emissions				
On-Site and Mobile Source Emissions	23.64	276.85	1.05	0.60
SCAQMD Localized Screening Threshold (adjusted for 4 acres at 136 meters)	***295***	***4,130***	***20***	***5***
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Source: CalEEMod version 2022.1. Refer to **Appendix A** for model outputs.				

Localized Operational Significance Analysis

According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a project only if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). Since the Project includes development of

warehouse buildings, the operational phase LST protocol is conservatively applied to both the area source and a portion of the mobile source emissions. As the closest receptors are located 136 meters (445 feet) to the south of the Project site, the LST thresholds for 136 meters were interpolated for this analysis. Although the Project site is 4.9 acres, the 4-acre LST threshold was conservatively used because the LSTs increase with the size of the site. Therefore, the 4-acre LSTs are conservative for evaluation of a 4.9-acre site.

The LST analysis only includes on-site sources. However, the CalEEMod model outputs do not separate on- and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions shown in **Table 4.3-8** conservatively include all on-site Project-related stationary sources, including on-site off-road equipment (yard trucks), and 30 percent of the Project-related mobile sources, since a portion of mobile sources would include trucks idling on-site.[8] **Table 4.3-8** shows that the maximum daily emissions of these pollutants during Project operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] Cal.5th, Case No. S219783).

The SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the SCAB) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based NAAQS.[9] The NAAQS establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's LSTs and mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts.

As previously discussed, localized effects of on-site Project emissions on nearby receptors were found to be less than significant (refer to **Table 4.3-8**). The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable State or federal ambient air quality standard. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The CAAQS and NAAQS establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations. Information on health impacts related to exposure to ozone and particulate matter emissions published by the U.S. EPA and CARB have been summarized above and discussed in the Regulatory Setting section. As shown above, Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the CAAQS or NAAQS or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels in excess of the

[8] Per the Live Oak Irwindale Traffic Impact Analysis (Appendix L) for the Project, the Project would generate 174 total daily vehicle trips, which includes 48 daily truck trips (30 percent of total daily trips).

[9] Code of Federal Regulation (CFR) [i.e., PSD (40 CFR 52.21, 40 CFR 51.166, 40 CFR 51.165 (b)), Non-attainment NSR (40 CFR 52.24, 40 CFR 51.165, 40 CFR part 51, Appendix S).

health-based CAAQS or NAAQS. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service of an intersection resulting from the Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard.

The SCAB was re-designated as attainment in 2007 and CO is no longer addressed in the SCAQMD's AQMP. The 2003 AQMP is the most recent version that addresses CO concentrations. As part of the SCAQMD CO Hotspot Analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm Federal standard. The Project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's CO Hotspot Analysis. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any vicinity intersections as the Project would result in 174 daily trips. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Carcinogenic Risk

Construction-related activities would result in Project-generated emissions of diesel particulate matter (DPM) from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); paving; application of architectural coatings; on-road truck travel; and other miscellaneous activities. For construction activity, DPM from the exhaust of off-road, heavy-duty diesel equipment is the primary toxic air contaminant of concern. On-road diesel-powered haul trucks traveling to and from the construction area to deliver materials and equipment are less of a concern because they would not stay on the site for long durations. As such, the diesel exhaust from construction equipment operating at the site could potentially pose a health risk to nearby sensitive receptors.

Operational vehicle DPM emissions were estimated using emission factors for PM10 generated with the Emissions Factors (EMFAC) developed by CARB. EMFAC is a mathematical model that was developed to calculate emission rates from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by CARB to project changes in future emissions from on-road mobile sources. EMFAC, incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled (VMT) by speed, and number of starts per day. The model includes the emissions benefits of the truck and bus rule and the previously adopted rules for other on-road diesel equipment. The nearest sensitive receptors are the residences located approximately 445 feet to the southeast of the Project site.

Table 4.3-9: Carcinogenic Risk Assessment shows the health risk for the following scenarios: construction, operation, and combined construction and operation of the Project. Based on OEHHA Risk Assessment

Guidelines, the exposure duration for a resident is 30 years, beginning with the third trimester. Operations would commence after construction. As such, construction would not overlap with operations. The analysis calculates risk based on exposure to construction concentrations during the entire 13 months of the exposure duration and operational concentrations for the remainder of the exposure duration.

Table 4.3-9: Carcinogenic Risk Assessment

Exposure Scenario	Cancer Risk (Risk per Million)[1]	Significance Threshold (Risk per Million)	Exceeds Significance Threshold?
Construction			
Residential Receptors	0.90	10	No
Worker Receptor	0.86	10	No
Operations			
Residential Receptors	2.06	10	No
Worker Receptor	3.51	10	No
Combined (Construction + Operation Sequential)			
Residential Receptors	3.04	10	No
Worker Receptor	4.37	10	No

1. The reported annual pollutant concentration is at the closest maximally exposed individual resident (MEIR) to the Project site.

Source: Refer to **Appendix B**.

As shown in **Table 4.3-9**, the construction risk at residential and worker receptors would be approximately one in one million. Additionally, the operational cancer risk at residential and worker receptors would be approximately two and four in one million, respectively. Further, the combined construction and operational cancer risk at residential and worker receptors would be three and four in one million, respectively.[10] As such, the maximum construction, operational, and combined construction and operational cancer risk would not exceed the SCAQMD threshold of 10 in one million. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Non-Carcinogenic Hazard

The significance thresholds for TAC exposure also require an evaluation of non-cancer risk stated in terms of a hazard index. Non-cancer chronic impacts are calculated by dividing the annual average concentration by the Reference Exposure Level (REL) for that substance. The REL is defined as the concentration at which no adverse non-cancer health effects are anticipated. RELs are designed to protect sensitive individuals within the population. According to OEHHA, the REL for DPM is 5 and the target organ is the respiratory system.[11]

Chronic non-carcinogenic impacts are shown in **Table 4.3-10: Chronic Hazard Assessment**. A chronic HI of 1.0 is considered individually significant. The HI is calculated by dividing the chronic exposure by the reference exposure level. The chronic hazard was calculated based on the highest annual average concentration at the maximally exposed individual receptor. It should be noted that there is no acute REL for DPM and acute health risk cannot be calculated. The highest maximum chronic HI associated with DPM emissions from Project construction would be 0.0013 at the residential receptors and 0.0165 at the worker receptors. Additionally, the highest maximum chronic HI associated with DPM emissions from Project operations would be 0.0007 at the residential receptors and 0.0028 at the worker receptors.

[10] Based on OEHHA's Risk Assessment Guidelines, the exposure duration for a resident is 30 years, beginning with the third trimester. As such, the combined construction and operations scenario includes the recommended residential exposure during of 30 years in sequential order.

[11] California Office of Environmental Health Hazard Assessment, OEHHA Acute, 8-hour and Chronic Reference Exposure Level (REL) Summary, https://oehha.ca.gov/air/general-info/oehha-acute-8-hour-and-chronic-reference-exposure-level-rel-summary. Accessed May 14, 2024.

Therefore, construction and operational non-carcinogenic hazards would not exceed the acceptable limits of 1.0. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Table 4.3-10: Chronic Hazard Assessment

Exposure Scenario	Chronic Hazard
Construction	
Residential Receptors	0.0013
Worker Receptors	0.0165
Operation	
Residential Receptors	0.0007
Worker Receptors	0.0028
SCAQMD Threshold	*1.0*
Threshold Exceeded?	**No**

1. The reported pollutant concentration is at the closest receptor (maximally exposed individual receptor).

Source: Refer to **Appendix B**.

As described above, impacts related to cancer risk would be less than significant. Additionally, non-carcinogenic hazards are calculated to be within acceptable limits. It should be noted that the impacts assess the Project's incremental contribution to health risk impacts, consistent with the SCAQMD guidance and methodology. The SCAQMD has not established separate cumulative thresholds and does not require combining impacts from cumulative projects. The SCAQMD considers projects that do not exceed the project-specific thresholds to generally not be cumulatively significant.[12] Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.3d Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact.

Construction

Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, 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.*

Odors may be generated during construction activities such as, equipment diesel exhaust, architectural coatings volatile organic compounds, and paving activities. However, these odors would be temporary,

[12] SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, 2003.

are not expected to affect a substantial number of people, and would disperse rapidly. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Operations

The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the Project would not create objectionable odors. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.4 Biological Resources

This Section is based on the Tree Assessment Report (TAR, Arborgate Consulting, Inc., September 2022) which is included in its entirety in **Appendix C: Tree Assessment Report**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
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 Game or U.S. Fish and Wildlife Service?			X	
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?			X	
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?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
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?				X

Impact Analysis

4.4a Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The Project site is occupied by an existing industrial office building and associated surface parking lot. The Project site contains ornamental landscaping, including mature ornamental trees and shrubs, along the perimeter and throughout the parking lot. The Project site is in an urbanized area of the City and is surrounded by industrial uses to the north, west, and south and a vacant, undeveloped lot to the east.

A review of the California Department of Fish and Wildlife (CDFW) California Natural Biodiversity Database (CNBDDB) QuickView Tool found nine threatened or endangered wildlife species in the Baldwin Park Quadrangle, in which is the Project site is located.[13] The nine species include the bald eagle, western yellow-billed cuckoo, bank swallow, willow flycatcher, coastal California gnatcatcher, southern willow flycatcher, least Bell's vireo, crotch bumble bee, and Santa Ana sucker.

There is currently no native habitat within or near the Project site supporting the nine listed species discussed above. Additionally, no natural biological resources or communities are present within, adjacent to, or in the vicinity of the Project site. Furthermore, according to the Tree Assessment Report (TAR) prepared for the Project, 72 trees are currently located on-site. However, none of these trees are protected, rare, or endangered; and only one species (California sycamores, *Platanus racemosa*) is native or naturally occurring in California.[14]

Therefore, the Project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.4b Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

4.4c 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?

Less Than Significant Impact. According to the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory, no riparian habitats or wetlands are present on or adjacent to the Project site.[15] The nearest identified wetlands are the Santa Fe Flood Control Dam and the San Gabriel River located approximately 0.25-mile north and 0.28-mile west of the Project site, respectively. The Santa Fe Flood Control Dam is mapped as freshwater pond, freshwater emergent wetland, freshwater forested/shrub wetland, riverine, and lake habitat. The dam has created temporary or seasonably flooded wetlands. Furthermore, although the San Gabriel River is mapped as riverine habitat, the San Gabriel River consists of a concrete channel and therefore does not support wetland resources. Therefore, the Project would

[13] California Department of Fish and Wildlife (CDFW). California Natural Biodiversity Database QuickView Tool, 2023, https://apps.wildlife.ca.gov/bios6/?tool=cnddbqv. Accessed November 21, 2023.
[14] Arborgates Consulting, Inc., Tree Assessment Report, 2022. Appendix C of this IS/MND.
[15] United States Fish and Wildlife Service. National Wetlands Inventory, 2021, https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-.mapper/. Accessed November 21, 2023.

not have an adverse effect on riparian habitat or other sensitive natural community, or wetlands. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.4d 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?

Less Than Significant Impact With Mitigation Incorporated. The Project site is fully developed, surrounded by urban development, and not part of an established wildlife corridor. The nearest wildlife corridor is the Santa Fe Flood Control Dam located approximately 0.25-miles north of the Project site, which consists of relatively undeveloped and undisturbed land. Additionally, the San Gabriel River, located approximately 0.28-mile west of the Project site, is a flood control channel that largely consists of concrete bed and banks. However, Project development would occur within the Project site and roadways adjacent to the Project site and would not impact the movement of any native wildlife species within the Santa Fe Flood Control Dam or the San Gabriel River.

Furthermore, the Project site contains ornamental landscaping and several mature ornamental trees and shrubs along the perimeter of the Project site and throughout the parking lot. It is unlikely that the trees, shrubs, grasses, and weeds on-site would provide suitable habitat for any native resident or wildlife species. However, the existing trees may provide habitat for nesting birds. Most bird nests and eggs are protected under the California Fish and Game Code (CFGC) Section 3503 and the Migratory Bird Treaty Act (MBTA). Therefore, development of the Project may potentially impact nesting birds. To avoid such impacts, the Project would be required to implement Mitigation Measure (MM) BIO-1, which states that Project construction activities and tree maintenance activities should occur outside of the general avian breeding season of February 1st to through August 31st to the extent feasible. If Project-related construction, demolition, and tree maintenance activities cannot occur outside of the general avian breeding season (February 1st to through August 31st), a pre-activity nesting bird survey shall be conducted prior to the onset of the aforementioned activities, within a maximum of 14 days prior to commencement. The survey shall be conducted by a qualified biologist. The survey shall be conducted within all suitable nesting habitat located within the area of activity, which includes a survey buffer around the activity site to account for all potentially nesting birds on and in the immediate vicinity. If no nesting birds are found, the Project-related activities may commence without potential impacts to nesting birds. Therefore, the Project would result in a less than significant impact with implementation of MM BIO-1.

4.4e Would the project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. The Project site contains a mix of native and exotic ornamental trees and shrubs throughout the Project site. Project development would include the removal of all 72 existing trees on-site. Although Project development would involve the removal of trees, there are no trees or other biological resources on-site that could be subject to City policies or ordinances protecting such resources, including IMC Section 12.10.030, which specifically addresses the planting, maintenance, and removal of trees and landscaping in the public right-of-way. All trees on-site are on private property and not in the public right-of-way. Furthermore, although the Project would remove several trees, the Project would replace them with a greater number of trees (85). Therefore, the Project would not conflict with local policies or ordinances protecting biological resources. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.4f Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. No portions of the City are located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[16] [17] Therefore, the Project would result in no impact, and no mitigation is required.

Mitigation Measures

BIO-1 To avoid disturbance of nesting birds, activities related to the Project, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the nesting bird season, February 1st to August 31st to the extent feasible. If construction must begin within the breeding season, then a pre-construction nesting bird survey shall be conducted no more than fourteen (14) days prior to commencement of ground disturbance and vegetation-removal activities. The nesting bird pre-construction survey shall be conducted within the project area. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California urban communities.

If an active nest is found (i.e., a complete nest with at least one egg), the nest and an appropriate buffer, to be determined by the biologist, should be avoided until after all young have fledged from the nest.

[16] CDFW. NCCP Plan Summaries, 2023, https://wildlife.ca.gov/conservation/planning/nccp/plans. Accessed November 21, 2023.
[17] Data Basin. Habitat Conservation Plan (HCP), California, https://databasin.org/maps/new/#datasets=c116dd0d32df408cb44ece185d98731c. Accessed November 21, 2023.

4.5 Cultural Resources

This Section is based on the Cultural Resources Assessment (CRA) (BCR Consulting, Inc., February 2024) which is included in its entirety in **Appendix D: Cultural Resources Assessment**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

Impact Analysis

4.5a Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No Impact. Section 15064.5(a) of the State CEQA Guidelines generally defines a historic resource as a resource that is: (1) listed in, or eligible for listing in the California Register of Historic Resources (California Register); (2) listed in a local register of historical resources (as defined in Section 5020.1(k) of the PRC); (3) identified as significant in a historical resources survey meeting the criteria in Section 5024.1(g) of the PRC; and/or (4) determined to be a historical resource by a project's Lead Agency. Additionally, any object, building, structure, site, area, place, record, or manuscript which a Lead Agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered a historical resource, provided the Lead Agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the Lead Agency to be historically significant if the resource meets the criteria for listing on the California Register.

The State-recommended threshold under which buildings may be considered historic resources is a construction age of 50 years. In order that the Cultural Resource Assessment's evaluation remain valid for a minimum of five years after the date of the Cultural Resource Assessment (CRA), all resources older than 45 years (i.e., resources from the historic period) were evaluated for listing eligibility in the California Register, or CEQA significance.[18]

According to the on-site field survey conducted for the CRA, the existing industrial office building was constructed in 1992 and is therefore less than 45 years in age. Therefore, the building is not historic in age and is not considered a historical resource under CEQA. There are no other historical resources or

[18] BCR Consulting, Inc., Cultural Resources Assessment, 2024. Appendix D of this IS/MND.

resources with the potential for historical significance on-site. Therefore, the Project would result in no impact, and no mitigation is required.

4.5b Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant Impact with Mitigation Incorporated. The cultural resources records search conducted for the CRA at the South Central Coastal Information Center (SCCIC) identified eleven cultural resources studies that have previously taken place within a 0.5-mile radius of the Project site, with one study assessing a portion of the Project site. One cultural resource was identified within 0.5-mile of the Project site: a series of transmission lines located approximately 220 feet south of the Project site. However, no cultural resources have been previously identified within the Project site boundaries. Additionally, a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC) resulted in negative findings. Also, an on-site pedestrian survey conducted in January 2024 did not identify any archaeological resources within the Project site. Therefore, the Project site does not indicate sensitivity for archaeological resources. Nevertheless, there is always a potential for unanticipated discoveries of archaeological resources during ground-disturbing activities. To mitigate such impacts, the Project would be required to implement MM CUL-1, which sets forth procedures for incidental discovery of archaeological resources. Therefore, the Project would result in a less than significant impact with implementation of MM CUL-1.

4.5c Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. Given the Project site has been subject to extensive disruption, the potential to disturb or impact any human remains is unlikely. Additionally, the Project would not include any subterranean levels and would require minimal ground disturbance. However, there is always a possibility that human remains could be interred beneath the Project site. If human remains were found, those remains would require proper treatment in accordance with applicable laws. PRC Section 5097, et seq., and California State Health and Safety Code Sections 7050.5-7055 describe the general provisions regarding human remains, including the requirements if any human remains are accidentally discovered during excavation of a site. The requirements and procedures set forth in PRC Section 5097.98 would be implemented if human remains are discovered, including notification of the County Coroner, notification of the Native American Heritage Commission if the remains are determined to be prehistoric, and consultation with the individual identified by the Native American Heritage Commission to be the "most likely descendant." If human remains are found during excavation, the Project will comply with California State Health and Safety Code Section 7050.5 in which excavation must stop within 50 feet of the discovery until the County Coroner has made a determination of origin and disposition of the remains pursuant to PRC Section 5097.98 and appropriate recommendations have been made for the treatment and disposition of the remains. Compliance with the established regulatory framework would ensure the proper treatment of human remains should they be encountered. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Mitigation Measures

CUL-1 In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, a

Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via Project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Guidelines Section 15126.4(b)(3)(C).

4.6 Energy

This Section is based on the Energy Calculations (Kimley-Horn Associates, Inc., March 2024) which is included in its entirety in **Appendix E: Energy Calculations**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Regulatory Setting

State

California's Energy Efficiency Standards for Residential and Non-Residential Buildings (Title 24)

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission [CEC]) in June 1977 and are updated every three years (Title 24, Part 6, of the California Code of Regulations). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

On August 11, 2021, the CEC adopted the 2022 Energy Code. In December, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. Among other updates like strengthened ventilation standards for gas cooking appliances, the 2022 Energy Code includes updated standards in three major areas:

- New electric heat pump requirements for residential uses, schools, offices, banks, libraries, retail, and grocery stores.
- The promotion of electric-ready requirements for new homes including the addition of circuitry for electric appliances, battery storage panels, and dedicated infrastructure to allow for the conversion from natural gas to electricity.
- The expansion of solar photovoltaic and battery storage standards to additional land uses including high-rise multifamily residences, hotels and motels, tenant spaces, offices, (including medical offices and clinics), retail and grocery stores, restaurants, schools, and civic uses (including theaters auditoriums, and convention centers).

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a Statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to

comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary measures (CALGreen Tier 1 and Tier 2) that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2022 and went into effect January 1, 2023. Projects whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.[19]

Renewable Portfolio Standard

In 2002, California established its Renewable Portfolio Standard (RPS) program with the goal of increasing the annual percentage of renewable energy in the State's electricity mix by the equivalent of at least 1 percent of sales, with an aggregate total of 20 percent by 2017.[20] Since then, various pieces of legislation have provided further goals. Signed in 2018, Senate Bill (SB) 100 revised the program's goal to achieve the 50 percent renewable resources target by December 31, 2026, and a 60 percent renewable resources target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 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.

Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10-percent total reduction in 2020. Petroleum importers, refiners and wholesalers can either develop their own low carbon fuel products or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas and hydrogen.

CARB Scoping Plan

Adopted December 15, 2022, CARB's 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with Assembly Bill (AB) 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high Global Warming Potential (GWP); providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place.

[19] California Energy Commission, 2022 Building Energy Efficiency Standards, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency. Accessed June 2023.

[20] The Renewable Portfolio Standard is a flexible, market-driven policy to ensure that the public benefits of wind, solar, biomass, and geothermal energy continue to be realized as electricity markets become more competitive. The policy ensures that a minimum amount of renewable energy is included in the portfolio of electricity resources serving a state or country.

CARB Advanced Clean Truck Regulation

CARB adopted the Advanced Clean Truck Regulation in June 2020 requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. This rule directly addresses disproportionate risks and health and pollution burdens and puts California on the path for an all zero-emission short-haul drayage fleet in ports and railyards by 2035, and zero-emission "last-mile" delivery trucks and vans by 2040. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8. The regulation has two components including a manufacturer sales requirement, and a reporting requirement:

- **Zero-Emission Truck Sales**: Manufacturers who certify Class 2b through 8 chassis or complete vehicles with combustion engines are required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales.
- **Company and Fleet Reporting**: Large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. This information would help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

Impact Analysis

4.6a 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 Impact.

Southern California Edison (SCE) provides electricity to the Project area. Total electricity demand in SCE's service area is forecast to increase by approximately 8,000 gigawatt hours (GWh), or 8 billion kilowatt hours (kWh), between 2024 and 2030.[21]

Construction

The energy consumption associated with construction of the Project includes primarily diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips. Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers, and heating, ventilation, and air conditioning) would be powered by a generator. The amount of electricity used during construction would be minimal; typical demand would stem from the use of electrically powered hand tools and several construction trailers by managerial staff during the hours of construction activities. The majority of the energy used during construction would be from petroleum.

Construction activity is anticipated to occur over a duration of approximately 13 months, beginning in fall 2025. The energy associated with Project construction includes electricity use associated with water utilized for dust control, diesel fuel from on-road hauling trips, vendor trips, and off-road construction

[21] California Energy Commission, California Energy Demand 2018-2030 Revised Forecast, Figure 49 Historical and Projected Baseline Consumption SCE Planning Area, 2018, https://www.enreergy.ca.gov/data-reports/reports/integrated-energy-policy-report/2017-integrated-energy-policy-report/2017-iepr.

diesel equipment, as well as gasoline fuel from on-road worker commute trips. Because construction activities typically do not require natural gas, it is not included in the following discussion. The methodology for each category is discussed below. Quantifications of construction energy are provided by the Project below; see **Table 4.6-1: Energy Use During Construction**.

Table 4.6-1: Energy Use During Construction

Source	Total Construction Energy	Los Angeles County Annual Energy Consumption	Percentage Increase Countywide
Electricity Use		**GWh**	
Water Use[1]	0.1539	68,485	0.0002%
Diesel Use		**Gallons**	
On-Road Construction Trips[2]	14,500	532,570,627	0.003%
Off-Road Construction Equipment[3]	42,522	532,570,627	0.008%
Gasoline Use		**Gallons**	
On-Road Construction Trips[2]	7,484	3,536,229,368	0.0002%

1. Construction water use based on acres disturbed per day per construction sequencing and estimated water use per acre. Water use includes the energy required to convey water to and from the Project site.
2. On-road mobile fuel source based on vehicle miles traveled (VMT) from CalEEMod and fleet-average fuel consumption in gallons per mile from EMFAC2021 in Los Angeles for 2025.
3. Construction fuel use was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry.

Source: Refer to the energy calculations in **Appendix E**.

Electricity

The Project's electrical demand is expected to be served by existing SCE electrical facilities. The Project's construction-related electrical demand would total approximately 0.1539 GWh per year. This would represent 0.0002 percent of SCE's forecasted 2026 increased demand. Therefore, Project construction would not result in wasteful, inefficient, or unnecessary consumption of electrical resources.

Fuel

During Project construction, transportation energy use would depend on the type and number of trips, VMT, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would be from transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel/gasoline. The use of energy resources by these vehicles would fluctuate according to the construction phase and would be temporary. Project construction would total approximately 57,022 gallons of diesel and 7,484 gallons of gasoline. As shown above in **Table 4.6-1**, the Project's fuel from the entire construction period would increase fuel use in the county by approximately 0.0107 percent for diesel and 0.0002 percent for gasoline.

Impacts related to transportation energy use during Project construction would be temporary and would not require expanded energy supplies or construction of new infrastructure. Therefore, Project construction would not result in wasteful, inefficient, or unnecessary fuel consumption. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Operations

The energy consumption associated with Project operations would occur from building energy (electricity and natural gas) use, water use, and transportation-related fuel use. Annual energy use during Project operations is shown in **Table 4.6-2: Annual Energy Consumption During Operations.**

Table 4.6-2: Annual Energy Consumption During Operations

Source	Project Operational Usage	Los Angeles County Annual Energy Consumption	Percentage Increase Countywide
Electricity Use	**GWh**		
Total Electricity (Electricity Demand + Water Conveyance)	0.7554	68,485	0.0011%
Natural Gas Use	**Therms**		
Area[1]	19,743	2,820,285,935	0.0007%
Diesel Use	**Gallons**		
Mobile[2]	26,487	535,038,344	0.00005%
Gasoline Use	**Gallons**		
Mobile[2]	25,700	3,446,400,366	0.0007%

1. The electricity, natural gas, and water usage are based on Project-specific estimates and CalEEMod defaults.
2. Calculated based on the mobile source fuel based on vehicle miles traveled (VMT) and fleet-average fuel consumption (in gallons per mile) from EMFAC2021 for operational year 2026. Trips associated with EV charging are assumed to be all EV with no diesel or gasoline use.
3. Annual Operational Energy represents the unmitigated operational from CalEEMod.

Source: Refer to the energy calculations in **Appendix E**.

Electricity

The Project's estimated operational electrical demand would total approximately 0.7554 GWh per year. This would represent 0.0009 percent of SCE's forecasted 2026 increased demand, thus, would result in a negligible increased demand compared to SCE's overall demand. It is also noted that the Project (i.e., design and materials) would be subject to compliance with the 2022 Building Energy Efficiency Standards. The Project would also be required to comply with CALGreen, which establishes planning and design standards for sustainable site development, energy efficiency (more than California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of electrical resources.

Natural Gas

Southern California Gas Company (SoCalGas) provides natural gas to the Project area. Natural gas is used at the Project site. As shown above in **Table 4.6-2**, the Project's estimated operational natural gas demand would total approximately 19,743 therms per year. This would represent 0.0007 percent of the natural gas consumption increase in the County, thus, would result in a negligible increase compared to the County's consumption.

Fuel

As shown in **Table 4.6-2**, during Project operations, diesel fuel consumption would be approximately 26,487 gallons per year. The Project would generate 174 daily trips, including 48 truck trips comprised of eight 2-axle trucks, ten 3-axle trucks, and thirty 4-plus axle trucks. As shown above in **Table 4.6-2**, the County's annual diesel fuel use in 2026 is anticipated to be 535,038,344 gallons.[22] Estimated Project operational diesel fuel use would represent 0.00005 percent of the County's current diesel use. Thus, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary fuel consumption. In addition, this analysis includes a conservative estimate of fuel usage. Future project-operational energy would decrease as fuel usage would switch from diesel to electricity per regulations.

None of the projected energy uses exceed one percent of the County use. Project operations would not substantially affect existing energy or fuel supplies or resources. Further, the Project would be subject to compliance with applicable energy standards and new capacity would not be required. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.6b Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Project design and operations would be subject to compliance with State Building Energy Efficiency Standards, appliance efficiency regulations, and CALGreen standards. As concluded in Threshold 4.6a, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The Project would be designed to meet all applicable State building energy efficiency standards as well as the City's energy efficiency standards. Therefore, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

[22] California Air Resources Board, EMFAC2017, 2018.

4.7 Geology and Soils

This Section is based on the Geotechnical Exploration Report (Leighton Consulting, Inc., February 2022) and Low Impact Development Report (Cannon Corporation, March 2024) which are included in their entirety in **Appendix F: Geotechnical Exploration Report** and **Appendix J: Low Impact Development Report**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?		X		
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?				X

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

Impact Analysis

4.7ai Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving the 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.

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as Alquist-Priolo (AP) Earthquake Fault Zones, around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet).

According to the Geotechnical Exploration Report prepared for this Project, there are no identified Alquist-Priolo Earthquake Fault Zones that traverse the Project site.[23] The closest active faults with the potential for surface rupture are the Sierra Madre Fault, Raymond fault, Clamshell-Sawpit Fault, and San Jose Fault, located approximately 3.2 miles, 4.0 miles, 5.1 miles, and 6.9 miles from the Project site, respectively. Therefore, the potential for surface fault rupture is expected to be low, and the Project would not cause potential substantial adverse effects involving rupture of a known earthquake fault. Nonetheless, the design of the proposed structures on-site would be designed to accommodate seismic loading, pursuant to the 2022 California Building Code (CBC), County Building Code, IMC Chapter 15.04, and engineering design recommendations in the Geotechnical Exploration Report. Therefore, the Project would not result in substantial damage to structures or infrastructure or expose people to substantial risk of injury involving the rupture of a known earthquake fault. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.7aii Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving strong seismic ground shaking?

Less Than Significant Impact. The Project site is within Southern California region, a seismically active area, and thus is exposed to potential risk involving strong seismic ground shaking. The intensity of ground shaking at a given location depends primarily upon the earthquake magnitude, the distance from the source, and the site response characteristics. Accordingly, the Project would be subject to compliance with the City's regulatory framework (i.e., 2022 CBC, County Building Code, and IMC Chapter 15.04), which is intended to minimize potential risk involving seismic ground shaking. The Project would also be required to adhere to design recommendations presented in the Geotechnical Exploration Report. The City would

[23] Leighton Consulting, Inc., Geotechnical Investigation Report, 2022, Appendix F of this IS/MND.

verify compliance with the Geotechnical Exploration Report recommendations through the Project's Building Permit review process. Therefore, following compliance with the established regulatory framework and recommendations provided by the Geotechnical Exploration Report, the Project would not cause potential substantial adverse effects involving strong seismic ground shaking. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.7aiii Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a seismic phenomenon in which loose, saturated, fine-grained granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: 1) shallow groundwater; 2) low density, fine, clean sandy soils; and 3) high-intensity ground motion. According to the Geotechnical Exploration Report, the Project is not located within a liquefaction hazard zone as indicated on the California Geological Survey's (CGS) Seismic Hazard Map. Additionally, groundwater was not encountered. In the field exploratory borings conducted for the Project site to the maximum depth of 20 feet below ground surface (bgs). The historically shallowest groundwater depth is reported to be approximately 100 to 150 feet bgs. Furthermore, based on a review of available information from the California Department of Water Resources for a nearby groundwater monitoring well located immediately to the east of the Project site, the shallowest groundwater level recorded was approximately 178.4 feet bgs. Based on these findings, the Project would not cause potential adverse effects involving seismic-related ground failure, including liquefaction. Therefore, the Project would result in no impact, and no mitigation is required.

4.7aiv Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving landslides?

No Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. The topography of the Project site and surrounding area is relatively flat and is thus devoid of any distinctive landforms. The Project site is not mapped within a seismically induced landslide hazard zone identified by the CGS. Therefore, the potential for seismically induced landslide hazards at the Project site is negligible, and the Project would not cause adverse effects involving landslides. Therefore, the Project would result in no impact, and no mitigation is required.

4.7b Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project site is located on relatively level ground, which would reduce the likelihood of soil erosion. However, earthmoving activities associated with proposed demolition and construction activities have the potential to result in soil erosion or the loss of topsoil. Development of the Project would be subject to local and State regulations for erosion control and grading during construction. For example, the Project would be required to comply with the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective September 1, 2023, which regulates construction activities to minimize water pollution, including sediment risk from construction activities to receiving waters. Project development would be subject to the National Pollution Discharge Elimination System (NPDES) program, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which is further discussed in **Section 4.10: Hydrology and Water Quality**. The Project's construction contractor would be required to prepare and implement a SWPPP and associated BMPs in compliance with the CGP during grading and construction activities. Typical construction BMPs include, but are not limited to, watering soil, soil cover of inactive areas, gravel bags, and fiber rolls.

Additionally, after Project completion, the Project site would be developed with a new warehousing facility and associated hardscape and landscape improvements. All landscaped areas would be required to comply with the provisions of the Model Water Efficient Landscape Ordinance and Chapter 15.30 of the IMC. For example, the Project's landscaping would be water conserving and enable soil stabilization and minimize erosion. Upon Project completion, the potential for soil erosion or the loss of topsoil would be expected to be low. Furthermore, in accordance with the City's initial requirements for development projects, Cannon Corporation prepared a Low Impact Development (LID) Report for City review (**Appendix J**). BMPs specified for the Project in the LID Report would also minimize sediment pollution of stormwater. Operational BMPs would include storm drains and inlets equipped with inlet filters to reduce sediment and trash loading, and a pre-treatment chamber; see **Section 4.10: Hydrology and Water Quality** for more information on operational BMPs. Implementation of the BMPs would help ensure that soil erosion would not occur during the Project's operation phase. BMP implementation would be ensured through the City's building plan check and development review process.

Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.7c 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?

Less Than Significant Impact. The Project site would not be subject to seismically induced liquefaction (see Threshold 4.7aiii) or landslides (see Threshold 4.7aiv).

Lateral Spreading

Liquefaction may cause lateral spreading. For lateral spreading to occur, the liquefiable zone must be continuous, unconstrained laterally, and free to move along gently sloping ground toward an unconfined area. Since liquefaction is not considered a hazard at the Project site and the Project site is relatively constrained laterally, earthquake-induced lateral spreading is also not considered a hazard at the Project site. Therefore, there would be no impacts associated with lateral spreading.

Subsidence

Ground surface subsidence generally results from the extraction of fluids or gas from the subsurface, which can result in a gradual lowering of the ground level. The Project site is not mapped in an area of subsidence by the U.S. Geological Survey.[24] Furthermore, the Project would not involve any dewatering activities that could cause ground subsidence on the Project site. Additionally, according to the Geotechnical Exploration Report, minor ground subsidence is expected due to earthquake-induced settlement which is estimated to be less than one inch. Therefore, the potential for ground collapse and other adverse effects due to subsidence to occur on the Project site is considered low, and impacts associated with subsidence would be less than significant.

Collapsible Soils

The soils within the planned excavation depths consist of layers that contain granular, unconsolidated soils with little or no cementation and very few fines with varying proportions of gravel and cobbles. These materials are prone to cave in or collapse in unshored excavations. According to the Geotechnical Exploration Report, the on-site soils are considered to be Type C soils which are subject to collapse in unbraced excavations (i.e., approximately three feet in vertical height). To address such potential impacts,

[24] United States Geological Survey. Areas of Land Subsidence in California, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed March 13, 2024.

the Project would be required to comply with procedures required by existing regulations, as detailed in the Geotechnical Exploration Report. According to the Geotechnical Exploration Report, during Project construction, soil conditions should be regularly evaluated to verify that conditions are as anticipated. The Project's construction contractor would be required to appoint a "competent person" required by California Division of Occupational Safety and Health (Cal OSHA) standards to evaluate soil conditions. Additionally, the Project would be required to comply with relevant regulations in the City's regulatory framework, including the 2022 CBC, County Building Code, and IMC Chapter 15.04. Following compliance with relevant regulations, impacts on unstable soils related to collapse would be reduced to a less than significant level. Therefore, Project development would not cause substantial hazards arising from collapsible soils. The Project would result in a less than significant impact, and no mitigation is required.

4.7d Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?

Less Than Significant Impact. The Uniform Building Code defines expansive soils as soils having an expansion index greater than 20.[25] One near-surface soil sample obtained during the on-site subsurface exploration conducted for the Geotechnical Exploration Report was tested for expansion potential and was reported to have an expansion index value of 0, which indicates very low potential for expansion. Expansive soils would likely not impact construction of the Project. However, variance in expansion potential of soil within the Project site is anticipated, and impacts could be potentially significant. The Project would incorporate requirements of the 2022 CBC, County Building Code, and IMC Chapter 15.04 that would address potential seismic-related effects from this soil type, which includes building foundation requirements appropriate to site-specific conditions. Additionally, as a Condition of Approval, the Project would be required to comply with the recommendations outlined in the Geotechnical Exploration Report. Such recommendations include additional testing upon completion of Project site grading and excavation to confirm the expansion potential presented in the report. Upon compliance with regulatory requirements, Project development would not cause substantial hazards arising from expansive soils. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.7e Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project would construct sewer laterals that would connect to existing sewer lines in surrounding roadways. The Project does not propose to use septic tanks or alternative wastewater disposal systems. Temporary sanitary systems would be brought in during construction and removed when the Project becomes operational. Therefore, the Project would result in no impact, and no mitigation is required.

4.7f Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation Incorporated. Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These resources are valued for the information they yield about the earth's history and its past ecological settings. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area. According to the Geotechnical Investigation Report, the Project site is underlain by a thin layer of undocumented artificial

[25] Uniform Building Code, Vol. 2 Structural Engineering Design Provisions, 1994.

fill materials with a depth of about two feet and is likely associated with existing and previous Project site improvements. The artificial fill overlies Quaternary-aged (Holocene) young alluvial gravel and sand (Qg) which was encountered in the borings to the maximum depth explored of 20 feet bgs. Given the relatively young age of the alluvial deposits, sediments more than 2 feet bgs within the boundaries of the Project site are anticipated to have a low potential for paleontological resources. Sediment disturbance associated with the development of the Project is expected to reach a maximum of 4 feet bgs for grading and utilities. Although construction activities on-site have a low potential to produce fossils of significance, they could extend into native rock units and soils potentially containing paleontological resources and potentially cause a significant impact. The Cultural Resources Report found that while excavation activity associated with the development of the Project is unlikely to be paleontologically sensitive, caution during development should be observed. To address such impacts, the Project would be subject to compliance with MM GEO-1, which sets forth protocols for the incidental discovery of paleontological resources during Project ground-disturbing activities. Therefore, the Project would result in a less than significant impact with implementation of MM GEO-1.

Mitigation Measures

MM GEO-1 If construction personnel encounter paleontological resources during ground-disturbing activities, they shall inform the site construction superintendent who will notify the City and project applicant. The project applicant shall then contact a qualified paleontologist and all ground-disturbing activity shall cease in the immediate area of the find (within a 50-foot buffer) until the paleontologist can evaluate the find.

If the discoveries are determined to be significant, full-time paleontological monitoring will be recommended for the remainder of ground disturbance for the project. Paleontological monitoring shall entail the visual inspection of excavated or graded areas and trench sidewalls. If a paleontological resource is discovered, the monitor shall have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and collected. Monitoring efforts can be reduced or eliminated at the discretion of the project paleontologist.

Upon completion of fieldwork, all significant fossils collected shall be prepared in a properly equipped paleontology laboratory to a point ready for curation. Preparation shall include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossil specimens shall be identified to the most specific taxonomic level possible, cataloged, analyzed, and delivered the Natural History Museum of Los Angeles County for permanent curation and storage. The cost of curation is assessed by the repository and shall be the responsibility of the project applicant. At the conclusion of laboratory work and museum curation, a final Paleontological Monitoring Report shall be prepared describing the results of the paleontological mitigation monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project area geology and paleontology, a list of taxa recovered, an analysis of fossils recovered and their scientific significance, and recommendations. A copy of the report shall be submitted to the Natural History Museum of Los Angeles County.

4.8 Greenhouse Gas Emissions

This Section is based on the Greenhouse Gas Emissions Assessment (Kimley-Horn, March 2024), which is included in its entirety in **Appendix G: Greenhouse Gas Emissions Assessment**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Regulatory Setting

Federal

To date, national standards have not been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

Clean Air Act

In April 2007, in Massachusetts v. EPA, the U.S. Supreme Court directed the Administrator of the U.S. EPA to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In making these decisions, the U.S. EPA Administrator was directed to follow the language of Section 202(a) of the FCAA. In December 2009, the Administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) of the FCAA:

> *Elevated concentrations of GHGs—CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the "endangerment finding."*
>
> *The combined emissions of GHGs— CO_2, CH_4, N_2O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the "cause or contribute finding."*
>
> *These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the FCAA.*[26]

[26] CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; HFCs = hydroflurocarbons; PFC = perfluorochemicals; SF_6 = sulfur hexafluoride

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

Additional provisions of the Energy Independence and Security Act (EISA) address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

Federal Vehicle Standards

In response to the U.S. Supreme Court ruling discussed above, Executive Order 13432 was issued in 2007 directing the U.S. EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking. On January 12, 2017, the U.S. EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program will reduce GHG emissions and fuel consumption for the 70 affected vehicles by 6 to 23 percent over the 2010 baselines.[27]

[27] U.S. EPA and NHTSA, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium and Heavy-Duty Engines and Vehicles – Phase 2, 2016. Available at: https://www.gpo.gov/fdsys/pkg/FR-2016-10-25/pdf/2016-21203.pdf. Accessed: March 2024.

In August 2016, the U.S. EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.

On September 27, 2019, the U.S. EPA and the NHTSA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program (84 Fed. Reg. 51,310 (September 27, 2019).[28] The SAFE Rule (Part One) revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the U.S. EPA and NHTSA finalized rulemaking for SAFE Part Two sets CO_2 emissions standards and corporate average fuel economy (I) standards for passenger vehicles and light duty trucks, covering model years 2021-2026. The current U.S. EPA administration repealed SAFE Rule Part One, effective January 28, 2022, and is reconsidering Part Two.

In December 2021, the U.S. EPA finalized federal GHG emissions standards for passenger cars and light trucks for Model Years 2023 through 2026. These standards are the strongest vehicle emissions standards ever established for the light-duty vehicle sector and are based on sound science and grounded in a rigorous assessment of current and future technologies. The updated standards will result in avoiding more than three billion tons of GHG emissions through 2050.[29]

State of California

California Air Resources Board

The CARB is responsible for the coordination and oversight of State and local air pollution control programs in California. Various statewide and local initiatives to reduce California's contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of carbon dioxide equivalent (CO_2e) in the world and produced 369 million gross metric tons of CO_2e ($MMTCO_2e$) in 2020.[30] The transportation sector is the State's largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark AB 32 California Global Warming Solutions Act of 2006, was specifically enacted to address GHG emissions. Other legislation, such as Title 24 building efficiency standards and Title 20 appliance energy standards, were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the major legislation related to GHG emissions reduction.

Assembly Bill 32 (California Global Warming Solutions Act of 2006)

AB 32 instructs the CARB to develop and enforce regulations for the reporting and verification of statewide GHG emissions. AB 32 also directed CARB to set a GHG emissions limit based on 1990 levels, to be achieved

[28] U.S. EPA and NHTSA, Federal Register, Vol. 84, No. 188, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program, September 27, 2019, https://www.govinfo.gov/content/pkg/FR-2019-09-27/pdf/2019-20672.pdf. Accessed March 2024.

[29] U.S. EPA, Final Rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026, 2021. https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-revise-existing-national-ghg-emissions. Accessed March 2024.

[30] California Air Resources Board, Current California GHG Emissions Inventory Data, 2000-2020 GHG inventory (2022 Edition), https://ww2.arb.ca.gov/ghg-inventory-data. Accessed March 2024.

by 2020. It set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

California Air Resources Board Scoping Plan

Adopted December 15, 2022, CARB's 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place.

Included in the 2022 Scoping Plan is a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions with recommendations to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan is not regulatory, is not exhaustive, and does not include everything local governments can implement to support the State's climate goals. It focuses primarily on climate action plans (CAPs) and local authority over new residential development. It includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. CARB specifically states that Section 3 of Appendix D, which discusses land use plans and development projects, does not address land uses other than residential and mixed-use residential such as industrial. However, CARB plans to explore new approaches for other land use types in the future.

California Air Resources Board Advanced Clean Truck Regulation

CARB adopted the Advanced Clean Truck Regulation in June 2020 requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. This rule directly addresses disproportionate risks and health and pollution burdens and puts California on the path for an all zero-emission short-haul drayage fleet in ports and railyards by 2035, and zero-emission "last-mile" delivery trucks and vans by 2040. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8. The regulation has two components including a manufacturer sales requirement, and a reporting requirement:

- **Zero-Emission Truck Sales:** Manufacturers who certify Class 2b through 8 chassis or complete vehicles with combustion engines are required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission

truck/chassis sales need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales.

- **Company and Fleet Reporting**: Large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. This information would help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

Senate Bill 32 (California Global Warming Solutions Act of 2006: Emissions Limit)

Signed into law in September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

With SB 32, the Legislature passed companion legislation, AB 197, which provides additional direction for developing the Scoping Plan. On December 14, 2017, CARB adopted a second update to the Scoping Plan. The 2017 Scoping Plan details how the State will reduce GHG emissions to meet the 2030 target set by Executive Order B-30-15 and codified by SB 32. Other objectives listed in the 2017 Scoping Plan are to provide direct GHG emissions reductions; support climate investment in disadvantaged communities; and support the Clean Power Plan and other federal actions. In 2022, CARB published the 2022 Scoping Plan, which is discussed above.

Senate Bill 375 (The Sustainable Communities and Climate Protection Act of 2008)

Signed into law on September 30, 2008, SB 375 provides a process to coordinate land use planning, regional transportation plans (RTP), and funding priorities to help California meet the GHG reduction goals established by AB 32. SB 375 requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, aligns planning for transportation and housing, and creates specified incentives for the implementation of the strategies.

Assembly Bill 1493 (Pavley Regulations and Fuel Efficiency Standards)

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. Implementation of the regulation was delayed by lawsuits filed by automakers and by the U.S. EPA's denial of an implementation waiver. The U.S. EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011. The regulations establish one set of emission standards passenger vehicle and light duty truck model years 2009–2016 and a second set of emissions standards for model years 2017 to 2025. By 2025, when all rules will be fully implemented, new automobiles will emit 34 percent fewer CO_2e emissions and 75 percent fewer smog-forming emissions.

Senate Bill 1368 (Emission Performance Standards)

SB 1368 is the companion bill of AB 32, which directs the California Public Utilities Commission (CPUC) to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 limits carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than 5 years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. The new law effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. The CPUC adopted the regulations required by SB 1368 on August 29, 2007.

The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, for 1,100 pounds of CO_2 per megawatt-hour.

Senate Bill 1078, Senate Bill 107, and Senate Bill X1-2 (Renewable Electricity Standards)

SB 1078 (2002) requires California to generate 20 percent of its electricity from renewable energy by 2017. SB 107 (2006) changed the due date to 2010 instead of 2017. On November 17, 2008, Executive Order S-14-08 established a RPS target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Executive Order S-21-09 also directed CARB to adopt a regulation by July 31, 2010, requiring the State's load serving entities to meet a 33 percent renewable energy target by 2020. CARB approved the Renewable Electricity Standard on September 23, 2010, by Resolution 10-23. SBX1-2, which codified the 33 percent by 2020 goal.

Senate Bill 350 (Clean Energy and Pollution Reduction Act of 2015)

Signed into law on October 7, 2015, SB 350 implements the goals of Executive Order B-30-15. The objectives of SB 350 are to increase the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40 percent by 2024, and 25 percent by 2027) and to double the energy efficiency savings in electricity and natural gas end uses of retail customers through energy efficiency and conservation. SB 350 also reorganizes the Independent System Operator to develop more regional electricity transmission markets and improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

Assembly Bill 398 (Market-Based Compliance Mechanisms)

The Cap-and-Trade program covers approximately 80 percent of California's GHG emissions.[31] The statewide cap for GHG emissions from the capped sectors (i.e., electricity generation, industrial sources, petroleum refining, and cement production) commenced in 2013 and would decline approximately three percent each year, achieving GHG emission reductions throughout the program's duration. Signed on July 25, 2017, AB 398 extended the duration of the Cap-and-Trade program from 2020 to 2030. AB 398 required CARB to update the Scoping Plan and for all GHG rules and regulations adopted by the State. It also designated CARB as the Statewide regulatory body responsible for ensuring that California meets its statewide carbon pollution reduction targets, while retaining local air districts' responsibility and authority to curb toxic air TACs and criteria pollutants from local sources that severely impact public health. AB 398 also decreased free carbon allowances over 40 percent by 2030 and prioritized Cap-and-Trade spending to various programs including reducing diesel emissions in impacted communities.

Senate Bill 150 (Regional Transportation Plans)

Signed on October 10, 2017, SB 150 aligns local and regional GHG reduction targets with State targets (i.e., 40 percent below their 1990 levels by 2030). SB 150 creates a process to include communities in discussions on how to monitor their regions' progress on meeting these goals. The bill also requires the CARB to regularly report on that progress, as well as on the successes and the challenges regions experience associated with achieving their targets. SB 150 provides for accounting of climate change efforts and GHG reductions and identify effective reduction strategies.

[31] California Air Resources Board, *Cap-and-Trade Program*, https://ww2.arb.ca.gov/our-work/programs/cap-and-tradeprogram/about. Accessed March 2024.

Senate Bill 100 and Senate Bill 1020 (California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases)

Signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. SB 1020 provides additional goals for the path to the 2045 goal of 100 percent clean electricity retail sales. It creates a target of 90 percent clean electricity retail sales by 2035 and 95 percent clean electricity retail sales by 2040.

Assembly Bill 1346 (Air Pollution: Small Off-Road Engines)

Signed into law in October 2021, AB 1346 requires CARB, to adopt cost-effective and technologically feasible regulations to prohibit engine exhaust and evaporative emissions from new small off-road engines, consistent with federal law, by July 1, 2022. The bill requires CARB to identify and, to the extent feasible, make available funding for commercial rebates or similar incentive funding as part of any updates to existing applicable funding program guidelines to local air pollution control districts and air quality management districts to implement to support the transition to zero-emission small off-road equipment operations.

Assembly Bill 1279 (The California Climate Crisis Act)

AB 1279 establishes the policy of the State to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies.

Executive Orders Related to Greenhouse Gas Emissions

California's Executive Branch has taken several actions to reduce GHGs using executive orders. Although not regulatory, they set the tone for the State and guide the actions of state agencies.

Executive Order S-3-05. Executive Order S-3-05 was issued on June 1, 2005, which established the following GHG emissions reduction targets:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

Executive Order S-01-07. Issued on January 18, 2007, Executive Order S 01-07 mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. The executive order established a LCFS and directed the Secretary for Environmental Protection to coordinate the actions of the California Energy Commission, CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels. CARB adopted the LCFS on April 23, 2009.

Executive Order S-13-08. Issued on November 14, 2008, Executive Order S-13-08 facilitated the California Natural Resources Agency development of the 2009 California Climate Adaptation Strategy. Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order S-14-08. Issued on November 17, 2008, Executive Order S-14-08 expands the State's Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, Executive Order S-21-09 (signed on September 15, 2009) directs CARB to adopt regulations requiring 33 percent of electricity sold in the State come from renewable energy by 2020. CARB adopted the Renewable Electricity Standard on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly owned electricity retailers.

Executive Order S-21-09. Issued on July 17, 2009, Executive Order S-21-09 directs CARB to adopt regulations to increase California's RPS to 33 percent by 2020. This builds upon SB 1078 (2002), which established the California RPS program, requiring 20 percent renewable energy by 2017, and SB 107 (2006), which advanced the 20 percent deadline to 2010, a goal which was expanded to 33 percent by 2020 in the 2005 Energy Action Plan II.

Executive Order B-30-15. Issued on April 29, 2015, Executive Order B-30-15 established a California GHG reduction target of 40 percent below 1990 levels by 2030 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of $MMTCO_2e$. The 2030 target acts as an interim goal on the way to achieving reductions of 80 percent below 1990 levels by 2050, a goal set by Executive Order S-3-05. The executive order also requires the State's climate adaptation plan to be updated every three years and for the State to continue its climate change research program, among other provisions. With the enactment of SB 32 in 2016, the Legislature codified the goal of reducing GHG emissions by 2030 to 40 percent below 1990 levels.

Executive Order B-55-18. Issued on September 10, 2018, Executive Order B-55-18 establishes a goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing GHG emissions. The executive order requires CARB to work with relevant state agencies to develop a framework for implementing this goal. It also requires CARB to update the Scoping Plan to identify and recommend measures to achieve carbon neutrality. The executive order also requires state agencies to develop sequestration targets in the Natural and Working Lands Climate Change Implementation Plan.

Executive Order N-79-20. Issued on September 23, 2020, Executive Order N-79-20 established a goal to end the sales of new internal combustion engine vehicles in the state as soon as possible, and no later than 2035, and continue to phaseout fossil-fueled cars and trucks. By setting a course to end sales of internal combustion passenger vehicles by 2035, the Governor's Executive Order establishes a target for the transportation sector that helps put the state on a path to carbon neutrality by 2045. It is important to note that the Executive Order focuses on new vehicle sales for automakers, and therefore does not require Californians to give up the existing cars and trucks they already own.

California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 20 Appliance Efficiency Regulations. The appliance efficiency regulations (CCR Title 20, Sections 1601-1608) include standards for new appliances. Twenty-three categories of appliances are included in

the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24 Building Energy Efficiency Standards. California's Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) 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. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The CEC adopted the 2022 Energy Code on August 11, 2021, which was subsequently approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption across California. For example, the 2022 Title 24 standards will require efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards.

Title 24 California Green Building Standards Code. The California Green Building Standards Code (CCR Title 24, Part 11 code) commonly referred to as CALGreen, is a Statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen standards require new residential and nonresidential buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics. The latest CALGreen Code took effect on January 1, 2023 (2022 CALGreen). The 2022 CALGreen standards has improved upon the 2019 standards for new construction of, and additions and alterations to, residential and nonresidential buildings.

California Vehicles Regulations

Advanced Clean Cars I and II. Advanced Clean Cars combines several regulations into one package including the Low-Emission Vehicle (LEV) criteria and greenhouse gas regulations and the zero-emission vehicle (ZEV) regulation. Advanced Clean Cars I was adopted in 2012 and Advanced Clean Cars II was adopted in 2022. These regulations rapidly scale down emissions of light-duty passenger cars, pickup trucks and SUVs and require an increased number of zero-emission vehicles to meet air quality and climate change emissions goals. By 2035 all new passenger cars, trucks and SUVs sold in California will be zero emissions. The Advanced Clean Cars II regulations take the State's already growing zero-emission vehicle market and robust motor vehicle emission control rules and augments them to meet more aggressive tailpipe emissions standards and ramp up to 100 percent zero-emission vehicles.

CARB Advanced Clean Fleets Regulation. CARB approved Advanced Clean Fleets Regulation (ACF) on April 28, 2023, requires fleet owners to begin transitioning toward ZEVs starting in 2024. Due to the impact that truck traffic has on residents living near heavily trafficked corridors, drayage trucks will need to be zero emissions by 2035. All other fleet owners have the option to transition a percentage of their vehicles to meet expected zero-emission milestones, which gives owners the flexibility to continue operating combustion-powered vehicles as needed during the move toward cleaner technology.

Regional

South Coast Air Quality Management District Rule 2305 (Warehouse Indirect Source Rule)

Rule 2305 was adopted by the SCAQMD Governing Board on May 7, 2021 to reduce NO_X and particulate matter emissions associated with warehouses and mobile sources attracted to warehouses. However, Rule 2305 would also reduce GHG emissions. This rule applies to all existing and proposed warehouses over 100,000 square feet located in the SCAQMD. Rule 2305 requires warehouse operators to track annual vehicle miles traveled associated with truck trips to and from the warehouse. These trip miles are used to calculate the warehouses WAIRE Points Compliance Obligation. WAIRE Points are earned based on emission reduction measures and warehouse operators are required to submit an annual WAIRE Report which includes truck trip data and emission reduction measures. Reduction strategies listed in the WAIRE menu include acquire ZE or NZE trucks; require ZE/NZE truck visits; require ZE yard trucks; install on-site ZE charging/fueling infrastructure; install on-site energy systems; and install filtration systems in residences, schools, and other buildings in the adjacent community. Warehouse operators that do not earn a sufficient number of WAIRE points to satisfy the WAIRE Points Compliance Obligation would be required to pay a mitigation fee. Funds from the mitigation fee will be used to incentivize the purchase of cleaner trucks and charging/fueling infrastructure in communities nearby.

South Coast Air Quality Management District Thresholds

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. As of the last Working Group meeting (Meeting #15) held in September 2010, the SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency.

With the tiered approach, a project is compared with the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. The SCAQMD has adopted a threshold of 10,000 metric tons of CO_2e ($MTCO_2e$) per year for industrial projects and a 3,000 $MTCO_2e$ threshold was proposed for non-industrial projects but has not been adopted. During Working Group Meeting #7 it was explained that this threshold was derived using a 90 percent capture rate of a large sampling of industrial facilities. During Meeting #8, the Working Group defined industrial uses as production, manufacturing, and fabrication activities or storage and distribution (e.g., warehouse, transfer facility, etc.). The Working Group indicated that the 10,000 $MTCO_2e$ per year threshold applies to both emissions from construction and operational phases plus indirect emissions (electricity, water use, etc.). The SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Southern California Association of Governments

On September 3, 2020, SCAG's Regional Council adopted the–2020-2045 RTP/SCS. The 2020-2045 RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The 2020-2045 RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals. The SCAG region strives toward sustainability through integrated land use and transportation

planning. The SCAG region must achieve specific federal air quality standards and is required by state law to lower regional GHG emissions.

Local

City of Irwindale General Plan

The General Plan is a long-range planning document that provides the City a framework for action and the direction in which to focus that action. The following policies focusing on GHG reduction are applicable to the proposed Project:

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 systems, water efficient landscaping, and sustainable, green, and energy efficient building standards.

Background

South Coast Air Quality Management District Thresholds

On December 5, 2008, the SCAQMD Governing Board adopted a 10,000 $MTCO_2e$ industrial threshold for projects where the SCAQMD is lead agency. During the GHG CEQA Significance Threshold Working Group Meeting #15, the SCAQMD noted that it was considering extending the industrial GHG significance threshold for use by all lead agencies. This working group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research, CARB, the Attorney General's Office, a variety of city and county planning departments in the SCAB, various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. However, the SCAQMD has not announced when staff is expecting to present GHG thresholds for land use projects where the SCAQMD is not the lead agency to the governing board. During Meeting #8, the Working Group defined industrial uses as production, manufacturing, and fabrication activities or storage and distribution (e.g., warehouse, transfer facility, etc.). Additionally, the SCAQMD GHG Significance Threshold Stakeholder Working Group has specified that a warehouse is considered to be an industrial project.[32] Furthermore, the Working Group indicated that the 10,000 $MTCO_2e$ per year threshold applies to both emissions from construction and operational phases plus indirect emissions (electricity, water use, etc.).

The screening threshold for industrial projects is 10,000 $MTCO_2e$ per year, and this analysis utilizes this screening threshold as the Project GHG threshold.

Methodology

The Project's construction and operational emissions were calculated using the California Emissions Estimator Model version 2022.1.1.21 (CalEEMod). Details of the modeling assumptions and emission factors are provided in **Appendix G**. For construction, CalEEMod calculates emissions from off-road

[32] South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #8*, 2009.

equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and applying the mobile-source and fugitive dust emissions factors derived from CalEEMod. The Project's construction-related GHG emissions would be generated from off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. The Project's operational-related GHG emissions would be generated by vehicular traffic, area sources (e.g., landscaping maintenance and consumer products), electrical generation, natural gas consumption, water supply and wastewater treatment, yard trucks, generators, and solid waste.

Impact Analysis

4.8a Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact.

Short-Term Construction Greenhouse Gas Emissions

The Project would result in direct emissions of GHGs from construction. The approximate quantity of annual GHG emissions generated by construction equipment utilized to build the Project is depicted in **Table 4.8-1: Construction-Related Greenhouse Gas.** As shown, the Project would result in the generation of approximately 646 $MTCO_2e$ over the course of construction. Construction GHG emissions are typically summed and amortized over a 30-year period, then added to the operational emissions.[33] The amortized Project construction emissions would be 22 $MTCO_2e$ per year. Once construction is complete, the generation of these GHG emissions would cease.

Table 4.8-1: Construction-Related Greenhouse Gas Emissions

Construction	$MTCO_2e$ per Year
Total Construction Emissions	**646**
30-Year Amortized Construction	*22*

Source: CalEEMod version 2022.1.1.21. Refer to **Appendix A** for model outputs.

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions would occur over the life of the Project. The Project's operational GHG emissions would result from direct emissions such as consumption of fossil fuels in the new generators and new employee trips. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

Table 4.8-2: Project Greenhouse Gas Emissions: Existing and Buildout provides the Project's long-term operational GHG emissions and indicates the Project would generate approximately 1,344 $MTCO_2e$.

[33] The 30-year amortization period is based on the standard assumption of the South Coast Air Quality Management District (SCAQMD, Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13, August 26, 2009).

Table 4.8-2: Project Greenhouse Gas Emissions: Existing and Buildout	
Emissions Source	**$MTCO_2e$ per Year**
Construction Amortized Over 30 Years	22
Existing (2024)	
Area Source	1
Energy	234
Mobile	911
Waste	16
Water and Wastewater	24
Total Existing Emissions	**1,187**
Buildout (2026)	
Area Source	2
Energy	199
Mobile	540
Off-Road – Yard Trucks	473
Emergency Generator	20
Waste	30
Water and Wastewater	58
Total Project Emissions	**1,344**
Net Emissions	
Existing Project Site	1,187
Proposed Project	1,344
Net Change	**157**
Threshold	*10,000*
Exceeds Threshold?	**No**
Total values are from CalEEMod and may not add up due to rounding.	
Source: CalEEMod version 2022.1.1.21. Refer to **Appendix A** for model outputs.	

Below is a description of the primary sources of operational emissions:

- **Area Sources**. Area source emissions occur from architectural coatings, landscaping equipment, and consumer products. Landscaping is anticipated to occur throughout the Project site. Additionally, the primary emissions from architectural coatings are volatile organic compounds, which are relatively insignificant as direct GHG emissions. The Project would result in 2 $MTCO_2e$ per year (refer to **Table 4.8-2**).

- **Energy Consumption**. Energy consumption consists of emissions from Project consumption of electricity and natural gas. The Project would result in 199 $MTCO_2e$ per year from energy consumption (refer to **Table 4.8-2**).
- **Mobile Sources**. Mobile sources from the Project were calculated with CalEEMod based on the trip generation from the Live Oak Irwindale Traffic Impact Analysis prepared by Environment Planning Development Solutions, Inc (**Appendix L**). Based on the Traffic Scoping Agreement, the Project would generate 174 daily trips, including 48 truck trips comprised of eight 2-Axle trucks, ten 3-Axle trucks, and thirty 4-plus axle trucks. As shown in **Table 4.8-2**, mobile source emissions from the Project would be 540 $MTCO_2e$ per year.
- **Off-Road – Yard Trucks.** Operational off-road emissions would be generated by off-road cargo handling equipment used during operational activities. For this Project it was assumed that the warehouses would include six-yard trucks. Based on CARB OFFROAD emissions data, the yard trucks would generate 473 $MTCO_2e$ per year.
- **Emergency Backup Generator.** As the Project warehouse is speculative, it is unknown whether emergency backup generators would be used. Backup generators would only be used in the event of a power failure and would not be part of the Project's normal daily operations. Nonetheless, emissions associated with this equipment were included to be conservative. Emissions from an emergency backup generator for the warehouse building was calculated separately from CalEEMod; refer to **Appendix G**. However, CalEEMod default emissions rates were used. If backup generators are required, the end user would be required to obtain a permit from the SCAQMD prior to installation. Emergency backup generators must meet SCAQMD's BACT requirements and comply with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines), which would minimize emissions. As shown in **Table 4.8-2**, backup generator emissions would be 20 $MTCO_2e$ per year.
- **Solid Waste**. Solid waste releases GHG emissions in the form of methane when these materials decompose. The Project would result in 30 $MTCO_2e$ per year from solid waste (refer to **Table 4.8-2**).
- **Water and Wastewater**. GHG emissions from water demand would occur from electricity consumption associated with water conveyance and treatment. The Project would result in 58 $MTCO_2e$ per year from water and wastewater conveyance and treatment (refer to **Table 4.8-2**).

It should be noted that the operational emissions reflect Project energy consumption based on the 2019 Title 24 Part 6 (Building Energy Efficiency Standards). The standards require updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements that would cut residential energy use by more than 50 percent (with solar) and nonresidential energy use by 30 percent. The standards also encourage demand responsive technologies including battery storage and heat pump water heaters and improve the building's thermal envelope through high performance attics, walls and windows to improve comfort and energy savings.[34] As noted above, the 2022 Energy Code became effective on January 1, 2023 and strengthens ventilation standards, includes new electric heat pump requirements, promotes electric-ready requirements for new homes (including the addition of circuitry for electric appliances, battery storage panels, and dedicated infrastructure), and expands solar

[34] California Energy Commission, 2019 Building Energy Efficiency Standards, 2018, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

photovoltaic and battery storage standards. The Project would be required to comply with the 2022 Energy Code.[35]

The Project would also comply with the appliance energy efficiency standards in Title 20 of the California Code of Regulations. The Title 20 standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances. The Project would be constructed according to the 2022 CALGreen standards, which includes water conserving plumbing fixtures and fittings, electric heat pump technology, electric-ready requirements when natural gas is installed, and strengthening ventilation standards.

At the State and global level, improvements in technology, policy, and social behavior can also influence and reduce operational emissions generated by a project. The State is currently on a pathway to achieving the RPS goal of 60 percent renewables by 2030 per SB 100 and 100 percent clean electricity by 2045 per AB 1279. Despite these goals, the majority of the Project's emissions would still be from mobile and energy sources. Future mobile source emissions are greatly dependent on changes in vehicle technology, fuels, and social behavior, which can be influenced by policies to varying degrees. This is assumed to also be applicable to the Project vehicle fleet, absent data that may suggest otherwise.

The primary source of Project emissions (approximately 75 percent) would occur from mobile sources and off-road equipment. CARB is directly responsible for regulating mobile and transportation source emissions in the State. Regarding the first parameter, California addresses emissions control technology through a variety of legislation and regulatory schemes, including the State's LCFS (Executive Order S-01-07), a regulatory program designed to encourage the use of cleaner low-carbon transportation fuels in California, encourage the production of those fuels, and therefore, reduce GHG emissions and decrease petroleum dependence in the transportation sector. The regulatory standards are expressed in terms of the "carbon intensity" of gasoline and diesel fuel and their substitutes.

Different types of fuels are evaluated to determine their "life cycle emissions" which include the emissions associated with producing, transporting, and using the fuels. Each fuel is then given a carbon intensity score and compared against a declining carbon intensity benchmark for each year. Providers of transportation fuels must demonstrate that the mix of fuels they supply for use in California meets these declining benchmarks for each annual compliance period. In 2018, CARB approved amendments to the LCFS, which strengthened the carbon intensity benchmarks through 2030 to ensure they are in-line with California's 2030 GHG emission reduction target enacted through SB 32. This ensures that the transportation sector is meeting its obligations to achieve California's GHG reduction targets. The State is also implementing legislation and regulations to address the second parameter affecting transportation related GHG emissions by controlling for VMT. Examples of this include SB 375, which links land use and transportation funding and provides one incentive for regions to achieve reductions in VMT, and SB 743, which discourages VMT increases for passenger car trips above a region-specific benchmark. As such, the City of Irwindale has no regulatory control over emissions control technology and therefore limited ability to control or mitigate emissions associated with mobile source emissions associated with this Project.

Table 4.8-2 shows that GHG impacts would be less than significant. Project-related GHG emissions would not result in a cumulatively considerable contribution to the significant cumulative impact of climate change. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

[35] California Energy Commission, 2022 Building Energy Efficiency Standards, 2022, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency.

4.8b Would the project conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. Key planning and policy documents in the City include 2022 CARB Scoping Plan and 2020-2045 RTP/SCS.

Consistency with the 2022 CARB Scoping Plan

The 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The transportation, electricity, and industrial sectors are the largest GHG contributors in the State. The 2022 Scoping Plan plans to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). Additional GHG reductions are achieved through decarbonizing the electricity and industrial sectors.

Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy zero-electric vehicle buses and trucks. Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology.

As shown previously, a majority of the Project's GHG emissions are from energy and mobile sources which would be further reduced by the 2022 Scoping Plan measures described above. It should be noted that the City has no control over vehicle emissions. However, these emissions would decline in the future due to statewide measures discussed above, as well as cleaner technology and fleet turnover.

- **CARB's Advanced Clean Truck Regulation**: Adopted in June 2020, CARB's Advanced Clean Truck Regulation requires truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8.
- **Executive Order N-79-20**: Executive Order N-79-20 establishes the goal for all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, will be zero-emission by 2035 and all medium and heavy-duty vehicles will be zero-emission by 2045. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new ZEVs "towards the target of 100 percent."
- **CARB's Mobile Source Strategy**: CARB's Mobile Source Strategy takes an integrated planning approach to identify the level of transition to cleaner mobile source technologies needed to achieve all of California's targets by increasing the adoption of ZEV buses and trucks.
- **CARB's Sustainable Freight Action Plan**: The Sustainable Freight Action Plan which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks.

This Plan applies to all trucks accessing the project site and may include existing trucks or new trucks that are part of the statewide goods movement sector.

- **CARB's Emissions Reduction Plan for Ports and Goods Movement**: CARB's Emissions Reduction Plan for Ports and Goods Movement identifies measures to improve goods movement efficiencies such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories.

While these measures are not directly applicable to the Project, any commercial activity associated with goods movement would be required to comply with these measures as adopted. The Project would not obstruct or interfere with efforts to increase ZEVs or State efforts to improve system efficiency. Compliance with applicable State standards (e.g., continuation of the Cap-and-Trade regulation; CARB's Mobile Source Strategy, Sustainable Freight Action Plan, and Advanced Clean Truck Regulation; Executive Order N-79-20; SB 100/renewable electricity portfolio improvements that require 60 percent renewable electricity by 2030 and 100 percent renewable by 2045, etc.) would ensure consistency with State and regional GHG reduction planning efforts, including the 2022 Scoping Plan.

The Project does not conflict with the applicable plans that are discussed above and would not conflict with statewide measures to obtain carbon neutrality by the year 2045. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

SCAG RTP/SCS Consistency

On September 3, 2020, the SCAG Regional Council adopted Connect SoCal*2020-2045* RTP/SCS. The 2020-2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The 2020-2045 RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG's 2020-2045 RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15.

The 2020-2045 RTP/SCS contains over 4,000 transportation Projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement bridges. These future investments were included in county plans developed by the six county transportation commissions and seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices for everyone. The 2020-2045 RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for federal funding.

The plan accounts for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. The 2020-2045 RTP/SCS is also supported by a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals and FCAA requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and utilize resources more efficiently. GHG emissions resulting from development-related mobile sources are the most potent source of emissions, and therefore Project comparison to the 2020-2045 RTP/SCS is an appropriate indicator of whether the Project would inhibit the post-2020 GHG reduction goals promulgated by the State. The Project's consistency with the 2020-2045 RTP/SCS goals is analyzed in detail in **Table 4.8-3: Regional Transportation Plan/Sustainable Communities Strategy Consistency.**

Table 4.8-3: Regional Transportation Plan/Sustainable Communities Strategy Consistency			
Emission Reduction Measure		**Project Consistency**	
SCAG Goals			
GOAL 1:	Encourage regional economic prosperity and global competitiveness.	N/A:	This is not a Project-specific policy and is therefore not applicable.
GOAL 2:	Improve mobility, accessibility, reliability, and travel safety for people and goods.	N/A:	Although the Project is not a transportation improvement Project, the Project is located near existing transit routes and access to Interstate 605 (I-605).
GOAL 3:	Enhance the preservation, security, and resilience of the regional transportation system.	N/A:	As the proposed Project is not a transportation improvement Project, Goal 3 is not applicable.
GOAL 4:	Increase person and goods movement and travel choices within the transportation system.	N/A:	As the proposed Project is not a transportation improvement Project, Goal 4 is not applicable. However, the Project includes a warehouse use that would support goods movement.
GOAL 5:	Reduce greenhouse gas emissions and improve air quality.	Consistent:	The reduction of energy use, improvement of air quality, and promotion of more environmentally sustainable development are encouraged through the development of alternative transportation methods, green design techniques for buildings, and other energy-reducing techniques. The proposed Project is required to comply with the provisions of the California Building Energy Efficiency Standards and CALGreen. In addition, the Project will have 13 EV parking stalls and 3 EV charging stations. Further, the Project is located within an urban area in proximity to existing truck routes and freeways. Location of the Project within an urbanized area would reduce trip lengths, which would reduce GHG and air quality emissions. Further as discussed in the analysis above, GHG emissions would not exceed SCAQMD thresholds.
GOAL 6:	Support healthy and equitable communities.	Consistent:	As discussed in the Project's Air Quality Assessment (**Appendix A**), the Project does not exceed the SCAQMD's regional or localized thresholds. Based on the Friant Ranch decision, projects that do not exceed the SCAQMD's LSTs would not violate any air quality standards or contribute

Table 4.8-3: Regional Transportation Plan/Sustainable Communities Strategy Consistency			
Emission Reduction Measure		**Project Consistency**	
			substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts.
GOAL 7:	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	N/A:	This is not a Project-specific policy and is therefore not applicable.
GOAL 8:	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	N/A:	As the proposed Project is not a transportation improvement Project, Goal 8 is not applicable.
GOAL 9:	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	N/A:	As the proposed Project is not a housing development Project, Goal 9 is not applicable.
GOAL 10:	Promote conservation of natural and agricultural lands and restoration of habitats.	N/A:	The Project is not located on agricultural lands.
Source: SCAG, *Regional Transportation Plan/Sustainable Communities Strategy*, 2020.			

Compliance with applicable State standards would ensure consistency with State and regional GHG reduction planning efforts. The goals stated in the 2020-2045 RTP/SCS were used to determine consistency with the planning efforts previously stated. As shown in **Table 4.8-3**, the Project would be consistent with the stated goals of the 2020-2045 RTP/SCS. Therefore, the Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Cumulative Setting and Impacts

Cumulative Setting

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately one day), GHGs have much longer atmospheric lifetimes of one year to several thousand years that allow them to be dispersed around the globe.

Cumulative Impacts

It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the Project as well as other cumulative related projects would also be subject to all applicable regulatory

requirements, which would further reduce GHG emissions. As discussed under Threshold 4.3b, the Project would not conflict with any applicable GHG reduction plans including the 2020-2045 RTP/SCS and 2022 Scoping Plan. Therefore, the Project's cumulative contribution of GHG emissions would be less than significant and the Project's cumulative GHG impacts would also be less than cumulatively considerable. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.9 Hazards and Hazardous Materials

This Section is based on the Phase I Environmental Site Assessment and Phase II Subsurface Investigation (Phase I & II ESA) (Ramboll US Consulting, Inc., January 2022) which is included in its entirety in **Appendix H: Phase I & II Environmental Site Assessment**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

Impact Analysis

4.9a 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 Impact. The Project involves the demolition of existing industrial office building and construction of a one-story concrete tilt-up warehouse building. The Project would involve the use of common types of potentially hazardous materials such as cleaners, pesticides for landscaping, and diesel fuel for one emergency generator. Truck trips to deliver diesel fuel and other hazardous materials are expected to reach the Project via I-605, I-10, and I-210, Live Oak Avenue, Arrow Highway, and possibly other local streets which connect the Project site to nearby highways. All potentially hazardous materials used on the Project site would be contained, stored, and used in accordance with manufacturer's instructions and handled in compliance with applicable standards and regulations. In accordance with federal and State law, the Project would be required to disclose hazardous materials handled at reportable amounts.

Additionally, the Project Applicant would be required to prepare an emergency response and evacuation plan, conduct hazardous materials trainings, and notify employees who work in the vicinity of hazardous materials, in accordance with federal Occupational Health and Safety Administration (OSHA) and California Division of Occupational Safety and Health (Cal OSHA) requirements. For transport and handling of fuel, Cal OSHA requirements include establishment of an Injury and Illness Prevention Program (CCR Title 8 Section 6760) and also specify design requirements for underground fuel storage tanks (CCR Title 8 Section 6807).

The Certified Unified Program Agency (CUPA) administers various programs within Los Angeles County; the Hazardous Waste Generator Program, the Hazardous Materials Release Response Plans and Inventory Program, the California Accidental Release Prevention Program (CalARP), the Aboveground Storage Tank Program and the Underground Storage Tank Program.

The Los Angeles County Fire Department (LACoFD) administers the California Accidental Release Prevention Program (CalARP) within the City. The program aims to prevent the accidental release of those substances determined to potentially pose the greatest risk and immediate harm to the public and the environment. CalARP requires facilities to review and update their Risk Management Plan (RMP) at least every five years from date of its initial submission. The Project would be required to prepare an RMP, which would be reviewed by LACoFD. With implementation of the required permit conditions and regulatory controls outlined above, the Project would result in a less than significant impact, and no mitigation is required.

4.9b 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 Impact. Project construction would require digging and excavation that could result in the accidental release of hazardous materials.

According to the Phase I & II ESA conducted for the Project site by Ramboll US Consulting, Inc., there are no Recognized Environmental Conditions (RECs) identified in connection with the Project site.[36] However, the Phase I & II ESA identified Historical Recognized Environmental Conditions (HRECs) in connection to the Project site. Five underground storage tanks (USTs) were formerly located at the Project site. Three

[36] Ramboll US Consulting, Inc., Phase I Environmental Site Assessment and Phase II Subsurface Investigation, January 2022, Appendix H of this IS/MND.

USTs were removed in 1986, and the remaining two USTs were removed in 1991. In both cases, subsequent soil testing identified the presence of soil contaminants, after which contaminated soils were removed for off-site disposal. Upon removal of the contaminated soils, additional soil testing did not detect the presence of soil contaminants. Accordingly, the Los Angeles County Department of Public Works issued closure certification for the 1986 and 1991 removals of the USTs in 1987 and 2005, respectively.

Additionally, the proposed emergency generator would not be used on a consistent basis. Diesel leaks are unlikely, but should they occur, they would be contained within the enclosed generator housing, which is installed on a concrete pad, thus, any spilled diesel fuel could be cleaned up without significant hazard to the public or environment. The CUPA administers inspection of businesses that use hazardous materials or generate hazardous waste and ensures compliance with federal and state regulations listed in Threshold 4.9a. Facilities that store, handle, or transport hazardous materials are required to procure businesses plans and adhere to strict procedures enforced by agencies with jurisdictions over business plans and adhere to strict procedures enforced by agencies with jurisdiction over businesses or areas that routinely use or handle hazardous materials. Project operations would comply with all CUPA, U.S. EPA and Department of Toxic Substances Control (DTSC) Standards.

Routine maintenance would require diesel fuel for the emergency generator. Project operations are not expected to release any hazardous materials as a result of foreseeable upset and accidental conditions. It is assumed that the use and storage of such materials would occur in compliance with applicable standards and regulations, and would not pose significant hazards. It is anticipated that the use of such hazardous materials would not create a significant hazard associated with a risk of upset or accident conditions involving the release of hazardous materials during Project operations. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.9c Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The Project site is not within one-quarter mile of an existing or proposed school. The nearest school is Margaret Heath Elementary School located approximately 0.38-mile southeast of the Project site. Therefore, the Project would result in no impact, and no mitigation is required.

4.9d Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the DTSC. The Cortese List contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination, sites with known USTs having a reportable release, solid waste disposal facilities from which there is a known migration, hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program.

According to the DTSC EnviroStor tool, there are no hazardous waste facilities or sites with known or suspected contamination issues within 500-feet of the Project site. The California State Water Board's Geotracker database tracks regulatory data about hazardous substances from underground storage tanks. According to Geotracker, there are no active leaking underground storage tanks on the Project site and within a 500-feet radius of the Project site. Furthermore, a regulatory agency database search determined

that there are no active hazardous waste and substances sites on the Project site.[37] [38] Therefore, the Project would result in no impact, and no mitigation is required.

4.9e For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The nearest public-use airport is the San Gabriel Valley Airport located approximately four miles to the west. The Airport Land Use Compatibility Plan for the San Gabriel Valley Airport, adopted in 2015, sets safety zones where land uses are regulated. According to the General Plan, there are no specific flight corridors that overlay the City. The Project site is also outside the 65-decibel (dB) noise contour for the airport.[39] Therefore, the Project would not result in an airport-related safety hazard or excessive noise for people working in the Project area. Therefore, the Project would result in no impact, and no mitigation is required.

4.9f Would the project impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the County of Los Angeles Department of Public Works, Arrow Highway, located approximately 0.2-mile northeast of the Project site, is designated as the nearest disaster route. The I-605, located approximately 0.6-mile west of the Project site, is designated as a freeway disaster route.[40] Construction activities are expected to be contained within the Project site boundaries and roadway lanes adjacent to the Project site and would not obstruct Arrow Highway and I-605. The Project would be designed according to applicable fire code standards and would provide adequate circulation and access to facilitate emergency response. Therefore, the Project would not impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.9g Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project site is in a fully urbanized area and it is not adjacent to any wildland. Additionally, the Project site is not within a very high fire severity zone (VHFSZ); see **Section 4.20: Wildfire**. Therefore, the Project would not expose people or structures to a significant risk involving wildland fires. Therefore, the Project would result in no impact, and no mitigation is required.

[37] California Department of Toxic Substances Control. EnviroStor, 2023, https://www.envirostor.dtsc.ca.gov/public/map/. Accessed March 13, 2024.
[38] State Water Resources Control Board. GeoTracker, 2023, https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=14005+Live+Oak+Irwindale. Accessed March 13, 2024.
[39] AECOM. Airport Layout Plan Drawing Set, 2015, page 8, https://case.planning.lacounty.gov/assets/upl/project/aluc_elmonte-plan.pdf. Accessed February 14, 2024.
[40] Los Angeles County Department of Public Works. City of Irwindale, 2007, https://pw.lacounty.gov/dsg/DisasterRoutes/map/Irwindale.pdf. Accessed October 26, 2023.

4.10 Hydrology and Water Quality

This Section is based on the *Drainage (LID) Report* (Cannon Corporation, March 2024) and *Low Impact Development Report* (Cannon Corporation, March 2024), which are included in their entirety in **Appendix I: Drainage Report** and **Appendix J: Low Impact Development Report**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin?			X	
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 substantial erosion or siltation on- or off-site.			X	
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			X	
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) Impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Impact Analysis

4.10a Would the project violate water quality or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. Following is a discussion of the potential water quality and waste discharge impacts resulting from urban runoff that would be generated during Project construction and operation.

Construction

The Project's construction-related activities would include demolition, excavation, grading, and trenching, which would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion and may allow eroded soils and other pollutants to enter the storm drain system.

Construction projects of one acre or more are regulated under the CGP, Order No. 2022-0057-DWQ, issued by the SWRCB. Projects obtain coverage by developing and implementing a SWPPP estimating sediment risk from construction activities to receiving waters and specifying BMPs that would be used to minimize pollution of stormwater.

The Project's construction contractor would be required to prepare and implement a SWPPP and associated BMPs in compliance with the CGP during grading and construction activities. Typical construction BMPs include, but are not limited to, watering soil, soil cover of inactive areas, gravel bags, and fiber rolls. Project construction activities would also comply with the requirements of IMC Chapter 8.28, Storm Water and Urban Runoff Pollution.

Adherence to the BMPs in the SWPPP and requirements in the IMC would reduce, prevent, minimize, and/or treat pollutants and prevent degradation of downstream receiving waters. BMPs identified in the SWPPP would reduce or avoid contamination of stormwater with sediment and other pollutants such as trash and debris; oil, grease, fuels, and other toxic chemicals; paint, concrete asphalt, etc.; and nutrients. Therefore, water quality and waste discharge impacts from Project demolition, grading, and construction activities would be less than significant. Therefore, the Project would result in a less than significant impact during Project construction activities.

Operation

Operation-related activities of the Project would generate pollutants that could adversely affect the water quality of downstream receiving waters if effective measures are not used to keep pollutants out of and remove pollutants from urban runoff.

Requirements for waste discharges to stormwater from operation of developed land uses within the coastal watersheds of Los Angeles and Ventura Counties are in the Regional Phase I Municipal Separate Storm Sewer System NPDES Permit (MS4 Permit), Order NO. R4-2021-0105, issued by the Los Angeles Regional Water Quality Control Board (LARWQCB) in 2021. The County of Los Angeles has a LID Standards Manual on developing water quality management plans for projects and selecting stormwater control and source control BMPs in addition to other LID strategies.

The Applicant prepared a LID Report in compliance with the requirements of the MS4 Permit, LID Standards Manual, and IMC Chapter 8.28, Storm Water and Urban Runoff Pollution, for City review.[41] The LID Report specifies operational BMPs that would be implemented to minimize water pollution from the

[41] Cannon Corporation, Low Impact Development Report, March 2024. Appendix J of this IS/MND.

Project site. The final BMPs to be implemented for the Project would be determined through the City's review of the LID Report during the City's development review and building plan check process.

According to the LID Report, the Project is a Designated Project under the terms of the LID Standards Manual. The Project is a redevelopment Project that would result in the replacement of more than 5,000 square feet of impervious surface on a site that was previously developed as a commercial and parking site. Because more than 50 percent of the impervious of the previously developed site is proposed to be altered, the entire development site must meet the requirements of the LID Standards Manual. Furthermore, all Designated Projects must retain 100 percent of the Storm Water Quality Design volume (SWQDv) on-site through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof.

Upon Project completion, approximately 90 percent of the Project site area would be impervious, and the remainder would be pervious. The Project would include LID infiltration BMPs to accommodate an 85th percentile (1.1-inch), 24-hour storm. Stormwater runoff from the Project site would be conveyed to 18 new on-site storm drain inlets and 1 catch basin that would divert runoff into the on-site storm drain detention system. All the grated inlets would be fitted with inlet filters to reduce sediment and trash loading of the inlets. A pre-treatment chamber would also be included. The infiltration system would be designed to adequately treat the required SWQDv. Therefore, the Project would result in a less than sigifnicant impact during operational activities.

For the reasons expounded above, the Project would result in a less than significant impact, and no mitigation is required.

4.10b 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 Impact. The Project site is within the Main San Gabriel Basin. The Valley County Water District (VCWD) would provide potable water to the Project site. The VCWD water system is supplied almost entirely through groundwater extracted from the Main San Gabriel Basin. The Main San Gabriel Basin is replenished by stream runoff, rainfall, subsurface inflow from Raymond and Puente Basin, return flow from water applied for overlying uses, and imported water.

VCWD estimates that water demands in its service area for normal years would increase from approximately 6,651 acre-feet per year (afy) in 2025 to approximately 6,822 afy in 2040. VCWD forecasts that it will have sufficient water supplies to meet water demands in its service area for normal, single-dry, and multiple dry years.[42] Projected populations in VCWD's service area were based on projections obtained from the California Department of Water Resources' online population tool provided by the Water Use Efficiency Data website. Therefore, Project development would have been accounted for in the VCWD's estimates of future water demands, and water demands would not substantially deplete groundwater supplies.

Additionally, as stated in the Geotechnical Investigation Report prepared for the Project (**Appendix F**), groundwater was not encountered in any of the explorations performed on-site to the maximum depth explored of 20 feet bgs. The historically shallowest groundwater depth is reported to be approximately 100 to 150 feet bgs. Furthermore, based on a review of available information from the California Department of Water Resources for a nearby groundwater monitoring well located immediately to the

[42] Valley County Water District (VCWD). 2020 Urban Water Management Plan, 2021, pages ES-2 – ES 3, https://www.vcwd.org/DocumentCenter/View/505/2020-Urban-Water-Management-Plan-PDF. Accessed February 26, 2024.

east of the Project site, the shallowest groundwater level recorded was approximately 178.4 feet bgs. No excavation on-site would intersect the groundwater at these levels. Furthermore, the Project site is not within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge.

Therefore, the Project would not substantially interfere with groundwater supplies or recharge. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.10c Would the project substantially alter the existing drainage pattern of the site or area, including through the alterations of the course of stream or river or through the addition of impervious surfaces, in a manner which would:

(i) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. See Threshold 3.10a, above. The construction contractor would be responsible for preparing and implementing an SWPPP in compliance with LARWQCB's GCP. This includes maintaining BMPs during the project's life and submitting the annual reports.

As part of Project development, the Project would include LID infiltration BMPs to accommodate an 85th percentile (1.1-inch), 24-hour storm, consistent with the requirements listed in the MS4 Permit, LID Standards Manual, and IMC Chapter 8.28, Storm Water and Urban Runoff Pollution. Stormwater runoff from the Project site would be conveyed to 18 new on-site storm drain inlets that would divert runoff into the on-site storm drain detention system. All the grated inlets would be fitted with inlet filters to reduce sediment and trash loading of the inlets. A pre-treatment chamber would also be included. This new stormwater drainage system would be designed to adequately treat the required SWQDv.

Compliance with existing regulations and BMPs developed to minimize erosion and siltation would reduce this impact to a less than significant level. Project infrastructure would connect to existing off-site storm drain infrastructure, and no upgrades or expansion of such off-site facilities would occur with Project implementation. Standard BMPs designed to prevent erosion during and after construction, as well as the introduction of pervious land uses in the Project site, would slow stormwater runoff velocities and allow sediment to settle out of the water, and the nature of drainage patterns on the Project site would capture trash and debris and restrict flow of debris into the storm drain system. Water runoff would be minimized to the extent possible, and the Project would comply with the requirements of the MS4 Permit. The Project would be designed to meet local, State, and federal water quality standards and to ensure that stormwater flows do not result in substantial erosion or siltation.

Therefore, post-development runoff would be adequately handled by the Project's drainage system and would not exceed the capacity of existing or planned stormwater drainage systems or substantially alter the existing drainage pattern of the Project site or area in a manner that would result in flooding on- or off-site. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. See Threshold 3.10c(i), above.

Under proposed conditions, on-site runoff from the Project site would be collected in the new storm drain inlets located within paved areas into the proposed detention system. The new stormwater drain system would be designed to adequately treat more than the required SWQDv.

Therefore, post-development runoff would be adequately handled by the Project's drainage system and would not exceed the capacity of existing or planned stormwater drainage systems or substantially alter

the existing drainage pattern of the Project site or area in a manner that would result in flooding on- or off-site. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less than Significant Impact. As described above in Threhsold 4.10.a, Project impacts on the capacity of storm drainage systems and stormwater pollution would be less than significant, and no mitigation is required.

(iv) Impede or redirect flood flows?

Less Than Significant Impact. According to the Irwindale Hazard Mitigation Plan, the Project site is located within a flood hazard area identified by the Federal Emergency Management Agency (FEMA) as Zone X, which is defined as an area of minimal flood hazard.[43] However, the Project site is within the dam inundation area of the Santa Fe Flood Control Dam. The Santa Fe Flood Control Dam is a flood control structure on the San Gabriel River that is owned and operated by the U.S. Army Corps of Engineers (USACE) and is located approximately 0.25-mile north of the Project site. The City of Irwindale has not been recently affected by dam failure due to the Santa Fe Flood Control Dam.

FEMA requires that all dam owners develop Emergency Action Plans (EAPs) for warning, evacuation, and post-flood actions. An EAP identifies potential emergency conditions at a dam and specifies actions to be followed to help minimize loss of life and property damage should those conditions occur. EAPs include procedures dam owners will follow to issue early warning and notification messages to responsible downstream emergency management authorities. EAPs also include inundation maps to help dam owners and emergency management authorities identify critical infrastructure and population-at-risk sites that may require protective measures, warning, and evacuation planning. The City periodically reviews the inundation maps for the Santa Fe Flood Control Dam to ensure these issues are considered as part of ongoing planning efforts. Therefore, impacts to flood flows from dam failure would be less than significant.

According to the USACE National Levee Database, the Project site is in the leveed area, or flood hazard area, of the San Gabriel River 6 (SGR6) Levee System.[44] The SGR6 Levee System is located along the left bank of the San Gabriel River downstream of the Santa Fe Flood Control Dam, approximately 0.28-mile west from the Project site. However, the risk associated with the SGR6 Levee System is considered to be low. The levee system has been loaded 75 percent with good performance. In the event that the levee were to breach or overtop, the leveed area would only be subject to approximately two feet of flood sheet flow, and it is unlikely that the entire leveed area would be affected.[45] Nevertheless, as further detailed in Threshold 4.9.f, the Project would comply with the County Emergency Operations Plan and would utilize Arrow Highway and the I-605 as emergency routes, as designated by the County of Los Angeles Department of Public Works. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

[43] City of Irwindale. Irwindale Hazard Mitigation Plan, 2012, https://www.irwindaleca.gov/DocumentCenter/View/50/Irwindale-Hazmit-Plan-11-20-12---Website?bidId=. Accessed February 15, 2024.
[44] U.S. Army Corps of Engineers (USACE). National Levee Database, https://levees.sec.usace.army.mil/map-viewer/index.html. Accessed March 13, 2024.
[45] USACE. San Gabriel River 6, https://levees.sec.usace.army.mil/levees/3805010061. Accessed March 13, 2024.

4.10d In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. As noted in Threshold 4.10.c.iv, the Project site is in an area of minimal flood hazard but is within the flood inundation area of the Santa Fe Flood Control Dam and SGR6 Levee System. However, impacts from dam failure and levee breach or overtop would be less than significant.

Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. The Project site is located approximately 30 miles inland from the Pacific Ocean and is therefore not at risk of tsunami.

Seiches are the oscillation of large bodies of standing water that can occur in response to ground shaking. The Project site is approximately 0.25-mile south of the Santa Fe Flood Control Dam, which would not pose a flood hazard to the Project site due to a seiche.

Based on the reasons above, the Project would not risk release of pollutants due to floods, tsunami, or seiche. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.10e Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As substantiated in Threshold 3.10a, through compliance with pertinent existing laws and regulations, the Project would not violate any water quality standards and therefore would not obstruct the implementation of a water quality control plan.

The Project site is in the San Gabriel Valley Basin, which is identified by the Sustainable Groundwater Management Act (SGMA) as a very low priority basin.[46] The SGMA requires only medium- and high-priority basins to form groundwater sustainability agencies, develop groundwater sustainability plans, and manage groundwater for long-term sustainability. Therefore, the San Gabriel Valley Basin does not require a sustainable groundwater management plan. Additionally, as further detailed in Threshold 3.10.b, the Project would not decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

[46] Sustainable Groundwater Management Agency. SGMA Data Viewer, https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#boundaries. Accessed March 13, 2024.

4.11 Land Use Planning

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				X
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?			X	

Impact Analysis

4.11a Would the project physically divide an established community?

No Impact. The Project site is developed with an existing industrial office building and is surrounded by industrial uses. No new streets or other physical barriers which could physically divide an established community are proposed. Although established residential neighborhoods lie to the south of the Project site, Project development would not physically divide these neighborhoods in any way as the Project would be developed within the Project site, and all off-site infrastructure improvements would be contained within roadways adjacent to the Project site such that they would not transect those neighborhoods. Access to the existing residential neighborhoods would not be impeded or cut off as a result of Project development. Therefore, the Project would not physically divide an established community. Therefore, the Project would result in no impact, and no mitigation is required.

4.11b 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 Impact.

General Plan

The Project site is designated as Industrial/Business Park land use by the Irwindale General Plan. According to the General Plan, this land use designation is intended to accommodate light industry, heavy industry, and distribution uses. The Project proposes to develop a speculative warehouse building, which constitutes a light industrial use and is therefore a permitted use within the Industrial/Business Park land use designation. Furthermore, the maximum FAR for the Industrial/Business Park designation is 1.0. The proposed FAR for the Project is 0.48. The Project would also help to implement and further a number of goals and policies of the General Plan, as follows:

Community Development Element (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.

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.

Policy 5: The City of Irwindale will continue to promote comprehensive development consistent with this General Plan as opposed to piecemeal and incremental planning.

Policy 7: The City of Irwindale will continue to promote economic development through the use of redevelopment.

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.

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.

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.

Project development would not include or require any amendments to the Irwindale General Plan and Project compliance with the Irwindale General Plan would be verified through the City's development review process. Therefore, the Project would not conflict with the any of the City's land use plan, policies, or regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect, and no land use conflict related to General Plan consistency is expected to occur. Therefore, the Project would result in no impact related to General Plan consistency, and no mitigation is required.

Zoning

The Project would develop a warehouse facility which is a permitted use under the M-2 (Heavy Manufacturing) zone and therefore would not conflict with the zoning of the Project site. Though the specific tenant(s) that would ultimately occupy the proposed building are unknown at this time, any prospective user must be either permitted by right or conditionally permitted under the Irwindale Zoning Code.

Additionally, Project development would not require the approval of a Zone Ordinance Amendment; nor would it require a Zone Variance or any other adjustments from the City's Zoning Code, which help ensure that development projects in the City are designed and implemented in a way that is not detrimental to the Project site or its surroundings. The Project would be subject to compliance with the M-2 development standards specified in IMC Chapter 17.56, which would be verified through the City's development review process. Therefore, the Project would be consistent with the zoning of the Project site, and no land use conflict related to zoning consistency would occur. Therefore, the Project would result in no impact related to zoning consistency, and no mitigation is required.

Table 4.11-1: Zoning Consistency

Development Standard	Irwindale City Code Citation	Standard	Proposed Project	Complies with Development Standard?
Minimum Lot Size	Section 17.68.110	5,000 square feet	4.86 acres (211,804 square feet)	Yes
Maximum Building Height	Chapter 17.56	N/A	49 feet	N/A
Street Front Yard Setback	Subsection 17.56.030(A)	20 feet	20 feet	Yes
Street Side Yard Setback	Subsection 17.56.030(A)	20 feet	20 feet	Yes
Maximum Floor Area Ratio (FAR)	Irwindale General Plan CDE	1.0	0.48	Yes
Walls	Subsection 17.56.030(B)	All uses shall be conducted wholly within a completely enclosed building or within an area enclosed on all sides with a solid, view-obscuring masonry wall not less than six, nor more than eight feet in height, except such uses as drive-in restaurants, gasoline stations, electric distribution substations, and horticultural nurseries and similar enterprises, customarily conducted in the open.	Warehousing uses to take place within proposed warehouse building	Yes
Landscaping – Street Yard Setback	Subsection 17.56.030(A)	20 feet, along all street frontage	20 feet, along all street frontage	Yes

City of Irwindale Commercial and Industrial Guidelines

The City of Irwindale Commercial and Industrial Guidelines establish architectural design principles, design guidelines, and a design review process to ensure that commercial and industrial projects in the City contribute 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 projects. All development plans, landscape plans, and graphic designs shall comply with these guidelines. The Project is an industrial warehouse project and would be required to comply with the City's Commercial and Industrial Guidelines and the provisions of the Site Plan and Design Review Permit to address the site configuration, design, location, and impact of the proposed use and compliance with established Zoning code standards. Therefore, the Project would result in no impact related to consistency with the City's Commercial and Industrial Guidelines, and no mitigation is required.

4.12 Mineral Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?				X
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?				X

Impact Analysis

4.12a Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Project site is designated by the California Geological Survey as a Mineral Resource Zone 2 (MRZ-2), which indicates that mineral resources may be present.[47] However, the Project site does not contain active mining operations, nor does it support mining activities. Additionally, the Project site is zoned M-2 (Heavy Manufacturing), in which mining is not a permitted use. The nearest active mining operation is located approximately 0.73-mile northwest of the Project site.[48] Furthermore, there are no oil or energy well drilling operations within or in the vicinity of the Project site.[49] Therefore, the Project would not result in the loss of availability of a known mineral resource or a locally-important mineral resource recovery site. Therefore, the Project would result in no impact, and no mitigation is required.

4.12b Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. Areas containing regionally significant mineral deposits in accordance with the Surface Mining and Reclamation Act (SMARA) are zoned Q (Quarry Overlay) Zone and M-2 in the Irwindale Municipal Code. Quarries are a conditionally permitted use in both zones. The Project site is designated M-2. Furthermore, the Project site does not contain or is near any active quarries identified in the Irwindale General Plan Resources Management Element.[50] Therefore, the Project site would not result in the loss of availability of a locally-important mineral resource recovery site delineated in the City's General Plan. Therefore, the Project would result in no impact, and no mitigation is required.

[47] California Geological Survey. San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations, 2010.
[48] DOC. Mines Online, 2016, https://maps.conservation.ca.gov/mol/index.html. Accessed November 21, 2023.
[49] DOC. Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/. Accessed November 21, 2023.
[50] City of Irwindale. 2020 General Plan Update, 2020, page 171.

4.13 Noise

This Section is based on the *Acoustical Assessment* (Kimley-Horn & Associates, Inc., March 2024), which is included in its entirety in **Appendix K: Acoustical Assessment.**

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?			X	
b) Generate of excessive ground borne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

Regulatory Setting

To limit population exposure to physically or psychologically damaging as well as intrusive noise levels, the Federal government, the State of California, various county governments, and most municipalities in the State have established standards and ordinances to control noise.

Federal

Federal Transit Administration Noise and Vibration Guidance

The Federal Transit Administration (FTA) has published the Transit Noise and Vibration Impact Assessment Manual (FTA Transit Noise and Vibration Manual) to provide guidance on procedures for assessing impacts at different stages of transit project development. The report covers both construction and operational noise impacts and describes a range of measures for controlling excessive noise and vibration. In general, the primary concern regarding vibration relates to potential damage from construction. The guidance document establishes criteria for evaluating the potential for damage for various structural categories from vibration.

State of California

California Government Code

California Government Code Section 65302(f) mandates that the legislative body of each county and city adopt a noise element as part of its comprehensive general plan. The local noise element must recognize

the land use compatibility guidelines established by the State Department of Health Services. The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable" noise levels for various land use types. Single-family homes are "normally acceptable" in exterior noise environments up to 60 CNEL and "conditionally acceptable" up to 70 CNEL. Multiple-family residential uses are "normally acceptable" up to 65 CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries, and churches are "normally acceptable" up to 70 CNEL, as are office buildings and business, commercial, and professional uses.

Title 24 – Building Code

The State's noise insulation standards are codified in the California Code of Regulations, Title 24: Part 1, Building Standards Administrative Code, and Part 2, California Building Code. These noise standards are applied to new construction in California for interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 65 decibels A (dBA) community noise equivalent level (CNEL) or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new multi-family residential buildings, the acceptable interior noise limit for new construction is 45 dBA CNEL.

Local

City of Irwindale General Plan

The Irwindale General Plan identifies policies in the Safety Element Policy. The Safety Element policies seek to reduce community noise exposure to excessive noise levels through the establishment of noise level standards for a variety of land uses.

The City's General Plan acknowledges the State Office of Noise Control Guidelines for the Preparation and Content of Noise Elements of General Plans, which is a guide for compatibility of noise-sensitive land uses in areas subject to noise levels of 55 to 80 dB CNEL or day-night average sound level (L_{dn}). Residential uses are normally unacceptable in areas exceeding 70 dB CNEL; and conditionally acceptable between 55-70 dB CNEL for low-density single-family dwelling units, duplexes, and mobile homes, and between 60-70 dB 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 dB CNEL. Commercial/professional office buildings and industrial land uses are normally unacceptable in areas exceeding 75 dB CNEL, and are conditionally acceptable within 67 to 78 dB CNEL (for commercial and professional offices only). The City's General Plan does not specifically acknowledge the State's noise guidelines for playgrounds and neighborhood parks. These land uses are normally unacceptable in areas exceeding 70 dBA CNEL, and are unacceptable in areas exceeding 75 dBA CNEL.

Public Safety Element

Policy 4: The City of Irwindale will strive to reduce the community's exposure to noise from on-going manufacturing activities.

Policy 5: The City of Irwindale will work towards reducing noise exposure in the City by considering noise and land use compatibility in land use planning.

Policy 6: The City of Irwindale will continue to investigate strategies that will be effective in reducing the community's exposure to harmful noise levels.

City of Irwindale Municipal Code

IMC Section 9.28.030 regulates noise levels. **Table 4.13-1: Ambient Base Noise Levels** displays ambient noise levels for residential, commercial, and industrial zones. The section also states any noise at a level which exceeds the ambient base level as set forth in **Table 4.13-1** below, whichever is greater, by more than 10 dB measured at any boundary line of the property from which the noise emanates shall constitute sufficient proof of a violation.

Table 4.13-1: Ambient Base Noise Levels

Zone	7 a.m. to 10 p.m.	10 p.m. to 7 a.m.
Residential	50 dBA	45 dBA
Commercial	55 dBA	50 dBA
Industrial	70 dBA	60 dBA

Source: Irwindale Municipal Code, Chapter 9.28.030

IMC Section 9.28.040, Noise Level violation designated. IMC Section 9.28.040 declares the following relevant act to be unlawful:

- It is unlawful for any person to willfully make or continue, or cause to be made or continued any noise at a level which exceeds by more than five dB the ambient or the ambient base level as set forth in Section 9.28.030, whichever is greater, when measured at any boundary line of the property from which the noise emanates.

IMC Section 9.28.110, Construction of building and projects – Time specified. IMC Section 9.28.110 declares the following times of construction and act to be unlawful:

- It is unlawful for any person within a residential zone, or within a radius of five hundred feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, steam shovel, pneumatic hammer, derrick, steam, or electric hoist to other construction type device on a development requiring a city permit, in such a manner that noise is produced which would constitute a violation of Section 9.28.040, unless beforehand authorization therefore has been dully obtained from the building inspector. Such activity is unlawful without a permit during all hours on Sunday. No permit shall be required to perform emergency work as defined in subsection E of 9.28.020.
- Construction authorized by subsection A of this section shall be limited to 7:00 a.m. to 7:00 p.m.

City of Baldwin Park General Plan

As discussed in Sensitive Receptors, below, the proposed Project is located approximately 445 feet northwest of residences within the City of Baldwin Park. As such, the pertinent noise standards and regulations for the City of Baldwin Park are provided below and discussed further below. The Noise Element of the Baldwin Park 2020 General Plan contains land use compatibility guidelines which are summarized in **Table 4.13-2: Baldwin Park Interior and Exterior Noise Standards**.

Table 4.13-2: Baldwin Park Interior and Exterior Noise Standards		
Land Use	**Interior[1]**	**Exterior[2]**
Residential – Single family, multifamily, duplex, mobile home	45 dBA CNEL	65 dBA CNEL
Residential – Transient lodging, hotels, motels, nursing homes, hospitals	45 dBA CNEL	65 dBA CNEL
Private Offices, churches, libraries, board rooms, conference rooms, theaters, auditoriums, concert halls, meeting halls, etc.	45 dBA L_{eq} (12 hours)	-
Schools	45 dBA L_{eq} (12 hours)	67 dBA L_{eq}
General office, reception, clerical, etc.	50 dBA L_{eq} (12 hours)	-
Bank, lobby, retail store, restaurant, typing pool, etc.	55 dBA L_{eq} (12 hours)	-
Manufacturing, kitchen, warehousing, etc.	65 dBA L_{eq} (12 hours)	-
Parks, playgrounds	-	65 dBA CNEL
Golf Courses, outdoor spectator sports, amusement parks	-	70 dBA CNEL
1. Indoor standard with windows closed. Indoor environment excludes bathrooms, toilets, closets, and corridors. 2. Outdoor environment limited to rear yard of single-family homes, multifamily patios and balconies and common recreation areas. Outdoor environment limited to playground areas, picnic areas, and other areas of frequent human use. Source: City of Baldwin Park, *Baldwin Park 2020 General Plan Noise Element*, 2002.		

City of Baldwin Park Municipal Code

The City of Baldwin Park Municipal Code (BPMC) Section 130.34 limits the exterior noise standards for specific land uses as shown in **Table 4.13-3: Baldwin Park Municipal Code Noise Standards**. The BPMC Section 130.34 also limits the interior noise levels at any dwelling unit to 45 dBA at any time. Section 130.37 of the BPMC restricts construction from occurring within 500 feet of a residential zone between the hours of 7:00 p.m. and 7:00 a.m. in such a way the causing discomfort or annoyance unless a permit has been obtained from the Department of Public Works.

Table 4.13-3: Baldwin Park Municipal Code Noise Standards		
Zone	**7 a.m. to 10 p.m.**	**10 p.m. to 7 a.m.**
Single-Family Residential (R-1)	55 dBA	45 dBA
Garden Multi-family Residential (RG) and High Density Multi-family Residential (R-3)	60 dBA	55 dBA
Commercial	65 dBA	60 dBA
Industrial	70 dBA	70 dBA
Source: Baldwin Park Municipal Code, Chapter 130.34		

Existing Conditions

Existing Noise Sources

The City is impacted by various noise sources. Mobile sources of noise, especially cars, trucks, and trains are the most common and significant sources of noise. Other noise sources are the various land uses (i.e., residential, commercial, institutional, and recreational and parks activities) throughout the City that generate stationary-source noise.

Mobile Sources. The predominant mobile noise source near the Project site is the traffic noise along Live Oak Avenue, which is located directly south of the site; Stewart Avenue, which is located to the west; and Rivergrade Road, which is located north of the site. Interstate-605 (I-605) is located approximately 0.6-mile to the west of the Project site and is also a contributor to mobile traffic noise in the vicinity of the site.

Stationary Sources. The primary sources of stationary noise in the vicinity of the Project site are those associated with the operations of adjacent commercial and industrial uses surrounding the site. The noise associated with these sources may represent a single-event noise occurrence or short-term noise. Other noises include those typical of urban areas, including mechanical equipment (e.g., heating ventilation and air conditioning [HVAC] equipment), dogs barking, idling vehicles, and employee/patron talking.

Noise Measurements

To quantify existing ambient noise levels in the Project area, Kimley-Horn conducted four short-term noise measurements on December 14, 2023; see Appendix A: Noise Data of **Appendix K**. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Project site. The 15-minute measurements were taken between 8:22 a.m. and 9:40 a.m. near potential and existing sensitive receptors (see **Figure 4.13-1: Noise Measurement Locations**) surrounding the site. Short-term equivalent continuous sound level (L_{eq}) measurements are considered representative of the noise levels throughout the day. The noise levels and sources of noise measured at each location are listed in **Table 4.13-4: Existing Noise Measurements**.

Table 4.13-4: Existing Noise Measurements

Site	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Time
ST-1	Stewart Avenue in front of closest residence to Project Site	66.4	46.3	80.8	9:40 a.m.
ST-2	On Live Oak Avenue directly across from Project Site	74.6	60.3	83.5	8:45 a.m.
ST-3	On Rivergrade Road between Stewart Avenue and Arrow Highway	65.7	51.6	78.5	8:20 a.m.
ST-4	Corner of Joanbridge Street and Baldwin Park Boulevard	67.9	48.3	85.1	9:11 a.m.

Source: Noise measurements taken by Kimley-Horn, December 14, 2023. See Appendix A of **Appendix K** for noise measurement results.

Sensitive Receptors

Sensitive populations are more susceptible to the effects of noise pollution than is the general population. Sensitive receptors that are in proximity to stationary sources of noise and vibration are of particular concern. Noise sensitive uses typically include residences, hospitals, schools, childcare facilities, and places of assembly. Vibration sensitive receivers are generally similar to noise sensitive receivers but may also include businesses, such as research facilities and laboratories that use vibration-sensitive equipment.

Sensitive land uses within 1,000 feet of the Project site consist of single-family and multi-family residential communities located within the City of Baldwin Park. The closest sensitive receptor in the City of Irwindale is the Kare Youth League and Chamberlain University located more than 2,741 feet and 3,000 feet away, respectively. Sensitive land uses nearest to the Project site are shown in **Table 4.13-5: Sensitive Receptors** and **Figure 4.13-2: Sensitive Receptors.**

Table 4.13-5: Sensitive Receptors

Receptor Description	Distance[1] and Direction from the Project
Single-Family Residences[2]	445 feet to the southeast
Multi-Family Residences[2]	530 feet to the south
Single-Family Residences[2]	580 feet to the south
Margaret Heath Elementary School[2]	1,995 feet to the southeast
Kare Youth League[3]	2,741 feet to the northwest
Chamberlain University[3]	3,000 feet to the southwest

1. Distance measured from the Project site boundary to the nearest sensitive receptor property line.
2. Receptors are located within the City of Baldwin Park.
3. Receptors are located within the City of Irwindale.

Source: Google Earth, 2023.

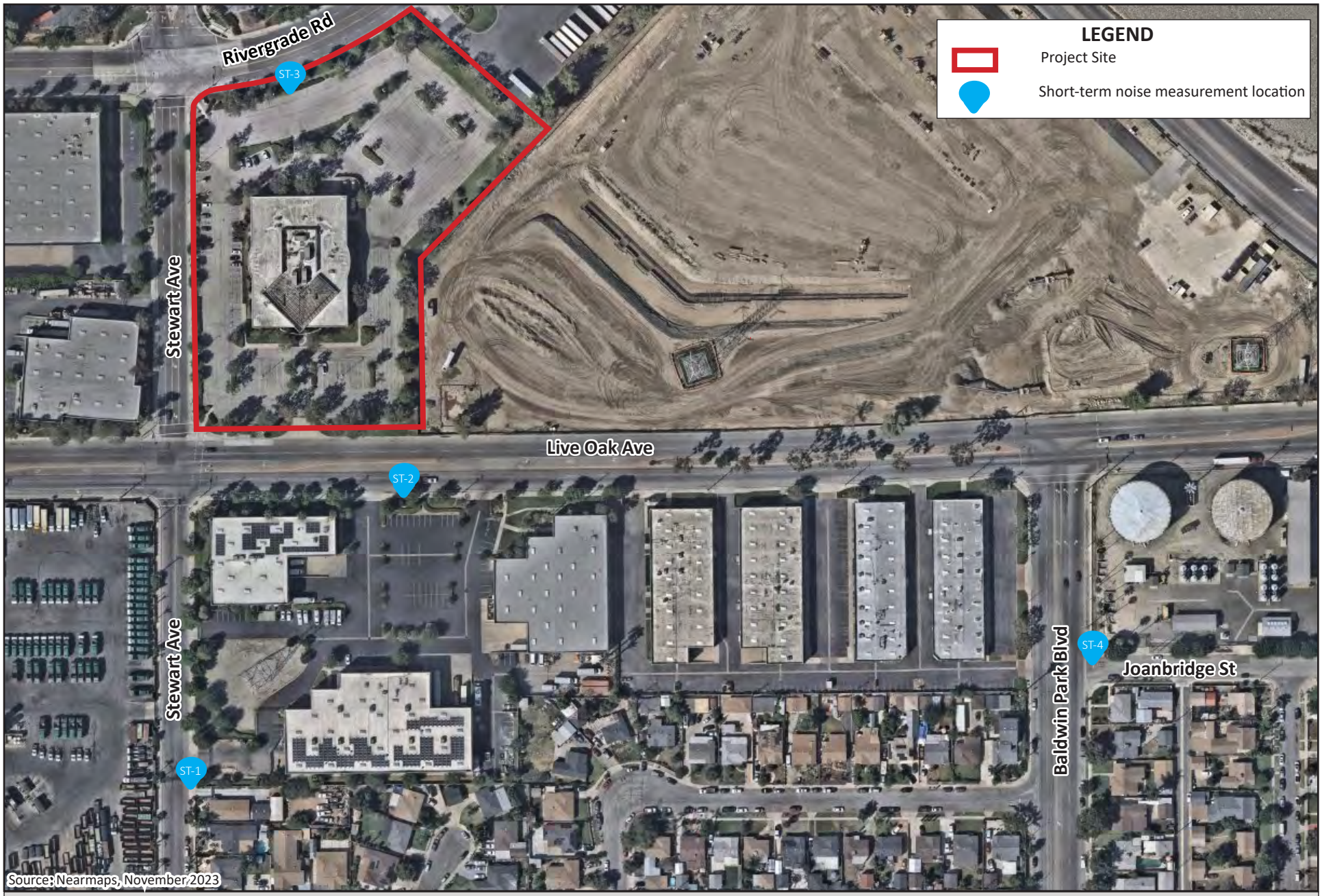

Figure 4.13-1: Noise Measurement Locations
14005 Live Oak Avenue Project
Initial Study/Mitigated Negative Declaration

NOT TO SCALE

Kimley»Horn

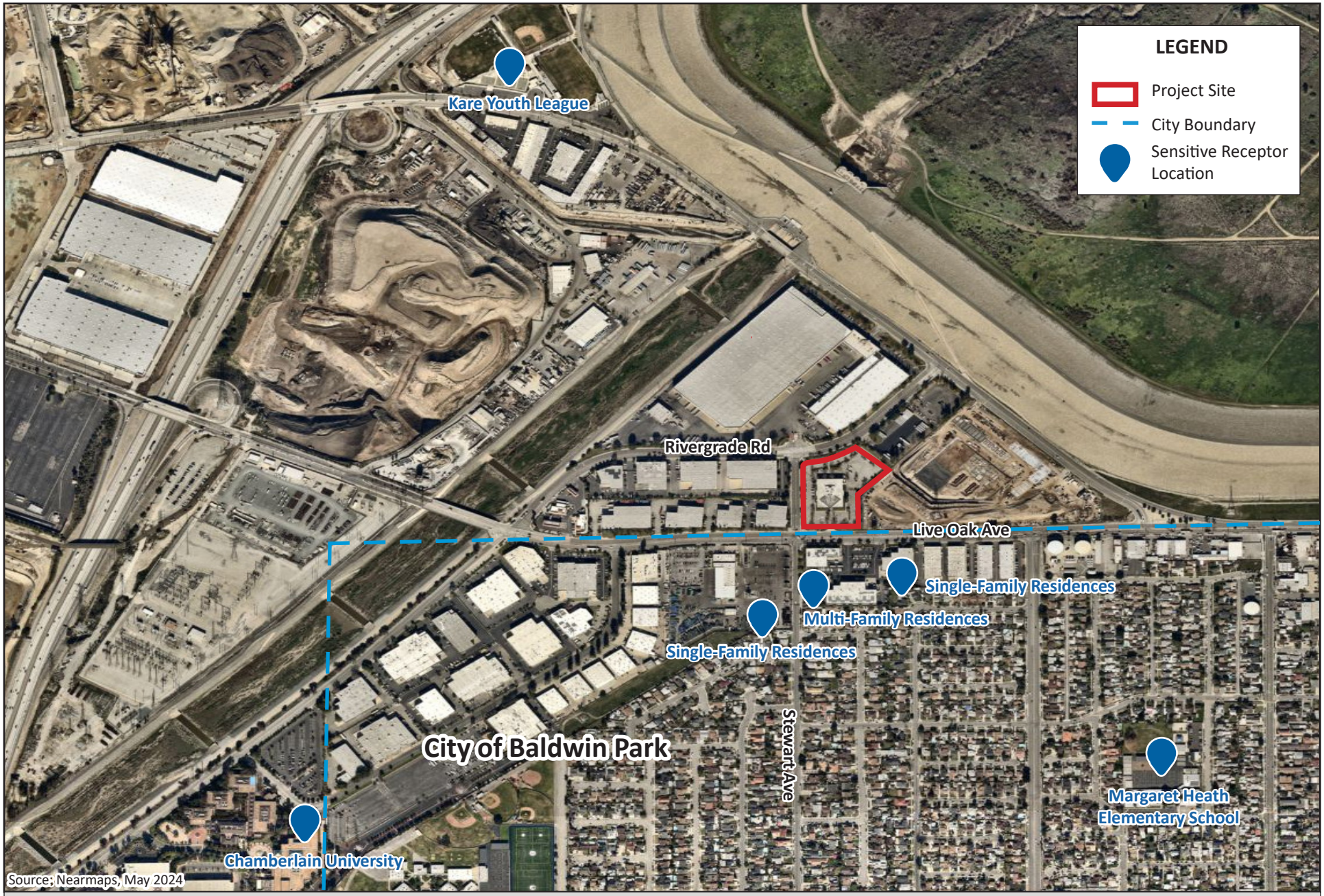

Figure 4.13-2: SENSITIVE RECEPTORS
14005 Live Oak Avenue Project
Initial Study/Mitigated Negative Declaration

NOT TO SCALE

Kimley»Horn

Methodology

Construction

Construction noise levels were based on typical noise levels generated by construction equipment published by the Federal Transit Administration (FTA) and FHWA. Construction noise is assessed in dBA L_{eq}. This unit is appropriate because L_{eq} can be used to describe noise level from operation of each piece of equipment separately, and levels can be combined to represent the noise level from all equipment operating during a given period.

Reference noise levels are used to estimate operational noise levels at nearby sensitive receptors based on a standard noise attenuation rate of 6 dB per doubling of distance (line-of-sight method of sound attenuation for point sources of noise). Noise level estimates do not account for the presence of intervening structures or topography, which may reduce noise levels at receptor locations. Therefore, the noise levels presented herein represent a conservative, reasonable worst-case estimate of actual temporary construction noise.

Per the City of Irwindale noise ordinance, if construction activities are within 500 feet of a residential zone, construction activities exceeding 75 dBA ambient base noise levels between 7:00 a.m. and 7:00 p.m. at the property boundary of an industrial zone would be considered a significant impact, unless authorization has been duly obtained beforehand from the building inspector.

The City of Baldwin Park does not have a quantitative threshold for construction noise. Section 130.37 of the BPMC limits the hours of construction between 7:00 a.m. and 7:00 p.m. when within 500 feet of a residential zone.

Operations

The analysis of the Project's noise environment is based on noise prediction modeling and empirical observations. Reference noise level data are used to estimate the Project's operational noise impacts from stationary sources. Noise levels were collected from published sources from similar types of activities and used to estimate noise levels expected with the Project's stationary sources. The reference noise levels are used to represent a worst-case noise environment as noise levels from stationary sources can vary throughout the day. Operational noise is evaluated based on the standards within the City's noise standards and General Plan.

As mentioned previously, the closest sensitive receptor located in the City of Irwindale is located approximately 2,741 feet northwest of the Project site. Thus, operational noise levels from the Project would not impact any sensitive receptors in the City of Irwindale. However, the Project site is located adjacent to commercial and industrial uses within the City of Irwindale. Per the City of Irwindale General Plan, exterior noise levels of up to 67 dBA CNEL are "conditionally acceptable" for commercial/professional office buildings and industrial land. Additionally, per the City of Irwindale noise ordinance, noise levels exceeding 75 dBA ambient base noise levels between 7:00 a.m. and 10:00 p.m. at the property boundary of an industrial zone would be considered a significant impact.

For sensitive receptors located in the City of Baldwin Park, noise levels must be below 65 dBA CNEL per the Baldwin Park 2020 General Plan and below 55 dBA L_{eq} during the daytime and 45 dBA L_{eq} during the nighttime per the BPMC. For nearby industrial receptors, noise levels must not exceed 70 dBA L_{eq} per the BPMC.

Vibration

Ground-borne vibration levels associated with construction activities for the Project were evaluated utilizing typical ground-borne vibration levels associated with construction equipment, obtained from FTA published data for construction equipment. Potential ground-borne vibration impacts related to building/structure damage and interference with sensitive existing operations were evaluated, considering the distance from construction activities to nearby land uses and typically applied criteria for structural damage and human annoyance. Per FTA guidance, a vibration limit of 12.7 millimeters per second (mm/sec; 0.5 inches per second [in/sec]) peak particle velocity (PPV) is used for buildings that are structurally sound and designed to modern engineering standards. A conservative vibration limit of 5 mm/sec (0.2 in/sec) PPV has been used for buildings that are found to be structurally sound but where structural damage is a major concern. For historic buildings or buildings that are documented to be structurally weakened, a limit of 2 mm/sec (0.08 in/sec) PPV is used to provide the highest level of protection.

Impact Analysis

4.13a Would the project result in generation 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 Impact.

Construction

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. During construction, exterior noise levels could affect the residential neighborhoods located to the northwest and southeast of the construction site. However, it is acknowledged that construction activities would occur throughout the Project site and would not be concentrated at a single point near sensitive receptors.

Construction activities would include site preparation, grading, building construction, paving, and architectural coating. Typical operating cycles for the construction equipment used in these phases may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping material or the hydraulic movement of machinery lifts). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Typical noise levels associated with individual construction equipment are listed in **Table 4.13-6: Typical Construction Noise Levels**.

Table 4.13-6: Typical Construction Noise Levels	
Equipment	**Noise Level (dBA) at 50 feet from Source[1]**
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Derrick	88
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Impact Wrench	85
Jack Hammer	88
Loader	80
Paver	85
Pile-driver (Sonic)	95
Pneumatic Tool	85
Pump	77
Roller	85
Saw	76
Scraper	85
Shovel	82
Truck	84
1. Calculated using the inverse square law formula for sound attenuation: $dBA_2 = dBA_1+20Log(d_1/d_2)$ Where: $QWdBA_2$ = estimated noise level at receptor; dBA_1 = reference noise level; d_1 = reference distance; d_2 = receptor location distance.	
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.	

Following the FTA's methodology for quantitative construction noise assessments, the FHWA Roadway Construction Noise Model (RCNM) was used to predict construction noise. The noise levels identified in **Table 4.13-7: Project Construction Noise Levels**, show the exterior construction noise at the nearest sensitive receptors, without accounting for attenuation from existing physical barriers.

Section 9.28.110 of the IMC states that if construction activities within 500 feet of a residential zone exceed 75 dBA ambient base noise levels at the property boundary of an industrial zone, it would be considered a significant impact. The nearest sensitive receptor within the City of Irwindale is located approximately 3,000 feet southwest. At this distance construction noise levels would remain below the IMC Section 9.28.110 construction threshold of 75 dBA. Construction activities may also cause increased noise along site access routes due to movement of equipment and workers. However, compliance with

the IMC would minimize impacts from construction noise, as construction would be limited to daytime hours on weekdays and Saturdays.

The City of Baldwin Park does not have a quantitative construction noise standard. Therefore, the FTA Transit Noise and Vibration Impact Assessment Manual's (2018) (FTA Noise and Vibration Manual) maximum 8-hour noise level standard of 80 dBA L_{eq} at residential uses for short-term construction activities is utilized for the receptors located in the City of Baldwin Park. As shown in **Table 4.13-7**, the highest exterior noise level at the nearest sensitive receptors would occur during the site preparation and building construction stage of construction and would be 68.6 dBA and 70.1 dBA, respectively. Therefore, construction noise levels would not exceed the FTA's construction noise standards of 80 dBA L_{eq} at the City of Baldwin Park receptors. Further, the Project would be consistent with Section 130.37 of the BPMC which restricts construction from occurring within 500 feet of a residential zone between the hours of 7:00 p.m. and 7:00 a.m.

As discussed above, construction noise levels associated with the Project would not exceed the FTA's construction noise standards or the IMC Section 9.28.110 construction noise threshold and would be required to comply with the Baldwin Park and Irwindale Municipal Code standards. Therefore, the Project would result in a less than significant construction noise impact, and no mitigation is required.

Table 4.13-7: Project Construction Noise Levels

Construction Phase	Receptor Location			Worst Case Modeled Noise Level, dBA $L_{eq\ (8\text{-}hour)}$ [2]	Noise Standard, dBA L_{eq} [3,4]	Exceeded ?
	Land Use	Distance (feet)[1]	Direction			
Demolition	Residential	445	Southeast	67.5	80	**No**
	Residential	530	South	65.9	80	**No**
	Residential	580	South	65.2	80	**No**
	School	1,995	Southeast	54.4	80	**No**
Site Preparation	Residential	445	Southeast	68.6	80	**No**
	Residential	530	South	67.1	80	**No**
	Residential	580	South	66.3	80	**No**
	School	1,995	Southeast	55.6	80	**No**
Grading	Residential	445	Southeast	68.3	80	**No**
	Residential	530	South	66.8	80	**No**
	Residential	580	South	66.0	80	**No**
	School	1,995	Southeast	55.2	80	**No**
Paving	Residential	445	Southeast	67.5	80	**No**
	Residential	530	South	66.0	80	**No**
	Residential	580	South	65.2	80	**No**
	School	1,995	Southeast	54.5	80	**No**
Building Construction	Residential	445	Southeast	70.1	80	**No**
	Residential	530	South	68.6	80	**No**
	Residential	580	South	67.8	80	**No**

Table 4.13-7: Project Construction Noise Levels

Construction Phase	Receptor Location			Worst Case Modeled Noise Level, dBA $L_{eq\ (8\text{-}hour)}$ [2]	Noise Standard, dBA L_{eq} [3,4]	Exceeded ?
	Land Use	Distance (feet)[1]	Direction			
	School	1,995	Southeast	57.0	80	**No**
Architectural Coating	Residential	445	Southeast	54.7	80	**No**
	Residential	530	South	53.2	80	**No**
	Residential	580	South	52.4	80	**No**
	School	1,995	Southeast	57.0	80	**No**

1. Distance measured from the location of the Project site boundary to the receptor's nearest property line.
2. Modeled noise levels conservatively assume the simultaneous operation of all pieces of equipment.
3. The FTA Noise and Vibration Manual establishes construction noise standards of 80 dBA L_{eq}(8-hour) for residential uses.

Source: Irwindale Municipal Code, 2022. Refer to Appendix A of **Appendix K** for noise modeling results

Operations

Implementation of the Project would create new sources of noise in the vicinity of the Project site. The major noise sources associated with the Project including the following:

- Mechanical equipment (i.e., trash compactors, air conditioners, etc.);
- Parking areas (i.e., car door slamming, car radios, engine start-up, and car pass-by);
- Loading dock activities (i.e., slow moving trucks on the site, maneuvering and idling trucks, air brakes, backup beepers, equipment noise) and;
- Off-site traffic noise

Mechanical Equipment. Potential stationary noise sources related to long-term operation of the Project site would include mechanical equipment. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 52 dBA L_{eq} at 50 feet.[51] The closest commercial/industrial receptor in the City of Irwindale is located approximately 250 feet to the west of the proposed building. At this distance, noise levels from mechanical equipment would reach 38.0 dBA L_{eq} which is below the 75 L_{eq} dBA standard.

At the closest sensitive receptor in the City of Baldwin Park (the single-family residences located approximately 745 feet southeast of on-site mechanical equipment), mechanical equipment noise would attenuate to 28.5 dBA L_{eq} and would not exceed the City of Baldwin Park's allowable noise levels of 55 dBA L_{eq} during the daytime and 45 dBA L_{eq} during the nighttime for residential uses. The closest industrial receptor in the City of Baldwin Park is located approximately 370 feet south and would experience a noise level of 34.6 dBA L_{eq} which would not be above the 70 dBA L_{eq} standard for industrial uses. Therefore, the Project would result in a less than significant impact related to mechanical equipment noise, and no mitigation is required.

Truck and Loading Dock Noise. During loading and unloading activities, noise would be generated by the trucks' diesel engines, exhaust systems, and brakes during low gear shifting' braking activities; backing up

[51] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010.

toward the docks; dropping down the dock ramps; and maneuvering away from the docks. Loading dock noise is approximately 64 dBA L_{eq} at 50 feet.[52] The closest commercial/industrial receptor in the City of Irwindale is located approximately 350 feet to the west of the proposed loading docks. At this distance, noise levels from mechanical equipment would reach 47.5 dBA L_{eq} which is below the 75 L_{eq} dBA standard.

At the closest sensitive receptor in the City of Baldwin Park (the single-family residences located approximately 745 feet southeast of loading docks), loading dock noise levels would be 40.9 dBA L_{eq} and would not exceed the City of Baldwin Park's allowable noise levels of 55 dBA L_{eq} during the daytime and 45 dBA L_{eq} during the nighttime for residential uses. The closest industrial receptor in the City of Baldwin Park is located approximately 410 feet south and would experience a noise level of 46.1 dBA L_{eq} which would not be above the 70 dBA L_{eq} standard for industrial uses.

Furthermore, loading dock doors would be surrounded with protective aprons, gaskets, or similar improvements that, when a trailer is docked, would serve as a noise barrier between the interior warehouse activities and the exterior loading area. This would attenuate noise emanating from interior activities, and as such, interior loading and associated activities would be permissible during all hours of the day. Therefore, the Project would result in a less than significant impact related to stationary noise levels, and no mitigation is required.

Parking Lot Noise. The Project would provide 64 parking stalls for passenger vehicles and 13 electronic vehicle (EV) spaces. Parking stalls would be located throughout the Project site. Nominal parking noise would occur within the on-site parking facilities. Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. The instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys range from 53 to 61 dBA L_{eq} [53] at 50 feet and may be an annoyance to adjacent noise-sensitive receptors. Conversations in parking areas may also be an annoyance to nearby sensitive receptors. Sound levels of speech typically range from 33 dBA at 50 feet for normal speech to 50 dBA L_{eq} at 50 feet for very loud speech.[54] It should be noted that parking lot noises are instantaneous noise levels compared to noise standards in the hourly L_{eq} metric, which are averaged over the entire duration of a time period.

Parking lot noise would occur at the surface parking lot on-site and would attenuate to approximately 48.0 dBA L_{eq} at the nearest industrial receptors located 280 feet west of the Project parking area and would not exceed the City of Irwindale's noise standard of 75 dBA L_{eq}. At the closest sensitive receptor in the City of Baldwin Park (the single-family residences located approximately 540 feet southeast of parking area), parking area noise levels would be 42.3 dBA L_{eq} and would not exceed the City of Baldwin Park's allowable noise levels of 55 dBA L_{eq} during the daytime and 45 dBA L_{eq} during the nighttime for residential uses. The closest industrial receptor in the City of Baldwin Park is located approximately 170 feet south and would experience a noise level of 52.4 dBA L_{eq} which would not be above the 70 dBA L_{eq} standard for industrial uses.

Furthermore, parking lot noise also currently occurs at the adjacent properties under existing conditions and would be consistent with the existing noise in the vicinity and would be partially masked by background noise from traffic along area roadways. Noise associated with parking lot activities is not

[52] Loading docks reference noise level measurements conducted by Kimley-Horn on December 18, 2018. Loading dock activities included trucks arriving at the docks, backing up, and loading/unloading using palette jacks.
[53] Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.
[54] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, 2015.

anticipated to exceed the City's noise standards during operation. Therefore, the Project would result in a less than significant impact related to noise associated with parking lots, and no mitigation is required.

Combined Noise Levels. Project operations could potentially result in simultaneous noise generating activities associated with the mechanical equipment, truck loading area, and parking lot area. The combined noise level associated with the simultaneous operation of all on-site noise sources at the nearest commercial/industrial receptor in the City of Irwindale would be approximately 51.0 dBA L_{eq} and would not exceed the City of Irwindale's noise standard of 75 dBA L_{eq}. At the closest sensitive receptor in the City of Baldwin Park (the single-family residences) the combined noise level would approximately 44.8 dBA L_{eq} and would not exceed the City of Baldwin Park's allowable noise levels of 55 dBA L_{eq} during the daytime and 45 dBA L_{eq} during the nighttime for residential uses. Furthermore, the combined noise levels at the nearest industrial receptor in the City of Baldwin Park would be 53.4 L_{eq} and would not exceed the 70 dBA L_{eq} standard for industrial uses. Therefore, the Project would result in a less than significant impact related to combined noise levels, and no mitigation is required.

Off-Site Traffic Noise. Implementation of the Project would generate increased traffic volumes along nearby roadway segments. Traffic data provided by Environmental Planning Development Solutions, Inc. Solutions (2023) shows that the Project would generate 174 daily trips which would result in noise increases on Project area roadways. In general, a traffic noise increase of less than 3 dBA is barely perceptible to people, while a 5-dBA increase is readily noticeable.[55] Generally, traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to increase by 3 dBA. Therefore, permanent increases in ambient noise levels of less than 3 dBA are considered to be less than significant.

According to the City of Irwindale General Plan, the average daily traffic along Live Oak Avenue, west of Arrow Highway (the closest study road segment to the Project site) is 27,300 vehicles. Therefore, the Project would not generate sufficient traffic to double existing volumes and result in a permanent 3-dBA increase in ambient noise levels. Therefore, the Project would result in a less than significant impact related to noise traffic, and no mitigation is required.

4.13b Would the project generate excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Increases in ground-borne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Construction on the Project site would have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved.

The FTA has published standard vibration velocities for construction equipment operations in their 2018 Transit Noise and Vibration Impact Assessment Manual. The types of construction vibration impacts include human annoyance and building damage. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time (0.20 in/sec annoyance threshold).[56] Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to

[55] Federal Highway Administration, *Highway Traffic Noise Analysis and Abatement Policy and Guidance, Noise Fundamentals*, https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm. Accessed January 3, 2024.
[56] California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, Table 5, April 2020.

vibration generated by construction equipment. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.20 in/sec is considered safe and would not result in any construction vibration damage.

The nearest structure to the Project site is the Price Impact Wholesale building located approximately 45 feet to the west. **Table 4.13-8: Typical Construction Equipment Vibration Levels**, lists vibration levels at 25 feet and 45 feet for typical construction equipment. Ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As indicated in **Table 4.13-8**, based on FTA data, vibration velocities from typical heavy construction equipment operations that could be used during Project construction range from 0.001 to 0.087 in/sec PPV at 45 feet from the source of activity (the distance from active construction zone to the nearest structure to the west), which is below the FTA's 0.20 PPV threshold for structural damage and Caltrans threshold for annoyance. Therefore, the Project would result in a less than significant impact related to construction vibration, and no mitigation is required.

Table 4.13-8: Typical Construction Equipment Vibration Levels

Equipment	Peak Particle Velocity at 25 Feet (in/sec)	Peak Particle Velocity at 45 Feet (in/sec)[1]
Vibratory Roller	0.210	0.087
Large Bulldozer	0.089	0.037
Loaded Trucks	0.076	0.032
Small Bulldozer/ Tractors	0.003	0.001

1. Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance; PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018; D = the distance from the equipment to the receiver.

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

Once operational, the Project would not be a significant source of ground-borne vibration. Ground-borne vibration surrounding the Project currently results from heavy-duty vehicular travel (e.g., refuse trucks, heavy duty trucks, delivery trucks, and transit buses) on the nearby local roadways. Operations of the Project would include periodic truck activities. Due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity. According to the FTA's Transit Noise and Vibration Impact Assessment, trucks rarely create vibration levels that exceed 70 velocity decibels (VdB) (equivalent to 0.012 in/secPPV) when they are on roadways. Therefore, trucks operating at the Project site or along surrounding roadways would not exceed FTA thresholds for building damage or annoyance. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.13c Would the project be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. The nearest airport to the Project site is the San Gabriel Valley Airport in El Monte, a public use strip, located approximately four miles to the west. The Project site is not within 2 miles of a public airport or private airfield, or identified within an airport land use plan. Further, there are not any specific flight corridors that overfly the City. During field surveys conducted in the City, helicopter

operations were observed within the vicinity of the Santa Fe Dam, however, no observation of helicopters were made during Project field visits. The Project would not expose people residing or working in the Project area to excessive airport- or airstrip-related noise levels. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Cumulative Noise Impacts

Cumulative Construction Noise

The Project's construction activities would not result in a substantial temporary increase in ambient noise levels. Construction noise would be periodic and temporary noise impacts that would cease upon completion of construction activities. The Project would contribute to other proximate construction Project noise impacts if construction activities were conducted concurrently. However, based on the noise analysis above, the Project's construction-related noise impacts would be less than significant by implementing the City of Irwindale Municipal Code.

Construction activities at other planned and approved projects near the Project site would be required to comply with applicable City rules related to noise and would take place during daytime hours on the days permitted by the applicable Municipal Code, and projects requiring discretionary City approvals would be required to evaluate construction noise impacts, comply with the City's standard conditions of approval, and implement mitigation, if necessary, to minimize noise impacts. Construction noise impacts are by nature localized. Based on the fact that noise dissipates as it travels away from its source, noise impacts would be limited to the Project site and vicinity. Therefore, Project construction would not result in a cumulatively considerable contribution to significant cumulative impacts, assuming such a cumulative impact existed, and impacts in this regard are not cumulatively considerable. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Cumulative Operational Noise

Cumulative Off-Site Traffic Noise. Cumulative noise impacts describe how much noise levels are projected to increase over existing conditions with the development of the proposed Project and other foreseeable projects. Cumulative noise impacts generally occur as a result of increased traffic on local roadways due to buildout of the Project and other projects in the vicinity. However, the Project is projected to result in 174 new daily vehicular trips and would result in a minimal traffic noise increase (less than 3.0 dBA) along local roadways. Therefore, the Project's contribution would not be cumulatively considerable.

Cumulative Stationary Noise. Stationary noise sources of the Project would not result in an incremental increase in non-transportation noise sources in the vicinity of the site. Therefore, operational noise caused by the proposed Project would be less than significant. Similar to the Project, other planned and approved projects would be required to mitigate for stationary noise impacts at nearby sensitive receptors, if necessary. As stationary noise sources are generally localized, there is a limited potential for other projects to contribute to cumulative noise impacts.

No known present or reasonably foreseeable projects would combine with the operational noise levels generated by the Project to increase noise levels above acceptable standards because each project must comply with applicable City regulations that limit operational noise. Therefore, the Project, together with other projects, would not create a significant cumulative impact, and even if there was such a significant cumulative impact, the Project would not make a cumulatively considerable contribution to significant cumulative operational noises.

Given that noise dissipates as it travels away from its source, operational noise impacts from on-site activities and other stationary sources would be limited to the Project site and immediate vicinity. Thus, cumulative operational noise impacts from related projects, in conjunction with project-specific noise impacts, would not be cumulatively significant. The Project would result in a less than significant impact, and no mitigation is required.

4.14 Population and Housing

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Impact Analysis

4.14a 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)?

Less Than Significant Impact. The Project proposes to construct a speculative warehouse building and does not include the construction of residential uses. Construction of the Project would temporarily increase the number of persons present at the Project site would only be present at the Project site during Project construction. Once operational, the Project would require approximately 57 employees,[57,58] which is anticipated to be hired from the local population in Los Angeles County and adjacent counties.

According to the Demographic and Growth Forecast Technical Report of SCAG's 2020-2045 RTP/SCS, Irwindale is projected to add approximately 1,400 new jobs through the year 2045.[59] According to the California Employment Development Department, the City's unemployment rate as of March 2024 is approximately 4.8 percent.[60] The number of new jobs that would be created by the Project is within the employment generation estimated by SCAG for the City. In 2021, the City has a total of 410 housing units with 31 vacant units, or a total vacancy rate of approximately 7.6 percent.[61] Since it is anticipated that the Project would hire employees from the local population, it is expected that not every employee would

[57] The estimated number of employees during Project operations was calculated from a report commissioned by NAIOP Research Foundation, which uses a ratio of one employee per 1,800 square feet of floor area.

[58] NAIOP Research Foundation, Logistics Trends and Specific Industries that Will Drive Warehouse and Distribution Growth and Demand for Space, 2010, https://www.naiop.org/globalassets/research-and-publications/report/logistics-trends-and-specific-industries-that-will-drive-warehouse-and-distribution-growth-and-demand-for-space/researchreportlogisticstrendsandindustries.pdf. Accessed March 22, 2024.

[59] Southern California Association of Governments (SCAG), Demographics and Growth Forecast Technical Report, 2020, page 34, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579. Accessed July 3, 2024.

[60] California Employment Development Department, Unemployment Rate and Labor Force: Current Month Unemployment Rate and Labor Force Summary, 2024, https://labormarketinfo.edd.ca.gov/cgi/databrowsing/localAreaProfileQSMoreResult.asp?viewAll=&viewAllUS=&currentPage=184&currentPageUS=&sortUp=&sortDown=G.AREANAME&criteria=unemployment+rate&categoryType=employment&geogArea=0621041500&timeseries=&more=More+Areas&menuChoice=localAreaPro&printerFriendly=&BackHistory=-75&goTOPageText=/. Accessed May 1, 2024.

[61] SCAG, Pre-Certified Local Housing Data for the city of Irwindale, 2021, page 10, https://scag.ca.gov/sites/main/files/file-attachments/irwindale-he-0421.pdf?1620796629. Accessed May 1, 2024.

relocate. Should Project-related employees relocate to the area, the local housing stock would be adequate to accommodate the additional workers. The Project would not result in a substantial increase in employment such that population growth could be induced directly or indirectly. Additionally, the Project does not propose the extension of new major infrastructure or uses that would indirectly induce substantial population growth. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.14b Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. There is no housing on the Project site. Therefore, the Project would not displace existing people or housing, or require construction of replacement housing elsewhere. Therefore, the Project would result in no impact, and no mitigation is required.

4.15 Public Services

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X

Impact Analysis

4.15a Fire Protection?

Less Than Significant Impact. The Los Angeles County Fire Department (LACoFD) provides emergency services to the City, including fire, rescue, and emergency services. The closest fire station is LACoFD Station 48 located approximately 1.5 miles east of the Project site at 15546 Arrow Highway. Project construction would require temporary lane closures on streets adjacent to the Project site for utility relocation, delivery of materials, and sidewalk construction. However, Project construction would not require the complete closure of any public streets during construction, and temporary construction activities would not impede the use of the streets for emergencies or access for emergency vehicles. During temporary partial street closure, emergency access and traffic detours would be established in coordination with the City and would confirm to City standards. Because the Project would not include housing or other uses that would induce substantial population growth in the area, the Project would not increase demand on fire protection providers such that new facilities are required.

The Project would be designed according to applicable fire code standards and would provide adequate circulation and access to facilitate emergency response during Project operation in accordance with the City and the LACoFD standards. The Project would provide two new 40-foot driveways: one off Rivergrade Road and one off Live Oak Avenue. The northern driveway off Rivergrade Road would provide full ingress and egress for trucking and automobile for employees only. The southern driveway off Live Oak Avenue would provide ingress and egress for employee/visitor vehicles only and would allow right-in/right-out access. Live Oak Avenue would also serve as an access point for emergency vehicles. Both driveways would connect to an internal aisle, which would also operate a fire access lane and provide an unobstructed width of 28 feet.

Furthermore, the Project would be required to comply with the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and the LACoFD, to minimize and mitigate fire and emergency response risk. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.15b Police Protection?

Less Than Significant Impact. The Irwindale Police Department (IPD) provides police protection services to the City. The Irwindale Police Department is approximately 2 miles southeast of the Project site at 5050 Irwindale Avenue. As discussed in Threshold 4.15a, Project construction could encroach on adjacent roadways and temporarily impact street access and traffic flow. However, Project construction would not require the complete closure of any public streets during construction, and temporary construction activities would not impede the use of the streets for emergencies or access for emergency vehicles. During temporary partial street closure, emergency access and traffic detours would be established in coordination with the City. During operations, the Project would implement security and safety measures that would minimize criminal activity, including gates and site lighting. Gates would restrict access into the truck yard and parking areas on the northeastern portion of the Project site to employees only. The gates would remain locked, except during operations and maintenance activities. According to IMC Section 3.50.020, the Project would be subject to pay police development impact fees to serve new development within the City. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.15c Schools?

No Impact. The Project would not include any residential uses. As mentioned, the Project would not induce population growth and thus would not increase the demand for school services. The Project would not require new or physically altered school facilities, therefore, would not result in adverse physical impacts in this regard. Therefore, the Project would result in no impact, and no mitigation is required.

4.15d Parks?

No Impact. The Project would not directly increase the residential population of the City and therefore is not expected to result in a demand for parks. Given the Project has no residential component, Project implementation would not increase demand for parks. Therefore, the Project would not require new or physically altered parks and therefore would not result in adverse physical impacts in this regard. The Project would result in no impact concerning parks, and no mitigation is required.

4.15e Other public facilities?

No Impact. Other public facilities such as libraries and hospitals are typically provided to serve residents within Irwindale. Given the Project has no residential component, Project implementation would not increase demand for other public facilities such as libraries and hospitals. Therefore, the Project would not require new or physically altered public facilities such as libraries and hospitals and therefore would not result in adverse physical impacts in this regard. Therefore, the Project would result in no impact, and no mitigation is required.

4.16 Recreation

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
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?				X

Impact Analysis

4.16a 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?

4.16b 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?

No Impact. The recreational facility nearest the Project site is the Santa Fe Dam Recreational Area located approximately 0.25-mile north of the Project site. Because the Project would not include housing or other uses that would induce substantial population growth in the area, the Project is not anticipated to increase the demand for existing recreational facilities or generate a demand for new ones. Further, Project implementation is not anticipated to increase the use of existing recreational facilities such that substantial physical deterioration of a facility would occur or be accelerated. The Project does not propose or require new or physically altered recreational facilities and therefore would not result in adverse physical impacts in this regard. Therefore, the Project would result in no impact, and no mitigation is required.

4.17 Transportation

This Section is based on the Traffic Impact Analysis (EPD Solutions, Inc., August 2023) and the Trip Generation, Circulation and Project Driveway Queuing Memorandum (EDP Solutions, October 2023), which are included in their entirety in **Appendix L: Traffic Impact Analysis** and **Appendix M: Trip Generation, Circulation and Project Driveway Queuing Memorandum.**

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycles, and pedestrian facilities?				X
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?			X	
d) Result in inadequate emergency access?				X

Impact Analysis

4.17a Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

No Impact. Regional access to the Project site would be provided from I-605, located approximately 0.6-mile to the west. The I-210, I-10, and SR- 39 freeways also provide regional access to the Project site and are approximately 1.8 miles north, 2.5 miles south, and 3.4 miles east of the Project site, respectively. Local access to the Project site is provided via Live Oak Avenue to the east and Rivergrade Road to the north. The Project is surrounded by one truck route, Live Oak Avenue, as designated by the General Plan.

Local bus service is provided by Foothill Transit lines 272 and 492 on Live Oak Avenue and Foothill Transit line 272 on Rivergrade Road. There are no designated bicycle paths within the vicinity of the Project site. Pedestrian access is currently provided by sidewalks along Rivergrade Road, Stewart Avenue, and a portion of Live Oak Avenue. Pedestrian access would be provided via a new meandering concrete sidewalk along the street frontages of Rivergrade Road, Stewart Avenue, and Live Oak Avenue. The existing sidewalk would be demolished and replaced with a new sidewalk, including curb, gutters, and landscaping improvements, consistent with the City's standards.

The Project would not conflict with any adopted policies, plans, or programs regarding alternative transportation because no changes to existing transportation policies, plans, or programs would result from Project implementation. Therefore, the Project would result in no impact, and no mitigation is required.

4.17b Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. State CEQA Guidelines Section 15064.3 codifies the change from level of service (LOS) to vehicle miles traveled (VMT) as a metric for transportation impact analysis. Pursuant to SB 743, VMT analysis is the primary method for determining CEQA impacts. According to State CEQA Guidelines Section 15064.3(a), VMT refers to the amount and distance of automobile travel attributable to a project. The City refers to the LA County Traffic Impact Analysis (TIA) guidelines, as required by the Governor's Office of Planning and Research (OPR), which include screening thresholds to identify if a project would be considered to have a less than significant impact on VMT and therefore could be screened out from further VMT analysis. Section 3.1.2.1 of the LA County TIA Guidelines states that further VMT analysis is not required, and a less than significant impact can be determined if the project does not generate a net increase of 110 or more daily vehicle trips.

According to the Traffic Impact Analysis and Trip Generation, Circulation and Project Driveway Queuing Memorandum by EPD Solutions, Inc., the Project would generate fewer daily trips compared to the existing land use. Vehicle trips for the existing and proposed buildings were generated using trip rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021).

Project truck trips were determined using data from the Vehicle Mix from the SCAQMD *Warehouse Truck Trip Study Data Results and Usage*. A passenger car equivalent (PCE) factor was applied to project truck trips to account for the greater roadway capacity utilized by heavy trucks. The Project is forecast to generate 360 fewer net daily PCE trips, including 60 net fewer PCE trips during the a.m. peak hour and 55 net fewer PCE trips during the p.m. peak hour when compared to the existing land use; see **Table 4.17-1: Project Trip Generation**. Therefore, the proposed Project trip generation would result in net negative trips, fewer than the net increase of 110 or more daily vehicle trip thresholds as stated in the LA County TIA guidelines. Given that the Project would generate substantially less than 110 net daily trips, the Project is presumed to result in a less than significant transportation impact concerning VMT. [62] [63] Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Table 4.17-1: Project Trip Generation

			AM Peak Hour			PM Peak Hour		
Land Use / ***Trip Rates***	**Units**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Warehouse[1]	TSF	1.71	0.13	0.04	0.17	0.05	0.13	0.18
General Office Building[2]	TSF	10.84	1.34	0.18	1.52	0.24	1.20	1.44
Existing Building								
Office Building	TSF	607	75	10	85	14	67	81
Proposed Building								
Warehouse Building	TSF	174	13	4	17	5	13	18
Vehicle Mix[3]								
Passenger Vehicle	72%	126	10	3	13	3	10	13
2-Axle Trucks	4.6%	8	1	0	1	0	1	1
3- Axle Trucks	5.7%	10	1	0	1	0	1	1
4+- Axle Trucks	17.2%	30	2	1	3	1	2	3

[62] EPD Solutions, Inc., Traffic Impact Analysis, August 2023. Appendix L of this IS/MND.
[63] EPD Solutions, Inc., Trip Generation, Circulation, and Project driveway Queuing Memorandum, October 2023. Appendix M of this IS/MND.

Table 4.17-1: Project Trip Generation								
			AM Peak Hour			PM Peak Hour		
	100%	174	13	4	17	4	14	18
PCE Trip Generation[4]								
Passenger Vehicles	1.0	126	10	3	13	3	10	13
2-Axle Trucks	1.5	12	1	0	1	0	1	1
3-Axle Trucks	2.0	20	2	0	2	1	1	2
4+- Axle Trucks	3.0	90	7	2	9	3	7	10
Total PCE Trip Generation		248	19	6	25	7	19	26
Total Vehicle Trip Generation [4]		-360	-56	-5	-60	-7	-48	-55

TSF = Thousand Square Feet; PCE = Passenger Car Equivalent

1. Trip rates from the Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 150 – Warehouse
2. Trip Rates from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 710 – General Office
3. Vehicle Mix from the SCAQMD Warehouse Truck Trip Study Data Results and Usage, July 2014. Classification: Without Cold Storage
4. Passenger Car Equivalent (PCE) factors from San Bernardino County CMP, Appendix B – Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County, 2016.

Source: **Appendix L**.

4.17c 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 Impact. Vehicular access is currently provided via one driveway off Stewart Avenue and one driveway off Live Oak Street. Vehicular access to the Project site would be provided via two new 40-foot driveways: one off Rivergrade Road and one off Live Oak Avenue. The northern driveway off Rivergrade Road would provide full ingress and egress for trucking and automobile for employees. The southern driveway off Live Oak Avenue would provide ingress and egress for employee and visitor vehicles and would allow right-in/right-out access. Live Oak Avenue would serve as an access point for emergency vehicles. Both driveways would connect to an internal drive aisle. The internal drive aisle would also operate as a fire access lane and provide an unobstructed width of 28 feet. The Project would remove and reconstruct the Project site driveways in accordance with applicable engineering standards of the City of Irwindale Public Works Engineering Department. Thus, the Project does not propose any improvements with potential to increase hazards due to incompatible uses. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.17d Would the project result in inadequate emergency access?

No Impact. The Project would provide vehicular access via two new 40-foot driveways: one off Rivergrade Road and Live Oak Avenue. Both driveways would connect to an internal drive aisle, which is divided by a manual tube steel swing gate on the central eastern portion of the Project site. The internal drive aisle would also operate as a fire access lane and provide an unobstructed width of 28 feet. The gates servicing the driveways at both Live Oak Avenue and Rivergrade Road are intended to remain fully open during operating hours. Emergency vehicle access would only be provided by the driveway located on Live Oak Street. As previously noted, the Project would not affect circulation within or near the Project site, therefore the Project would not result in inadequate emergency access. Therefore, the Project would result in no impact, and no mitigation is required.

4.18 Tribal Cultural Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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); or		X		
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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

Impact Analysis

4.18ai Cause a substantial adverse change in the significance of a tribal cultural resource, listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or

4.18aii Cause a substantial adverse change in the significance of a tribal cultural resource- a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant With Mitigation Incorporated. Chapter 532 Statutes of 2014 (i.e., Assembly Bill 52 (AB 52)) requires that lead agencies evaluate a project's potential impact on "tribal cultural resources," which include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives lead agencies the

discretion to determine, based on substantial evidence, whether a resource qualifies as a "tribal cultural resource." In compliance with PRC Section 21080.3.1(b), the City provided formal notification to California Native American tribal representatives identified by the California NAHC. Results of the Sacred Lands File Search conducted with the NAHC were negative, however, Native American groups may have knowledge about the area's cultural resources and may have concerns about a development's adverse effects on tribal cultural resources, as defined in PRC Section 21074. The City contacted the tribal representative of the tribe noted below pursuant to AB 52 requirements.

Pursuant to AB 52, the City engaged with the Gabrieleno Band of Mission Indians-Kizh Nation in consultation on the Project on March 5, 2024. On March 14, 2024, the Gabrieleno Band of Mission Indians-Kizh Nation responded in writing to the City requesting consultation. Consultation pursuant to AB 52 is deemed complete when:

- Parties reach mutual agreement concerning appropriate measures for preservation or mitigation; or
- Either party, acting in good faith or after reasonable effort, concludes that mutual agreement cannot be reached concerning appropriate measures of preservation or mitigation.

On April 23, 2024, the Gabrieleno Band of Mission Indians – Kizh Nation provided documents from historic books, screenshots of historic maps, and additional explanatory text to identify the high cultural sensitivity of the Project site and to explain their concerns with specific subsurface ground disturbance activities that have impacted tribal cultural resources in the past. The tribe also explained the cultural significance of the area and the high amount of pre-historic human activity there and submitted mitigation measures included in this IS/MND as MM TCR-1 through MM TCR-3. Therefore, consultation pursuant to AB 52 is deemed complete for the Project.

As discussed in Threshold 4.7f, the Project site is underlain by a thin layer of undocumented artificial fill materials with a depth of about two feet and is likely associated with existing and previous Project site improvements. The artificial fill overlies Quaternary-aged (Holocene) young alluvial gravel and sand (Qg) which was encountered in the borings to the maximum depth explored of 20 feet bgs. Given the relatively young age of the alluvial deposits, sediments more than 2 feet bgs within the boundaries of the Project site are anticipated to have a low potential for archaeological resources. Sediment disturbance associated with the development of the Project is expected to reach a maximum of 4 feet bgs for grading and utilities. Notwithstanding, the potential exists for the Project to result in a substantial adverse change in the significance of a previously unidentified Native American tribal cultural resource. The Project would result in a less than significant impact with implementation of Mitigation Measures TCR-1 through TCR-3.

Mitigation Measures

TCR-1 A Native American monitor from the Gabrieleno Band of Mission Indians – Kizh Nation shall be retained prior to commencement of ground-disturbing activities:

A. The project applicant/lead agency 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 will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will 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.

TCR-2 Unanticipated discovery of tribal cultural resource objects (non-funerary/non-ceremonial):

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (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 will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-3 Unanticipated discovery of human remains and associated funerary or ceremonial objects:

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

4.19 Utilities and Service Systems

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded facilities concerning the following, the construction or relocation of which could cause significant environmental effects? i. Water, ii. Wastewater, iii. Wastewater Treatment, iv. Stormwater Drainage, v. Electric Power, Natural Gas, and Telecommunications.			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project projected demand in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Impact Analysis

4.19a Require or result in the relocation or construction of new or expanded facilities concerning the following, the construction or relocation of which could cause significant environmental effects?

(i) Water,

Less Than Significant Impact. The Project site is within the Main San Gabriel Basin. The VCWD would provide potable water to the Project site. The VCWD water system is supplied entirely through groundwater extracted from the Main San Gabriel Basin. In addition, VCWD may receive water from the

Covina Irrigating Company (CIC) in the event of an emergency or when groundwater production is temporarily unavailable.

VCWD has a pumper's share of approximately three percent of the Operating Safe Yield as of water year 2018 to 2019. Groundwater production in excess of the pumper's share of the Operating Safe Yield requires purchase of replenishment water to recharge the basin. VCWD's four active wells include Maine West, Maine East, Nixon West, and Nixon East. These wells have a combined capacity of about 7,700 gallons per minute (gpm).[64] VCWD has averaged approximately 6,811 afy (approximately 4,223 gpm) of groundwater production from fiscal years 2016 to 2020 and is projected to generate approximately 7,311 afy (approximately 4,533 gpm) of groundwater in fiscal year 2040.

During construction activities associated with the development of the Project site, there would be a temporary, intermittent demand for water for such activities as soil watering for Project site preparation, fugitive dust control, concrete preparation, painting, cleanup, and other short-term activities. According to the Energy Calculations prepared for this Project (**Appendix E**), the estimated total amount of water to be used during construction activities is approximately 22.61 million gallons, or approximately 69.4 acre-feet. Since water usage during construction is typically less demanding than the proposed water usage, it is anticipated that existing water infrastructure would meet the limited, temporary water demand associated with construction of the Project, and that the water purveyor is able to provide water during construction. Therefore, construction-related water usage is not expected to have an adverse impact on available water supplies or the existing water distribution system.

As shown in **Table 4.19-1: Estimated Project Water Consumption**, Project operations would result in an estimated net water demand decrease of 10,365 gallons per day (gpd) or approximately 11.7 afy.

Table 4.19-1: Estimated Project Water Consumption

Land Use	Size	Consumption Rate[1]	Water Consumed (gpd)	Water Consumed (afy)
Existing Land Use				
Office Building	56 ksf	240 gpd/ksf	13,440	15.1
Proposed Land Use				
Warehouse	102.5 ksf	30 gpd/ksf	3,075	3.4
Project Net Water Consumption			*(10,365)*	*(11.7)*

gpd = gallons per day; afy = acre feet per year; ksf = thousand square feet
[1] Water consumption rates are assumed as 120 percent of the wastewater generation rates provided in Table 4.19-2.

No off-site water improvements are proposed. VCWD forecasts that it will have sufficient water supplies to meet water demands in its service area for normal, single-dry, and multiple dry years. The Projected populations in VCWD's service area were based on projections obtained from the California Department of Water Resources' online population tool provided by the Water Use Efficiency Data website. Therefore, Project development would have been accounted for in the VCWD's estimates of future water demands, and water demands would not substantially deplete groundwater supplies.

Therefore, the Project would result in a less than significant impact, and no mitigation is required.

(ii) Wastewater,

(iii) Wastewater Treatment,

[64] VCWD. 2015 Urban Water Management Plan, 2016, page 3-1, https://www.vcwd.org/DocumentCenter/View/119/2015-Urban-Water-Management-Plan-PDF. Accessed February 26, 2024.

Less Than Significant Impact. Wastewater generated by the land uses in the City is treated by the Los Angeles County Sanitation Districts (LACSD). Wastewater generated by the Project would be conveyed to existing City-owned sewer lines located in Live Oak Avenue via proposed lateral sewer connections, which would then tie into one of LACSD's regional trunk sewers crossing through LACSD. Wastewater from the Project site would be treated at the San Jose Creek Water Reclamation Plant (SJCWRP) in the City of Whittier. The SJCWRP currently provides primary, secondary, and tertiary treatment with a design capacity of 100 million gallons of wastewater per day (mgd) and an average flow of approximately 54 mgd.[65] [66]

During Project construction, a negligible amount of wastewater would be generated by construction workers. Any such wastewater generation would be temporary, only lasting as long as Project construction activities occur. Minimal wastewater flows are not expected to exceed the applicable treatment requirements of the SJCWRP, and such wastewater would be treated prior to discharge if discharged within the City. The minimal wastewater generated during construction would not require the new or expanded existing wastewater treatment facilities, and, given their small amount, are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems.

The Project's estimated wastewater generation during Project operations is presented in **Table 4.19-2: Estimated Project Wastewater Generation**.

Table 4.19-2: Estimated Project Wastewater Generation

Land Use	Size	Wastewater Generation Rate[1]	Wastewater Generated (gpd)	Wastewater Generated (afy)
Existing Land Use				
Office Building	56 ksf	200 gpd/ksf	11,200	12.55
Proposed Land Use				
Warehousing	102.5 ksf	25 gpd/ksf	2,563	2.87
Project Net Water Consumption			*(8,638)*	*(9.68)*

gpd = gallons per day; afy = acre feet per year; ksf = thousand square feet
[1] Wastewater consumption estimates are prepared based on the Los Angeles County Sanitation District, Table 1: Loadings for Each Class of Land Use.

Based on the estimates provided in **Table 4.19-2**, it can be assumed that Project operations would generate a net decrease of approximately 8,638 gpd of wastewater (approximately 0.0086 mgd). Furthermore, the Project's wastewater generation of approximately 2,563 gpd (approximately 0.0026 mgd) would represent approximately 0.000047 percent of the capacity available at the SJCWRP. Therefore, the Project would not require the relocation or construction of new or expanded wastewater or wastewater treatment facilities. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

(iv) Stormwater Drainage,

Less Than Significant Impact. Refer to Threshold 4.10c concerning drainage patterns and stormwater drainage systems. As discussed in Threshold 4.10c, all proposed drainage improvements would be located within the Project site, and the Project would not require or result in the relocation or construction of

[65] Los Angeles County Sanitation Districts. San Jose Creek Water Reclamation Plant, https://www.lacsd.org/services/wastewater-sewage/facilities/san-jose-creek-water-reclamation-plant. Accessed February 26, 2024.
[66] State Water Resources Control Board. Order Approving Change in Place of Use, Purpose of Use, and Quantity of Discharge, 2019, page 1, https://www.waterboards.ca.gov/waterrights/water_issues/programs/applications/wastewater_petition_orders/docs/ww0100approval_order_final_jwb.pdf. Accessed February 26, 2024.

new or expanded off-site stormwater facilities. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

(v) Electric Power, Natural Gas, and Telecommunications.

Less Than Significant Impact. The City's electrical power is provided by SCE and natural gas is provided by SoCalGas. The City's telecommunications are provided by various companies. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure throughout the City. Refer to Thresholds 4.6a and 4.6b for further discussions concerning electricity and natural gas usage.

The Project proposes to install one emergency backup diesel generator. The Project's estimated operational electrical demand would total approximately 594,215 kWh per year. This would represent 0.0009 percent of SCE's forecast 2026 increased demand, thus, would result in a negligible increased demand compared to SCE's overall demand. It is also noted that the Project (i.e., design and materials) would be subject to compliance with the 2022 Building Energy Efficiency Standards. No construction-related natural gas demand is anticipated for the Project since most construction equipment would be gasoline- or diesel-powered. The Project's estimated operational natural gas demand would total approximately 19,743 therms per year. This would represent 0.0007 percent of the natural gas consumption increase in the County, thus, would result in a negligible increase compared to the County's consumption. Regarding telecommunications, the Project would include on-site connections to telecommunications services. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.19b 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 Impact. As substantiated in Section 4.19a, VCWD has adequate water supplies to meet Project water demands. The Project would be required to install and maintain landscaping in compliance with IMC Chapter 15.30, Water Efficient Landscape Standards and Guidelines, which sets landscape design standards for water conservation.

Project development would also be required to comply with the provisions of CalGreen, which has requirements for indoor water use reduction and site irrigation conservation. Specifically, development of the Project would be required to adhere to the mandatory nonresidential measures in CALGreen Division 5.3, Water Efficiency and Conservation, including Sections 5.303, Indoor Water Use, and 5.304, Outdoor Water Use. The Project would comply with CalGreen through the implementation of LEED measures pertaining to water efficiency including water-efficient fixtures, such as the proposed smart low flow irrigation system, and water-efficient landscapes.

Based on the above, there are adequate water supplies to meet the water demands of the Project. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.19c Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As demonstrated in Thresholds 4.19a.ii and Sections 4.19a.iii, there is existing treatment capacity in the region for estimated Project wastewater generation. Project development would not impact LACSD wastewater treatment facility capacity. The Project would not require or result in the relocation or construction of new or expanded off-site sewer facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.19d 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?

4.19e Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Athens Services waste haulers provide services in the City of Irwindale, including the Project site. The City primarily disposes at various landfills throughout Los Angeles County.

Project construction would result in generation of construction and demolition (C&D) debris such as metal scrap, lumber, concrete which will be collected and diverted to a C&D debris facility for materials to be recycled and/or discarded. As shown in **Table 4.19-3: Estimated Project Waste Generation**, C&D of the Project is estimated to generate approximately 2,782 tons of construction and demolition debris. This estimation is a conservative estimate as it assumes that no reductions in waste generation would occur due to recycling.

Table 4.19-3: Estimated Project Waste Generation

Land Use	Size	Waste Generation Rate	Waste Generated (tons)	Waste Generated (lbs)
Demolition[1]				
Office	56 ksf	46 tons/ksf	2,576 tons	5,152,000 lbs
Construction[2]				
Warehouse	102.5 ksf	4,020 lb/ksf	206 tons	412,050 lbs
Total Demolition and Construction Waste			*2,782 tons*	*5,564,050 lbs*
Operations[3]				
Manufacturing/ warehouse	1,025 100 sf	1.42 lb/100 sf/day	0.7 tpd	1,455 lbs/day
Total Operational Waste			*0.7 tpd*	*1,455 lbs/day*

Sf = square feet; ksf = thousand square feet; lbs = pounds; tpd = tons per day

1. The demolition waste generation rate of 46 tons/ksf is based on the CalEEMod User Guide Appendix A, page 13.
2. The construction waste generation rate of 4,020 lb/ksf is based on the U.S.EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.
3. Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed February 21, 2024.

Residual wastes such as trash packing materials, and plastics could require disposal at landfill. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations.

All construction and operational activities would be subject to conformance with relevant Federal, State, and local requirements related to solid waste disposal. The Project would be required to comply with the California Integrated Waste Management Act of 1989 (AB 939), which requires that at least 65 percent of waste produced is recycled, reduced, or composted and is included in IMC Chapter 09.22, Specific Regulation or Organic Waste Disposal Reduction, Recycling, and Solid Waste Collection, which would achieve compliance with State law.

As detailed in **Table 4.19-3**, Project operations would generate approximately 0.7 tons per day (tpd) or approximately 256 tons per year (tpy). The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other diversion measures. The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 137 million tons of remaining disposal capacity at the County's Class III landfills.[67] As such, the solid waste generated by the Project would be accommodated by the landfills that serve the Project site.

During operation, the Project would be required to comply with CalRecycle's waste diversion rate target of 50 percent of the waste stream. The Project would also be subject to AB 1826, which requires businesses to provide separate recycling bins for organic waste. Therefore, the Project would be subject to compliance with the CALGreen Code, State regulations, and City regulations regarding solid waste management and reduction. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

[67] County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022.

4.20 Wildfire

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Impact Analysis

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

4.20a Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. As described in **Section 4.9: Hazards and Hazardous Materials**, Arrow Highway, located approximately 0.2-mile northeast of the Project site, is designated as a disaster route. The I-605, located approximately 0.6-mile west of the Project site, is designated as a freeway disaster route. The Project may require temporary lane closures on streets adjacent to the Project site, however, construction activities would not impact designated disaster routes and would not interfere with emergency response or evacuation plans. The Project would be designed according to applicable fire code standards and would provide adequate circulation and access to facilitate emergency response. Therefore, the Project would not impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

4.20b Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. According to the California Department of Forestry and Fire Protection (CAL FIRE), the Project site is not within or near a State Responsibility Area (SRA) or a very high fire severity zone (VHFSZ).[68] The nearest VHFSZ is located approximately 0.77-miles north of the Project site. The Project site and surrounding area are relatively flat and developed with urban uses which precludes factors such as slopes or strong winds from exacerbating fire risk. Therefore, the Project would result in no impact, and no mitigation is required.

4.20c Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. As described above, the Project site is not within or near a SRA or a VHFSZ. The Project is located on an existing developed site and would connect to existing utilities and would not require the installation or maintenance of infrastructure that may exacerbate fire risk. Therefore, the Project would result in no impact, and no mitigation is required.

4.20d Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. As described above, the Project site is not within or near a SRA or a VHFSZ. Post-fire impacts such as drainage changes and landslides would not occur as the Project site and its surroundings are highly urbanized. The Project site is relatively flat and does not have any steep slopes or hillsides that would be susceptible to landslides or flooding. Therefore, the Project would result in no impact, and no mitigation is required.

[68] CAL FIRE. FHSZ Viewer. Available at https://egis.fire.ca.gov/FHSZ/. Accessed February 12, 2024.

4.21 Mandatory Findings of Significance

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Does the Project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Impact Analysis

4.21a Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact with Mitigation Incorporated. As discussed throughout this IS/MND, the Project does not have the potential to degrade the environment's quality or result in significant environmental impacts that cannot be reduced to less than significant following compliance with the established regulatory framework (i.e., federal, State, and local regulations) and the recommended mitigation measures.

As concluded in **Section 4.4**, with implementation of MM BIO-1, the Project would not reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or

endangered plant or animal. Therefore, the Project would result in a less than significant impact with implementation of MM BIO-1.

As concluded in **Section 4.5**, the Project would not eliminate important examples of the major periods of California history. The Project was assessed to have low sensitivity for prehistoric resources and buried historic archaeological resources. Mitigation measure CUL-1 was included to reduce impacts to a less than significant level. Therefore, the Project would result in a less than significant impact with incorporation of CUL-1.

As concluded in **Section 4.7**, although the Project site was assessed to have low sensitivity for paleontological resources, construction activities could potentially encroach on such resources. With implementation of MM GEO-1, the Project would result in a less than significant impact.

As concluded in **Section 4.18**, the Project could cause an adverse change in the significance of a tribal cultural resource, unless mitigated. Following compliance with MM TCR-1 through MM TCR-3, potential impacts to tribal cultural resources would be reduced to less than significant.

4.21b Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. The Project would result in significant impacts unless mitigated for the following environmental resource areas: cultural resources, geology and soils, and tribal cultural resources. The potential impacts associated with these three resource areas are localized, thus, would not result in cumulative impacts. A Mitigation Program has been prepared for each of these environmental resource areas to reduce impacts to less than significant. Other development projects within the City would be subject to the City's discretionary review process, CEQA, and the established regulatory framework, which would be evaluated on a case-by-case basis.

For all other resources areas, the analysis determined the Project would result in either no impact or a less than significant impact following compliance with the established regulatory framework, without the need for mitigation. Therefore, the Project would result in a less than significant impact and would not be cumulatively considerable, and no mitigation is required.

4.21c Does the project have environmental effects which will cause substantial adverse effects on human beings, directly or indirectly?

Less Than Significant Impact. As discussed in the respective sections, the Project would have no potentially significant impacts that would not be reduced to less than significant following compliance with the established regulatory framework and/or recommended mitigation measures. The Project would not cause substantial adverse effects on human beings directly or indirectly. Therefore, the Project would result in a less than significant impact, and no mitigation is required.