CITY OF MONROVIA
CEQA ENVIRONMENTAL CHECKLIST
MONROVIA LAFCO REORGANIZATION NO. 2023-02
DRAFT INITIAL STUDY/NEGATIVE DECLARATION

PROJECT SUMMARY:

APNs:	5780-019-011	*Street Address:*	923 South 10th Avenue, Arcadia, CA 91006
Applicant or Agent:	James Troyer 2355 #670 Westwood Blvd. Los Angeles CA 90064 latroy@yahoo.com	*Project Contact Information:*	Elizabeth Kho 130 South First Ave. #B Arcadia, CA 91006 626-487-2222 Elizabeth@elizabethkho.com
Project Name:	Monrovia LAFCO Reorganization No. 2023-02; City of Monrovia Preliminary – GPA 2024-0001 and Pre-zoning Amendment ZA 2024-0002.	*Project Case Number(s);*	Monrovia LAFCO Reorganization No. 2023-02; City of Monrovia, Preliminary General Plan Amendment GPA 2024-0001 and Pre-zoning Amendment ZA 2024-0002
Existing Zoning:	City of Arcadia: R-1, 7,500 sq. ft. minimum lot area	*Existing General Plan Designation:*	City of Arcadia – Low Density Residential
Site Acreage:	0.46 acres	*Existing Land Use:*	Single Family Residential (one existing dwelling unit)
Summary of Proposal:	Detachment of the subject parcel from the City of Arcadia and the Arcadia Sphere of Influence and related annexation into the City of Monrovia and Monrovia Sphere of Influence, including a preliminary General Plan Amendment and pre-zoning of the same by the City of Monrovia to allow future development of up to six dwelling units if consolidated with two adjacent parcels under common ownership within the City of Monrovia. No specific development project or construction is proposed as part of these entitlement requests before the LA LAFCO or the City of Monrovia at the present time.		

LEAD AGENCY PROJECT CONTACT INFORMATION:

Lead Agency:	City of Monrovia 415 South Ivy Avenue Monrovia, Ca 91006
Lead Agency Contact person:	Craig Jimenez, AICP Community Development Director
Phone No:	(626) 932-5537
E-mail:	cjimenez@MonroviaCA.gov

INTRODUCTION

The Project encompasses three parcels: one parcel is currently located within the City of Arcadia and two parcels are located within the City of Monrovia ("City"). The Project would result in the detachment of the single parcel from the City of Arcadia and related annexation into the City of Monrovia

The City of Arcadia parcel is located at 923 South 10th Avenue in the City of Arcadia; (Assessor's Parcel Number [APN] 5780-019-011, 0.46 acres). The City of Monrovia parcels APN 5780-019-008 (0.20 acres) and APN 5780-019-010 (0.13 acres) are presently within the jurisdiction of the City. All three parcels are under common ownership.

The City of Monrovia will prepare a preliminary General Plan Amendment (GPA 2024-0001) and Pre-Zoning Amendment (ZA 2024-0002) that would allow future residential construction on the three contiguous parcels (5780-019-008, 010, and 011) that, if approved, would be wholly within the City of Monrovia. If all three parcels are consolidated and rezoned as proposed, up to six (6) dwelling units could be allowed. No construction is proposed as part of this Project application. Subsequent discretionary actions including a tentative subdivision map by the City of Monrovia will be necessary to permit construction.

CEQA STATUTORY AUTHORITY AND REQUIREMENTS

In accordance with Sections 15051 and 15367 of the California Code of Regulations (CCR), the City of Monrovia is identified as the Lead Agency for the project. Under CEQA (Public Resources Code [PRC] Section 21000-21177) and pursuant to Section 15063 of the CCR, the City is required to undertake the preparation of an Initial Study to determine if the project would have a significant environmental impact. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that any aspect of the project may cause a significant environmental effect, the Lead Agency shall further find that additional CEQA analysis is warranted to fully evaluate project-related and cumulative environmental impacts. Alternatively, if the Lead Agency finds that there is no evidence that the project may cause a significant effect on the environment, the Lead Agency shall find that the project would not have a significant effect on the environment and shall prepare a Negative Declaration (or Mitigated Negative Declaration). Such determination can be made only if "there is no substantial evidence, in light of the whole record before the Lead Agency" that such impacts may occur (PRC Section 21080(c)).

The environmental documentation, which is ultimately selected by the Lead Agency in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for considering discretionary actions necessary to approve or undertake the project. The resulting documentation is not, however, a policy document, and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

PURPOSE

CEQA Guidelines Section 15063 identifies the following specific contents for inclusion in an Initial Study:

- A description of the project, including the location of the project;
- An identification of the environmental setting;
- An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- A discussion of ways to mitigate significant effects identified, if any;
- An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study.

EARLY CONSULTATION

Pursuant to CEQA Guidelines Section 15063(g), as soon as the Lead Agency has determined that an Initial Study would be required for the project, the Lead Agency is directed to consult informally with all Responsible Agencies and Trustee Agencies that are responsible for resources affected by the project in order to obtain the recommendations of those agencies as to whether an EIR or Negative Declaration should be prepared for the project. Following receipt of any written comments from those agencies, the Lead Agency considers any recommendations of those agencies in the formulation of the preliminary findings. Following completion of this Initial Study, the Lead Agency initiates formal consultation with these and other governmental agencies as required under CEQA and its implementing guidelines.

INCORPORATION BY REFERENCE

The following documents were used during preparation of this Initial Study and are incorporated into this document by reference. These documents are available for review at the City of Monrovia Community Development Department, 415 South Ivy Avenue, Monrovia, California, 91016.

- **City of Monrovia General Plan Amendment - Land Use Element (2021 Update).** The Monrovia General Plan is a long-range planning document that guides decisions related to land use and other related topics. If the “Project” is approved, future construction would be subject to the land use and other planning policies of the City of Monrovia.
- **City of Monrovia 2021-2029 Housing Element and Safety Element Update. (September 2022.)** The Housing Element is a component of the City’s General Plan. The Housing Element addresses projected housing needs, constraints to housing development, and housing resources including an inventory of available and suitable sites as well as additional related topics. If the “Project” is approved, future construction would be subject to the housing policies of the City of Monrovia.

- **City of Monrovia, 2021-2029 Housing Element Update, Safety Element Update, Initial Study/Mitigated Negative Declaration. (September 2022)** This document evaluates the potential environmental impacts associated with the implementation of Housing and Safety Element updates at a programmatic level.

- **Monrovia General Plan Proposed Land Use and Circulation Elements Draft Environmental Impact Report, September 2008.** This document evaluates the potential environmental impacts associated with the implementation of the updated City General Plan Land Use and Circulation Elements at a programmatic level.

- **Monrovia Municipal Code.** The Monrovia Municipal Code (Municipal Code), Codified through Ordinance 2023-03, passed August 1, 2023, consists of codes and ordinances adopted by the City. These include standards intended to regulate land use, development, health and sanitation, water quality, public facilities, and public safety. If the "Project" is approved, future construction would be subject to the regulations of the City of Monrovia.

PROJECT DESCRIPTION

The 0.46-acre Project site is located at 923 South 10th Avenue in the City of Arcadia. The Project would result in the detachment of the subject parcel from the City of Arcadia and Arcadia Sphere of Influence and related annexation into the City of Monrovia and Monrovia Sphere of Influence, including actions to pre-designate an appropriate General Plan Land Use (Residential Medium Density and Public/Quasi-Public) and appropriate pre-zoning (RM - 4000 and P/QP) to allow future construction of up to six total dwelling units on the subject parcel (5780-019-011) and two adjacent parcels (5780-019-008 and -010) if consolidated wholly within the City of Monrovia (Parcels 5780-019-008 and -010 are presently within the jurisdiction of the City of Monrovia). It should be emphasized that no construction is proposed as part of this Project application.

The Project site is currently occupied by a single family dwelling. The Los Angeles County Flood Control District holds an easement over the rear 130' of the subject property and is improved with a concrete flood control channel (Santa Anita Wash), which is part of the County stormwater management system. The Project anticipates no change to the use of that portion of the property and is proposed to be designated Public/Quasi Public (P/QP). The surrounding vicinity is a mixture of single family and medium density residential uses, as outlined in Table 1 below and shown in Exhibit E through H that follow this section.

TABLE 1 Existing General Plan Land Use and Zoning Districts		
Location	**Existing Land Use Designation**	**Existing Zoning District Designation**
Project Site	City of Arcadia, Low Density Single Family Residential	City of Arcadia, R-1, 7,500 sq ft lot area minimum
North	City of Monrovia, Medium Density Residential	City of Monrovia, RM4000 (Residential Medium 4000) and P/QP (Public/Quasi Public)
South	City of Arcadia, Low Density Single Family Residential.	City of Arcadia, R-1, 7,500 sq ft lot area minimum
East	City of Arcadia, Low Density Single Family Residential,	City of Arcadia, R-1, 7,500 sq ft lot area minimum.
West	City of Arcadia – Low Density Single Family Residential west of the Santa Anita Wash.	City of Arcadia, R-1, 7,500 sq ft lot area minimum

Sources: City of Monrovia Zoning Database and Map, City of Arcadia Database and Zoning Map..

PROJECT LOCATION, EXISTING ON-SITE AND SURROUNDING LAND USES AND CONDITIONS

The City of Monrovia and its Sphere of Influence ("planning area") lies within the San Gabriel Valley in Los Angeles County, along the base of the San Gabriel Mountains. The City covers an area of approximately 14 square miles and is bounded by Arcadia to the west, Angeles National Forest to the north, Bradbury and Duarte to the east, and unincorporated Los Angeles County and Irwindale to the south. Interstate 210 (I-210), Huntington Drive, and Foothill Boulevard traverse the City.

Exhibit A - Regional Location, shows the location of the City of Monrovia in a regional context. Exhibit B – Local Vicinity illustrates the boundaries of the Cities of Monrovia and Arcadia and the approximate location of Project site relative to these jurisdictional boundaries. Exhibit C - Project Site and Vicinity, illustrates the site location and surrounding neighborhood vicinity. Exhibit D - Annexation Map, illustrates in detail the specific parcel which is the subject of Reorganization 2023-02. Exhibits E through H provide an aerial view of the Project site and photographic views of the Project site street frontage and character of the adjacent neighborhood area.

The Project site is located within an urban setting. When annexed to the City of Monrovia, it will form part of the southwest boundary of the City as shown in Exhibit B. The topography of the Project site is essentially level. Access to the Project site is provided by South 10th Avenue and El Norte Avenue. No natural habitat exists on or near the Project site. As has been noted, the Project site is presently occupied by one single family dwelling.

In the immediate vicinity of the Project site, the surrounding neighborhood is a mix of residential densities with single story, single family dwellings predominating as illustrated in Exhibits E through H. The Santa Anita Wash runs along the west property line as shown in the aerial view on Exhibit E.

The following is the legal description of the subject parcel:

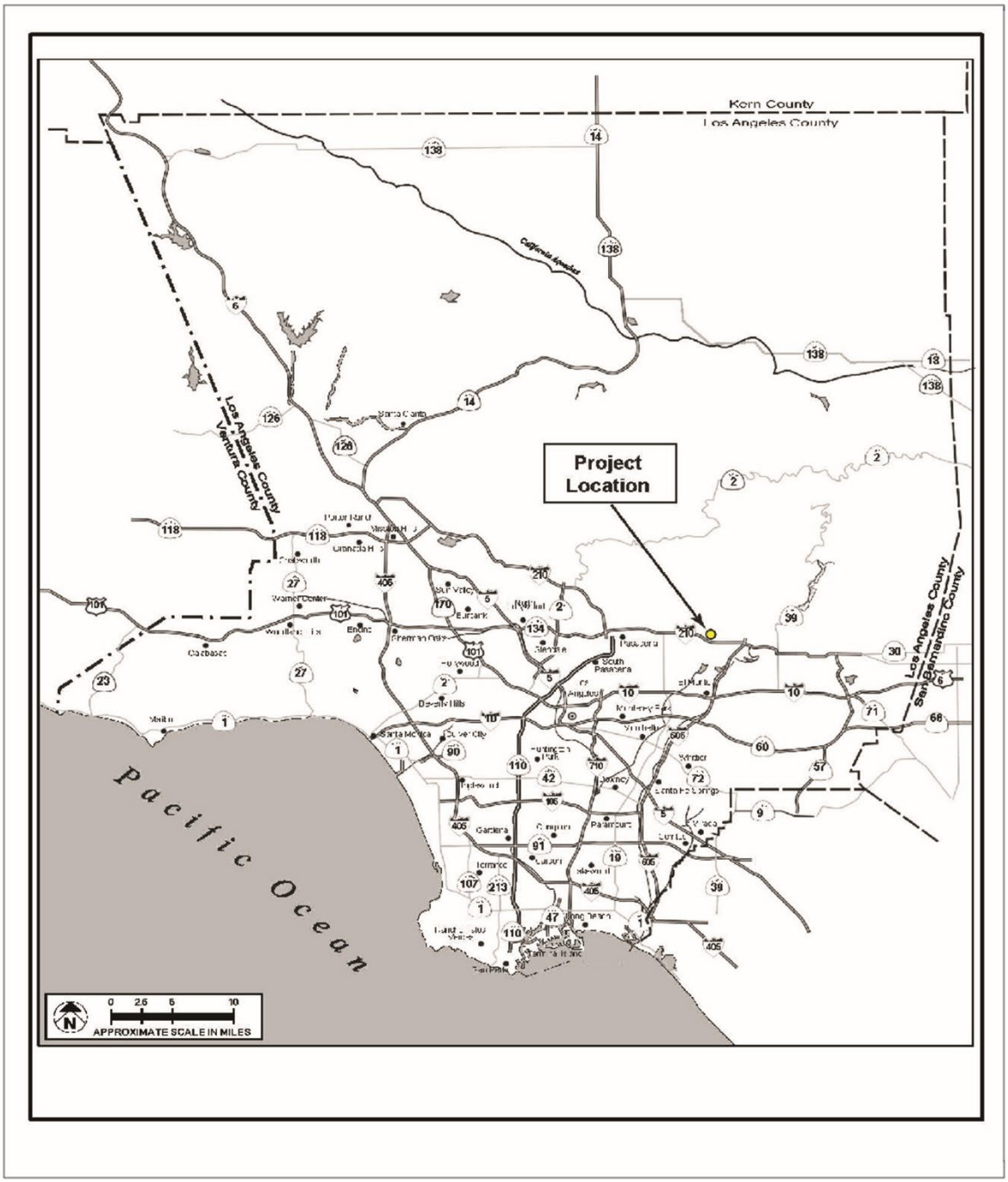
"A PORTION OF LOT 84 OF TRACT NO. 808, PER MAP BOOK 16, PAGE 82 AND 83, OF MAPS IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, ALSO BEING A PORTION OF LOT 135 ON THE ARCADIA ACREAGE TRACT, PER MAP BOOK 10, PAGE 18, O.R. IN SAID COUNTY, SAID STATE, IN THE RANCHO SANTA ANITA, DESCRIBED AS FOLLOWS:

BEGINNING AT THE INTERSECTION OF THE CENTERLINE OF 10TH AVENUE AND THE NORTHERLY RIGHT OF WAY OF EL NORTE AVENUE, 60.00 FEET WIDE, ALSO BEING THE EXISTING CITY OF MONROVIA BOUNDARY; THENCE, SOUTHERLY ALONG SAID CENTERLINE, (1) SOUTH 00°00'00" EAST, A DISTANCE OF 45.17 FEET; THENCE, (2) SOUTH 89°36'00" WEST, A DISTANCE OF 470.92 FEET TO THE WESTERLY LINE OF SAID LOT 84; THENCE, NORTHERLY ALONG SAID WESTERLY LINE, (3) NORTH 00°00'00" EAST, A DISTANCE OF 45.17 FEET TO THE SAID EXISTING BOUNDARY; THENCE, EASTERLY ALONG SAID BOUNDARY, (4) NORTH 89°36'00" EAST, A DISTANCE OF 470.92 FEET TO THE POINT OF BEGINNING AND CONTAINING 0.46 ACRES OF LAND, MORE OR LESS."

APPLICABLE RESIDENTIAL DEVELOPMENT GUIDELINES

As has been described, the Project involves a Zone Change to RM4000 (Residential Medium Density – 4000 Sq.ft. Minimum Lot Area). Subsequent development will be required to comply with the design standards establshed in the Municipal Code, Title 17- Zoning, Chapter 17.12.030 pertaining to Multiple Family Residential Development Standards. Briefly, subsequent residential construction on the Project site must comply with key development standards highlighted below, among others, and is subject to Neighborhood Compatibility Design Review and approval of the Planning Commision and City Council.

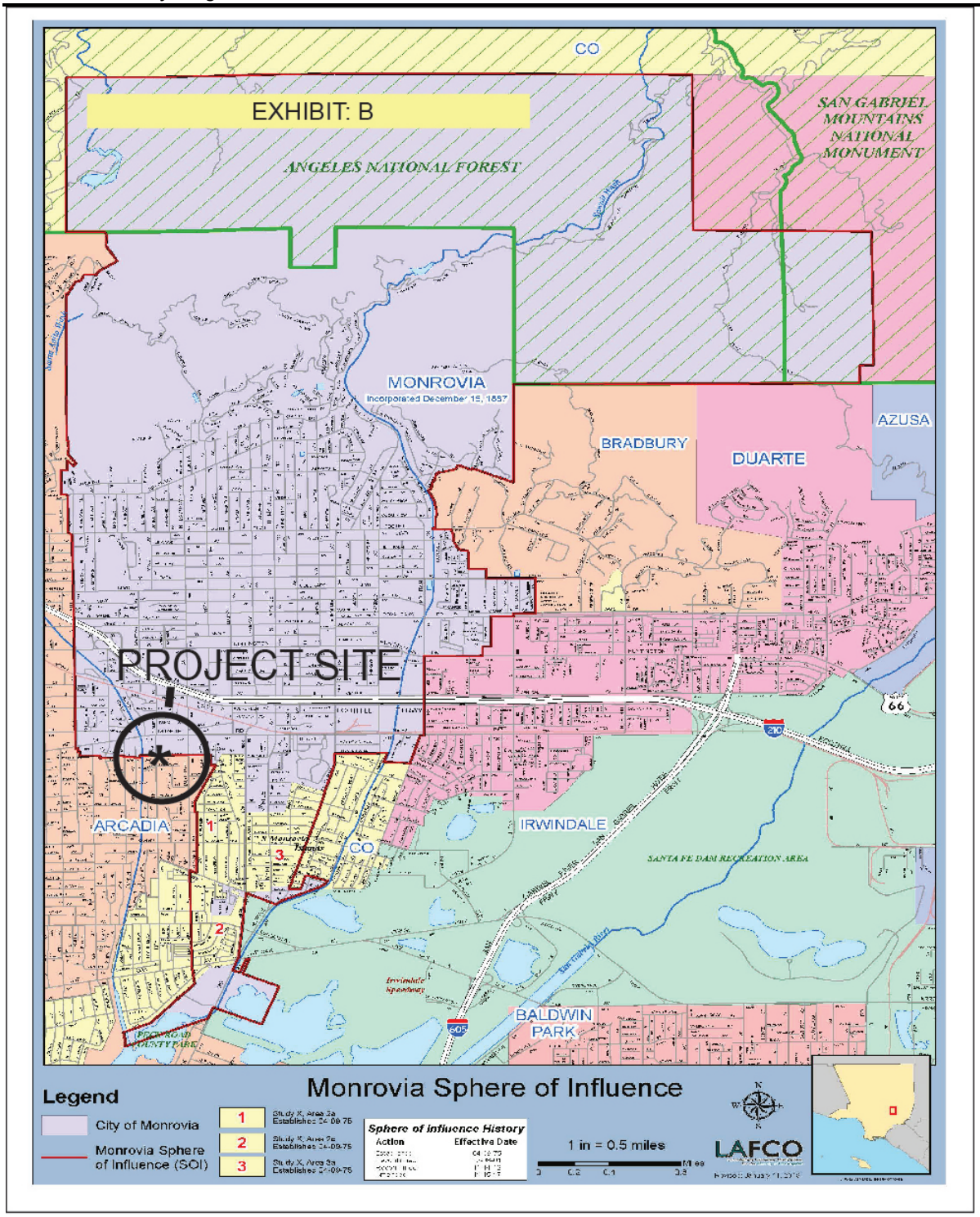
- Maximum building height - two stories (27 feet maximum);
- Maximum Dwelling Unit Floor Area Ratio - 40%;
- Required Front Street Setback - 25 feet;
- Required Side Yard Setbacks - 10% of Lot Width;
- Recreation Space - 40% of the gross dwelling unit floor area;
- Parking - Two-car garage required for each unit;
- Guest Parking - One-half space required per unit when there are 6 (six) or more units on a lot;
- RV Storage – Allowed only within an entirely enclosed building;
- Multiple-family residential projects. Shall be enclosed by five- to six-foot decorative walls.



RPG ROMO PLANNING GROUP

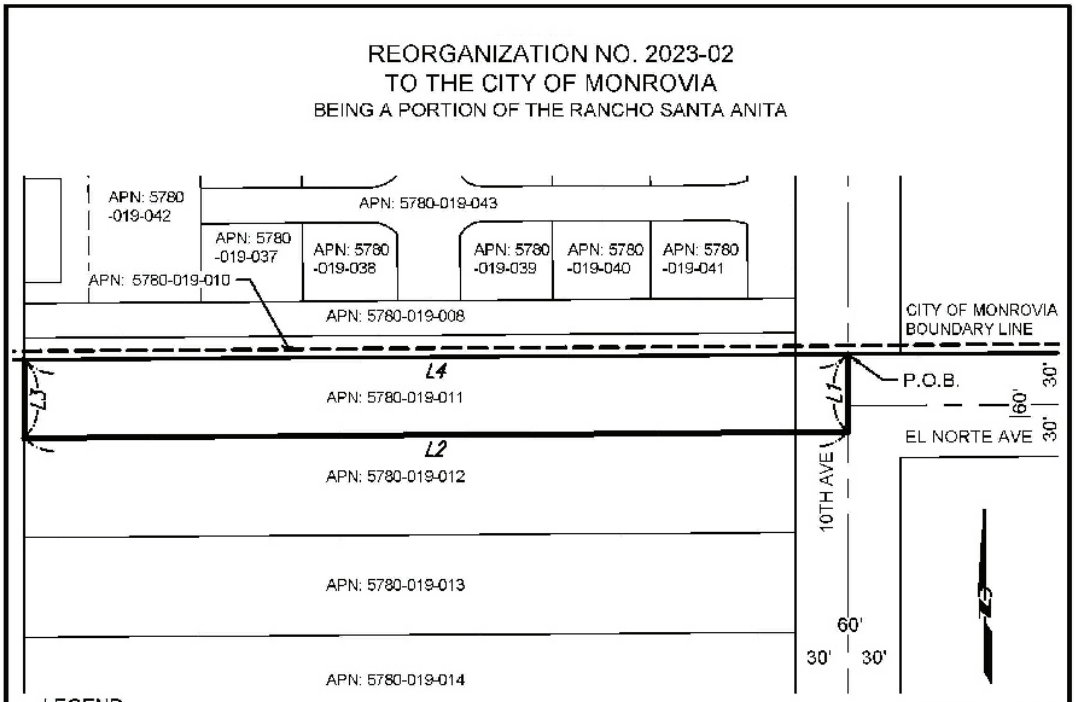
EXHIBIT : A

TITLE: REGIONAL LOCATION
CITY OF MONROVIA



RPG ROMO PLANNING GROUP

EXHIBIT: B
TITLE: LOCAL VICINITY
SOURCE: LA LAFCO



LEGEND

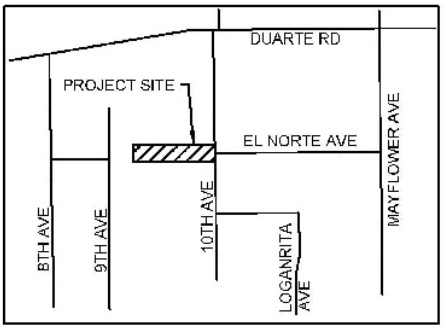
P.O.B. POINT OF BEGINNING
T.P.O.B. TRUE POINT OF BEGINNING

EXISTING CITY OF MONROVIA BOUNDARY

PROPOSED CITY OF MONROVIA BOUNDARY

LINE TABLE		
LINE #	BEARING	DISTANCE
L1	S0°00'00"E	45.17'
L2	S89°36'00"W	470.92'
L3	N0°00'00"E	45.17'
L4	N89°36'00"E	470.92'

0.46 ACRES



VICINITY MAP
N.T.S.

DISCLAIMER:
"FOR ASSESSMENT PURPOSES ONLY. THIS DESCRIPTION OF LAND IS NOT A LEGAL PROPERTY DESCRIPTION AS DEFINED IN THE SUBDIVISION MAP ACT AND MAY NOT BE USED AS THE BASIS FOR AN OFFER FOR SALE OF THE LAND DESCRIBED."

APN: 5780-019-011	LAFCO RESOLUTION NO:	ACREAGE: 0.46	DATE: 3/28/23	SCALE: 1" = 80'

MONROVIA REORGANIZATION NO. 2023-02

BEING A PORTION OF THE RANCHO SANTA ANITA

PREPARED BY:
Southland Civil Engineering & Survey, LLP
87 N. Raymond Ave., Ste 300
Pasadena, CA 91103
Office: 626 486 2556
Fax: 626-486-2558

RPG ROMO PLANNING GROUP

EXHIBIT: C
TITLE: PROJECT SITE AND VICINITY
SOURCE: SOUTHLAND CIVIL ENGINEERING

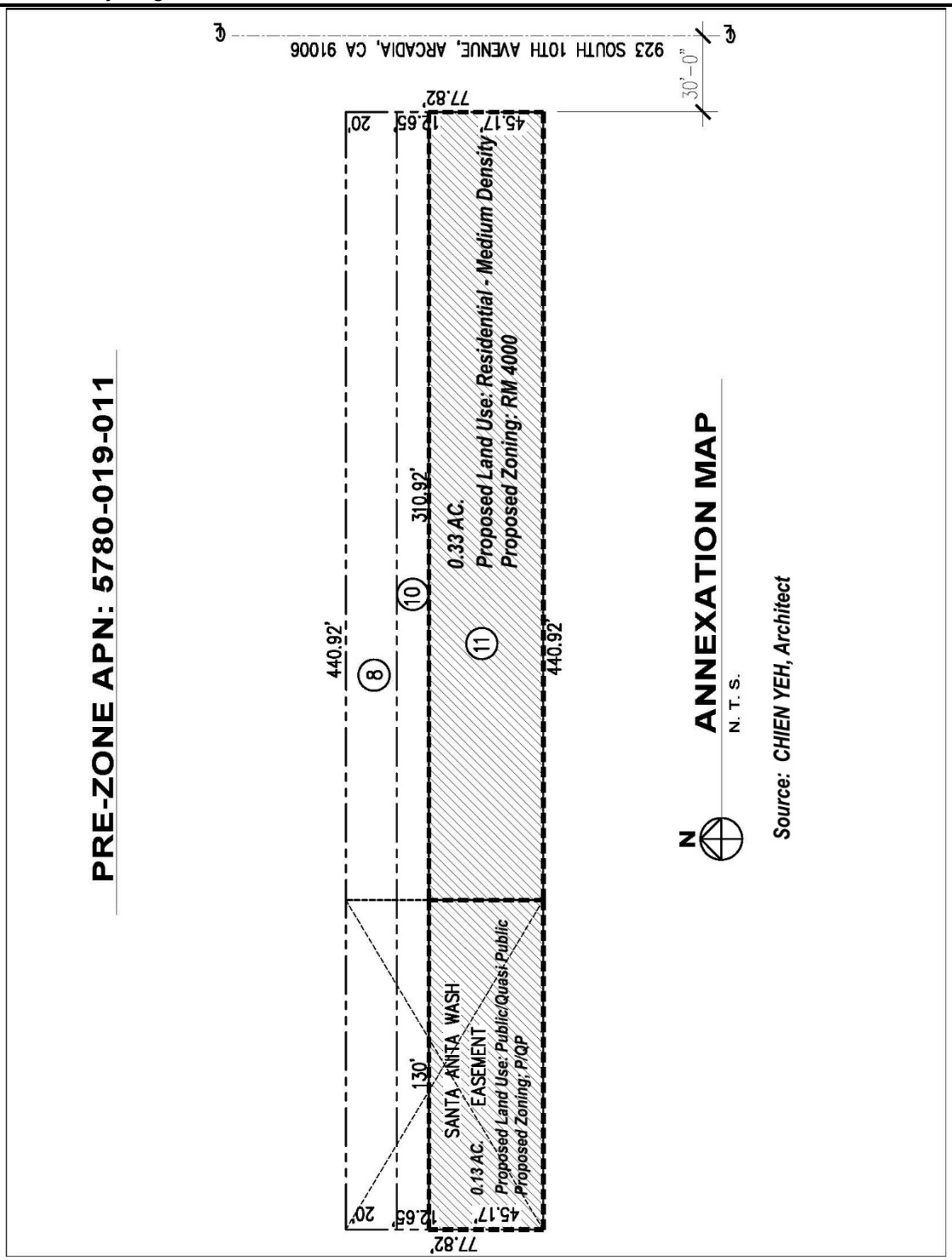


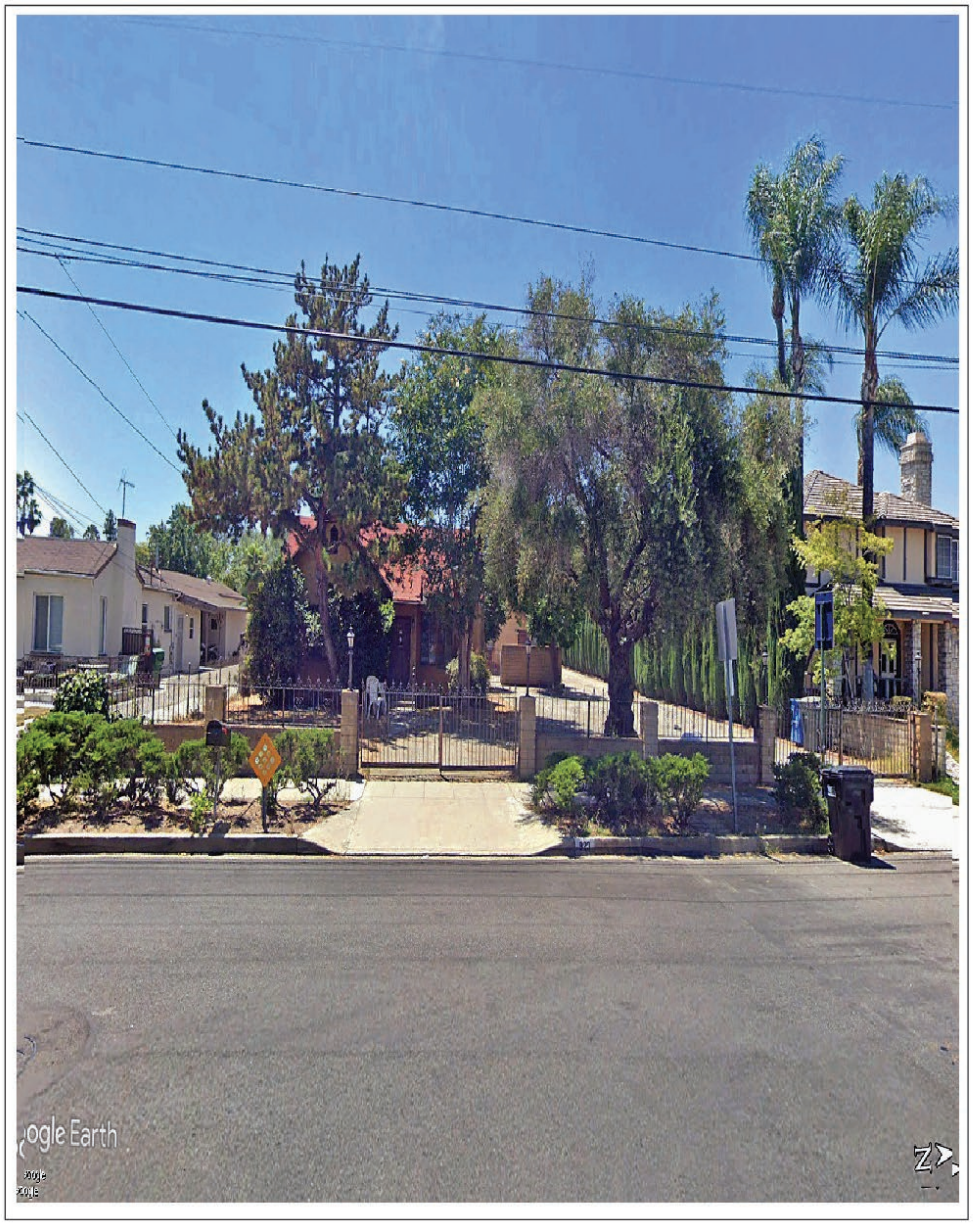
EXHIBIT D
ANNEXATION MAP

RPG ROMO PLANNING GROUP

EXHIBIT: E

TITLE: AERIAL VIEW - PROJECT SITE

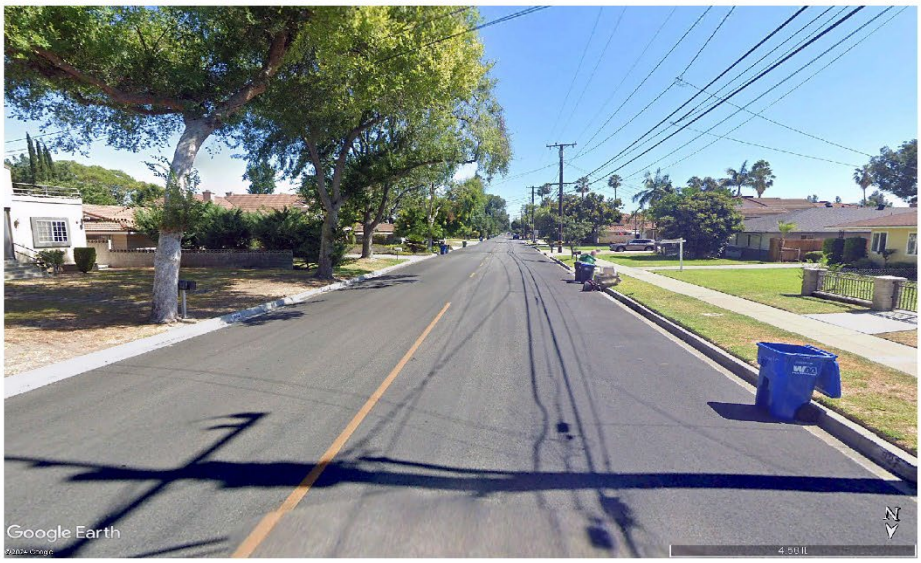
source: GOOGLE EARTH



RPG ROMO PLANNING GROUP

EXHIBIT: F
TITLE: STREET VIEW
923 S.10TH AVE., ARCADIA CA
SOURCE: GOOGLE EARTH

10TH AVENUE LOOKING NORTH FROM SITE



10TH AVENUE LOOKING SOUTH FROM SITE

RPG ROMO PLANNING GROUP

EXHIBIT: G
TITLE: STREET VIEWS - S. 10th AVE.
SOURCE: GOOGLE EARTH

RPG ROMO PLANNING GROUP

EXHIBIT: H
TITLE: STREET VIEW LOOKING EAST ON EL NORTE AVE.
SOURCE: GOOGLE EARTH

ENTITLEMENTS REQUESTED

This Initial Study/Mitigated Negative Declaration evaluates the proposed Project at a programmatic level. Subsequent environmental review at a project specific level will be required prior to future construction. Actions which are part of this "Project" under CEQA are:

1. Approval of Reorganization 2023-02 by the Los Angeles County Local Agency Formation Commission to allow a boundary change and jurisdictional reorganization to detach the subject parcel from the City of Arcadia and the Arcadia Sphere of Influence and annex it into to the City of Monrovia and the Monrovia Sphere of Influence for purposes of land use jurisdiction;
2. Approval of Preliminary General Plan Amendment GPA 2024-0001 by the City of Monrovia to allow incorporation of the Project site into the jurisdiction of the City of Monrovia and the Monrovia Sphere of Influence and to designate an approximate 0.33 acre portion of the Project site for Residential Medium Density land use and an approximate 0.13 acre portion incorporating the Santa Anita Wash as Public/Quasi-Public land use.
3. Approval of Pre - Zoning Amendment ZA 2024-0002 to designate an approximate 0.33 acre portion the Project site for RM - 4000 zoning, and an approximate 0.13 acre portion incorporating the Santa Anita Wash as P/QP zoning.

ADDITIONAL APPROVALS REQUIRED

Federal: None.
State of California: None.
Regional: None.
County: None.
Local: None.

CONSULTATION WITH CALIFORNIA NATIVE AMERICAN TRIBES

The proposed Project would change the boundary between the Cities of Arcadia and Monrovia and allow an increase in the density of residential use in the City of Monrovia. The Project site has been previously disturbed by the construction of the existing onsite single family dwelling. No new construction is associated with the current application.

Consultation with California Native American Tribes is warranted per Senate Bill 18 and Assembly Bill AB 52 with respect to the proposed Project. The Community Development Department has notified Native American tribes with known geographic or traditional connection to the area in which the proposed Project is located and no requests for consultation under either AB 52 or SB 18 have been made. Tribal representatives have, however, requested advance notification prior to subsequent construction on-site. Appropriate measures to ensure tribal resources are not significantly impacted are outlined in Section XVIII - Tribal Cultural Resources.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code Section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources

Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.

EVALUATION FORMAT

This Initial Study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines.

This format of the study is presented as follows. The project is evaluated based on its effect on 20 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant	No Impact

Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

1. **No Impact**: No impacts are identified or anticipated and no mitigation measures are required.
2. **Less than Significant Impact**: No significant adverse impacts are identified or anticipated and no mitigation measures are required.
3. **Less than Significant Impact with Mitigation Incorporated**: Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List of mitigation measures)
4. **Potentially Significant Impact**: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are (List of the impacts requiring analysis within the EIR).

At the end of the analysis, the required mitigation measures, if any, are restated and categorized as being either self- monitoring or as requiring a Mitigation Monitoring and Reporting Program.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation, the following finding is made:

☒	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION shall be prepared.
☐	Although the proposed project could have a significant effect on the environment, there shall 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 shall be prepared.
☐	The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	The proposed project MAY have a "potentially significant impact" or "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.
☐	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.

Signature: [signature]

Title: Director of Community Development

Printed Name: Craig Jimenez, AICP

Agency: City of Monrovia

Date: 8 OCTOBER 2024

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on- site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analyses Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than a significant level.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
I.	**AESTHETICS** – Except as provided in Public Resources Code Section 21099, would the project:				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b)	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area?	☐	☐	☒	☐

SUBSTANTIATION:

Sources: City of Arcadia General Plan. City of Monrovia General Plan. Monrovia Municipal Code - Zoning Ordinance. Google Earth. Project Application Materials.

a) **Have a substantial adverse effect on a scenic vista?**

Impact discussion:
The Project site is located in a fully urbanized area. As described in the General Plan EIR, the City of Monrovia does not have any identified scenic vista, scenic resources, or scenic highways within the Planning Area. Future construction would be required to comply with the goals, policies, and design guidelines contained in the Land Use Element to ensure that future development is designed to complement and blend in with existing visual character of the neighborhood. Future construction would have to adhere to zoning requirements and development standards pertaining to the RM4000 Zone, which would ensure compatibility with the surrounding neighborhood. These development standards are highlighted on page 7, under "Applicable Residential Development Guidelines". As has been noted, there is no construction associated with the current Project. Compliance with existing regulations would ensure any impacts to scenic vistas are less than significant.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact discussion:
See Response I-a above**.** The Project site is presently developed with one single family residence, which was built in 1931. Due to its age, the existing residence must be evaluated for its possible historical significance by a qualified professional approved by the City. The Monrovia Historical Commission must then review the assessment and make a determination as to the historical significance of affected structures prior to issuance of building permits for replacement structures. As has been noted, no construction is presently proposed as part of this Project *and* future construction must comply with pertinent City requirements.

The Project site is essentially level and it has been previously developed. There are a number of existing trees on-site, including several oak trees, as shown in Exhibit E-1. Oak trees are subject to Section 17.20.040 - Oak Tree Preservation of the Municipal Code and will be evaluated in accordance with established criteria and procedures prior to issuance of a grading permit. (Additional discussion of oak trees is contained in Section IV-e) Biological Resources). There are no unique geologic features on-site such as rock outcroppings, and there is no designated Scenic Highway in proximity to the Project site.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

c) **In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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?**

Impact discussion:
The Project site is located in a fully urbanized area and is presently developed with one single family structure. The proposed Project would allow the future construction of up to 6 dwelling units. No construction is proposed as part of the proposed Project. Because of the configuration of the Project site, it is probable that one residential structure would be visible from 10th Avenue, similar to the current visual condition. Consequently, the visual character of the Project Site from any public viewpoint would not substantially change.

The proposed Project involves a change of Zone from R-1 (7,500) in the City of Arcadia to RM - 4000 (Residential Medium Density) and P/QP (Public/Quasi-Public) in the City of Monrovia. The Project would also designate the property as Residential Medium (RM)

in the Land Use Element of the Monrovia General Plan. The proposed Project would thereby maintain consistency with applicable Monrovia General Plan and the Zoning designations. The proposed Zone Change would be compatible with the existing visual character of the surrounding neighborhood as illustrated in Exhibits E through H and has been discussed in prior Responses I - a) and b) above.

Oak trees located on-site are subject to Section 17.20.040 - Oak Tree Preservation of the Municipal Code and will be evaluated in accordance with established criteria and procedures contained therein and must obtain an Oak Tree Preservation Permit prior to issuance of a grading permit. With compliance to existing regulations, possible impacts to "scenic quality" are considered less than significant.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact discussion:
The proposed Project would allow the replacement of one single family residence with up to six dwelling units. No construction is proposed as part of the Project, however. Adjacent parcels are developed with similar uses as illustrated in Exhibit E-1, Project site: Aerial and Street View. While additional sources of light can be anticipated with additional residences, they would not be out of character with the existing development pattern of the neighborhood. Implementation of the lighting requirements of the Municipal Code would ensure that outdoor lighting is appropriately designed to provide necessary security while not creating undue nuisance to adjacent areas or hazards on roadways. Additionally, future construction would be subject to standards enumerated in the City's code and other regulatory documents, requiring review by staff that would limit the use of highly reflective materials thereby minimizing the potential for daytime glare. Consequently, no new sources of substantial light or glare are anticipated.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

Summary Conclusion(s) - Aesthetics:
In consideration of the preceding information and analysis, no substantial aesthetic impacts are anticipated related to the proposed Project. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
II.	**AGRICULTURE AND FORESTRY RESOURCES** - 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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. 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?	☐	☐	☐	☒
	b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
	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))?	☐	☐	☐	☒
	d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
	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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: Google Earth, City of Arcadia General Plan. California Department of Conservation Farmland Mapping and Monitoring Program.

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?

Impact discussion:
The Project site is located in a fully urbanized area. There are no designated farmlands of any sort located on-site or in the local vicinity. According to the "Important Farmland Finder" within the state's Farmland Mapping and Monitoring Program (FMMP) website, all land within the City is designated as Urban and Built Up, Grazing Land, or Other Land. The General Plan EIR found there would be no significant impacts related to the loss of important farmland by future development.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Impact discussion:
See Response II-a above. The Project site is not zoned for agricultural use nor are there any agriculturally zoned parcels in the local vicinity.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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))?

Impact discussion:
The Project site is located in a fully urbanized area . There are no forest lands on-site or in the local vicinity.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

Impact discussion:
See Response II-c above. No impacts to forest land would occur with the proposed Project.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?

Impact discussion:
See Responses II-a through II-d above. No impacts to farm or forest land would occur with the proposed Project.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Agriculture and Forestry Resources:
In consideration of the preceding information, no impacts to farmland or forest lands are anticipated related to the proposed Project. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
III.	**AIR QUALITY -** Where available, the significance criteria established by the applicable air quality management district or air pollution control district should be relied upon to make the following determinations. Would the project:				
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: Southern California Air Quality Management Plan (SCAQMP). City of Arcadia General Plan, City of Monrovia General Plan.

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

Impact discussion:
The City of Monrovia is located in the South Coast Air Basin (Basin). The Basin encompasses approximately 10,600 square miles, and air quality in the Basin is managed by the South Coast Air Quality Management District (SCAQMD). Pursuant to the California Clean Air Act, SCAQMD is responsible for bringing air quality within the basin into conformity with federal and State air quality standards by reducing existing emission levels and ensuring that future emission levels meet applicable air quality standards. SCAQMD works with federal, State, and local agencies to reduce pollutant emissions through adoption and implementation of rules and regulations.

General Plans of local jurisdictions form the basis of projections utilized in regional planning programs such as the South Coast Air Quality Management Plan (SCAQMP). Although the implementation of the Pre-Zoning associated with Reorganization 2023-02 would allow an increased density of residential development on the Project site, it would be a negligible change (up to an additional six residential units) which would not conflict with or obstruct the implementation of the current SCAQMP. In addition, adjustments are made on a regular periodic basis to all regional plans, including the AQMP. Any amendments to the General Plan of both cities (Arcadia and Monrovia) involved in Reorganization 2023-02 would be input into future AQMP updates, thus a less than significant impact to regional air quality plans is anticipated.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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?

Impact discussion:
The U.S. EPA has established National Ambient Air Quality Standards (NAAQS) for six common air pollutants: ozone (O_3), particulate matter (PM), which consists of "inhalable coarse" PM (particles with an aerodynamic diameter between 2.5 and 10 microns in diameter, or PM_{10}) and "fine" PM (particles with an aerodynamic diameter smaller than 2.5 microns, or $PM_{2.5}$), CO, nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. The U.S. EPA refers to these six common pollutants as "criteria" pollutants because the agency regulates these pollutants on the basis of human health and/or environmentally based criteria and because they are known to cause adverse human health effects and/or adverse effects on the environment. The California Air Resources Board (CARB) has also established California Ambient Air Quality Standards (CAAQS) for the six criteria air pollutants regulated by the federal Clean Air Act (the CAAQS are more stringent than the NAAQS).

As has been noted, the SCAQMP, updated on a three-year cycle, contains policies and measures designed to achieve federal and state standards in the South Coast Air Basin (Basin) and portions of the surrounding area, which is a non-attainment area for ozone (O3), particulate matter less than 10 microns in diameter (PM10), and particulate matter less than or equal to 2.5 microns in diameter (PM2.5). The scope of the proposed Project is very limited and is not anticipated to result in any significant project specific or cumulatively considerable air quality impacts.

It is also worth noting that the Housing Element of the General Plan encourages the densification of residential development in order to meet a wide range of regional housing needs. The proposed Project is an urban infill project which would be consistent with Housing Element objectives.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Impact discussion:
As has been noted, the proposed Project is very limited in scope (up to an additional five units of housing would be allowed). Common sensitive receptors include children under age 14, the elderly over age 65, athletes, and people with cardiovascular and chronic respiratory diseases. Housing projects are generally not considered uses that emit

substantial levels of hazardous air pollutants that could have an effect on the environment such that potentially significant impacts to sensitive receptors would occur. Further, the Project site is not located within 500 feet of the I-210 which was identified in the General Plan EIR as a potential concern with respect to potential air quality impacts on surrounding areas.

Future construction activities must comply with SCAQMP Rule 402 - Nuisance Dust and Rule 403 - Fugitive Dust, which require the implementation of Best Available Control Measures (BACMs) for fugitive dust sources, and Best Available Control Technologies (BACTs) for area and point sources. BACMs and BACTs would include but may not be limited to those listed below. These regulations ensure any potential short term air quality impacts are minimized.

- "The Project Applicant shall ensure that any portion of the site to be graded shall be pre-watered prior to the onset of grading activities.

  (a) The Project Applicant shall ensure that watering of the site or other soil stabilization method shall be employed on an on-going basis after the initiation of any grading activity on the site. Portions of the site that are actively being graded shall be watered regularly (2 x daily) to ensure that a crust is formed on the ground surface and shall be watered at the end of each workday.

  (b) The Project Applicant shall ensure that all disturbed areas are treated to prevent erosion until the site is constructed upon.

  (c) The Project Applicant shall ensure that landscaped areas are installed as soon as possible to reduce the potential for wind erosion.

  (d) The Project Applicant shall ensure that all grading activities are suspended during first and second stage ozone episodes or when winds exceed 25 miles per hour.

- To reduce emissions, all equipment used in grading and construction must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel.

- The Project Applicant shall ensure that existing power sources are utilized where feasible via temporary power poles to avoid on-site power generation during construction.

- The Project Applicant shall ensure that construction personnel are informed of ride sharing and transit opportunities.

- All buildings on the Project Site shall conform to energy use guidelines in Title 24 of the California Administrative Code.

- The Project Applicant shall maintain and effectively utilize and schedule on-site equipment in order to minimize exhaust emissions from truck idling.

- The Project Applicant shall comply with all existing and future CARB and MDAQMD regulations related to diesel-fueled trucks, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment."

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact discussion:
The proposed Project would facilitate development of the Project site with medium density residential land use. Residential uses do not typically result in objectionable odors. Moreover, the surrounding area is developed with similar uses.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions – Air Quality:
In consideration of the preceding information and analysis, no significant impacts to air quality have been identified or are anticipated. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
IV.	**BIOLOGICAL RESOURCES -** Would the project:				
a)	Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: Google Earth; City of Arcadia General Plan

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

Impact discussion:
The Project site is located in an urbanized area and presently developed with a single family residence. No natural habitat exists on-site or in any adjacent areas.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?**

Impact discussion:
See Response IV-a above. The Project Site is located in an urbanized area and presently developed with a single-family residence. No riparian or other sensitive habitat exists on-site or in any adjacent areas.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact discussion:
See Response IV-a above. The Project Site is located in an urbanized area and presently developed with a single family residence. No wetland habitat exists on-site or in any adjacent areas.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact discussion:
See Response IV-a above. The Project Site is located in an urbanized area and presently developed with a single-family residence. No natural habitat, migratory wildlife corridors or nursery sites exist on-site or in any adjacent areas.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact discussion:
The Project site is essentially level and it has been previously developed. Consequently, there is no natural habitat remaining on-site. There are, however, a number of existing trees on-site, including several oak trees, as shown in Exhibit E. Oak trees are subject to Section 17.20.040 - Oak Tree Preservation of the Monrovia Municipal Code. All oak trees on-site will be evaluated in accordance with established criteria and procedures contained therein and must obtain an Oak Tree Preservation Permit prior to issuance of a grading permit.

As has been noted, no construction is part of this current Project. Implementation of the Project would not conflict with any locally adopted ordinance or regulation protecting biological resources.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact discussion:
There is no Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan applicable to the Project site nor in proximity to it.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Biological Resources:
In consideration of the preceding information and analysis, no adverse impacts to biological resources have been identified or are anticipated. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
V.	**CULTURAL RESOURCES** - Would the project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c)	Disturb any human remains, including those outside of formal cemeteries?	☐	☐	☒	☐

SUBSTANTIATION:

Sources: City of Arcadia General Plan; City of Monrovia General Plan and GP EIR, City of Monrovia Municipal Code.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Impact discussion:
The Project site is developed with a single family residence that was built in 1931. Consequently, demolition of this residence in order to accommodate future construction would be subject to Chapter 17.10.060 of the Monrovia Municipal Code which requires an assessment of the possible historical significance of the existing structure by a qualified professional approved by the City. The Monrovia Historic Preservation Commission must then review the assessment and make a determination as to the historical significance of affected structure prior to issuance of discretionary demolition permits or building permits for replacement structures. As has been noted, no construction is presently proposed as part of this Project *and* future construction must comply with pertinent City requirements. With compliance to existing regulations, no significant impacts to a historical resource is anticipated.

Level of Impact Before Mitigation: Less than significant.

Level of Impact After Mitigation: Less than Significant.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact Discussion:

The 2008 General Plan EIR concluded that no known archaeological sites exist within the City. The Project site is in a heavily urbanized area. Infill development in already developed areas is not anticipated to result in the uncovering of additional resources. As has been noted, the Project site is developed, thus the ground surface has been disturbed in the past.

Nevertheless, unknown archaeological sites may be unearthed during any deep excavation and grading activities associated with future construction on-site. Prior discoveries of archaeological resources in the region have been limited to projects located within two sensitive geologic formations: Topanga Formation and Late Miocene Marine Monterey Formation. The General Plan EIR included the following mitigation measure to address unknown archaeological sites:

- ***Monrovia General Plan EIR Mitigation Measure CUL-A****: Project proponents proposing substantial grading or earthmoving in areas that might contain important paleontological and/or archaeological resources, including work within the Topanga Formation and Late Miocene Marine Monterey Formation, shall conduct a pre-excavation field assessment and literature search to determine the potential for disturbance of paleontological and/or archaeological resources. If warranted, grading and other earthmoving shall be monitored by a qualified professional*.

Compliance with Monrovia General Plan EIR Mitigation Measure CUL-A above would ensure that impacts to possible archaeological and paleontological resources that might be associated with future construction on the Project site are less than significant.
.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

c) Disturb any human remains, including those outside of formal cemeteries?

Impact discussion:
As has been noted, the Project site is developed, thus the ground surface has been significantly disturbed in the past. The proposed Project would simply change the boundary between the Cities of Arcadia and Monrovia and allow an increase in the density of residential use. No construction is included in the proposed Project.

Site preparation and earthmoving activities that may be associated with future construction on the Project site, nonetheless, have the unlikely potential to uncover buried or surficial human remains outside of a recognized cemetery or other burial location. Should human remains be discovered, compliance with State Health and Safety Code §7050.5 and CEQA Guidelines Section 15064.5 is required. This entails halting work in the immediate area of the find and notifying the County Coroner, who must then determine whether the remains are of forensic interest. If the Coroner, with the aid of a supervising archaeologist, determines that the remains are, or appear to be,

of Native American origin, the Coroner must contact the Native American Heritage Commission for possible further investigations and proper recovery of such remains, if determined necessary. Compliance with existing regulations would ensure that any remains that may possibly be discovered in association with future construction on-site are appropriately collected and examined. Impacts on human remains would be less than significant with compliance with existing regulations.

Level of Impact Before Mitigation: Less than Significant..

Level of Impact After Mitigation: Less than Significant.

Summary Conclusions - Cultural Resources:
In consideration of the preceding information and analysis, no significant adverse impacts to cultural resources have been identified or are anticipated. No mitigation measures other than compliance with Monrovia General Plan EIR Mitigation CUL-A are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
VI.	**ENERGY** – 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?	☐	☐	☐	☒
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: City of Monrovia General Plan and Monrovia Municipal Code.

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

Impact discussion:
The proposed Project would facilitate the future development of up to six dwelling units on-site. While no construction is proposed as part of the proposed Project, future construction would have to comply with all applicable provisions of the California Building Energy Efficiency Standards (Title 24), California Green Building Standards (CALGreen), Senate Bill 100 (Chapter 312, Statutes 2018), California Public Utilities Commission Energy Efficiency Strategic Plan, City of Monrovia Municipal Code, inclusive of the Water Efficient Landscape Ordinance (MMC Section 17.20.030) and Conditions of Approval. No wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation is anticipated.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact discussion:
The proposed Project is limited in scope. While no construction is proposed as part of the proposed Project, the future construction of up to six dwelling units on-site would have to comply with all applicable provisions of the California Building Energy Efficiency Standards (Title 24), California Green Building Standards (CALGreen), Senate Bill 100 (Chapter 312, Statutes 2018), California Public Utilities Commission Energy Efficiency Strategic Plan, City of Monrovia Municipal Code, inclusive of the Water Efficient Landscape Ordinance (MMC Section 17.20.030) and Conditions of Approval. No conflict

with or obstruction of a state or local plan for renewable energy or energy efficiency is anticipated.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Energy:
In consideration of the preceding information and analysis, no adverse impacts pertaining to energy resources have been identified or anticipated. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
VII.	**GEOLOGY AND SOILS** - 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.	☐	☐	☒	☐
	ii. Strong seismic ground shaking?	☐	☐	☒	☐
	iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv. Landslides?	☐	☐	☐	☒
b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

SUBSTANTIATION:

Sources:1) City of Monrovia General Plan - Safety Element, 2022 2) City of Monrovia Municipal Code (Chapter 12.36, Storm Water and Urban Runoff Pollution Control) 3) City of Monrovia Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire – 2021; 4) City of Monrovia Local Hazard Mitigation Plan 5) City of Arcadia General Plan EIR, Geology 2010.

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.

Impact discussion:
Virtually all of Southern California is a seismically active region. Alquist-Priolo earthquake fault zones are areas surrounding surface traces of known active faults in California. Within Los Angeles County numerous regional and local faults are capable of producing severe earthquakes (magnitude [M] of 6.0 or greater). The most prominent faults in close proximity to the City of Monrovia are the Sierra Madre Fault Zone, the San Andreas Fault, and the Raymond Hill fault. The Sierra Madre Fault is located in the San Gabriel Mountains, while the Raymond Hill Fault is situated in the foothills in the northern portion of the City of Monrovia. The San Andreas Fault is located approximately twenty miles to the north of the City. While rupturing on all these faults could affect the Project site from ground shaking, none traverse the site or are located in immediate proximity.

Any future construction on the Project site would be subject to all applicable provisions of the City of Monrovia General Plan and the Municipal Code, including applicable seismic-related design requirements of the California Building Code (CBC) pertaining to geological and soils investigations. With compliance to adopted plans, policies, and regulations, fault rupture is not considered a significant risk from any known active area faults.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

ii. Strong seismic ground shaking?

Impact discussion:
See Response VII - a)i. above**.** Virtually all of Southern California is a seismically active region. No active faults traverse the Project site or are in close proximity as noted in

Response VII-a) above. Within Los Angeles County numerous regional and local faults are, however, capable of producing severe earthquakes (magnitude [M] of 6.0 or greater). Nonetheless, the Project site is not known to be subject to an unusual risk from strong seismic ground shaking.

Any future construction on the Project site would be subject to all applicable provisions of the City of Monrovia General Plan and the Municipal Code pertaining to geological and soils investigations. With compliance to adopted plans, policies and regulations, strong seismic ground shaking is not considered a significant risk from any known active area faults.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

iii. Seismic-related ground failure, including liquefaction?

Impact discussion:
Liquefaction occurs when water-saturated sediment temporarily loses strength and acts as a fluid. Liquefaction potential and severity depends on several factors, including soil and slope conditions, proximity to a fault, earthquake magnitude, and type of earthquake. According to California Geological Survey mapping, some hillside areas in the northern portion of the City of Monrovia are subject to potential seismically induced liquefaction.

The Project site is not located within an area known to be at risk from seismically related ground failure or liquefaction. Any future construction on the Project site would be subject to all applicable provisions of the City of Monrovia General Plan and the Municipal Code pertaining to geological and soils investigations. With compliance to adopted plans, policies and regulations, seismic-related liquefaction or ground failure is not considered a significant risk from any known area faults.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

iv. Landslides?

Impact discussion:
Landslides typically occur in areas with steep, unstable slopes. The topography of the Project site is essentially level and there are no hillside areas located in proximity. Consequently, no landslide risk is anticipated.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

b) Result in substantial soil erosion or the loss of topsoil?

Impact discussion:
Erosion poses environmental hazards through the effect of removing soils that can undermine roads and buildings and destabilize slopes. Erosion can also result in environmental damage by depositing soils in downstream reservoirs, lakes, and drainage structures that can result in impacts to wildlife and human health by changing the ecological properties or the physical boundaries of the water body or drainage control facility.

The topography of the Project site is essentially level and the site has been previously graded to accommodate the existing on-site residence. Limited additional grading would be anticipated with future construction. All construction is subject to National Pollutant Discharge Elimination System (NPDES) permit requirements. Construction activities covered under the State's General Construction Permit include removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more. The Project site in conjunction with adjacent parcels owned by the future Applicant (APN's 5780 - 019-008 and 010) which would be simultaneously developed, may total one acre.

The City of Monrovia's Municipal Code (Chapter 12.36, Storm Water and Urban Runoff Pollution Control) implements General Construction Permit requirements and requires a Stormwater Pollution Prevention Plan (SWPPP) prior to issuance of building permits. The SWPPP must list Best Management Practices (BMPs) to avoid and minimize soil erosion. Adherence to BMPs is required to ensure that future construction does not result in substantial soil erosion or the loss of topsoil. Grading and erosion control provisions of the Municipal Code, including those outlined in Chapter 15.28, would also be applicable to future on-site construction. Consequently, no significant impacts from soil erosion or loss of topsoil are identified or anticipated.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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?

Impact discussion:
See preceding Responses VII-a)iii and iv. The topography of the Project Site is essentially level and no landslide or hillside areas are located on-site or in the site vicinity. In addition, the Project site is not located within an area subject to known liquefaction risks. Any future construction on the Project site would be subject to all applicable provisions of the City of Monrovia General Plan and the Municipal Code pertaining to geological and soils investigations. With compliance to adopted plans,

policies and regulations, potential risks from landslide, lateral spreading, subsidence, liquefaction or collapse, are considered either not applicable or less than significant.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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?

Impact discussion:
Expansive soils are those that greatly increase in volume when they absorb water and shrink when they dry out. Expansion is measured by shrink-swell potential defined by the relative volume change in soil while gaining in moisture. If the shrink-swell potential is rated moderate to high, damage to buildings, roads, and other structures can occur.

The Project site is not known to be subject to expansive soil conditions. Any future construction on the Project site would be subject to all applicable provisions of the City of Monrovia General Plan and the Municipal Code pertaining to geological and soils investigations. With compliance to adopted plans, policies and regulations, potential risks from expansive soils are considered less than significant.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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?**

Impact Discussion:
The project site is served by the public sewer system of the City of Arcadia. The proposed jurisdictional reorganization may result in the transfer of that responsibility to the City of Monrovia. No use of septic tanks or alternative waste disposal systems is anticipated, however.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Impact discussion:
Please see Response V-b) in the Cultural Resources discussion. The Project site is in a heavily urbanized area. Infill development in already developed areas is generally not anticipated to result in the uncovering of cultural resources. No unique geologic features

are present on-site. Due to its past development, the ground surface on the Project site has been disturbed. Future construction may involve limited excavation for building foundations, but all such site preparation would be subject to the issuance of a Grading Permit by the City of Monrovia.

Further, the Monrovia General Plan EIR included the following mitigation measure to address potential unknown archaeological and/or paleontological resources:

- ***Monrovia General Plan EIR Mitigation Measure CUL-A****: Project proponents proposing substantial grading or earthmoving in areas that might contain important paleontological and/or archaeological resources, including work within the Topanga Formation and Late Miocene Marine Monterey Formation, shall conduct a pre-excavation field assessment and literature search to determine the potential for disturbance of paleontological and/or archaeological resources. If warranted, grading and other earthmoving shall be monitored by a qualified professional.*

Compliance with Monrovia General Plan EIR Mitigation Measure CUL-A above and compliance with provisions of a grading permit would ensure that impacts to possible paleontological resources that might be associated with future construction on the Project Site are less than significant.
..
Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

Summary Conclusions - Geology and Soils:
In consideration of the preceding information and analysis, no significant adverse impacts pertaining to soils and geology are anticipated. No mitigation measures are necessary other than compliance with Monrovia General Plan EIR Mitigation Measure CUL-A.

	Issues	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
VIII.	**GREENHOUSE GAS EMISSIONS – Would the project:**				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b)	Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: City of Monrovia, 1) 2021-2029 Housing Element Update, Safety Element Update, and New Environmental Justice Element Draft IS/MND; 2) *Community Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire, 2021*

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact discussion:
The proposed Project does not involve any construction at this time. Future construction of up to six dwelling units would replace one single family residence currently on-site. Direct GHG emissions associated with future construction would include emissions from construction activities, area sources, and mobile sources, as well as indirect sources emissions from electricity consumption, water demand, and solid waste generation.

Future development would be subject to CEQA review, as applicable, and include evaluation of greenhouse gas emissions and identify appropriate mitigation if found necessary. With these measures, potential greenhouse gas emissions would be reduced to the extent feasible and would not result in a significant impact on the environment.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

b) Conflict with any plan, policy or regulation of an agency adopted for the purpose of reducing the emission of greenhouse gases?

Impact discussion:
See Response VIII-a) above. The proposed Project is located in a fully urbanized area where all services are available in proximity. Future construction would be limited in scope and would not be anticipated to significantly contribute to cumulative increases in GHG emissions over time nor conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Future

construction would be subject to CEQA review, as applicable, and include evaluation of greenhouse gas emissions in the context of applicable plans, polices and regulations.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions – Greenhouse Gas Emissions:
In consideration of the preceding information and analysis, no significant adverse impacts related to greenhouse gas emissions have been identified or are anticipated. No mitigation measures are necessary.

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

SUBSTANTIATION:

Sources: 1) City of Monrovia: Safety Element of the General Plan, 2) Community Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire, 2021; 3) Hazard Mitigation Plan, 2017; 4) Los Angeles County Airport Land Use Plan; 5) Google Earth.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact Discussion:
The project proposes to change the land use and zoning designation from single family residential (Arcadia) to multifamily residential (Monrovia). No construction is proposed as part of the actions under consideration. However, future construction of up to six dwelling units is anticipated. A significant impact could occur if routine use or disposal of substantial quantities of hazardous materials was typical of long term operations.

Future construction could involve the temporary transport, use, and disposal of potentially hazardous materials including materials such as paints, adhesives, surface coatings, cleaning agents, fuels, and oils. These substances are typical of development of urban residential infill projects. Construction would be subject to health and safety requirements such as Monrovia General Plan policies, the Monrovia Municipal Code, and the California Health and Safety Code. All future development would also be subject to CEQA review, if applicable, and include evaluation of potential hazardous material impacts and identification of appropriate mitigation if found necessary.

Future operation of residences would involve the use and storage of small quantities of potentially hazardous substances such as cleaning solvents, paints, and pesticides for landscaping. Such substances are typical of residential land use and generally do not produce significant amounts of hazardous waste. All future development would also be subject to CEQA review, if applicable, and include evaluation of potential hazardous material impacts and identification of appropriate mitigation if found necessary.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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?

Impact discussion:
See Response IX-a above. No construction is proposed as part of the actions under consideration. Future construction of up to six residences is anticipated. A significant impact could occur if upset or accident conditions involving hazardous materials was typical of construction activities or long-term operations.

Future construction could involve the temporary transport, use, and disposal of potentially hazardous materials including materials such as paints, adhesives, surface coatings, cleaning agents, fuels, and oils. These products are typical of development of

urban residential infill projects and are not generally associated with upset or accident conditions involving the release of hazardous substances into the environment. Construction would be subject to health and safety requirements such as Monrovia General Plan policies, the Monrovia Municipal Code, and the California Health and Safety Code.

During operation of the future residential development, the use of household hazardous materials would be minimal, in small quantities, and would be associated with routine maintenance, cleaning, and landscaping activities. These products are typical of development of urban residential infill projects and are not generally associated with upset or accident conditions involving the release of hazardous substances into the environment. All future development would also be subject to CEQA review, if applicable, and include evaluation of potential hazardous material impacts and identification of appropriate mitigation if found necessary.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact Discussion.
See Responses IX-a and IX-b. No construction is proposed as part of the actions under consideration. The Project Site is not located within one quarter mile of any existing or proposed schools. Future residential construction would be typical of urban infill development and would not involve acutely hazardous substances in routine activities. All future development would also be subject to CEQA review, if applicable, and include evaluation of potential hazardous material impacts and identification of appropriate mitigation if found necessary.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?

Impact Discussion*:*
California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste. The Project site is not on such a list. Consequently, no impacts pertaining to hazardous waste disposal facilities would occur.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact Discussion:
The Project site is not located within an airport land use plan and no public airport or public use airport is located within two miles. The nearest airport to the project site is the San Gabriel Valley Airport, located approximately 3.3 miles to the southwest "as the crow flies" at 4233 Santa Anita Avenue, El Monte. Therefore, no impacts pertaining to airport proximity would occur.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Impact Discussion:
A significant impact may occur if a project interfered with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan.

No construction is proposed as part of the actions under consideration. Future construction would add up to six dwelling units on-site. No modifications to adjacent streets that would affect the ability of project or area residents to evacuate in an emergency are likely. The Project Site is located within a fully urbanized area with existing infrastructure, including fire hydrants and is located approximately 1.5 miles from Fire Station 102 located at 2055 E. Myrtle Avenue. Any subsequent development proposals must be reviewed and approved by the Monrovia Fire Department. All future development would also be subject to CEQA review, if applicable, and include evaluation of potential effects on adopted emergency response and evacuation plans including identification of appropriate mitigation if found necessary

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

g) **Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

Impact Discussion:
According to the City's Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire, Monrovia has been listed by CalFire as a "Community at Risk from Wildfire." The extensive wildland interface with the Angeles National Forest land at its northern border makes the City susceptible to the effects of any fire that originates in the northern reaches. The Project site, however, is not located in a hillside area and is not considered at risk of wildland fires. Future construction on the Project Site must comply with provisions of the Municipal Code pertaining to fire protection and building design standards.

Level of Impact Before Mitigation: Less than Significant Impact.

Level of Impact After Mitigation: Less than Significant Impact.

Summary Conclusions- Hazards and Hazardous Materials:
In consideration of the preceding information and analysis, no significant adverse impacts pertaining to hazards and hazardous materials have been identified or are anticipated. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
X.	**HYDROLOGY AND WATER QUALITY -** Would the project:				
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i. result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
	ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;	☐	☐	☒	☐
	iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of runoff; or	☐	☐	☒	☐
	iv. impede or redirect flood flows?	☐	☐	☒	☐
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☒
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: City of Monrovia 1) General Plan EIR- 2008; 2) 2021-2029 Housing Element Update, Safety Element Update, and Environmental Justice Element Draft IS/MND, 2021; 3) Safety Element of the General Plan - 2022; 4) *Vulnerability Assessment: Resiliency, Climate Adaptation, And Wildfire – 2021; 5) Local Hazard Mitigation Plan - 2017, 6) Monrovia Urban Water Management Plan -2020; 7) City of Monrovia Municipal Code.*

a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

Impact discussion:
No construction is associated with the current application. Future development would, however, be subject to adopted water quality standards and waste discharge requirements. The US Environmental Protection Agency (EPA), the Los Angeles Region Regional Water Quality Control Board (LARWQCB), and the Los Angeles County Health Department are responsible for monitoring and regulating groundwater in the San Gabriel Valley. The National Pollutant Discharge Elimination System (NPDES) permit is the primary regulation for storm water pollutant sources in the City of Monrovia. The NPDES was developed as part of the municipal storm water program to address storm water pollution from new development and redevelopment by the private sector.

The City of Monrovia's Municipal Code (Chapter 12.36, Storm Water and Urban Runoff Pollution Control) implements the City's storm water quality management strategies consistent with its General Construction permit from the LARWQCB. These regulations are applicable to all developed or undeveloped land within the City. As outlined in Municipal Code Section 12.36.090 (Requirements for Industrial/Commercial and Construction Activities), dischargers associated with construction activities would be required to implement effective Best Management Practices (BMPs) to minimize or avoid water pollution. Additionally, future construction would be required to comply with provisions within Chapter 15.28 (Grading and Erosion Control) of the Municipal Code, which includes measures to substantially reduce the potential damage from erosion and sedimentation. Compliance with all applicable permit and Municipal Code requirements would prevent violation of any water quality standards or waste discharge requirements or otherwise substantially degrading surface water or groundwater quality.

Long-term operations associated with future development of the proposed Project could result in an incremental increase in the levels of urban pollutants entering public drainage systems. The proposed Project is limited in scope, however, and measures such as landscaping to stabilize soils would be required in accordance with established standards. In consideration of the preceding information, the proposed Project would not result in a violation of any water quality standards or waste discharge requirements.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

b) **Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

Impact Discussion:
The project site would be supplied with water through the City's municipal system, which primarily draws upon groundwater but has access to additional water supplies from the Metropolitan Water District if needed. The City has determined that sufficient municipal supplies are available to serve development anticipated in the City's General Plan. As has been noted there is no development proposed as part of the current application and future construction is anticipated to be limited to no more than six dwelling units. No pumping of groundwater from below the project site would be allowed. In summary, the project would not affect groundwater basins below the site nor substantially deplete groundwater in the area. In consideration of the preceding information, the proposed Project would not substantially affect groundwater supplies. All future development would also be subject to CEQA review, if applicable, and include an evaluation of groundwater impacts.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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.

Impact Discussion:
See previous Response VII-b, Geology and Soils, pertaining to soil erosion. There are no natural streams or rivers on the Project site or in the near proximity**.** As has been noted, there is no development proposed as part of the current application. Although construction would alter the drainage patterns on-site, it would not likely affect surface drainage patterns in a substantial manner.

The City of Monrovia's Municipal Code (Chapter 12.36, Storm Water and Urban Runoff Pollution Control) implements General Construction Permit requirements and requires a Stormwater Pollution Prevention Plan (SWPPP) prior to issuance of building permits. The SWPPP must list Best Management Practices (BMPs) to avoid and minimize soil erosion. Adherence to BMPs is required to ensure that future construction does not result in substantial soil erosion or the loss of topsoil. Additionally, future construction will be required to comply with provisions within Chapter 15.28 (Grading and Erosion Control) of the Municipal Code. All future development would also be subject to CEQA review and include evaluation of project drainage patterns and soil erosion potential. Consequently, no significant impacts from soil erosion or loss of topsoil are identified or anticipated.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;

Impact Discussion:
See prior Response X – c. i. As has been noted there is no development proposed as part of the current application. According to evaluation contained in the Initial Study/Mitigated Negative Declaration prepared for the 2021-2029 Housing Element Update, the Project site is not located within a FEMA Flood Risk Zone. Although future construction would alter the drainage patterns on-site by creating additional impervious surfaces, it would not likely result in a substantial change in surface run-off volumes. Future construction would be required to conform to all pertinent policies of the Safety Element including, among other measures, preparation of a hydrology report at the time a grading plan is submitted to the City. All future development would also be subject to CEQA review and include evaluation of project drainage patterns and any potential for flooding. In consideration of the preceding information, the proposed Project would not substantially affect surface runoff in a manner that would result in flooding on or offsite.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of runoff;

Impact discussion:
See prior Response X- c. ii. As has been noted there is no development proposed as part of the current application. Although future construction would alter the drainage patterns on-site by creating additional impervious surfaces, it would not likely result in a substantial change in surface run-off volumes. In consideration of the preceding information, the proposed Project would not result in substantial additional sources of run-off that would create or significantly contribute to runoff which would exceed the capacity of existing or planned stormwater drainage systems. Future construction would be required to conform to all pertinent policies of the Safety Element including, among other measures, preparation of a hydrology report at the time a grading plan is submitted to the City. All future development would also be subject to CEQA review and include evaluation of project impacts on existing drainage systems. It should also be noted that such impacts to area drainage systems could occur regardless of whether the Project site is developed within the City of Monrovia or Arcadia.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

iv. impede or redirect flood flows?

Impact Discussion:
See Response X- c. ii. As has been noted there is no development proposed as part of the current application. The Project site is not located within a FEMA Flood Risk Zone. Although future construction would alter the drainage patterns on-site by creating additional impervious surfaces, it would not likely result in construction or other alterations that would impede or redirect flood flows in a hazardous manner. Future construction would be required to conform to all pertinent policies of the Safety Element including, among other measures, preparation of a hydrology report at the time a grading plan is submitted to the City. All future development would also be subject to CEQA review and include evaluation of project drainage patterns and any impacts pertaining to potential flooding. In consideration of the preceding information, the proposed Project would not substantially impede or obstruct flood flows.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact discussion:
As has been noted, the Project site is not located in a FEMA Flood Zone. It is also not located near any lake or within a coastal area. According to the Safety Element of the Monrovia General Plan, a portion of the City of Monrovia including the Project site, is however, located within the Santa Anita Wash and Dam Flood Inundation Area. Future construction within this area would be required to conform to all pertinent policies of the Safety Element including, among other measures, preparation of a hydrology report at the time a grading plan is submitted to the City. The hydrology report must identify areas of possible inundation, downstream effects, natural drainage courses, conclusions, and recommendations regarding the effects of hydrologic conditions on the proposed development, opinions and recommendations regarding the adequacy of facilities proposed for the site, and design criteria to mitigate identified hydrologic hazards.

Risks pertaining to release of pollutants due to possible inundation would be no greater than any other flood conditions. As outlined in Response X-a) the City of Monrovia's Municipal Code (Chapter 12.36, Storm Water and Urban Runoff Pollution Control) implements the City's storm water quality management strategies consistent with its General Construction permit from the LARWQCB. With compliance with these measures, no significant impacts from possible release of pollutants due to site inundation are anticipated.

Level of Impact Before Mitigation: Less than significant pertaining to risk from dam inundation. No impact pertaining to tsunami and seiche.

Level of Impact After Mitigation: Less than significant.

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

Impact discussion:
See prior Responses X - a) and b). As has been noted, there is no development proposed as part of the current application. Future development would not be anticipated to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Hydrology and Water Quality.
In consideration of the preceding information and analysis, no significant impacts pertaining to hydrology and water quality have been identified or are anticipated. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XI.	**LAND USE AND PLANNING** - Would the project:				
a)	Physically divide an established community?	☐	☐	☐	☒
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: City of Monrovia General Plan - Land Use Element.

a) **Physically divide an established community?**

Impact discussion:
The Project site is located in a fully urbanized area immediately adjacent to the south boundary of the City of Monrovia and would represent a minor alteration in the jurisdictional boundary**.** As has been noted there is no development proposed as part of the current application. The primary purpose of the proposed change in jurisdiction of the subject parcel is to facilitate a cohesive development plan.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact Discussion:
The proposed Project would result in the transfer of regulatory authority and jurisdiction from the City of Arcadia to the City of Monrovia in order to facilitate cohesive future development of three adjacent parcels. No construction is, however, included in the current application. A change of Zone and General Plan land use designation will be necessary to accommodate future development. Future construction will also be subject to all requirements of the Municipal Code as has been highlighted in impact discussions throughout this Initial Study.

The analysis contained in this Initial Study has not identified any significant environmental impacts associated with the proposed Project. Future development would also be subject to CEQA review, if applicable, and include evaluation of consistency with applicable land use plans, policies and regulations.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Land Use and Planning:
In consideration of the preceding information and analysis, no adverse impacts pertaining to land use and planning have been identified or anticipated. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XII.	**MINERAL RESOURCES** - Would the project:				
a)	Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?	☐	☐	☒	☐
b)	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: City of Arcadia General Plan; California State Dept of Conservation Mineral Resources Mapping.

a) **Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?**

Impact Discussion:
The Project site is located in a fully urbanized area and is currently occupied by a single family residence. The proposed Project involves a General Plan Amendment and a Zone Change to increase the residential density on-site. No mining activities or oil and gas operations exist on or in proximity to the Project site.

The State Department of Conservation does, however, identify the Project site and the general vicinity surrounding it as "MRZ-2" (Mineral Resource Zone 2) where *"Adequate information indicates that significant mineral deposits are present or there is a high likelihood for their presence, and development should be controlled".* Nonetheless, development of mineral resources on-site would result in environmental conflicts with the surrounding neighborhood and is not anticipated in either the City of Arcadia General Plan or the City of Monrovia General Plan. The Project site is small (0.46 acres) in size and would not represent a significant regional loss of any subterranean mineral resources that might be present beneath the site.

Level of Impact Before Mitigation: Less than Significant

Level of Impact After Mitigation: Less than Significant.

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?**

Impact Discussion*:*

See prior Response XII-a). The Project site is located in a fully urbanized area and is not designated as a mineral resource area on any General Plan, Specific Plan or other land use plan of the City of Arcadia or City of Monrovia.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Mineral Resources:
In consideration of the preceding information and analysis, no significant impacts to mineral resources have been identified or are anticipated. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XIII.	**NOISE** - Would the project result in:				
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b)	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: City of Arcadia General Plan - Noise Element, and General Plan EIR- Noise Chapter. City of Monrovia Municipal Code; City of Monrovia - 2021-2029 Housing Element Update Draft IS/MND, 2021.

a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Impact Discussion*:*
The Project site is presently located within the jurisdiction of the City of Arcadia, thus analysis conducted in the Arcadia General Plan provides background noise level information. The City of Arcadia Noise Element modelled ambient noise levels along 10th Avenue in the year 2010 in the project site vicinity at 62 dBA CNEL approximately 137 feet from the street centerline. Although measurements were taken in 2010, increases in ambient noise that may have occurred since are likely to be minimal because the area in which the Project site is located is essentially fully developed.

Construction activity generates noise that has a short-term impact on ambient noise levels related primarily to the use of heavy equipment. As has been noted, no construction is part of the current application. Future construction would be required to comply with all pertinent noise controls outlined in the Monrovia Municipal Code (MMC), Chapter 9.44 including limits on construction hours. In addition, compliance with

Monrovia General Plan EIR Mitigation Measures NOISE-C through NOISE- E, as highlighted below, would reduce construction noise to a less than significant level. The determination of whether or not a particular project would violate the noise standards would be analyzed in subsequent CEQA review, if applicable, when specific development characteristics are known.

- ***Monrovia General Plan EIR Mitigation Measure NOISE - C:*** *All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.*
- ***Monrovia General Plan EIR Mitigation Measure NOISE - D*** *Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).*
- ***Monrovia General Plan EIR Mitigation Measure NOISE - E*** *All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule of a proposed project. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.*

The primary long term noise sources associated with the project would include typical residential noise sources such as heating, ventilating, and air conditioning (HVAC) units. Future development would result in additional traffic on 10th Avenue. It is unlikely however that vehicular noise levels in the vicinity of the Project site would be significantly affected. The noise attributable to future development would be subject to the City of Monrovia's limit of 55 dBA Ldn at the surrounding environment outside of a Project site. MMC Section 9.44.040 states that permanent project-generated noise levels should not exceed median ambient noise levels for daytime and nighttime hours. The determination of whether or not a particular project would violate these established noise standards would be analyzed in subsequent CEQA review when specific development characteristics are known.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

b) **Generation of excessive groundborne vibration or groundborne noise levels?**

Impact Discussion:
Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. As has been noted, no construction is proposed as part of the current application. The proposed rezoning of the Project site envisions future single family development. This type and intensity of development typically does not involve activities such as pile driving for foundations that

causes groundborne vibration or noise. Future construction would be required to comply with all pertinent noise controls outlined in the City of Monrovia Municipal Code, Chapter 9.44 including limits on construction hours. The determination of whether or not a particular project would generate excessive groundborne vibration or noise would, however, be analyzed in subsequent CEQA review when specific development characteristics are known.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact Discussion:
The closest airport to the City of Monrovia is the San Gabriel Valley Airport, approximately 3.3 miles from the Project site "as the crow flies" (according to Google Earth measurements). The City of Monrovia does not fall within the Airport Influence Area for the airport. The Project site is not located in proximity to a private airstrip or public airport and is not located within an Airport Land Use Plan. In consideration of these facts, future development on the Project site would not be exposed to airport related safety hazards or excessive noise from airport operations.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Noise:
In consideration of the preceding information and analysis, no significant impacts related to noise have been identified or are anticipated. No mitigation measures are necessary other than compliance with Monrovia General Plan EIR Mitigation Measures NOISE C through E.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XIV.	**POPULATION AND HOUSING** - 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)?	☐	☐	☒	☐
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

SUBSTANTIATION:

Sources: Southern California Association of Governments (SCAG) Regional Growth Projections. *City of Monrovia General Plan. City of Arcadia General Plan*.

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)?**

Impact Discussion:
A project could induce population growth in an area either directly, through the development of new residences or businesses, or indirectly, through the extension of roads or other infrastructure. While up to six dwelling units may be constructed in the future on the project site, no construction is included in the current project application.

In 2020, the population of the City of Monrovia was estimated to be 37,935 people, with an average household size of 2.65 people. Future construction on the proposed Project site could result in a direct increase in population of approximately 16 people. No extensions of roads or other major infrastructure would be necessary to accommodate development of the proposed Project.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

b) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

Impact Discussion:
The Project Site is developed with one single family residence which would be demolished to make way for future construction of up to six dwelling units**.** At the present time, the existing residence is not inhabited. The Project site is located in a fully urbanized area and within a single-family neighborhood. In consideration of the preceding information, the proposed Project would not result in the displacement of substantial numbers of existing population or housing.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

Summary Conclusions – Population and Housing:
In consideration of the preceding information and analysis, no significant impacts related to population and housing have been identified or are anticipated. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XV.	**PUBLIC SERVICES**				
a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	Fire Protection?	☐	☐	☐	☒
	Police Protection?	☐	☐	☐	☒
	Schools?	☐	☐	☐	☒
	Parks?	☐	☐	☐	☒
	Other Public Facilities?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: 1) City of Monrovia General Plan – Safety Element and General Plan EIR : 2) City of Monrovia Municipal Code; 3) City of Monrovia Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire – 2021;

a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

- **Fire Protection?**

Impact Discussion:
The Monrovia Fire and Rescue Department (MFD) provides 24- hour fire, rescue, and emergency medical services to the project area. MFD services also include a Fire Prevention Division and Hazard Materials Division. The nearest fire station to the project site is Station 102 located at 2055 E. Myrtle Avenue approximately 1.5 miles from the Project site. Future construction would be subject to Municipal Code Chapter 15.20, Fire Code, and review by the MFD for compliance with applicable regulations. This review process ensures that fire prevention measures such as appropriate ingress/egress points, fire protection systems such as alarms, smoke detectors and automatic sprinklers, chimney spark arresters, non-flammable roofing materials, and minimum fire flow requirements are incorporated into all project plans.

No construction is associated with the current project application. The Monrovia General Plan EIR noted that while the number of calls for fire protection services would increase with future planned future growth, the City does not anticipate a decrease in response

times or the need to construct new or expanded fire stations. Future construction of up to six dwelling units could result in project related population growth of approximately 16 persons as described in Section XIV – Population and Housing. This incremental increase in the demand for fire protection services is not anticipated to result in the need for alteration of existing fire facilities or the construction of new facilities. In consideration of these facts, no physical impacts pertaining to fire protection are anticipated.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

- **Police Protection?**

Impact discussion:
If approved, the Monrovia Police Department (MPD) would provide law enforcement services to the Project site. The nearest MPD facility is located approximately 1.5 miles from the project site at 140 East Lime Avenue. According to the General Plan, the police department is staffed with 64 regular police officers, 11 reserve officers and 23 volunteer support personnel.

No construction is associated with the current project application. The General Plan EIR noted that while the number of calls for police services would increase with planned future growth, the City does not anticipate a decrease in response times or the need to construct new or expanded police stations. While future construction of up to six dwelling units could result in population growth estimated at 16 persons in Section XIV – Population and Housing, this associated incremental increase in the demand for police protection services is not anticipated to result in the need for the physical alteration of existing law enforcement facilities or the construction of new facilities. In consideration of these facts, no physical impacts pertaining to police protection are anticipated.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

- **Schools?**

Impact Discussion:
The Project site is currently located within the City of Arcadia and the Arcadia Unified School District. The proposed reorganization of jurisdictional boundaries would result in the removal of the Project site from the Arcadia Unified School District and annexation into the Monrovia Unified School District (MUSD). MUSD operates 12 schools, which also includes an early learning center and an adult school. In the 2020-2021 school year, the District had an enrollment of 5,247 students.

No construction is associated with the current project application. If approved, future construction of up to six dwelling units could potentially add approximately 16 persons

to the local population, a fraction of which would be anticipated to be of school age. The project would be subject to the requirements of AB 2926 and SB 50, which allow school districts to collect development impact fees to minimize potential impacts to school districts. The project related incremental increase in student population would not be anticipated to result in the need for the physical alteration of existing school facilities or the construction of new facilities. MUSD has sufficient classroom capacity to accommodate potential growth that may occur due to the Project. Potential project demands on school services would be fully offset through the collection of school impact fees imposed through the Education Code. In consideration of these facts, no physical impacts pertaining to schools are anticipated.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

- **Parks?**

Impact Discussion:
The closest City of Monrovia neighborhood park to the project area is Station Square Park located at 1629 Myrtle Avenue, approximately one mile away. Camino Grove Park, located in the City of Arcadia at 1420 South 6th Avenue, is also approximately one mile from the Project site. No construction is associated with the current project application. While future construction on the project site would add to area population (estimated total of approximately 16 persons), such an increase would not be anticipated to result in the need for the physical alteration of any existing public park facilities or the construction of new public parks.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

- **Other Public Facilities?**

Impact Discussion:
No construction is associated with the current project application. While future construction of up to six dwellings could result in population growth estimated at 16 persons in Section XIV – Population and Housing, the associated incremental increase in the demand for public facilities is not anticipated to result in the need for the physical alteration of existing facilities or the construction of new public facilities. In consideration of these facts, no physical impacts pertaining to other public services are anticipated.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions – Public Services:
In consideration of the preceding information and analysis, no adverse impacts to public services have been identified or are anticipated. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XVI.	**RECREATION**				
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: City of Monrovia General Plan and General Plan EIR. Monrovia Municipal Code.

a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated?**

Impact Discussion:
Refer to Response XV – Public Services – Parks. No construction is associated with the current project application. While future construction on the project site would add to area population (estimated total of approximately 16 persons) and a potential incremental increase in use of existing recreational facilities, such as increase would not be anticipated to result in substantial physical deterioration or the acceleration of such deterioration of any facility.

Monrovia's dwelling unit tax (Monrovia Municipal Code Title 3, Chapter 3.32) may be collected to satisfy park provision requirements. The City's dwelling unit tax is determined at the time of the issuance of the building permits and all proceeds from the tax collected shall be paid into the Project Resource Fund. The Project Resource Fund is used by the City for the purposes of municipal projects, which can include purchasing land or improving and expanding public parks and recreational facilities.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Impact Discussion:
See Response XVI- a) above. No construction is associated with the current application. Future construction on the Project Site may incorporate modest recreational facilities solely for use by project residents. There is no need for the construction or expansion of public recreational facilities. Monrovia's dwelling unit tax (Monrovia Municipal Code Title 3, Chapter 3.32) may be collected to satisfy park provision requirements.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Recreation:
In consideration of the preceding information and analysis, no adverse impacts to recreational facilities have been identified or are anticipated. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XVII.	**TRANSPORTATION** – Would the project:				
a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b)	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	☐	☐	☒	☐
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d)	Result in inadequate emergency access?	☐	☐	☒	☐

SUBSTANTIATION:

Sources: City of Monrovia General Plan - Circulation Element; City of Monrovia Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire – 2021.

a) **Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

Impact Discussion:
No construction is associated with the current application. Future development would generate an incremental increase in traffic volumes on local streets and an incremental increase in the use of transit, bicycle and pedestrian facilities. Such an increase would, however, be anticipated to have minimal impacts on existing facilities and would not be anticipated to require the alteration of any public roadway, transit facility or service, bicycle or pedestrian facilities. On this basis, the proposed Project is considered consistent with all applicable transportation programs and policies.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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b) **Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?**

Impact Discussion:
Section 15064.3(b)(1) of the CEQA Guidelines pertains to requirements for Vehicle Miles Traveled (VMT) impact analysis. The City of Monrovia has adopted screening criteria to determine whether a project requires detailed transportation analysis or if it could be assumed to have less than significant environmental impacts without additional study such as a VMT analysis. A residential project may be exempt from VMT analysis if it would generate 110 or fewer daily trips. The State Office of Planning and Research (OPR) gives examples of typical land uses which would not likely generate over 100 daily trips or lead to a significant VMT related impact. These include: 11 single-family units, 16 multifamily units, 10,000 square feet of office space, and 15,000 square feet of industrial space.

While no construction is associated with the current application, the future construction of up to six dwelling units on the reconfigured project site would fall beneath both the single family and multifamily thresholds indicated above, indicating that no detailed VMT analysis is warranted under CEQA Guidelines Section 15064.3(b)(1).

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

c) **Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

Impact discussion:
While no construction is associated with the current application, the future construction of up to six dwelling units on the reconfigured project site would not require the modification of any public roadway. Plans for any future development would be reviewed by the City of Monrovia Department of Public Works to determine compliance with adopted roadway and other infrastructure design standards. In consideration of these facts, the proposed Project would not be expected to significantly increase any road hazards due to geometric design features.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

d) **Result in inadequate emergency access?**

Impact Discussion:
No construction is proposed as part of the actions under consideration. Future construction could result in up to six dwelling units on the re-configured project site. No modifications to adjacent streets that would affect the ability of project or area residents to evacuate in an emergency are likely. The Project Site is located within a fully urbanized area with existing infrastructure, including fire hydrants, and is approximately 1.5 miles from Fire Station 102 located at 2055 E. Myrtle Avenue. Any subsequent development proposals must be reviewed and approved by the Monrovia Fire Department. All future development would also be subject to CEQA review, if applicable, and include evaluation of potential effects on emergency access including identification of appropriate mitigation if necessary.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

Summary Conclusions - Transportation:
In consideration of the preceding information and analysis, no significant impacts to transportation have been identified or are anticipated. No mitigation measures are necessary.

Issues	*Potentially Significant -*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XVIII. TRIBAL CULTURAL RESOURCES				
a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of 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?	☐	☐	☒	☐

SUBSTANTIATION:

Sources: City of Monrovia, General Plan and General Plan EIR. 2021-2029 Housing Element Update Draft IS/MND

a) **Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Impact Discussion:
The Project site is developed with a single family residence that was built in 1931. Consequently, demolition of this residence to accommodate future construction would be subject to Chapter 17.10.060 of the Monrovia Municipal Code (Determination of Historic Significance) which requires an assessment of the existing structure by a qualified professional approved by the City. The Monrovia Historic Preservation Commission must then review the assessment and make a determination as to the historical significance of affected structures prior to issuance of discretionary

demolition permits or building permits for replacement structures. As has been noted, no construction is presently proposed as part of this Project and future construction must comply with pertinent City requirements. With compliance to existing regulations, no significant impacts to a historical resource is anticipated.

Level of Impact Before Mitigation: Less than Significant Impact.

Level of Impact After Mitigation: Less than Significant Impact.

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?

Impact Discussion:
Similar to potential impacts resulting from the effects of future development on historical resources, impacts to archaeological resources can result in the loss of information important to the history (and potentially the pre-history) of California and the people who created and/or used the materials. The potential for uncovering significant resources at the Project site during construction activities is unknown given that no such resources have been discovered and/or recorded previously. No construction is included within the scope of the proposed Project. Nevertheless, unknown archaeological and/or paleontological sites may be unearthed during future excavation and grading activities.

Changes to state law (SB 18 and AB 52) require cities to consult directly with local Native American tribes to determine if any tribal cultural resources would be impacted by private development or public works projects proposed in the City. The Community Development Department has notified Native American Tribes with geographic or traditional connection to the area in which the proposed project is located and no requests for consultation under either AB 52 or SB 18 for the proposed Project have been made, although tribal representatives have requested notification prior to subsequent construction-site.

As discussed in Section V-b), Cultural Resources, the Monrovia General Plan EIR included the following mitigation measure to address unknown archaeological and paleontological sites:

- ***Monrovia General Plan EIR Mitigation Measure CUL-A****: Project proponents proposing substantial grading or earthmoving in areas that might contain important paleontological and/or archaeological resources, including work within the Topanga Formation and Late Miocene Marine Monterey Formation, shall conduct a pre-excavation field assessment and literature search to determine the potential for disturbance of paleontological and/or archaeological resources. If warranted, grading and other earthmoving shall be monitored by a qualified professional.*

> *If potential impacts associated with future construction are subsequently identified, mitigation measures would be also required per CEQA. CEQA Guidelines Section 15064.5(e) states "in the event of accidental discovery or recognition of human remains in any location other than a dedicated cemetery, there shall be no further work or ground disturbance of the site or any nearby areas reasonably suspected to overlay the adjacent human remains. The coroner must determine that no investigation of the cause of death is required. Or if the coroner determines the remains to be Native American, the most likely descendent of the remains makes a recommendation involving the treatment or disposal of the remains. In accordance with CEQA Guidelines Section 15064.5(f), if historical or unique archaeological resources are accidentally discovered during construction, work shall stop until the find can be evaluated by a qualified archaeologist and appropriate avoidance measures implemented."*

With compliance to General Plan EIR Mitigation Measure CUL-A and compliance with CEQA regulations, impacts to potential tribal resources are considered less than significant.

Level of Impact Before Mitigation: Less Than Significant Impact.

Level of Impact After Mitigation: Less Than Significant Impact.

Summary Conclusions – Tribal Cultural Resources:
In consideration of the preceding information and analysis, no significant impacts to historical or tribal cultural resources have been identified or are anticipated. No mitigation measures other than compliance with General Plan EIR Mitigation Measure CUL-A are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XIX.	**UTILITIES AND SERVICE SYSTEMS -** Would the project:				
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b)	Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c)	Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d)	Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: 1) City of Monrovia General Plan and GP EIR; 2) City of Monrovia Urban Water Management Plan; 3) City of Monrovia-Community Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire, 2021.

a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

Impact Discussion:

- **Potable Water**

The City of Monrovia operates its own water utility service system. The City's water supply is derived from five active wells located in the Main San Gabriel Basin, which has a total capacity of over 10,000 gallons per minute. According to the City's Urban Water Master Plan, the City's water use was approximately 6,976 acre-feet in 2020, representing 154 gallons per capita per day in 2020. As discussed in Section XIV-Population and Housing, the average household size in Monrovia is estimated to be approximately 2.65 people. The future construction of up to six dwelling units could result in a population increase of approximately 16 persons, resulting in a minor incremental increase in water demand. The scope of future development is very limited and would not be expected to require or result in the relocation or construction of new or expanded water distribution systems in Monrovia beyond a service connection to the Project Site.

- **Wastewater Treatment**.

The local wastewater collection system is owned and operated by the City. The City, through its Public Works Department, owns, operates, and maintains a sanitary sewer collection system. Wastewater generated in Monrovia is carried by the local system to trunk sewers operated by the County Sanitation Districts of Los Angeles County (Sanitation Districts). The City Public Works Department would be required to review any future development plans and issue a Will Serve letter stating that the City would supply sanitation services to the Project site. The scope of future development is very limited and would not be expected to require or result in the relocation or construction of new or expanded wastewater collection or treatment capacity beyond a service connection to the Project Site.

- **Stormwater Drainage**

The City operates and maintains the storm drain system within its boundaries. Future development on the Project Site would be required to comply with the design specifications and other requirements of Municipal Code Section 12.36.100 and divert runoff to vegetated areas prior to discharge. The proposed Project is very limited in scope and anticipated future on-site development would not be expected to result in the need for relocation or construction of new or expanded stormwater system capacity beyond on-site storm drainage facilities.

- **Electric Power, Natural Gas and Telecommunications Systems**

Electricity and natural gas services in Monrovia are provided by Southern California Edison and the Southern California Gas Company, respectively. Telecommunication services are provided by various companies. The proposed Project would result in the future construction of up to six dwelling units and would require private on-site dry utilities associated with electricity, gas, and telecommunications. The development sponsor would be required to obtain Will Serve letters from Southern California Gas Company and SCE prior to project approval. The anticipated scope of future construction on-site is very limited and would not be expected to require the need for relocation or construction of new or expanded dry utilities beyond service to the Project site.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

b) **Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?**

Impact Discussion:
The Project site would be supplied with water through the City's municipal system, which primarily draws upon groundwater but has access to additional water supplies from the Metropolitan Water District if needed. The City has determined that sufficient municipal supplies are available to serve development anticipated in the City's General Plan. According to the Urban Water Management Plan, the City is currently capable of meeting projected demands during normal, dry, and multiple dry years through 2045.

As has been noted there is no development proposed as part of the current application and future construction is anticipated to be limited to six dwelling units. Future construction would not be expected to affect groundwater basins below the site nor substantially deplete groundwater in the area. In consideration of the preceding information, the proposed Project would not substantially affect groundwater supplies in any manner. All future development would also be subject to CEQA review, if applicable, and include evaluation of potential impacts to the local water supply.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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's projected demand in addition to the provider's existing commitments?**

Impact Discussion:
See preceding Response XIX a) Wastewater Treatment**.** Future construction would not require the relocation or construction of new or expanded wastewater treatment facilities. The scope of future development is very limited and is not anticipated to

generate a substantial increase in wastewater above existing conditions. The City Public Works Department would be required to review any future development plans and issue a Will Serve letter stating that the City would supply sanitation services to the project site and which indicates sufficient wastewater collection facilities and treatment capacity are available.

Level of Impact Before Mitigation: Less than Significant

Level of Impact After Mitigation: Less than Significant.

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?**

Impact Discussion:
Athens Services provides solid waste collection for the City, including the project site, and disposes the City's solid waste at designated area landfills which have available capacity. The scope of future development is very limited and is not anticipated to generate a substantial increase in solid waste above existing conditions. Construction must comply with all City and State regulations regarding solid waste. Therefore, the proposed Project would not generate solid waste in excess of state or local standards or in excess of the capacity of local landfills.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

e) **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

Impact Discussion:
See preceding Response XIX-d). Future development on-site would be required to comply with all applicable federal, state, and local management and reduction statutes and regulations related to solid waste.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Utilities and Service Systems:
In consideration of the preceding information and analysis, no adverse impacts to utilities and services have been identified or are anticipated. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XX.	**WILDFIRE:** 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?	☐	☐	☐	☒
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: 1) City of Monrovia: Safety Element of the General Plan, 2) Community Vulnerability Assessment: Resiliency, Climate Adaptation, and Wildfire, 2021; 3) Hazard Mitigation Plan, 2017.

a) **Substantially impair an adopted emergency response plan or emergency evacuation plan?**

Impact Discussion:
See Response IX-f) Hazards and Hazardous Materials. No construction is proposed as part of the actions under consideration. Future construction would result in up to six dwelling units on-site. No modifications to adjacent streets are likely that would affect the ability of project or area residents to evacuate in an emergency. The Project site is located within a fully urbanized area with existing infrastructure, including fire hydrants, and is approximately 1.5 miles from Fire Station 102 located at 2055 E. Myrtle Avenue. Any subsequent development proposals must be reviewed and approved by the Monrovia Fire Department. All future development would also be subject to CEQA review, if applicable, and include evaluation of potential effects on adopted emergency

response and evacuation plans including identification of appropriate mitigation if found necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact Discussion:

The Project Site is located in a heavily urbanized area and on essentially flat topography. It is also not located within a designated Wildfire Hazard Zone**.** Future development of the Project Site would not exacerbate wildfires risks.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact Discussion:

See Response XX-b). The Project Site is located in a heavily urbanized area and on essentially flat topography. It is also not located within a designated Wildfire Hazard Zone. Future development of the Project Site would not require the installation or maintenance infrastructure associated with wildfires and would not exacerbate wildfire risks.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact Discussion:
See Responses XX-a) and b). The Project Site is in a heavily urbanized area, is essentially flat topography and not located in a flood hazard area. It is also not located within a designated Wildfire Hazard Zone. Future development of the Project Site would not expose people or structures to wildfire hazard risks.

Level of Impact Before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Wildfire:
In consideration of the preceding information and analysis, no adverse impacts related to wildfire risks have been identified or are anticipated. No mitigation measures are necessary.

	Issues	*Potentially Significant*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XXI.	**MANDATORY FINDINGS OF SIGNIFICANCE:**				
a)	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?	☐	☐	☒	☐
b)	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 past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c)	Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) **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?**

Summary impact discussion:
As has been described throughout this Initial Study, the Project site is located in a heavily urbanized area and there is no natural habitat on-site or in the surrounding area. Several oak trees which exist on-site will be evaluated and appropriately addressed under the City of Monrovia's Oak Tree Preservation Ordinance (Section 17.20.040 of the Municipal Code). The existing residence on-site, built in 1931, will be evaluated for its potential historical significance and appropriately addressed under Section 17.10. 060 of the Municipal Code (Determination of Historic Significance). Potential archaeological and paleontological resources will be evaluated and appropriately addressed in accordance with Public Resources Code Section 5020.1 (k) and CEQA

Sections 15064.5 - (e) and (f). Further, the proposed Project will comply with Monrovia General Plan EIR Mitigation Measure CUL-A outlined herein in Section V - Cultural Resources. In addition, advance notification of future construction will be given to Native American tribes with a known geographic or traditional connection to the local area, as described in Section XVIII -Tribal Resources. Compliance with these existing regulations and General Plan mitigation measures will ensure that no significant impacts to biological, historical, archaeological or paleontological resources (including tribal resources) will occur in association with the proposed Project.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

b) **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 past projects, the effects of other current projects, and the effects of probable future projects)?**

Summary Impact discussion:
A significant impact may occur if a project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As concluded in the preceding Sections I through XX, the proposed Project would not result in any significant impacts in any environmental categories with compliance with existing regulations. No cumulatively considerable impacts are anticipated.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

c) **Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?**

Summary Impact discussion:
Previous sections of this Initial Study reviewed the proposed Project's potential impacts related to aesthetics, air quality, noise, hazards and hazardous materials, traffic, and other issues. As concluded in these previous sections, the proposed Project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly with compliance with existing regulations and policies.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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11. City of Monrovia, "*General Plan - Adopted Safety Element Update",* November 2022;

12. City of Monrovia, *" 2021-2029 Housing Element Update, Safety Element Update, and New Environmental Justice Element and Zoning Text Amendment - Final IS/MND",* prepared by MIG Consultants, October 2022;

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16. City of Monrovia, *"Norumbega Drive Residence Project Draft Initial Study/Mitigated Negative Declaration"*, Prepared by SWCA Environmental Consultants, Feb 2022;

17. Monrovia Unified School District website, 2021. https://www.monroviaschools.net/ .

18. Los Angeles County Airport Land Use Commission, *"Comprehensive Land Use Plan",* Revised December 2004;

19. Los Angeles County Assessor Property Assessment Information System, *"Parcel Summary Report*", https://portal.assessor.lacounty.gov/parceldetail/5780019011;

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21. Southern California Air Quality Management District, *"Southern California Air Quality Management Plan (SCAQMP)", 2022*, *and "CEQA Air Quality Handbook"*, 1993.

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